



Burton W. Wiand
Fowler White Boggs P.A.
501 East Kennedy Blvd., Suite 1700
Tampa, Florida 33602

August 28, 2009
Invoice 723017
Tax # 59-1280172
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BWW/1091072

Re: **1091072**
Scoop Legal Team - Recovery of Assets from Chris and Neil Moody

Professional Services Through 06/30/09

Asset Analysis and Recovery

05/06/09	Telephone conference with Sharon of PDR regarding obtaining Excel spreadsheets of the Moodys' transfers (.1); review and analyze Excel spreadsheets received from PDR (.1); prepare spreadsheets of transfers to Chris Moody and Neil Moody (2.7).	ASSET	DMM	2.90 hrs.
05/12/09	Brief factual research regarding Moodys' trading and receipt of funds (.2); legal research regarding (1) Receiver's authority to bring Moodys into receivership and/or to file summary action and (2) whether the court can freeze the Moodys' assets (4.7).	ASSET	ABT	4.90 hrs.
05/12/09	Received and reviewed Motion for Garnishment in Paolino action (.3); conferred with Burt Wiand regarding Paolino action (.5).	ASSET	CRN	0.80 hrs.
05/12/09	Conduct inquiries on sunbiz.org relating to the management structure of the Valhalla and Viking funds (.7); review internal spreadsheets relating to the same in preparation for drafting a complaint against Neil and Chris Moody (.7).	ASSET	DH	1.40 hrs.
05/13/09	Begin drafting the outline of a Complaint against Neil and Chris Moody			

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for Fraudulent Transfer and Unjust Enrichment (2.0); review and analyze documents organizing the Valhalla and Viking entities and related Private Placement Memorandums in preparation of drafting a Complaint against Neil and Chris Moody (3.1).

ASSET DH 5.10 hrs.

05/14/09 Legal research regarding whether receiver can obtain asset freeze of Moodys, as non-parties (4.5); preparation of memorandum summarizing research and analyzing receiver's options (1.2).

ASSET ABT 5.70 hrs.

05/15/09 Correspondence regarding obtaining certified copies of Delaware corporate filings and Delaware corporate information on Valhalla Investment Partners, L.P. (.2); conduct research regarding same (.2).

ASSET DMM 0.40 hrs.

05/18/09 Legal research regarding freezing Moodys' assets and preparation of memorandum regarding same.

ASSET ABT 4.50 hrs.

05/18/09 Analyze Fla. Stat. Section 726-- Fraudulent Transfers-- in connection with drafting the Complaint against Chris and Neil Moody for fraudulent transfer and unjust enrichment (.6); office conference with G. Morello to discuss the contents of the Complaint against Chris and Neil Moody and the allegations in support of the fraudulent transfer claims (.6); continue drafting the Complaint against Neil and Chris Moody for fraudulent transfer and unjust enrichment (2.5).

ASSET DH 3.70 hrs.

05/19/09 Legal research of and preparation of memorandum regarding obtaining, via summary proceedings, assets of non-party to SEC enforcement action.

ASSET ABT 4.30 hrs.

05/19/09 Continue drafting the Complaint against Chris and Neil Moody for fraudulent transfer and unjust enrichment.

ASSET DH 3.70 hrs.

05/20/09	Legal research regarding receiver's authority to initiate summary proceedings against nonparties in SEC enforcement action and preparation of memorandum regarding same.	ASSET	ABT	5.50 hrs.
05/20/09	Analyze exhibits attached to the SEC's emergency motion for TRO to assist the drafting of the Complaint against Chris and Neil Moody for fraudulent transfer and unjust enrichment (.4); continue drafting the Complaint against Neil and Chris Moody for fraudulent transfer and unjust enrichment (4.4).	ASSET	DH	4.80 hrs.
05/20/09	Drafted a chart of the partnerships to attach to the Complaint.	ASSET	MEG	1.50 hrs.
05/21/09	Finalize and distribute memorandum regarding receiver's options for bringing Chris and Neil Moody into the SEC action and legal research in support thereof.	ASSET	ABT	1.90 hrs.
05/21/09	Considered options regarding Moodys (.3); e-mail from Bentley Morgan regarding Moodys (.4).	ASSET	CRN	0.70 hrs.
05/21/09	Continue drafting and revising the Complaint against Neil and Chris Moody for fraudulent transfer and unjust enrichment.	ASSET	DH	8.00 hrs.
05/22/09	Office conference with G. Morello to discuss research needed regarding how to state a claim under Florida's Fraudulent Transfers statute when the debtor is not the transferor (.3); conduct legal research regarding whether a debtor under Florida's fraudulent transfer statute must be the transferor (1.0); proof read and revise the first draft of the complaint for fraudulent transfer and unjust enrichment against Chris and Neil Moody and forward to G. Morello for review (1.3); review legal research regarding whether a			

debtor under Florida's fraudulent transfer statute must be the transferor (1.5).

ASSET DH 4.10 hrs.

05/26/09 Office conference with G. Morello to discuss legal research findings and how to state the creditor/debtor relationship in the complaint against Chris and Neil Moody for fraudulent transfer (.3); conduct legal research regarding the interpretation of "assets of a debtor" under Uniform Fraudulent Transfer statutes (3.0); review and analyze legal research regarding the interpretation of "assets of a debtor" under Uniform Fraudulent Transfer statutes (4.6).

ASSET DH 7.90 hrs.

05/27/09 Conduct legal research regarding the application of the adverse interest exception (.5); conduct legal research regarding a receiver's standing to bring certain tort claims against defendants on behalf of the receivership entities (.2); conduct legal research regarding whether a receivership entity may be a debtor under Florida's fraudulent transfer statute (.4); continue to review and analyze legal research regarding the interpretation of "assets of a debtor" under Uniform Fraudulent Transfer statutes (4.9).

ASSET DH 6.00 hrs.

05/28/09 Begin reviewing legal research regarding the "adverse interest exception" in connection with stating a cause of action against Chris and Neil Moody.

ASSET DH 0.80 hrs.

06/01/09 Draft a checklist of pleading requirements for the second draft of the complaint against Chris and Neil Moody for fraudulent transfers and unjust enrichment (.7); continue to review legal research regarding whether a receivership entity may be a creditor and another receivership entity the debtor under Florida's Fraudulent Transfer statute (3.0); continue to review legal research regarding the application of the adverse interest exception in fraudulent transfer cases (.7).

ASSET DH 4.40 hrs.

06/01/09 Research and pull dockets and documents for similar Receiver cases in

Florida's Southern District for Attorney Dominique Pearlman, regarding filing a claim against the Moodys.

	ASSET	LJ	0.40 hrs.
06/03/09	Call from Hill Ward regarding Christopher Moody's unfinished house (.3); worked on subpoena for documents to the Moodys (2.7).		
	ASSET	CRN	3.00 hrs.
06/04/09	E-mail exchange with Bob Fulton regarding Chris Moody's partially completed house (.4); further work on subpoena to Moodys (.8); conferred with Burt Wiand regarding Moody's house (1.2).		
	ASSET	CRN	2.40 hrs.
06/05/09	Draft and revise the second draft of the Complaint for fraudulent transfers and unjust enrichment against Chris and Neil Moody.		
	ASSET	DH	5.60 hrs.
06/07/09	Begin to review and analyze legal research regarding excessive compensation causes of action (Grasso cases) in support of the complaint for fraudulent transfer against Chris and Neil Moody.		
	ASSET	DH	1.10 hrs.
06/09/09	Revise the specific allegation sections of the complaint for fraudulent transfer and unjust enrichment against Chris and Neil Moody and submit the fully revised complaint to B. Wiand and G. Morello for review.		
	ASSET	DH	2.00 hrs.
06/11/09	Revision of the Partnership Chart for the complaint.		
	ASSET	MEG	0.30 hrs.
06/15/09	Preparation of subpoenas to Chris and Neil Moody (financial documents).		
	ASSET	ABT	0.50 hrs.
06/15/09	E-mail to David Knight regarding discovery (.2); edited subpoenas to Moody's (.7).		

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	ASSET	CRN	0.90 hrs.
06/16/09	Communicate with Ms. Trehan regarding correspondence to Ms. Merritt at SeaGate and review of proposed correspondence.		
	ASSET	JCR	0.20 hrs.
06/17/09	Preparation of subpoenas to Chris and Neil Moody (regarding financial information).		
	ASSET	ABT	0.20 hrs.
06/17/09	E-mail exchanges with Mark Donzi and David Knight regarding Moodys.		
	ASSET	CRN	0.30 hrs.
06/18/09	Receive confirmation of service of subpoenas on Moodys via attorney David Knight and update discovery spreadsheet regarding same.		
	ASSET	ABT	0.10 hrs.
06/18/09	Meeting with David Knight and Burt Wiand.		
	ASSET	CRN	0.30 hrs.
06/18/09	Communicate with Mr. Jernigan and Ms. Trehan regarding information on aircraft of Chris Moody.		
	ASSET	JCR	0.20 hrs.
06/19/09	Letter to Landmark regarding recovery of Bonds.com debt (.8); conferred with Burt Wiand regarding recovery of Moody assets (1.7).		
	ASSET	CRN	2.50 hrs.
06/19/09	Review of materials related to Chris Moody's Bonds.com certificate pledge to Landmark bank per conferences with Mr. Nelson.		
	ASSET	JCR	0.40 hrs.
06/22/09	Review of correspondence and ledger report from Bill Price at PDR regarding Moody's investments in Quest (.2); receipt and review of memo from Mr. Liu to Bonds.com regarding status of request for information		

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(.1).		ASSET	JCR	0.30 hrs.
06/24/09	Reviewed Landmark Bank loan documents (.8); attended interview of Chris Moody (1.8).	ASSET	CRN	2.60 hrs.
06/24/09	Review of deposition transcript of Chris Moody per conference with Receiver in preparation for meeting (.3); meeting with Chris Moody, David Knight, Esq., Receiver and Mr. Nelson regarding assets and interests of Chris Moody (2.5).	ASSET	JCR	2.80 hrs.
06/26/09	Review of materials from Chris Moody's office folders found by Ms. Jones.	ASSET	JCR	0.20 hrs.
06/29/09	Telephone conference with Lance Curry regarding production of documents.	ASSET	CRN	0.20 hrs.
06/30/09	Worked on affidavit regarding jewelry (.3); e-mail exchange with Moodys' attorney regarding production (.4).	ASSET	CRN	0.70 hrs.
TOTAL Asset Analysis and Recovery			\$22,703.70	110.20 hrs.

Case Administration

06/05/09	Conferences with Ms. Jones, Mr. Nelson and Ms. Salo regarding documentation provided by Moodys in response to FWB Subpoenas.	CASE	JCR	0.20 hrs.
TOTAL Case Administration			\$28.00	0.20 hrs.

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Summary of Fees

	Hours	Rate/Hr	Dollars	
Carl R Nelson	14.40	325.00	4,680.00	
Mary Gura	1.80	140.00	252.00	
Dione M Mitchell	3.30	140.00	462.00	
Linda Jones	0.40	140.00	56.00	
Ashley Bruce Trehan	27.60	193.50	5,340.60	
Dominique Pearlman	58.60	193.50	11,339.10	
Jeffrey C Rizzo	4.30	140.00	602.00	
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TOTAL	110.40		22,731.70	
Fees for Professional Services Rendered.....				\$ 22,731.70

Disbursements Through 06/30/09

05/31/09	Westlaw Online Research - May 2009	0.00
05/31/09	Westlaw Online Research - May 2009	0.00
06/30/09	Westlaw online research June 2009	0.00
Total Disbursements		\$ 0.00

TOTALS FOR THIS INVOICE

Fees for Professional Services.....	22,731.70
Disbursements	0.00
TOTAL DUE FOR THIS INVOICE.....	\$ 22,731.70

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***** REMITTANCE ADVICE *****

**Payment is due upon receipt.
Please remit this page with your payment.**

Fees Due This Invoice	22,731.70
Disbursements Due This Invoice	0.00
TOTAL DUE FOR THIS MATTER.....	\$ <u>22,731.70</u>

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