

EXHIBIT 15

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Burton W. Wiand

Attention: Burton W. Wiand

Wiand Guerra King, P.L

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Tampa, FL 33607

September 07, 2011

Client: 025305

Matter: 090833

Invoice #: 2795

Page: 1

RE: Scoop Legal Team - Recovery from Investors

For Professional Services Rendered Through April 30, 2011

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/3/2011	GM	Addressed service of process issues (.1); SETTLAGE: reviewed defendant's bankruptcy notice and follow-up regarding same (.2); M. CORCIONE: reviewed orders and filings regarding defendant (.1); reviewed research regarding arbitration (1.8); reviewed notices regarding failure to mediate (.1).	2.3	\$724.50
1/3/2011	ML	Legal research regarding arbitration and standing (3.4); LOBDELL: drafted correspondence to M. Lobdell regarding settlement (.2); MASON: drafted correspondence to B. Turffs regarding S. Mason (.2); MAYFAIR: exchange correspondence to T. Barlow regarding Mayfair Associates (.2); SCHWAB: prepare for mediations with W. Schwab and related parties (2.5); MAYFAIR: telephone call with T. Barlow regarding Mayfair Associates; mediations (.3).	6.8	\$1,836.00
1/3/2011	AV	LIBMAN and GROSMAN: Correspondence to J. Jacobs regarding defendants waivers of service (.2); LETELLIER: follow up with J. Malone regarding service and possible settlement (.2); LETELLIER: review and revise waiver of service (.2); V. LEE: review and revise amended complaint regarding subsequent transferees (1.5).	2.1	\$519.75
1/3/2011	JDM	D. CLOUD: Review correspondence received from attorney for defendant (.2).	0.2	\$38.70

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/3/2011	RJ	Prepare mediation notices for January clawback mediations (.7); EFG BANK: correspondence with S. Grossman regarding EFG Bank mediation (.2); revise notices of failure to mediate (.8); draft letters to Group 13 clawback defendants regarding mediation (1.0).	2.7	\$522.45
1/3/2011	JWH	B. KARLSSON: Research accurtin for current contact information for defendant regarding service of process (.2).	0.2	\$28.00
1/4/2011	GM	R. WILKES: addressed matters regarding IRS and investor (.2); V. LEE: considered amendments to complaint (.3); reviewed caselaw regarding arbitration (1.6).	2.1	\$661.50
1/4/2011	ML	V. LEE: Draft amended complaint (1.2); MAYFAIR ASSOCIATES: factual analysis (1.3); SCHWAB: analyze Schwab Trust documents (2.5); MAYFAIR ASSOCIATES: multiple telephone calls with T. Barlow (.5); TIMMICK: drafted correspondence to S. Masel regarding settlement with Timmick/Winners Circle (.1); TIMMICK: drafted motion to approve settlement (.4); TIMMICK: drafted notice of settlement (.1); drafted motions to dismiss with prejudice (.6); R. FAGIN: revised settlement agreement with R. Fagin (.2); exchange correspondence with E. Gluck regarding settlement (.2); M. LOBDELL: telephone call with M. Lobdell regarding settlement (.2); consider legal issues with Receiver (.5).	7.7	\$2,079.00
1/4/2011	AV	V. LEE: Review and revise amended complaint and exhibits regarding V. Lee and subsequent transferees (.7).	0.7	\$173.25
1/4/2011	JDM	EFG BANK and D&E UNIT (241): draft/revise motion to extend deadline to mediate against EFG Bank and D&E Unit Trust Associates (.3); EFG BANK (242): draft/revise motion to extend deadline to mediate for EFG Bank and John or Jane Doe (.4).	0.7	\$135.45
1/4/2011	RJ	Revise letters to Group 13 clawback defendants regarding mediation (1.0); review and revise mediation notices for M. Barlow mediations on January 14th (.5).	1.5	\$290.25
1/4/2011	JR	Retrieval of Nadel criminal proceeding documents per request of Mr. Lamont (.2).	0.2	\$28.00
1/4/2011	JR	SCHNEIDERMAN: Review and retrieval of documentation related to investor H. Schneiderman per conference with Mr. Lamont (.5); confirm investor settlement checks have cleared and prepare memo to Mr. Jamieson, Mr. Lamont, Mr. Morello and Ms. Rehus (.2).	0.7	\$98.00
1/5/2011	GM	V. LEE: revised amended complaint (.3); MEEKER: considered relation back of answer (.1); reviewed documents regarding Shoreline Trading and GSEC (3.1).	3.5	\$1,102.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/5/2011	ML	TIMMICK: Revise motion to approve settlement regarding (.3); SCHWAB: analyze Schwab trust documents (1.0); P. FARLEY: prepare for mediation (.4); B. MEEKER: drafted correspondence to B. Vincent regarding amended answer (.2); TIMMICK: receive and review order approving settlement (.1); TIMMICK: drafted correspondence to M. Timmick regarding order approving settlement (.2); V. LEE: exchange correspondence with E. Assouline regarding settlement with V. Lee daughters (.3); ALBAR MGMT: receive and review correspondence from B. Persante regarding settlement with Albar Management (.1); review executed agreement (.1); P. FARLEY: telephone calls with E. Assouline regarding settlement with P. Farley (.4); telephone call with potential expert (.5); telephone calls with T. Barlow regarding settlement and extension of time to respond (.5); receive and review motions for extension of time (.2); analyze client documents regarding third-party claims (2.0); drafted motions to dismiss (.5).	6.8	\$1,836.00
1/5/2011	RJ	Draft mediation letters to Group 13 defendants (.5); prepare motions for dismissal for 4 clawback defendants (.4).	0.9	\$174.15
1/5/2011	JR	MASON: Communicate with K. Cox at Standifer & Standifer regarding warranty deed on Tazewell, TN of investor Mason and valuation affirmation and recording fees and communicate with Mr. Lamont regarding same (.3); V. LEE: research regarding V. Lee property per request of Mr. Lamont (.5).	0.8	\$112.00
1/6/2011	GM	V. LEE: revised complaint (.2); S. SETTLAGE: revised subpoena to defendant (.2); V. LEE: considered requests for discovery from defendant (.2).	0.6	\$189.00
1/6/2011	ML	V. LEE: Draft amended complaint (1.2); V. LEE: analyzed documents regarding defendant (1.0); V. LEE: exchange correspondence with E. Assouline regarding amended complaint (.2); V. LEE: telephone calls with E. Assouline regarding amended complaint (.4); V. LEE: analyze PDR spreadsheets regarding false profits (.7); V. LEE: exchange multiple correspondence with V. Lee's counsel regarding discovery (.4); V. LEE: analyze current claims (.5).	4.4	\$1,188.00
1/6/2011	AV	Draft subpoena and attachment regarding Backlot Arts (.3); CHARITIES: draft memo to Receiver regarding charitable organizations (.8).	1.1	\$272.25

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/6/2011	RJ	N. MOODY: Draft and revise Notice of Settlement and Motion to Approve Settlement (.8); BOSHART: correspondence with D. Boshart regarding mediation (.2); WOF: correspondence with M. Rogers regarding World Opportunity Fund mediation (.2).	1.2	\$232.20
1/6/2011	JR	V. LEE: Review of documentation related to Lee Victory IRA account to confirm numbers per conferences with Mr. Lamont in preparation for amending complaint (1.0).	1.0	\$140.00
1/7/2011	GM	TERRELL/GRIER: Worked on settlement (.2); V. LEE: addressed matters regarding subsequent transfers (.4); V. LEE: communications with S. Masel regarding same (.3).	0.9	\$283.50
1/7/2011	ML	P. FARLEY: Prepare for mediation (.4); analyze false profits regarding Sewell Solutions, Tractenberg and entities, R. Schwab (2.5); consider legal strategy with Receiver (.7); analyze Schwab Trust documents (1.0); telephone call with counsel for C. Trachtenberg regarding settlement (.3); V. LEE: telephone call with S. Masel regarding V. Lee and daughters (.5); telephone call with E. Assouline regarding letter to Judge (.2); drafted correspondence to Receiver regarding settlements with various investors (.5).	6.1	\$1,647.00
1/7/2011	AV	SETTLAGE: Review, revise, and finalize correspondence to J. Warren regarding Settlage subpoena (.3); research information regarding Sentinel Management Group and N. Moody Charitable Trust (1.0).	1.3	\$321.75
1/7/2011	RJ	ALBAR MGMT: Draft Motion to Approve Settlement for A. Gaskill (.4); ALBAR MGMT: draft Notice of Settlement for A. Gaskill (.1); P. FARLEY: calculating interest for mediation (.5); M. BARLOW cases: correspondence with M. Barlow regarding corporate documents for Valhalla, Victory, and Viking (.2).	1.2	\$232.20
1/7/2011	JR	Review of Scoop records for LLC and LP agreements per request of Mr. Jamieson (.5).	0.5	\$70.00
1/7/2011	MG	Compilation of documents supporting false profits in preparation for the mediation (2.5).	2.5	\$350.00
1/10/2011	GM	SETTLAGE: reviewed bankruptcy notice (.1); HABITAT: considered potential settlement with Habitat for Humanity (.1).	0.2	\$63.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	ASSET	Asset Analysis and Recovery		
1/10/2011	ML	P. FARLEY: Prepare for and attend mediation (3.5); draft settlement agreement (.4); draft correspondence to E. Assouline regarding proposed settlement agreement (.2); draft correspondence to S. Masel regarding settlement (.1); draft motion to approve settlement regarding Albar Management (.2); J. WILLIAMS (JORDAN): telephone call with J. Williams regarding settlement (.3); SCHWAB: telephone call with R. English regarding Schwab Trusts (.4); receive and review order approving settlement (.1); draft correspondence to E. Assouline regarding accept service of amended complaint (.2); telephone call with J. Morella regarding settlement (.2); telephone call with PDR regarding transfers (.4); W. SCHWAB: prepare for mediations (.5); CORCIONE: telephone calls with M. Corcione regarding settlement (.4); CORCIONE: consider settlement with Receiver (.2).	7.1	\$1,917.00
1/10/2011	AV	Review and finalize subpoena regarding Backlot Arts (.2); prepare litigation plan regarding charitable organizations in connection with Guy Nadel Foundation (.5); telephone and correspondence to J. Jacobs regarding Libman, Grosman, and Khodorkovsky (.3); review documents from Jazz Club of Sarasota (.7); telephone to G. McLain regarding Jazz Club of Sarasota (.3); SETTLAGE: correspondence with E. Gunn regarding Settlage subpoena (.1).	2.1	\$519.75
1/10/2011	RJ	J. WILLIAMS (JORDAN): Correspondence with J. Williams regarding mediation deadline (.3); ALBAR MGMT: revise motion to approve settlement for A. Gaskill (.2).	0.5	\$96.75
1/10/2011	JR	LOFGREN: Communicate with Alex at Bay Cities regarding wire payment made by investor Lofgren and communicate with Ms. Rehus, Mr. Morello, Mr. Lamont, Mr. Jamieson and PDR regarding same (.2); MASONS: prepare correspondence to Ms. Cox regarding recording Warranty Deed on Tazewell, TN property (.3).	0.5	\$70.00
1/11/2011	GM	JAMES RIVER: communications with W. Jung regarding extension (.2); CHARITIES: considered status of cases against defendants' with tolling agreements (.2); reviewed certain documents from Barrett Capital Management (.3).	0.7	\$220.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/11/2011	ML	Receive and review order regarding administrative closure (.1); receive and review motions for pro hac (.1); receive and review corresponding order (.1); LETELLIER: receive and review acceptance of service (.1); V. LEE: exchange correspondence with E. Assouline regarding settlement agreement (.2); receive and review correspondence from B. Jung regarding motion for enlargement of time (.2); analyze investor files regarding Carrswold partnership (.5); drafted correspondence to T. Barlow regarding false profits (.2); prepare for 1/14/11 mediations (1.0); SCHWAB: analyze Schwab trusts (1.0); MAYFAIR: drafted correspondence to T. Barlow regarding Mayfair Associates (.1); SCHWAB: consider legal issues with Receiver regarding Schwab trusts (.4); analyze documents produced by Barrett Capital (1.5); consider legal issues with Receiver regarding due diligence by Barrett Capital (.3); analyze scoop files regarding LLC documents (2.0).	7.9	\$2,133.00
1/11/2011	AV	Consider strategy for case management reports (.5); review motion to quash Holmes subpoena (.3); LETELLIER: correspondence from J. Mallone and review executed waiver (.2).	1.0	\$247.50
1/11/2011	MG	Compilation of documents supporting false profits in preparation for the mediations (5.2).	5.2	\$728.00
1/12/2011	GM	Addressed certain defendants' request for documents (.1); considered information regarding possible experts for clawback suits (.3).	0.4	\$126.00
1/12/2011	ML	Analyze scoop documents (1.0); draft correspondence to T. Barlow regarding Valhalla document (.3); JAMES RIVER: receive and review motion for enlargement of time regarding defendant (.2); draft motions for enlargement of time to conduct mediations (.4); draft correspondence to S. Grossman regarding enlargement of time; scheduling order (.2); EFG BANK: draft motion to enlarge deadlines (.5); draft correspondence to S. Grossman regarding proposed dates (.2).	2.8	\$756.00
1/12/2011	AV	CHARITIES: Telephone to C. Person regarding initial disclosures for Diocese, Catholic Charities and Sarasota Opera (.1); D&E UNIT TRUST: telephone from D. Holmes regarding subpoena for Ehrlich information (.2); CARRELAGE: telephone from J. Coleman regarding Carrelage clawback case (.2); GROUP 3: prepare case management reports (1.3); CARRELAGE: correspondence to J. Coleman regarding Carrelage clawback case and Holmes subpoena (.2); track case management deadlines for various clawback cases (.4).	2.4	\$594.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/12/2011	RJ	GROUP 3: Correspondence with T. Barlow regarding mediations (.2); EFG BANK: draft and revise motion for extension of time to mediate (.3); J. COOK: draft and revise motion for extension of time to mediate (.3); E. KAYE: draft and revise motion for extension of time to mediate (.3); D. BOSHART: draft and revise motion for extension of time to mediate (.3); H. BUHL: prepare mediation notice (.1).	1.5	\$290.25
1/13/2011	GM	Teleconference with potential experts (1.0); considered response to legal arguments raised by certain clawback defendants (1.2); WOF: considered strategy for mediation of case against defendant (.6); considered case management deadlines for several clawback cases (.2); reviewed several orders in clawback cases (.1).	3.1	\$976.50
1/13/2011	ML	Analyze investor files (1.5); prepare for mediations (1.0); draft correspondence to P. Grilli regarding mediation statement (.4); telephone calls with T. Barlow regarding mediations; settlement (.5); telephone call with G. Hays regarding expert testimony (.5); exchange correspondence with S. Grossman regarding unopposed motion to extend deadlines (.2); B. MEEKER: receive and review defendant's motion to extend deadline to mediate (.2); E. KAYE: receive and review motion to extend deadlines (.1); J. COOK: receive and review motion to extend deadlines (.1); drafted correspondence to B. Kirtley regarding motion (.2); telephone call with B. Kirtley (.2).	4.9	\$1,323.00
1/13/2011	AV	GROUP 3: prepare case management reports (1.0); S. ELLIS: prepare case management report (.2); research the crime-fraud exception to the attorney-client privilege (1.3); CHARITIES: telephone and correspondence to C. Person regarding initial disclosures for Catholic Charities, Diocese of Venice, and Sarasota Opera (.2); correspondence to H. Haskins and M. Barlow regarding case management reports (.4).	3.1	\$767.25
1/13/2011	RJ	WOF: Correspondence with M. Rogers regarding mediation (.2); J. COOK: correspondence with B. Kirtley regarding mediation (.1); E. KAYE: correspondence with B. Kirtley regarding mediation (.1); EFG BANK: correspondence with S. Grossman regarding EFG mediations (.2); WOF: Interest calculations for mediation (.3); E. SCHWAB: Interest calculations for mediation (.3); E. STEINHAUSER: Interest calculations for mediation (.3); J. COOK: Interest calculations for mediation (.3); E. KAYE: Interest calculations for mediation (.3); CARRSWOLD PARTNERSHIP: Interest calculations for mediation (.3).	2.4	\$464.40
1/14/2011	GM	HABITAT: considered settlement proposal from Habitat for Humanity (.2).	0.2	\$63.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/14/2011	ML	Prepare for and attend mediation of The Carrswold Partnership, E. Schwab, D. Schwab, C. Schwab and W. Schwab (4.0); WOF: prepare for and attend mediation (3.0); telephone calls with M. Lobdell regarding settlement (.2); drafted correspondence to M. Lobdell regarding settlement agreement (.2).	7.4	\$1,998.00
1/14/2011	RJ	WOF: Correspondence regarding mediation (.2); B. MEEKER: correspondence regarding mediation (.2); J. COOK: correspondence with B. Kirtley regarding mediation (.1); E. KAYE: correspondence with B. Kirtley regarding mediation (.1); EFG BANK: prepare extension for mediation (.3).	0.9	\$174.15
1/14/2011	JR	Receipt and review of correspondence and recorded warranty deed from Stanifer & Stanifer regarding Tazewell, TN property (Masons) (.1).	0.1	\$14.00
1/15/2011	GM	WARREN and BARLOW Cases: Reviewed motions to compel arbitration filed in several clawback cases (1.1); reviewed motions to extend time filed in several clawback cases by defendants (.2).	1.3	\$409.50
1/15/2011	ML	J. WARREN, T. BARLOW and WOF cases: Analyze motions to compel arbitration (x10) (2.0); T. BARLOW cases: receive and review correspondence from T. Barlow regarding motions to compel arbitration (.2); receive and review motions for enlargement of time (.5).	2.7	\$729.00
1/17/2011	GM	JAMES RIVER: prepare for mediations (.4); reviewed proposed case management reports for various clawback cases (.2); WARREN and BARLOW Cases: reviewed case law for response to motions to compel arbitration (.7).	1.3	\$409.50
1/17/2011	ML	J. WARREN, T. BARLOW and WOF cases: Legal research regarding cases cited by Defendants in Motion to Compel Arbitration (3.5); J. COOK: prepare for and attend mediation (3.0); drafted settlement agreement (.3); exchange correspondence with T. Barlow regarding case management report; FAA (.4); V. KOUVANT: consider financial affidavit (.4); R. SCHWAB: receive and review correspondence from R. Schwab (.2); drafted correspondence to T. Barlow regarding correspondence from his client (.1); B. MEEKER: receive and review motion for leave to amend answer (.3); SCHWAB: exchange correspondence with T. Barlow regarding Schwab trusts (.2).	8.5	\$2,295.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	ASSET	Asset Analysis and Recovery		
1/17/2011	AV	S. ELLIS and GROUP 3: Finalize 11 case management reports (2.0); S. ELLIS: correspondence with H. Haskins regarding case management report (.2); GROUP 3: correspondence and telephone call with T. Barlow regarding case management reports (.5); J. WARREN, T. BARLOW and WOF cases: research statutes on whether motion to compel arbitration automatically stays the proceedings (.3); V. KOUVANT: analyze possible bankruptcy issues (.6).	3.6	\$891.00
1/17/2011	JDM	WARREN, BARLOW and WOF Cases: Meet with M. Lamont regarding strategy and status of motions to compel arbitration (.4); WARREN, BARLOW and WOF Cases: review/analyze motions to compel arbitration (2.0).	2.4	\$516.00
1/17/2011	RJ	J. COOK: Draft settlement agreement (.4); D. BOSCHART: correspondence with defendant regarding mediation (.2); interest calculations for mediators of J. Cook, H. Buhl, James River Diversified Fund, James River Multi Strategy Fund, Paul Sanders, D. Boshart, and E. Kaye (1.2).	1.8	\$348.30
1/17/2011	JR	K. HUMPERT: Receipt, review and reply to correspondence from defendant regarding jewelry turned over to receiver, receipt and valuation (.1); R. SCHWAB: receipt and review of correspondence from R. Schwab (.1); S. MOODY: communicate with Mr. Jones regarding recording S. Moody settlement documents (.2); communicate with Sandra at B. Mooney's office regarding mediation invoices (.1).	0.5	\$70.00
1/18/2011	GM	JAMES RIVER: prepare for mediation and reviewed documents regarding same (1.0); WARREN, BARLOW and WOF Cases: considered response to motion to compel arbitration (.4); addressed matters regarding case management reports (.1).	1.5	\$472.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/18/2011	ML	H. BUHL: Prepare for and attend mediation (3.0); drafted correspondence to K. Morgan regarding preclusive effect of guilty plea (.3); J. WARREN, T. BARLOW and WOF cases: legal research regarding motion to compel arbitration and cases cited by Defendants (3.0); MAYFAIR ASSOCIATES: telephone call with T. Barlow regarding Mayfair (.5); LOBDELL FUND: drafted correspondence to S. Masel regarding motion to approve settlement with defendant (.1); R. FAGIN: drafted correspondence to S. Masel regarding motion to approve settlement with defendant (.1); receive and review correspondence from S. Masel regarding no objection (.1); LOBDELL FUND and R. FAGIN: drafted motions to approve settlement (.6); LOBDELL FUND and R. FAGIN: drafted notice of settlements (.3); receive and review various orders (.3); drafted correspondence to W. Kirtley regarding order approving settlement (.2); H. BUHL: drafted correspondence to Receiver regarding mediation (.2); exchange correspondence with E. Gluck regarding settlement agreement (.2); drafted correspondence to E. Gluck regarding notice of any default (.2).	9.1	\$2,457.00
1/18/2011	RJ	BECKER: Correspondence with M. Garvey regarding mediation (.3).	0.3	\$58.05
1/18/2011	JR	P. SAUNDERS and JAMES RIVER: Communicate with Mr. Morello, Mr. Harris and E-Hounds regarding recovery of documentation regarding P. Saunders and James River in preparation for mediation and review of previously retrieved materials (.2).	0.2	\$28.00
1/18/2011	JWH	P. SAUNDERS and JAMES RIVER: Research Summation for mentions of P. Saunders and James River for review by attorney in preparation for mediation (3.0).	3.0	\$420.00
1/19/2011	GM	JAMES RIVER: prepared for mediation of James River and Saunders cases (1.4); JAMES RIVER: mediated James River and Saunders cases (1.5); reviewed case management orders in various clawback cases (.1); JAMES RIVER: communications with B. Jung regarding mediations (.1); V. KOUVANT: reviewed correspondence (.1).	3.2	\$1,008.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/19/2011	ML	Receive and review correspondence from B. Dooley regarding settlement (.1); factual analysis regarding EFG Bank and D&E Unit Trust (1.0); telephone call with PDR regarding spreadsheets (.4); R. FAGIN: drafted correspondence to S. Masel regarding motion to approve settlement (.1); R. FAGIN: drafted motion to approve settlement (.4); R. FAGIN: drafted notice of settlement (.1); receive and review letter from M. Moran regarding S. Bell (.1); LOBDELL: drafted motion to approve settlement regarding Lobdell Fund (.3); LOBDELL: drafted notice of settlement (.2); LOBDELL: receive and review order granting same (.1); exchange correspondence with E. Gluck regarding settlement agreement (.2); drafted correspondence to D. Holmes regarding false profits (.2); legal research regarding contracts (1.2).	4.4	\$1,188.00
1/19/2011	AV	V. KOUVANT: Meet with Receiver and M. Lamont regarding Kouvant (.2); V. KOUVANT: telephone and correspondence to W. Dooley regarding bankruptcy analysis (.5); review and revise case management deadline chart (.4).	1.1	\$272.25
1/19/2011	JDM	J. WARREN, T. BARLOW and WOF cases: Review and analyze defendants' motion to compel arbitration and review caselaw (2.1).	2.1	\$406.35
1/19/2011	RJ	Confer with J. Harris regarding service of process in France (.3).	0.3	\$58.05
1/19/2011	JR	Review of bank account information for cleared investor settlement check and communicate with Ms. Rehus regarding same (.2); K. HUMPERT: receipt and review of correspondence from K. Humpert and communicate with A. Eblen regarding jewelry turned over by investor K. Humpert and review of Scoop documentation (.3); receipt of voided check from Mr. Mooney in connection with mediation and communicate with Sharon at PDR regarding same (.1); S. MOODY: preparation of correspondence to S. Jones regarding certified copies of court order approving settlement with defendant (.3).	0.9	\$126.00
1/19/2011	JWH	Research procedures for serving summons in foreign countries according to Hague Convention (.7); CRESVALE: prepare summons for issuance to Cresvale Associates (.2).	0.9	\$126.00
1/20/2011	GM	Reviewed proposed motion to amend answer (.1); LEE: reviewed answer (.3).	0.4	\$126.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/20/2011	ML	M. LOBDELL: Drafted correspondence to M. Lobdell regarding order approving settlement (.2); telephone call with Millennium Trust regarding R. Summer (.3); drafted correspondence to B. Kirtley regarding statement of financial condition (.2); receive and review correspondence from B. Vincent regarding motion for leave to amend (.1); review motion for leave to amend (.2); receive and review motion for extension of time regarding P. Saunders (.2); prepare for and attend Rule 16 conference regarding Rowe (1.0); receive and review case management order (.2); legal research regarding arbitration (2.7); factual research regarding subscription documents (2.7); telephone call with D. Holmes regarding false profits (.5).	8.3	\$2,241.00
1/20/2011	AV	BOSHART: work on mediation (.8).	0.8	\$198.00
1/20/2011	JDM	J. WARREN, T. BARLOW and WOF cases: Review/analyze caselaw from defendants' motion to compel arbitration (3.8); research caselaw re waiver of attorney-client privilege by failure to include in privilege log (1.2).	5.0	\$967.50
1/20/2011	RJ	C. CAMPAIGNE: Prepare motion for clerk's default (.3); DANCING \$: prepare motion for clerk's default (.3); V. BURNS: prepare motion for clerk's default (.3); C. TENG: prepare motion for clerk's default (.3); EFG BANK: prepare motion for entry of proposed scheduling order (.8); D. BOSHART: correspondence with defendant regarding mediation and forwarding notice of mediation (.2).	2.2	\$425.70
1/20/2011	JR	Review of investor files and Scoop documents related to EFG and Wachovia Securities and prepare new Exhibit As and retrieve back-up/support for Exhibit As per conference with Mr. Lamont (2.0).	2.0	\$280.00
1/20/2011	JWH	CRESVALE: Research State of Florida and State of California Department of Corporations for any registered agents for Cresvale Ministerial Association and Cresvale Associates (.3).	0.3	\$42.00
1/21/2011	GM	Teleconference with potential expert (.4); C. CAMPAIGNE: revised motion for entry of clerk's default against defendant (.1); DANCING \$: revised motion for clerk's default against defendant (.1); C. TENG: revised motion for clerk's default against defendant (.1); V. BURNS: reviewed motion for clerk's default against defendant (.1); DANCING \$: reviewed clerk's default against defendant (.1).	0.9	\$283.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/21/2011	ML	Analyze pleadings and transcript regarding Goldberg (2.0); EFG BANK: factual analysis regarding false profits (.5); drafted motions to dismiss (.5); receive and review orders regarding administrative closure (.3); drafted motion for clerk's default (.5); legal research regarding cases cited by Defendants; arbitration (3.0).	6.8	\$1,836.00
1/21/2011	AV	D. BOSHART: Prepare for and attend mediation in Sarasota (4.0); D. BOSHART: draft settlement agreement (.3).	4.3	\$1,064.25
1/21/2011	AV	D. BOSHART: Travel to mediation (2.0).	2.0	\$247.50
1/21/2011	RJ	EFG BANK: Prepare Unopposed Motion for Entry of Stipulated Scheduling Order (.7).	0.7	\$135.45
1/24/2011	GM	WARREN, BARLOW, and WOF Cases: considered arguments in response to motion to compel arbitration (.3).	0.3	\$94.50
1/24/2011	ML	M. CORCIONE: Exchange correspondence with M. Corcione regarding settlement (.2); consider settlement with Receiver regarding M. Corcione, H. Buhl, and P. Farley (.5); receive and review orders regarding dismissal (.2); P. FARLEY: exchange multiple correspondence with E. Assouline regarding settlement (.5); P. FARLEY: revised settlement agreement (.3); ALLIANCE: exchange correspondence with O. Rarric regarding settlement payment from Alliance Equities (.2); receive and review entry of defaults (.2); legal research regarding case cited by Defendants; arbitration (4.7); receive and review correspondence from D. Holmes regarding documents (.1); EFG BANK: factual analysis regarding EFG Bank and Wachovia transfers (.7); D&E UNIT: prepare for mediation with D&E (.5).	8.1	\$2,187.00
1/24/2011	AV	Review service deadlines regarding Traders defendants (.1); CRESVALE: telephone call to Bolter & Carr (.1); CRESVALE: draft motion to extend service deadline and declaration regarding Cresvale Associates (.6); B. DAVIS: review and revise acceptance of service regarding defendant (.2); B. DAVIS: correspondence with H. Leonard regarding defendant (.2); D. BOSHART: review and revise settlement agreement (.5); telephone from and correspondence to J. Jacobs regarding Khodorkovsky, Libman, and Grosman (.3); V. KOUVANT: telephone with W. Dooley (.2); DIOCESE OF VENICE: review motion to dismiss amended complaint (.3); DIOCESE OF VENICE: prepare initial disclosures (1.0); V. KOUVANT: analyze bankruptcy issues (.7); DIOCESE OF VENICE: review motion to strike (.4).	4.6	\$1,138.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/24/2011	RJ	BLACK: Correspondence with O. Rarric regarding mediation (.2); GROUP 3: correspondence with M. Barlow regarding mediations (.3); prepare Motions for Default Judgment against C. Teng, Dancing \$, C. Campaigne, and V. Burns. (1.0).	1.5	\$290.25
1/24/2011	JWH	Research procedure for service of process for defendants in foreign countries (1.3).	1.3	\$182.00
1/25/2011	GM	Revised motion for approval of settlement (.2); V. LEE: reviewed defendant's motion regarding discovery and considered response (.3); BUTLER PAPPAS Cases: revised motion for extension of time (.3); EFG BANK: revised motion for stipulated deadlines regarding defendant (.6); revised draft initial disclosures (1.0); revised settlement agreement (.6) addressed case management matters (.2).	3.2	\$1,008.00
1/25/2011	ML	Legal research regarding arbitration (2.5); V. LEE: receive and review defendant's motion to commence discovery (.2); V. LEE: drafted opposition to motion to commence discovery (4.0); E. KAYE: drafted correspondence to B. Mooney regarding mediation (.1); E. KAYE: analyze investor file (.4); drafted correspondence to M. Rogers regarding enlargement of time to respond to complaint (.2); H. BUHL: telephone call with M. Buckstein (.2); exchange correspondence with B. Kirtley regarding mediation (.1); P. FARLEY: exchange correspondence with counsel for defendant regarding settlement payments (.2); P. FARLEY: telephone call with E. Assouline regarding payments (.2).	8.1	\$2,187.00
1/25/2011	AV	DIOCESE OF VENICE: Telephone to C. Person regarding extension of deadline to respond to defendant's motion to dismiss and to strike (.2); DIOCESE OF VENICE: draft motion to extend regarding same (.5); V. KOUVANT: draft memo to Receiver regarding proposed settlement and analysis (.5); V. LEE: review motion to commence discovery (.2); D. BOSHART: review case on statute of limitations issue and correspondence to D. Boshart regarding same (.4); D. BOSHART: review, revise and finalize draft settlement agreement (.3).	2.1	\$519.75

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/25/2011	RJ	C. TENG: Revise motion for default judgment against defendant (.3); V. BURNS: revise motion for default judgment against defendant (.3); C. CAMPAIGNE: revise motion for default judgment against defendant (.3); DANCING \$: revise motion for default judgment against defendant (.3); GROUP 3: correspondence with M. Barlow regarding mediation (.3); correspondence with O. Rarric regarding mediation (.2); EFG BANK: revise Motion for Stipulated Scheduling Order (.4); EFG BANK: correspondence with S. Grossman regarding motion (.2); CLOUDS and S. RICHTER: prepare notices of failure to mediate (.5).	5.7	\$1,102.95
1/26/2011	GM	MEEKER: reviewed amended answer (.2); V. LEE: considered matters regarding money transfers (.3); MEEKER: reviewed discovery requests (.3); work on initial disclosures (.8); DIOCESE OF VENICE: reviewed amended motion to strike (.3); MEEKER: considered response to discovery requests (.3).	2.2	\$693.00
1/26/2011	ML	R. FAGIN: Receive and review order approving settlement (.1); R. FAGIN: drafted correspondence to E. Gluck regarding order approving settlement (.2); telephone call with B. Dooley regarding settlement (.2); TRACHTENBERG: telephone call with counsel for defendant regarding settlement (.5); TRACHTENBERG: drafted correspondence to counsel for defendant regarding settlement (.2); E. KAYE: prepare for and attend mediation (3.0); E. KAYE: drafted settlement agreement (.4); E. KAYE: drafted correspondence to S. Masel regarding motion to approve (.1); E. KAYE: drafted motion to approve (.3); E. KAYE: drafted notice of settlement (.2); legal research regarding arbitration (2.0); consider settlement of cases with Receiver (.4); M. CORCIONE: drafted correspondence to defendant regarding settlement (.2); D&E UNIT TRUST: drafted correspondence to counsel for defendant regarding documents (.2); drafted correspondence to P. Grilli regarding mediation statement (.4).	8.4	\$2,268.00
1/26/2011	AV	Correspondence from J. Coleman and M. Lamont regarding Holmes subpoena (.1); DIOCESE OF VENICE: review and revise initial disclosures and exhibits (1.8); CHARITIES: telephone from C. Person regarding motion to strike (.2); SARASOTA OPERA and CATHOLIC CHARITIES: draft initial disclosures (.5); D. BOSCHART: correspondence and telephone call with D. Boshart regarding potential settlement of claim (.4).	3.0	\$742.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/26/2011	JDM	ZAK: Review and analyze caselaw cited in Defendant's Motion to Compel Arbitration (2.0); ZAK: meet with M. Lamont regarding case discussion and strategy (.4).	2.4	\$464.40
1/26/2011	RJ	CLOUDS and S. RICHTER: Prepare notices of failure to mediate (.4); C. CAMPAIGNE: revise motion for default judgment against defendant (.2); V. BURNS: revise motion for default judgment against defendant (.2); C. TENG: revise motion for default judgment against defendant (.2); DANCING \$: revise motion for default judgment against defendant (.2); E. KAYE: interest calculations for mediation (.4); D&E UNIT TRUST: interest calculations for defendant (.3).	1.9	\$367.65
1/27/2011	GM	V. LEE: Revised response to defendant's motion to commence discovery (1.3); revised Rule 16 disclosures (.4); S. MOODY: addressed matters regarding S. Moody's house (.4); reviewed notices regarding defendant's failure to comply with mediation order (.1); BUTLER PAPPAS Cases: reviewed initial disclosures (.2); considered arguments regarding arbitration (.4).	2.8	\$882.00
1/27/2011	ML	J. WARREN, T. BARLOW, and WOF cases: Legal research regarding arbitration (3.0); J. WARREN, T. BARLOW, and WOF cases: drafted opposition to motion to compel arbitration (1.0); EFG BANK: prepare for and attend mediation (3.5); EFG BANK: analyze documents (.4); drafted correspondence to D. Holmes regarding subscription documents (.2); drafted correspondence to B. Kirtley regarding settlement documents (.2); drafted notice of failure to mediate (.2).	8.5	\$2,295.00
1/27/2011	AV	CHARITIES: Review, revise, and finalize initial disclosures regarding Diocese of Venice, Catholic Charities, and Sarasota Opera Association (1.5).	1.5	\$371.25
1/27/2011	JDM	J. WARREN, T. BARLOW and WOF cases: Research caselaw regarding response to motion to compel arbitration (6.8).	6.8	\$1,315.80
1/27/2011	RJ	C. CAMPAIGNE: Revise motion for default judgment against defendant (.4); DANCING \$: revise motion for default judgment against defendant (.4); C. TENG: revised motion for default judgment against defendant (.4); V. BURNS: revise motion for default judgment against defendant (.4).	1.6	\$309.60

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/27/2011	JR	Review and retrieval of subscription agreements for EFG and Wachovia International investors per request of Mr. Lamont (.2); review of Scoop office materials and retrieval of limited partnership agreements for Scoop Real Estate and Victory, IRA per request of Mr. Lamont (.4); review of Scoop documentation related to investor Teng per conference with Mr. Jamieson (.3); review of Scoop documentation for employee information and address per request of Mr. Villoch in preparation for filing initial disclosures in clawback cases (.2); review of Scoop files for executed limited partnership and operating agreements (2.0).	3.1	\$434.00
1/28/2011	GM	Prepared for Rule 16 conferences (.7); ELLIS: addressed scheduling of Rule 16 conference (.1); WOF: reviewed motion for extension (.1); LEE: reviewed order on motion for discovery (.1).	1.0	\$315.00
1/28/2011	RJ	WOF: Correspondence with M. Rogers regarding deadlines (.2); EFG BANK: revise motion for entry of scheduling order (.2); P. FARLEY: correspondence with E. Assouline regarding settlement (.2); V. LEE: correspondence with E. Assouline regarding case (.2).	0.8	\$154.80
1/28/2011	JR	TRACHTENBERG: Communicate with Mr. Lamont, Mr. Jamieson and Mr. Morello regarding telephone call from Mr. Marks regarding settlement calculations (.1).	0.1	\$14.00
1/31/2011	GM	Prepare for and attend Rule 16 conference (2.2); reviewed proposed case management reports (.4); EFG BANK: reviewed scheduling order (.1); LEE: considered request regarding deposition of A. Nadel (.3).	3.0	\$945.00
1/31/2011	ML	GROUPS 1 and 3: Prepare for and attend Rule 16 conference (1.5); J. WARREN, T. BARLOW, and WOF cases: legal research regarding arbitration (2.3); EFG BANK: exchange correspondence with S. Grossman (.2); J. WILLIAMS (JORDAN): exchange correspondence with defendant regarding financial affidavit (.2); V. LEE: exchange correspondence with E. Assouline regarding response by Lee's daughters to complaint (.2); WOF: receive and review motion for enlargement of time (.1); telephone call with T. Barlow regarding settlement; amended case management report (.2); J. WARREN, T. BARLOW, and WOF cases: drafted opposition to motion to compel arbitration (2.5); V. LEE: exchange correspondence with counsel for defendant regarding Nadel deposition (.2).	7.4	\$1,998.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
1/31/2011	AV	V. KOUVANT: Telephone call with W. Dooley (.2); GROUP 3: amend case management reports (.4); GROUP 3: correspondence with M. Barlow (.2); GROUPS 4 and 5: prepare case management reports (.3).	1.1	\$272.25
1/31/2011	JDM	Research caselaw regarding determination of contract arbitrability (1.9).	1.9	\$367.65
2/1/2011	GM	JAMES RIVER: prepared amended complaint and research regarding same (7.3).	7.3	\$2,299.50
2/1/2011	ML	E. KAYE: Telephone call with E. Kaye regarding settlement payment (.1); drafted correspondence to B. Kirtley regarding settlement payment (.1); P. FARLEY: receive and review executed agreement (.1); P. FARLEY: draft correspondence to S. Masel regarding motion to approve (.1); P. FARLEY: draft motion to approve (.3); P. FARLEY: draft notice of settlement (.2); M. LOBDELL: draft correspondence to M. Lobdell regarding receipt of check (.1); J. WILLIAMS (JORDAN): analyze balance sheet (.4); consider settlement issues with Receiver regarding M. Corcione and J. Jordan (.4); telephone call with J. Morella regarding settlement (.3); telephone call with S. Grossman regarding complaint and mediation (.4); draft correspondence to S. Grossman regarding false profits (.3); draft motions for default judgment (.7); draft affidavit of Receiver (.5); M. CORCIONE: exchange correspondence with defendant regarding settlement (.3); M. CORCIONE: draft settlement agreement (.3); J. WARREN, T. BARLOW and WOF cases: legal research regarding arbitration (1.8); J. WARREN, T. BARLOW and WOF cases: draft opposition to motion to compel arbitration (1.0); P. FARLEY: receive and review order approving settlement (.1); P. FARLEY: drafted correspondence to E. Assouline regarding order approving settlement (.1); J. CLOUD: telephone call with counsel regarding documents and mediation (.2); ROWE: prepare for deposition of J. Rowe (.5).	8.2	\$2,214.00
2/1/2011	AV	GROUP 3: Prepare amended case management reports (1.0).	1.0	\$247.50
2/1/2011	JDM	Research caselaw regarding response to motion to compel arbitration (7.5).	7.5	\$1,451.25
2/1/2011	RJ	S. MORGAN: Correspondence with B. Vincent regarding S. Morgan mediation (.2); R. SCHNEIDERMAN: correspondence with M. Barlow regarding mediation (.2); CLOUD: correspondence with S. Dominko (.2); J. TERRELL AND JOHN GRIER CONST.: calculate settlement payment schedule (.7); prepare motions for default judgment (.5).	1.8	\$348.30

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	ASSET	Asset Analysis and Recovery		
2/1/2011	JR	J. WILLIAMS (JORDAN): Research regarding investor, per request of Mr. Lamont and review Accurint results (.4).	0.4	\$56.00
2/2/2011	GM	JAMES RIVER: amended complaints in cases involving James River entities (4.7); WOF: amended complaint (.3); addressed service of process matters (.1); WARREN, BARLOW and WOF Cases: work on response to motion to compel arbitration (.3); SETTLAGE: considered strategy for addressing bankruptcy of defendant (.3).	5.7	\$1,795.50
2/2/2011	ML	BLACK: Draft correspondence to B. Mooney regarding mediation (.2); exchange correspondence with E. Gluck regarding settlement payment (.1); legal research regarding arbitration (4.7).	5.0	\$1,350.00
2/2/2011	AV	GROUPS 4 and 5: Prepare case management reports (.3); SETTLAGE: review financial account information provided by bankruptcy counsel in response to subpoena (.4).	0.7	\$173.25
2/2/2011	JDM	Research caselaw regarding arbitrability and related issues in motion to compel arbitration (3.7).	3.7	\$715.95
2/2/2011	RJ	GROUP 3: Correspondence with M. Barlow regarding mediation of Group 3 cases (.2); B. BLACK: damages interest calculations (.3); B. MEEKER: damages interest calculations (.4); prepare motions for nunc pro tunc Orders for D. Zak, M. Zak, R. Russell, and R. Schneiderman (.7); prepare mediation notices for B. Meeker, Becker, and B. Black (.3).	1.9	\$367.65
2/3/2011	GM	JOHN GRIER CONST.: prepared settlement agreement for case against defendant and related cases (2.0); considered proposed case management reports (.3).	2.3	\$724.50
2/3/2011	ML	H. BUHL: Exchange correspondence with counsel regarding extension of time to respond (.2); M. CORCIONE: exchange correspondence with defendant regarding settlement (.2); receive and review correspondence from J. Morella regarding settlement (.2); telephone call with K. Mather regarding mediation (.2); CLOUDS: receive and review correspondence from B. Farrell regarding they do not represent Clouds (.1); analyze spreadsheet from PDR (.4).	1.3	\$351.00
2/3/2011	AV	GROUPS 4 and 5: Prepare case management reports (1.5).	1.5	\$371.25
2/3/2011	RJ	CLOUDS: Correspondence with S. Dominko regarding mediations (.5); S. RICHTER: correspondence regarding mediation (.2).	0.7	\$135.45
2/4/2011	GM	Revised case management reports and addressed other case management matters (1.3); addressed issues regarding service of process (.1).	1.4	\$441.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
2/4/2011	ML	B. BLACK: Prepare for mediation (.5).	0.5	\$135.00
2/4/2011	AV	V. LEE: Telephone call from P. Thanasides regarding case management report (.4); V. KOUVANT: telephone call from C. Morrison regarding case management report (.4); H. BUHL: telephone call from K. Morgan regarding case management report (.4); GROUPS 4 and 5: review and revise case management reports (1.0).	2.2	\$544.50
2/4/2011	JDM	Research caselaw regarding arbitrability and motion to compel arbitration (2.7).	2.7	\$522.45
2/4/2011	RJ	V. KOUVANT: Correspondence regarding settlement (.2); CLOUDS: correspondence with S. Dominko regarding mediations (.3); MASONS: review materials to effect foreign service on defendants in France (.3).	0.8	\$154.80
2/4/2011	JR	Review bank account and verify investor settlement checks cleared and communicate with Mr. Lamont, Mr. Jamieson, Mr. Morello and Ms. Rehus regarding same (.2).	0.2	\$28.00
2/6/2011	AV	H. BUHL: Correspondence with K. Morgan (.2); review and revise case management report (.2).	0.4	\$99.00
2/7/2011	GM	Revised communications with E. Assouline (.2); WOF: revised complaint against defendant (.3); TRACHTENBERG: revised settlement agreement (.3); reviewed case management reports (.3).	1.1	\$346.50
2/7/2011	ML	B. BLACK: Prepare for and attend mediation (5.0); V. LEE: draft correspondence to counsel for V. Lee regarding Nadel's health (.2); receive and review correspondence from E. Assouline regarding complaint (.2); draft correspondence to E. Assouline regarding complaint (.5); V. LEE: telephone call with M. Addison regarding prior representation of V. Lee and mediation (.2); WOF: draft amended complaint (.5); WOF: draft correspondence to counsel regarding amended complaint (.2); LETELLIER: telephone call with counsel regarding settlement agreement (.2); LETELLIER: revised settlement agreement (.2); LETELLIER: draft correspondence to J. Malone, counsel for J. LeTellier, regarding revised settlement agreement (.2).	7.4	\$1,998.00
2/7/2011	AV	P. SAUNDERS and JAMES RIVER: Telephone call with S. Rausher regarding case management reports (.3); H. BUHL: telephone call with K. Morgan regarding case management report (.2); V. KOUVANT: telephone call to W. Dooley regarding case management report and potential settlement (.3); GROUPS 4 and 5: finalize case management reports (.7).	1.5	\$371.25

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
2/7/2011	JDM	Research caselaw regarding actual/apparent authority to enter into illegal contract (3.1).	3.1	\$599.85
2/7/2011	RJ	MASONS: Review foreign service forms to serve complaint on defendants in France (.3).	0.3	\$58.05
2/7/2011	JR	Communicate with Mr. Price at PDR regarding 1099-Misc submitted to Receiver by investors who settled clawback claims (.1).	0.1	\$14.00
2/8/2011	GM	WARREN, BARLOW, and WOF Cases: Meeting regarding strategy and arguments for response to motions to dismiss and to compel arbitrations (1.1); D&E UNIT: reviewed motion to quash subpoena (.1); considered possible claims against additional clawback defendants (.2).	1.4	\$441.00
2/8/2011	ML	Legal research regarding arbitration; jurisdiction of district court (4.5); legal strategy with scoop legal team regarding response to motion to compel arbitration (1.3); exchange correspondence with M. Garvey regarding mediation (.2); drafted memo regarding jurisdiction of court (1.5); B. BLACK: telephone call with O. Rarric regarding settlement (.2); B. BLACK: drafted correspondence to O. Rarric regarding sample settlement agreement (.1).	7.8	\$2,106.00
2/8/2011	AV	Meet with scoop legal team regarding motions to dismiss and motions to compel arbitration (1.3); V. KOUVANT: telephone to W. Dooley regarding proposed settlement (.3); review tolling agreements and correspondence regarding Moody Trust charities (.4).	2.0	\$495.00
2/8/2011	JDM	Meet with scoop legal team regarding status and plan for response to motions to compel arbitration (1.3); research caselaw re distinction between void/voidable agreements and argument that agreement never came into existence (.9).	2.2	\$425.70
2/8/2011	RJ	Meeting with scoop legal team regarding opposition to motions to compel arbitration (1.3); research regarding contract formation and proving the existence of contracts (1.1); S. MORGAN: correspondence with B. Vincent regarding mediation (.2).	2.6	\$503.10
2/8/2011	JR	Review of documentation from Scoop office files regarding various investors for subscription materials, etc. per request of Mr. Jamieson (2.0); receipt and review of defendants' memorandum in opposition to motion to compel (.2).	2.2	\$308.00
2/9/2011	GM	Revised default judgment motions (.4); WARREN, BARLOW and WOF Cases: reviewed case law regarding motions to compel arbitration (3.2); revised motions for leave to amend (.2).	3.8	\$1,197.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
2/9/2011	ML	B. BLACK: Telephone call with O. Rarric regarding extension of time to respond (.2); B. BLACK: drafted correspondence to O. Rarric regarding motion (.1); exchange correspondence with P. Watson regarding oppose arbitration (.2); legal research regarding arbitration (3.0); drafted memo regarding in rem jurisdiction (3.5).	7.0	\$1,890.00
2/9/2011	AV	DIOCESE OF VENICE: Review motion to dismiss and motion to strike (.5); work on tolling agreements for Moody Charitable Trust (.6); review case law and argument regarding motions to dismiss and to strike (1.0).	2.1	\$519.75
2/9/2011	JDM	Research caselaw regarding court's authority to determine existence of arbitration agreement (2.7).	2.7	\$522.45
2/9/2011	RJ	CLOUD: Correspondence with P. Dominko regarding motions for extension of time (.2); S. MORGAN: correspondence with B. Vincent regarding mediation (.2); JAMES RIVER: prepare motion for leave to amend (1.2).	1.6	\$309.60
2/9/2011	JR	Receipt of wire information from Bay Cities regarding payment by J. Lofgren and communicate with Ms. Rehus, Mr. Lamont, Mr. Morello, Mr. Jamieson and Sharon at PDR regarding same (.1).	0.1	\$14.00
2/9/2011	JR	Review of binder of documents containing LP agreements and retrieve alternate versions per request of Mr. Jamieson (.5); review of Scoop documentation related to various investors and execution of offering documentation and communicate with Mr. Sharp at E-Hounds regarding e-mail and server searches (.5).	1.0	\$140.00
2/9/2011	MRS	Prepare binders for the Operating Agreements (2.5).	2.5	\$350.00
2/10/2011	GM	JAMES RIVER: Prepared motion for leave to amend complaint (7.0); DANCING \$: considered request to vacate default (.1).	7.1	\$2,236.50
2/10/2011	ML	M. BURGESS: Exchange correspondence regarding settlement payment (.2); exchange multiple correspondence with P. Stillman regarding default (.4); legal research regarding arbitration; jurisdiction (4.5); drafted opposition to motions to compel arbitration (2.0); B. BLACK: telephone call with O. Rarric (.4).	7.5	\$2,025.00
2/10/2011	AV	CHARITIES: Review and research case law on fraudulent transfers and limitations issues regarding motions to dismiss and to strike (.8); DIOCESE OF VENICE: draft opposition to motion to dismiss (.5).	1.3	\$321.75
2/10/2011	JDM	J. WARREN, T. BARLOW, and WOF cases: Research caselaw regarding response to motion to compel arbitration (2.6).	2.6	\$503.10

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
2/10/2011	RJ	S. MORGAN: Correspondence with B. Vincent regarding mediation (.2); DANCING \$: prepare motion for entry of default judgment (.3); C. TENG: prepare motion for entry of default judgment (.3); V. BURNS: prepare motion for default judgment (.3); C. CAMPAIGNE: prepare motion for default judgment (.3); research regarding proving existence of contracts related to arbitration clauses (1.5).	2.9	\$561.15
2/11/2011	GM	JAMES RIVER: Communications with B. Mooney regarding mediation (.1); JAMES RIVER: considered settlement negotiations (.5); JAMES RIVER: finalized motions for leave to amend cases (3.2); WARREN, BARLOW and WOF Cases: reviewed motions to compel arbitration and reviewed caselaw (1.8); D. CLOUD: communications with counsel regarding extension (.1); MORGAN: reviewed answer (.3); LEE: reviewed communications from E. Assouline regarding additional defendants (.2).	6.2	\$1,953.00
2/11/2011	ML	Receive and review multiple motions to compel arbitration (2.0); analyze cases cited therein (1.0); legal research regarding arbitration (4.5); V. LEE: receive and review correspondence from E. Assouline regarding mediation (.2); V. LEE: drafted response to E. Assouline (.4); drafted motion for leave to file second amended complaint (.3); drafted motions for default judgment (.5); drafted affidavit of Receiver in support (.4); JAMES RIVER and B. BLACK: telephone call with B. Mooney (.3).	9.1	\$2,457.00
2/11/2011	JDM	Research caselaw regarding whether contract used as ponzi investment vehicle is unenforceable (4.0).	4.0	\$860.00
2/11/2011	RJ	Research regarding burden of proof to establish existence of contract related to arbitration clauses (1.1); J. COOK: prepare motion to dismiss (.3).	1.4	\$270.90
2/11/2011	JR	Confirm checks from investors cleared and prepare memo to Ms. Rehus, Mr. Lamont, Mr. Jamieson and Mr. Morello regarding same (.2); review of Summation documents for executed agreements (1.5).	1.7	\$238.00
2/11/2011	MG	Research and pull documents supporting the deposits and withdrawals of investors money in preparation for mediation (1.4).	1.4	\$196.00
2/12/2011	AV	CHARITIES: Draft opposition to motions to dismiss (.8).	0.8	\$198.00
2/12/2011	JDM	Research caselaw re applicability of separability doctrine (2.5).	2.5	\$537.50
2/13/2011	AV	DIOCESE OF VENICE: Draft opposition to motion to dismiss (1.2).	1.2	\$297.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
2/13/2011	JDM	J. WARREN, T. BARLOW, and WOF cases: Research caselaw regarding defendant's motion to compel arbitration (3.5); J. WARREN, T. BARLOW, and WOF cases: draft Plaintiff's response (1.4).	4.9	\$948.15
2/14/2011	GM	V. LEE: Revised email regarding defendant (.4); JAMES RIVER: revised settlement agreement (.7); participated in meeting with potential expert (2.5); addressed discovery matters (.5); V. LEE: considered matters relating to defendant (.3); reviewed motion to set aside default (.2); BUTLER PAPPAS Cases: prepared response to defendants' motions to dismiss (4.3).	8.9	\$2,803.50
2/14/2011	ML	Receive and review orders regarding motions for enlargement of time (.2); J. COOK: receive and review order regarding dismissal (.1); J. COOK: drafted correspondence to B. Kirtley regarding dismissal (.1); TRACHTENBERG: work on settlement (.4); TRACHTENBERG: revised settlement agreement (.4); TRACHTENBERG: telephone call with J. Morella regarding settlement (.2); exchange correspondence with P. Stillman regarding pro hac (.1); receive and review motion to set aside default (.2); receive and review correspondence from B. Jung regarding settlement (.1); P. SAUNDERS and JAMES RIVER: drafted settlement agreement (.4); V. LEE: drafted correspondence to E. Assouline regarding claims against daughters (.4); V. LEE: telephone calls with M. Addison (.4); V. LEE: drafted correspondence to M. Addison regarding mediation (.2); D. BOSHART: receive and review motion for summary judgment (.4); K. LEE and V. LEE: analyze file regarding communications (.4); legal research regarding arbitration; mediation (3.3); analyze recent motions to compel arbitration (1.0).	8.3	\$2,241.00
2/14/2011	JDM	J. WARREN, T. BARLOW, and WOF cases: Draft argument for Plaintiff's response to defendants' motion to compel arbitration (4.2); research caselaw regarding court's role in determining existence and formation of contract (1.5).	5.7	\$1,225.50
2/14/2011	RJ	Research regarding proving arbitration agreements and public policy against enforcing illegal agreements (3.7).	3.7	\$715.95
2/14/2011	RJ	Scheduling mediations (.4).	0.4	\$77.40
2/15/2011	GM	BOSHART: Reviewed defendant's motion for summary judgment (.2); JAMES RIVER: reviewed order granting leave to amend against defendant (.1); V. LEE: reviewed defendants' motion to strike complaint and considered response (.7).	1.0	\$315.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
2/15/2011	ML	B. BLACK: Telephone call with B. Mooney regarding mediation (.2); B. BLACK: consider settlement with Receiver (.2); B. BLACK: drafted settlement agreement (.3); B. BLACK: drafted correspondence to O. Rarric, counsel for defendant regarding proposed settlement agreement (.2); V. LEE: telephone call with M. Buckstein regarding mediation (.2); V. LEE: analyze file regarding communications with defendant (.3); CLOUD: receive and reivev orders regarding extension of time (.2); B. MEEKER: prepare for mediation (1.0); B. MEEKER: drafted correspondence to P. Grilli regarding mediation statement (.4); G. BECKER: analyze file (.5); revised mediation statement (.4); drafted correspondence to D. Lichter regarding mediation (.2); analyze motions to compel arbitration (1.0); OPM: drafted motion for clerk's default regarding OPM Alpha (.4); OPM: analyze investor file (.5); drafted correspondence to K. Mather regarding response to complaint (.2); conference with Receiver regarding status of claims (.4); analyze recent motions to compel arbitration (.5).	7.0	\$1,890.00
2/15/2011	JDM	J. WARREN, T. BARLOW and WOF cases: Draft argument regarding court decides existence of contract for Plaintiff's response to defendants' motion to compel arbitration (2.5); J. WARREN, T. BARLOW, and WOF cases: draft argument regarding ultra vires nature of agreement and inability of defendants to enforce for Plaintiff's response to defendants' motion to compel arbitration (4.7).	7.2	\$1,393.20
2/15/2011	RJ	Research regarding proving arbitration agreements and public policy against enforcing illegal agreements (1.0); B. MEEKER: calculation of interest on false profits (.2).	1.2	\$232.20
2/15/2011	JR	Research regarding asset, credit and background searches and communicate with various companies regarding services and with Mr. Lamont regarding results (.7); research CD and money market rates per conference with Receiver (.7).	1.4	\$196.00
2/16/2011	GM	Revised proposed edits to confidentiality agreement (.2); GROUP 3 Cases: revised initial disclosures (.3); reviewed clerk's defaults in several cases (.1); prepared confidentiality agreement for several cases (.3).	0.9	\$283.50
2/16/2011	ML	B. MEEKER: Prepare for and attend mediation (3.5); legal research regarding arbitration (1.0); drafted opposition to motion to strike (3.0).	7.5	\$2,025.00
2/16/2011	AV	GROUP 3: Review, revise and finalize initial disclosures (.3).	0.3	\$74.25

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
2/16/2011	JDM	Revise argument regarding court must decide existence of arbitration agreement for Plaintiff's response to defendants' motion to compel arbitration (2.1); draft/revise argument re ultra vires and no authority to act for Plaintiff's response to defendants' motion to compel arbitration (5.3).	7.4	\$1,431.90
2/16/2011	RJ	Research regarding proving arbitration agreements and public policy against enforcing illegal agreements and prepare memo on same (4.4); B. MEEKER: calculate interest on false profits for mediation (.4).	4.8	\$928.80
2/16/2011	JR	Review Scoop documentation for executed agreements (1.0).	1.0	\$140.00
2/16/2011	MG	Research and pull documents supporting the deposits and withdrawals of investors money in preparation for mediation (1.5).	1.5	\$210.00
2/17/2011	GM	JAMES RIVER: Revised amended complaints against James River and Paul Saunders (.1); BOSHART: considered response to motion for summary judgment (.3); JAMES RIVER: communications with W. Jung regarding settlement documents status (.2); LETELLIER: reviewed proposed settlement language (.3); LEE: considered possible dismissal of claims against certain defendants (1.2); considered strategy for clawback cases (.8); reviewed caselaw relating to matters connected to Receiver clawback cases (1.7).	4.6	\$1,449.00
2/17/2011	ML	Legal research regarding arbitration (3.0); drafted opposition to motion to compel arbitration (2.0); B. BLACK: exchange correspondence with O. Rarric regarding settlement (.2); revised opposition to motion to strike (2.0); LETELLIER: telephone call with J. Malone regarding settlement (.3); LETELLIER: revised settlement agreement (.2); M. CORCIONE: exchange correspondence with defendant regarding settlement (.2).	7.9	\$2,133.00
2/17/2011	AV	Research case law on opposition to motions to dismiss (1.1); BOSHART: review motion for summary judgment (.4); review documents and draft chart regarding charitable organizations (.5); meet with Receiver regarding course of action for charitable organizations (.3); draft opposition on motions to dismiss (.9).	3.2	\$792.00
2/17/2011	JDM	J. WARREN, T. BARLOW and WOF cases: Revise argument regarding ultra vires act void/public policy for Plaintiff's response to defendants' motion to compel arbitration (2.1); research case law regarding ultra vires acts void and unenforceable (2.4).	4.5	\$870.75
2/17/2011	RJ	Correspondence with S. Dominko regarding mediation (.2).	0.2	\$38.70

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
2/18/2011	GM	Revised settlement agreement (.4); V. LEE: considered claims in case against defendant (.6); V. LEE: considered requests for documents (.2); BARLOW Cases: Teleconference with Mr. Barlow regarding clawback cases and disclosures (.3); ELLIS: considered information provided by defendant (.3).	1.8	\$567.00
2/18/2011	ML	Exchange correspondence with B. Vincent regarding Nadel guilty plea (.2); M. CORCIONE: exchange correspondence with S. Masel regarding settlement with defendant (.2); V. LEE: drafted correspondence to E. Assouline regarding dismissal of V. Lee's daughters (.2); drafted correspondence to J. Malone regarding settlement agreement (.2); drafted opposition to motion to compel arbitration (5.0).	5.8	\$1,566.00
2/18/2011	AV	Draft demand letter to charitable organizations regarding N. Moody Charitable Trust; (.1) CHARITIES: draft opposition to motions to dismiss (2.7); memo to M. Lockwood regarding status update on charitable organizations (.7).	3.5	\$866.25
2/18/2011	JDM	Research caselaw regarding Janvey argument for Plaintiff's response to defendants' motion to compel (.8); revise argument regarding ultra vires acts for Plaintiff's response to defendants' motion to compel arbitration (.8).	1.6	\$309.60
2/18/2011	RJ	Research regarding proving arbitration agreements and public policy against enforcing illegal agreements and prepare memo on same (1.5); CLOUD: correspondence with S. Dominko regarding scheduling mediations, unopposed motions for nunc pro tunc orders (.7).	2.2	\$425.70
2/18/2011	JR	SCHWAB: Communicate with E-Hounds and review documentation related to Schwab, et al investors regarding agreements, etc. from Scoop server searches (.5).	0.5	\$70.00
2/18/2011	JR	Confirm investor settlement checks cleared and communicate with Mr. Lamont, Mr. Jamieson, Ms. Rehus and Mr. Morello regarding same (.2).	0.2	\$28.00
2/18/2011	MG	Research and pull documents supporting the deposits and withdrawals of investors money in preparation for mediation (1.5).	1.5	\$210.00
2/19/2011	ML	J. WARREN, T. BARLOW and WOF cases: Legal research regarding arbitration (3.0); drafted opposition to motion to compel (3.0).	6.0	\$1,620.00
2/20/2011	ML	J. WARREN, T. BARLOW and WOF cases: Drafted opposition to defendants' motion to compel arbitration (4.0).	4.0	\$1,080.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
2/20/2011	AV	CHARITIES: Draft opposition regarding charities' motions to dismiss (.7).	0.7	\$173.25
2/21/2011	GM	Considered matters regarding settlements (.4); reviewed discovery (2.6); BUTLER PAPPAS Cases: prepared response to motion to dismiss by certain charities (4.1); S. ELLIS: considered information regarding defendant and Rule 16 conference (.3); S. ELLIS: reviewed motion to continue Rule 16 conference (.1).	7.5	\$2,362.50
2/21/2011	ML	TRACHTENBERG: Telephone call with J. Morella regarding settlement with C. Trachtenberg and entities (.2); TRACHTENBERG: revised settlement agreement (.3); S. ELLIS: receive and review correspondence from H. Haskins regarding financial information from defendant (.2); S. ELLIS: analyze financial statement and tax returns (.4); S. ELLIS: drafted correspondence to H. Haskins regarding Rule 16 conference (.1); consider settlement issues with Receiver (.4); M. CORCIONE: drafted motion to approve settlement (.4); M. CORCIONE: drafted notice of settlement (.1); receive and review motion to continue Rule 16 conference (.2); J. WARREN, T. BARLOW and WOF cases: drafted opposition to defendants' motion to compel arbitration (6.0); prepare for Rule 16 conference (.3).	8.5	\$2,295.00
2/21/2011	AV	GROUPS 4 and 5: Work on initial disclosures (.4); CHARITIES: draft opposition regarding charities' motions to dismiss (1.0); GROUPS 4 and 5: draft confidentiality agreements (.4); telephone call from and correspondence to A. Osburn regarding All Childrens' Hospital Guild (.4); G. BECKER: prepare for mediation (1.0); G. BECKER: conduct mediation (1.5); G. BECKER: draft settlement agreement (.4); G. BECKER: correspondence to M. Garvey regarding settlement (.1).	5.2	\$1,287.00
2/21/2011	RJ	G. BECKER: Calculate interest on false profits (.4); CLOUD: correspondence with S. Dominko regarding mediation (.2).	0.6	\$116.10
2/22/2011	GM	Revised settlement agreement (.8); JAMES RIVER: addressed matter regarding James River and Paul Saunders settlement (1.6); WARREN, BARLOW and WOF Cases: work on response to motion to compel (5.1); reviewed several orders entered in clawback cases (.1); S. ELLIS: communications with M. Lamont regarding Rule 16 conference (.1); V. LEE: communications with E. Assouline regarding possible resolution of claims against certain defendants (.1); addressed informal discovery matters (.3).	8.1	\$2,551.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
2/22/2011	ML	Prepare for and attend Rule 16 conference (.8); receive and review orders (.2); J. WARREN cases: telephone calls with J. Warren regarding extension of time to respond to defendants' motions to compel arbitration (.2); T. BARLOW cases: telephone calls with T. Barlow regarding same (.3); exchange correspondence with P. Watson regarding same (.2); drafted motion for enlargement of time (.5); drafted opposition to motion to compel (2.5); legal research regarding arbitration (2.0); receive and review orders granting enlargement of time (.2); M. CORCIONE: drafted correspondence to defendant regarding order granting motion to approve (.2); review correspondence from DOJ regarding Nadel (.2); drafted correspondence to B. Vincent regarding response to informal discovery (.1).	7.4	\$1,998.00
2/22/2011	AV	H. BUHL and V. LEE: review and revise confidentiality agreements (.2); correspondence from K. Morgan regarding confidentiality agreement (.1); research case law on subsequent transferees and pleading in the alternative (.5).	0.8	\$198.00
2/22/2011	RJ	Research regarding proving arbitration agreements and public policy against enforcing illegal agreements and prepare memo on same (2.5).	2.5	\$483.75
2/22/2011	JR	Review of documentation related to Nadel's plea agreement for possible production per request of investor's counsel and communicate with Mr. Lamont and Ms. Rehus regarding same (.3); scan, organize and bates label DOJ correspondence per request of Mr. Lamont (.2).	0.5	\$70.00
2/23/2011	GM	V. LEE: Considered correspondence from counsel in Lee case (.2); BUTLER PAPPAS Cases: reviewed recent caselaw in connection with response to defendants' motions to dismiss (1.0); WARREN, BARLOW and WOF Cases: work on response to motions to compel arbitration (2.0); reviewed information regarding possible claims against third parties (2.7).	5.9	\$1,858.50
2/23/2011	ML	TRACHTENBERG: Exchange correspondence with D. Lewis regarding settlement with C. Trachtenberg (.2); V. LEE: exchange correspondence with E. Assouline regarding complaint (.2); legal research regarding arbitration (3.5); J. CLOUD: exchange correspondence with counsel regarding mediation (.2); drafted opposition to motion to compel (.3.0); prepare for mediations (1.0).	9.1	\$2,457.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
2/23/2011	AV	Draft, review and revise motion to exceed page limitations (.7); draft global opposition to motions to dismiss and motion to strike regarding charities (1.5); telephone and correspondence with C. Person regarding motion to exceed page limitations (.2); research case law on equitable tolling and continuous tort doctrines (1.0).	3.4	\$841.50
2/23/2011	JDM	Revise arguments in favor of Plaintiff's response to defendants' motion to compel arbitration (1.2); research caselaw regarding application of ultra vires to partnerships/LLC's (.7).	1.9	\$367.65
2/23/2011	RJ	Correspondence with S. Dominko regarding nunc pro tunc orders for extension of time to mediate (.3); WOF: correspondence with M. Rogers regarding motion to compel arbitration (.2); review and analyze Scoop partnership agreements (1.1).	1.6	\$309.60
2/23/2011	JR	CHARITIES: Communicate with Ms. Gura regarding documentation supporting payment to charities in preparation for mediations (.2).	0.2	\$28.00
2/23/2011	MG	Research and pull documents supporting the deposits and withdrawals of investors money in preparation for mediation (2.5); research and pull documents showing deposits and withdrawals of money donated to charities in preparation for mediations (2.5).	5.0	\$700.00
2/24/2011	GM	D&E UNIT: Addressed service of process matters (.1); BUTLER PAPPAS Cases: prepared response to defendants' motions to dismiss and to strike (6.0); JAMES RIVER: revised settlement agreements (.3).	6.4	\$2,016.00
2/24/2011	ML	D&E UNIT TRUST: Drafted motion to extend deadline to serve D&E (.4); H. BUHL: review revisions to confidentiality agreement (.2); receive and review orders re: enlargement of time to serve response to motions to dismiss (.1); prepare for mediations (2.0); drafted correspondence to B. Mooney regarding mediation statement (.4); legal research regarding probate; arbitration (4.5); drafted opposition to motion to compel arbitration (1.3).	8.9	\$2,403.00
2/24/2011	AV	D&E UNIT TRUST: Draft motion to extend service deadline (1.3); D&E UNIT TRUST: draft affidavit in support (.4); review P. Nadel's deposition testimony (1.5); DIOCESE OF VENICE: draft opposition to motion to strike (2.0).	5.2	\$1,287.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET		Asset Analysis and Recovery		
2/24/2011	RJ	D. ZAK: Prepare interest calculations for mediation (.2); M. ZAK: prepare interest calculations for mediation (.2); R. SCHNEIDERMAN: prepare interest calculations for mediation (.2); R. RUSSELL: prepare interest calculations for mediation (.2); research regarding proving arbitration agreements and public policy against enforcing illegal agreements and prepare memo on same (.4).	1.2	\$232.20
2/24/2011	JR	Conference with Mr. Morello, Mr. Lamont and C. Moody regarding Scoop office procedures (.4); prepare asset search requests per confernces with Mr. Lamont and Receiver (.3).	0.7	\$98.00
2/25/2011	GM	BUTLER PAPPAS Cases: Prepared response to defendants' motions to dismiss (2.7); reviewed initial disclosures (.3); S. ELLIS: revised case scheduling order (.1); WOF: reviewed motion to compel arbitration or to dismiss (.4).	3.5	\$1,102.50
2/25/2011	ML	Prepare for and attend mediations (4.0); exchange correspondence with E. Assouline regarding settlement (.2); S. ELLIS: receive and review scheduling order (.2); legal research regarding probate (1.0); drafted motion for enlargement of time to serve response to motion for summary judgment (.3); WOF: receive and review motion to compel arbitration and motion to dismiss (.5); WOF: analyze cases cited therein (.5); drafted opposition to motions to compel arbitration (2.0).	8.7	\$2,349.00
2/25/2011	AV	CHARITIES: Draft three motions for extension of time regarding charities' motions to dismiss (1.0); CHARITIES: correspondence and telephone call with C. Person regarding extension of time (.2); V. KOUVANT: draft settlement agreement (.3); H. BUHL and V. LEE: draft and finalize initial disclosures (.5); draft three supplements to 3.01(g) certification (.3); BOSHART: draft motion for extension of time regarding Boshart motion for summary judgment (.4); DIOCESE OF VENICE: draft opposition to motion to strike (.5) research case law on Ponzi scheme transfers (.7).	3.9	\$965.25
2/25/2011	JR	S. ELLIS: Communicate with Mr. Lamont and Receiver regarding results of asset search for defendant (.2).	0.2	\$28.00
2/28/2011	GM	BUTLER PAPPAS Cases: Prepared response to motions to dismiss by defendants (.6).	0.6	\$189.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
2/28/2011	ML	V. LEE: Receive and review correspondence from E. Assouline regarding settlement (.2); receive and review orders regarding enlargement of time to respond to motions (.1); GIRLS, INC.: prepare for mediation (.4); T. BARLOW Cases: exchange correspondence with T. Barlow regarding motions to compel arbitration (.2); FAGIN: exchange correspondence with E. Fagin regarding settlement payment (.2); B. BLACK: drafted correspondence to O. Rarric regarding settlement (.2); legal research regarding arbitration (3.0); drafted opposition to motions to compel arbitration (5.0).	9.3	\$2,511.00
2/28/2011	JDM	Meet with M. Lamont regarding possible arguments in Plaintiff's Response to Defendant's Motion to Compel Arbitration (.2).	0.9	\$174.15
2/28/2011	RJ	D. CLOUD: Correspondence with S. Firlotte regarding mediation (.2).	0.2	\$38.70
3/1/2011	GM	Revised opposition to motion to dismiss (3.1); V. LEE: considered possible resolution of claims in case (.1); TRACHTENBERG: reviewed proposed revisions to settlement agreement (.1).	3.3	\$1,039.50
3/1/2011	ML	V. LEE: Exchange correspondence with E. Assouline regarding settlement (.2); legal research regarding arbitration (2.0); drafted opposition to motions to compel arbitration (6.0).	8.2	\$2,214.00
3/1/2011	AV	S. ELLIS: Draft initial disclosures and confidentiality agreement (.6); V. KOUVANT: correspondence with W. Dooley regarding settlement (.1).	0.7	\$173.25
3/1/2011	RJ	CLOUDS: Correspondence with S. Firlotte regarding motion for extension to conduct D. Cloud, J. Cloud, and M. Cloud Trust mediations (.3).	0.3	\$58.05
3/2/2011	GM	BUTLER PAPPAS Cases: Prepared response to defendants' motions to dismiss (10.4).	10.4	\$3,276.00
3/2/2011	ML	Legal research regarding arbitration and jurisdiction (3.0); drafted opposition to motions to compel arbitration (6.0); LOBDELL: exchange correspondence with M. Lobdell regarding order dismissing case (.2).	9.2	\$2,484.00
3/2/2011	AV	Research federal rule and case law on amended pleadings and relation back (1.0); draft memo regarding same (.7).	1.7	\$420.75
3/2/2011	JDM	Research caselaw regarding federal statutes or policies rendering claims nonarbitrable (1.5).	0.9	\$174.15
3/3/2011	GM	BUTLER PAPPAS Cases: Prepared response to defendants' motions to dismiss and to strike (9.5); considered case management report drafts (.4).	9.9	\$3,118.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
3/3/2011	ML	Drafted opposition to motions to compel arbitration (8.5); CHARITIES: drafted opposition to motions to dismiss (1.0).	9.5	\$2,565.00
3/3/2011	AV	Review and corroborate information for background section of omnibus brief regarding motions to dismiss (1.0); investigate amount of investor (1.8); review and revise omnibus brief regarding motion to dismiss (2.0); research case law regarding same (.8); prepare case management reports for Group 6, 7, 8, and 9 investors (.6).	6.2	\$1,534.50
3/3/2011	JDM	Research caselaw regarding inherent conflict between arbitration and federal statute/policy of receivership (2.4).	2.4	\$516.00
3/3/2011	RJ	Correspondence with S. Firlotte regarding nunc pro tunc orders for extension of time to mediate (.2).	0.2	\$38.70
3/3/2011	MG	CHARITIES: Assist with compilation of total investors and investor claim amounts in preparation for our motion to dismiss and motion to strike (.7).	0.7	\$98.00
3/4/2011	GM	BOSHART: considered response to motion for summary judgment (.3); V. LEE: revised response to motion to strike (1.0); SETTLAGE: considered matters regarding defendant's bankruptcy case (.2); JAMES RIVER: communications with defendant's counsel regarding status (.1); V. LEE: addressed discovery matters regarding case (.2); WARREN, BARLOW and WOF Cases: considered arguments in response to motion to compel arbitration (1.0); V. LEE: reviewed proposed resolution of certain claims in case (.3).	3.1	\$976.50
3/4/2011	ML	Draft opposition to motions to compel arbitration (4.5); draft response to motion to strike and/or stay (2.0); receive and review proposed settlement agreement (.4); M. BURGESS: draft motion to dismiss (.2); WOF: draft correspondence to counsel regarding extension of time to respond to motion (.2); receive and review motions to enlarge time to mediate (.2).	7.5	\$2,025.00
3/4/2011	AV	Prepare case management reports for Group 2, 6, 7, and 8 investors (.5); review and analyze claims against charitable organizations (.6); review "donations" made to Sarasota Ballet and Sarasota Arts Council (.4); draft memo to Receiver regarding "donations" made to Sarasota Ballet and Sarasota Arts Council (.4); correspondence with M. Usher regarding mediation for Habitat for Humanity (.2); correspondence to G. McLain regarding Jazz Club of Sarasota (.2); GIRLS, INC.: telephone to M. Low (.2); telephone to J. Collier regarding Community Aids Network (.3).	2.8	\$693.00
3/4/2011	JDM	Research caselaw regarding legislative policy and purpose of 28 USC 754 (1.3).	1.3	\$279.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/4/2011	JR	Confirm checks from investors have cleared and prepare memo to Mr. Rehus, Mr. Lamont, Mr. Jamieson and Mr. Morello regarding same (.3).	0.3	\$42.00
3/4/2011	MRS	Prepare binders with cited cases (1.6); prepare index for cited cases (.4).	2.0	\$280.00
3/6/2011	RJ	Research for opposition to motions to compel arbitration regarding lack of signatures on arbitration agreements and burden of proof on movant (2.0).	2.0	\$387.00
3/7/2011	GM	Reviewed documents regarding potential investor (.2); WARREN, BARLOW and WOF Cases: work on response to motions to compel arbitration (1.8).	2.0	\$630.00
3/7/2011	ML	Draft opposition to motion to compel arbitration (3.5); CLOUDS: prepare for mediation regarding Clouds (2.0); D. CLOUD: analyze claims D. Cloud regarding B. Diamond (.5); drafted mediation statement (.5); S. RICHTER: prepare for mediation (.7); draft correspondence to P. Grilli regarding mediation (.2); LETELLIER: draft motion to approve settlement (.3); LETELLIER: draft correspondence to S. Masel regarding motion to approve (.1); LETELLIER: draft correspondence to J. Malone regarding order approving settlement (.2); TRACHTENBERG: analyze proposed changes to settlement (.3); telephone call with M. Rodgers regarding extension to respond to motion to dismiss (.2).	8.5	\$2,295.00
3/7/2011	AV	Prepare case management reports regarding Group 2, 6, 7, 8 investors (1.0); S. ELLIS: draft supplemental initial disclosures (.2); telephone from A. Osburn regarding All Children's Hospital Guild tolling agreement (.2).	1.4	\$346.50
3/7/2011	RJ	D. CLOUD: Prepare calculation of interest on false profits (.2); M. CLOUD TRUST: prepare interest calculation (.2); J. CLOUD: prepare interest calculation (.2); S. RICHTER: prepare interest calculation (.2).	0.8	\$154.80
3/7/2011	MG	Research and pull documents supporting the deposits and withdrawals of investors money in preparation for mediation (4.8).	4.8	\$672.00
3/7/2011	MRS	Prepare binders with cited cases (2.5).	2.5	\$350.00
3/8/2011	GM	J. CLOUD: Considered matters relating to mediation (.3); WARREN, BARLOW Cases: work on response to motions to compel arbitration (2.8); BUHL: reviewed motion to dismiss complaint (.3); work on case management reports (.2).	3.6	\$1,134.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET		Asset Analysis and Recovery		
3/8/2011	ML	J. CLOUD and D. CLOUD: Prepare for and attend mediation (4.5); S. RICHTER: prepare for and attend mediation (2.5); draft settlement agreement (.4); TRACHTENBERG: consider settlement with Receiver (.4).	7.8	\$2,106.00
3/8/2011	AV	Prepare case management reports regarding Group 2, 6, 7, 8, and 9 investors (1.0).	1.0	\$247.50
3/8/2011	JDM	Research legislative history of 28 USC 754 (1.1).	1.1	\$212.85
3/9/2011	GM	JAMES RIVER: Finalized settlements of James River cases (.6); addressed matters regarding case management reports (.4); WARREN, BARLOW and WOF Cases: work on opposition to motion to compel arbitration (2.1); work on discovery requests (.6).	3.7	\$1,165.50
3/9/2011	ML	C. TRACHTENBERG: Revised settlement agreement (.3); C. TRACHTENBERG: receive and review correspondence from counsel regarding settlement (.1); receive and review correspondence from E. Assouline regarding settlement (.1); R. FAGIN: receive and reievw correspondence from E. Gluck regarding settlement (.1); R. FAGIN: draft correspondence to E. Gluck regarding settlement (.2); drafted motion for enlargement of time to respond to motion to dismiss (.3); exchange correspondence with M. Rogers regarding enlargement of time (.2); JAMES RIVER: receive and review executed settlements (.1); JAMES RIVER: draft motion to approve settlements (.5); JAMES RIVER: draft notice of settlement (.2); draft opposition to motions to compel (7.0).	9.1	\$2,457.00
3/9/2011	AV	Prepare case management reports regarding Group 2, 6, 7, 8, and 9 investors (4.0); J. WARREN cases: correspondence and telephone call with J. Warren regarding case management reports (.3); WOF: draft motion to extend deadline for response to motion to compel arbitration (.5).	4.8	\$1,188.00
3/9/2011	JDM	Research legislative history of 28 USC 754 (.8); correspond with Stetson and USF regarding Congressional Record and House Report Availability (.2).	1.0	\$215.00
3/10/2011	GM	Addressed case management matters for clawback cases (.4); reviewed orders on motions for default judgments (.2); JAMES RIVER: addressed matters regarding settlements (.2); S. ELLIS: reviewed defendant's Rule 26 disclosures (.1); WARREN, BARLOW and WOF Cases: work on response to motions to compel arbitration (4.0).	4.9	\$1,543.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/10/2011	ML	J. CLOUD: Exchange correspondence with counsel regarding extension of time (.2); D. CLOUD: exchange correspondence with counsel regarding extension of time (.2); J. CLOUD and D. CLOUD: review draft motion for extension of time (.2); B. BLACK: receive and review correspondence from O. Rarric regarding revisions to settlement agreement (.1); B. BLACK: analyze proposed revisions to settlement agreement (.4); receive and review default judgments (.4); H. BUHL: receive and review correspondence from counsel regarding enlargement of time (.1); S. RICHTER: receive and review correspondence from counsel (.2); legal research regarding response to motion to compel arbitration (2.0); draft opposition to motion to compel arbitration (5.2).	9.0	\$2,430.00
3/10/2011	AV	Review and revise case management reports regarding Group 2, 6, 7, 8, and 9 investors (2.5); multiple conference calls with various counsel regarding case management reports (1.5); J. WILLIAMS (JORDAN): draft motion to extend (.4); V. KOUVANT: correspondence with W. Dooley regarding Rule 16 conference (.1).	4.5	\$1,113.75
3/10/2011	RJ	Researching signatures and conduct on agreements as evidence of mutual assent, and exceptions to assent requirement, and drafting memo regarding same in connection with opposition to M. Barlow's Motions to Compel Arbitration (8.3).	8.3	\$1,606.05
3/10/2011	JR	Communicate with Ben at Windsearch regarding status of bank record searches and communicate with Mr. Lamont regarding same (.1).	0.1	\$14.00
3/11/2011	GM	Addressed collection efforts for default judgments (.2); addressed case management report matters (.3); J. WILLIAMS (Jordan): considered potential resolution of clawback case against defendant (.4); WARREN, BARLOW and WOF Cases: prepared response to motions to compel arbitration (5.1); C. TENG: reviewed default judgment against defendant (.1).	6.1	\$1,921.50
3/11/2011	ML	J. WILLIAMS: Receive and review order regarding sale of jewelry (.1); J. WILLIAMS: draft motion for enlargement of time for defendant to respond (.3); V. KOUVANT: draft notice of settlement (.1); J. CLOUD and D. CLOUD: receive and review orders regarding extension (.2); WARREN, BARLOW and WOF cases: legal research regarding response to motions to compel arbitration (2.0); WARREN, BARLOW and WOF cases: draft opposition to motions to compel arbitration (6.0).	8.7	\$2,349.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
3/11/2011	AV	Review and revise case management reports re: Groups 2, 6, 7, 8, and 9 (1.6); telephone calls and correspondence with various counsel regarding case management reports (1.0); telephone calls with pro se defendants regarding case management reports (.5); DANCING \$: draft case management report (.4); DANCING \$: telephone call and correspondence to counsel for defendant (.2); J. WILLIAMS (JORDAN): correspondence to defendant regarding motion for extension and ordered entered by the Court (.2).	3.9	\$965.25
3/11/2011	JDM	Research caselaw regarding adverse-interest exception/appointment of receiver as equitable relief/independent entity status of limited partnership (2.2).	2.2	\$425.70
3/11/2011	RJ	Research and revise memo regarding signatures and conduct on agreements as evidence of mutual assent, and exceptions to assent requirement (3.7).	3.7	\$715.95
3/11/2011	JR	Receipt and review of mediation invoices and communicate with Sharon at PDR regarding same (.1); J. WILLIAMS (JORDAN): receipt and review of Windsearch results regarding defendant and communicate with Mr. Lamont regarding same (.1).	0.2	\$28.00
3/11/2011	MRS	Prepare binders with cases cited in motion (4.0).	4.0	\$560.00
3/12/2011	GM	WARREN, BARLOW and WOF Cases: Prepared response to motions to compel arbitration (4.7).	4.7	\$1,480.50
3/12/2011	ML	WARREN, BARLOW and WOF cases: Draft opposition to motions to compel arbitration (4.0).	4.0	\$1,080.00
3/13/2011	GM	WARREN, BARLOW and WOF Cases: Prepared response to motions to compel arbitration (4.1).	4.1	\$1,291.50
3/13/2011	JDM	Research issues for inclusion in Receiver's response to defendants' motion to compel arbitration and summarize in email to M. Lamont and G. Morello (.8).	0.8	\$154.80
3/13/2011	RJ	Research regarding imposition of constructive trust on fraudulent funds (2.0); research regarding parties being equitably estopped from avoiding arbitration where their claims are based upon the contract containing the arbitration clause (1.0).	3.0	\$580.50
3/14/2011	GM	Prepared for and attended Rule 16 conferences (2.0); WARREN, BARLOW and WOF Cases: worked on response to motions to compel arbitration (7.1); BURNS: reviewed default judgment (.1); DANCING \$: reviewed motion to dismiss (.3).	9.5	\$2,992.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
3/14/2011	ML	WARREN, BARLOW and WOF cases: Draft opposition to defendants' motion to compel arbitration (11.0); receive and review orders regarding administrative closures (.1); receive and review correspondence from K. Mather regarding settlement (.2); V. LEE: draft settlement agreement regarding V. Lee's daughters (.2); B. BLACK: draft correspondence to E. Assouline regarding settlement (.2).	11.7	\$3,159.00
3/14/2011	AV	DANCING \$: Correspondence with P. Stillman regarding case management report and motion to dismiss (.3); DANCING \$: review motion to dismiss (.8).	1.1	\$272.25
3/14/2011	JDM	Draft section addressing adverse-interest exception for inclusion in omnibus response to defendants' motion to compel arbitration (2.8); revise argument regarding Defendant has not carried burden to prove existence of agreement for inclusion in Receiver's omnibus response in opposition to defendants' motion to compel arbitration (1.9); research adverse-interest exception to agency and applicable caselaw (1.8).	6.5	\$1,257.75
3/14/2011	RJ	J. WARREN, T. BARLOW and WOF cases: Research regarding opposition to defendants' motions to compel arbitration regarding equitable estoppel of non-signatories to arbitration agreements, evidentiary standard for proving agreements, and investment company 3(c)(1) and 3(c)(7) exclusions (3.1).	3.1	\$599.85
3/15/2011	GM	WARREN, BARLOW and WOF Cases: Worked on response to motions to compel arbitration (10.6).	10.6	\$3,339.00
3/15/2011	ML	Telephone call with K. Mather regarding settlement (.2); legal research regarding securities law violations (2.5); WARREN, BARLOW and WOF cases: draft opposition to motions to compel arbitration (9.0).	11.7	\$3,159.00
3/15/2011	AV	S. ELLIS: Draft supplemental initial disclosures (.3); telephone call and correspondence with J. Collier regarding Community Aids Network (.5); draft chart regarding collections of final default judgments (.4).	1.2	\$297.00
3/15/2011	JDM	Revise Receiver's omnibus response in opposition to defendants' motion to compel arbitration (3.9); research caselaw regarding purpose of Receivership (1.0); revise argument regarding existence of contract and proving mutual assent for inclusion in Receiver's omnibus response to defendants' motion to compel arbitration (1.6); research cases cited in In re Randy for inclusion in Receiver's omnibus response in opposition to defendants' motion to compel arbitration (2.5).	9.0	\$1,741.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
3/16/2011	GM	WARREN, BARLOW and WOF Cases: work on response to motions to compel arbitration and file same with court (11.1).	11.1	\$3,496.50
3/16/2011	ML	WARREN, BARLOW, and WOF cases: Draft opposition to motions to compel arbitration (12.0); WARREN, BARLOW, and WOF cases: legal research regarding response to arbitration (2.0); WARREN, BARLOW, and WOF cases: draft declaration of G. Morello in support of motion (1.0).	15.0	\$4,050.00
3/16/2011	AV	BOSHART: draft response regarding defendant's motion to dismiss (2.0); BOSHART: review investor file (.5); research case law on liability for money held in joint tenancy and tenancy in common (2.0); H. BUHL: correspondence with K. Morgan (.1); H. BUHL: draft motion for extension of time regarding defendant's motion to dismiss (.4).	5.0	\$1,237.50
3/16/2011	JDM	J. WARREN, T. BARLOW, and WOF Cases: Edit and revise Receiver's omnibus response to defendants' motion to compel arbitration (8.1); draft and complete Declaration of G. Morello in support (1.2); draft parenthetical regarding imputation of agent acts to principal for inclusion in Receiver's omnibus response (.9); research ability of judge to take judicial notice of proceedings in other cases (1.3).	11.5	\$2,225.25
3/17/2011	GM	WARREN, BARLOW and WOF Cases: Communications with defense counsel regarding request for reply (.1); considered strategy for various clawback cases (1.1).	1.2	\$378.00
3/17/2011	ML	V. KOUVANT: Receive and review email from Court regarding status of approval (.1); telephone call with Chambers regarding status of approval (.2); receive and review multiple correspondence regarding extension to serve reply (.4).	0.7	\$189.00
3/17/2011	AV	Telephone to S. Newton with Judge Kovachevich's chambers regarding omnibus briefs (.1); BOSHART: research Florida's probate code and draft response to motion for summary judgment Boshart (1.0); V. KOUVANT: review and revise settlement (.4).	1.5	\$371.25
3/17/2011	JDM	Research caselaw regarding entitlement to further discovery to contest existence of Ponzi Scheme (1.2).	1.2	\$258.00
3/18/2011	GM	BUSH ROSS Cases: Communications with L. Pilkington regarding reply (.1); OMNIBUS: work on motion for partial summary judgment (1.7).	1.8	\$567.00
3/18/2011	ML	WARREN, BARLOW, and WOF cases: Receive and review motions for leave to serve reply in support of motion to compel arbitration (.3); WARREN, BARLOW, and WOF cases: receive and review orders granting leave (.2).	0.5	\$135.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/18/2011	AV	DANCING \$: Teleconference with P. Stillman regarding case management report (.8); BOSHAART: draft response to motion for summary judgment (1.2).	2.0	\$495.00
3/18/2011	JDM	Research preclusive effect of guilty plea to establish ponzi scheme and to preclude discovery (1.2).	1.2	\$232.20
3/18/2011	JR	Confirm deposited investor settlement checks have cleared and prepare memo to Mr. Lamont, Mr. Jamieson, Ms. Rehus and Mr. Morello regarding same (.2); receipt of wire transfer information from Bay Cities and communicate with Mr. Lamont, Mr. Morello, Mr. Jamieson, Ms. Rehus and Sharon at PDR regarding same (.2).	0.4	\$56.00
3/21/2011	GM	MUNSONS: Communications with defense counsel regarding service (.1); MUNSONS: reviewed and considered motion to quash service of process (.4); OMNIBUS: work on motions for partial summary judgment (6.3).	6.8	\$2,142.00
3/21/2011	ML	Telephone call with S. Topolski regarding motion to quash (.2); analyze motion to quash (.3); work on settlements regarding C. Trachtenberg, Black, and Berger (1.0); consider status of settlements with Receiver (.5).	2.0	\$540.00
3/21/2011	AV	BOSHAART: Review and revise notice of dismissal (.2); MUNSONS: correspondence from opposing counsel and review motion to quash service regarding Munsons and Munson Family Partnership (.3); BOSHAART: draft opposition to defendant's motion for summary judgment (1.7).	2.2	\$544.50
3/21/2011	JDM	Research caselaw regarding preclusive effect of guilty plea on subsequent civil proceeding; research standard of review under Rule 56f discovery motion; research collateral estoppel issue regarding guilty plea (5.5).	5.5	\$1,182.50
3/21/2011	JJP	WOF: Meeting with G. Morello to discuss opposition to defendant's motion to dismiss (1.0); reviewing background materials, including amended complaint (3.2); reviewing and analyzing motion to dismiss and arguments raised therein (3.9).	8.1	\$2,004.75
3/21/2011	RJ	SHEADE: Telephone call with D. Maglich regarding mediation and deadlines (.2).	0.2	\$38.70
3/21/2011	JR	Receipt of wire transfer information from Bay Cities and communicate with Mr. Lamont, Mr. Morello, Mr. Jamieson, Ms. Rehus and Sharon at PDR regarding same (.1).	0.1	\$14.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/22/2011	GM	Communications with M. Lamont regarding status and strategy (.4); B. BLACK: revised settlement (.2); JAMES RIVER: finalized matters regarding James River settlements (.2); V. LEE: prepared motion regarding discovery and preclusive effect of guilty plea (2.2); SEWELL SOLUTIONS: revised letter to C. Sewell (.2).	3.0	\$945.00
3/22/2011	ML	Work on pending motions to dismiss (1.5); B. BLACK: revise settlement (.5); B. BLACK: draft correspondence to O. Rarric regarding settlement (.2); C. TRACHTENBERG: draft motion to approve settlement (.5); C. TRACHTENBERG: draft notice of settlement (.2); C. TRACHTENBERG: draft correspondence to S. Masel regarding motion to approve (.1); draft correspondence to H. Haskins regarding financial statement (.1); M. CORCIONE: draft correspondence to defendant regarding settlement check (.2); drafted correspondence to E. Assouline re: status of settlement agreement (.1); EFG BANK: prepare for mediation (.7); exchange correspondence with D. Holmes regarding mediation (.2); LETELLIER: drafted motion to dismiss with prejudice (.2); drafted correspondence to J. Malone regarding dismissal (.1).	5.1	\$1,377.00
3/22/2011	AV	BOSHART: Draft opposition brief regarding defendant's motion for summary judgment (3.4).	3.4	\$841.50
3/22/2011	JJP	WOF: Draft outline of arguments raised by defendant in its motion to dismiss (2.3); WOF: reviewing and analyzing cases cited and arguments raised in motion to dismiss (5.9).	8.2	\$2,029.50
3/22/2011	MG	Research and pull documents supporting the deposits and withdrawals in preparation for mediation (1.5).	1.5	\$210.00
3/23/2011	GM	V. LEE/MEEKER/MORGAN: Teleconference with P. Thanasides regarding discovery matters (.2); WOF: considered response to motion to dismiss by defendant (2.6); V. LEE: considered matters regarding case (.2); V. LEE: work on motion to limit discovery (2.4).	5.4	\$1,701.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/23/2011	ML	Receive and reivew order granting motion to approve (.1); TRACHTENBERG: exchange correspondence with counsel for defendant regarding order (.2); TRACHTENBERG: drafted correspondence to counsel for defendant regarding settlement agreement (.2); receive and review orders dismissing cases (.1); drafted correspondence to J. Malone regarding dismissal (.1); V. LEE: receive and review revised settlement agreement regarding V. Lee's daughters (.3); revise settlement agreement (.3); V. LEE: drafted correspondence to E. Assouline regarding revised agreement (.2); work on oppositions to motions to dismiss (2.7); drafted correspondence to T. Barlow regarding mediation (.1).	4.3	\$1,161.00
3/23/2011	AV	Review and revise opposition to motion for summary judgment (3.0); review case law cited by defendant (2.0).	5.0	\$1,237.50
3/23/2011	JDM	Research caselaw regarding collateral estoppel/claim preclusion (3.4).	3.4	\$657.90
3/23/2011	JJP	WOF: Review and analyze cases cited and arguments raised in defendant's motion to dismiss (8.0).	8.0	\$1,980.00
3/24/2011	GM	V. LEE: Work on motion to limit discovery (6.1); BOSHART: prepared response to motion for summary judgment (3.4); SHEADE: considered potential resolution of case (.3); V. LEE/MORGAN/MEEKER: communications regarding discovery and summary judgment motion (.1); J. WILLIAMS (Jordan): considered possible resolution of case (.1).	10.0	\$3,150.00
3/24/2011	ML	EFG BANK: Prepare for mediation (3.0); EFG BANK: exchange correpndence with parties of EFG regarding mediation (.5); receive and review draft opposition to motion for summary judgment (.4); exchange correspondence with D. Maglich regarding motion to extend deadlines (.2); D&E UNIT TRUST: telephone call with D. Holmes (.3); D&E UNIT TRUST: analyze investor files (.5); D&E UNIT TRUST: drafted correspondence to D. Holmes regarding documents (.3).	5.2	\$1,404.00
3/24/2011	AV	BOSHART: Review and revise opposition brief regarding defendant's motion for summary judgment (3.0); CRESVALE: draft motion and declaration to extend service deadline regarding defendant (.4).	3.4	\$841.50
3/24/2011	JJP	WOF: Research issues and arguments raised in defendant's motion to dismiss (8.0).	8.0	\$1,980.00
3/24/2011	RJ	R. SHEADE: Telephone call and correspondence with D. Maglich regarding mediation and deadlines (.2).	0.2	\$38.70

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
3/24/2011	RJ	EFG and Wachovia interest calculations for mediation (.5); CRESVALE: confer with A. Villoch regarding motion (.2).	0.7	\$135.45
3/25/2011	GM	Reviewed motion to extend time to serve process (.1); prepared for Rule 16 conferences (1.0); TERRELL/J. GRIER: communications with G. Aaronson regarding settlement (.3); WARREN, BARLOW and WOF Cases: reviewed replies regarding motions to compel arbitration (.4); BUSH ROSS Cases: reviewed documents produced by Barrett Capital Management (.4); EFG BANK: research regarding clawback suits against defendant and "mere conduit" defense (3.3).	5.5	\$1,732.50
3/25/2011	ML	EFG BANK: Prepare for and attend mediation (6.0); CARRELAGE: telephone calls with counsel for defendant regarding settlement (.2); B. BLACK: exchange correspondence with O. Rarric regarding settlement (.2).	6.4	\$1,728.00
3/25/2011	JJP	WOF: Research issues and arguments raised in defendant's motion to dismiss (6.5); WOF: draft opposition to motion to dismiss (1.3).	7.8	\$1,930.50
3/25/2011	RJ	CRESVALE: Confer with G. Morello and A. Villoch regarding defendant's motion (.3).	0.3	\$58.05
3/25/2011	JR	Confirm investor settlement checks have cleared and prepare memo to Mr. Lamont, Mr. Jamieson, Mr. Morello and Ms. Rehus regarding same (.2).	0.2	\$28.00
3/28/2011	GM	Attended Rule 16 conferences (2.5); JOHN GRIER and TERRELL: work on settlements (1.0); J. WILLIAMS (Jordan): considered possible resolution (.2); WOF/Sivyer/Bush Ross Cases: reviewed recent caselaw regarding motion to compel arbitration (.7); J. WILLIAMS (Jordan): reviewed case management report (.1).	4.5	\$1,417.50
3/28/2011	ML	Prepare for and attend pretrial conference (3.0); receive and review multiple notices of appearance (.3); exchange correspondence with K. Mather regarding settlement (.2); V. LEE: analyze proposed agreement regarding V. Lee's daughters (.3).	3.8	\$1,026.00
3/28/2011	AV	TERRELLS and JOHN GRIER CONST.: correspondence with G. Morello and G. Aaronson regarding case management reports (.2); DANCING \$: draft motion for extension regarding response to defendant's motion to dismiss (.4); G. BECKER: review and revise notice of settlement and motion for approval regarding settlement (.3); V. KOUVANT: review and revise settlement (.3); J. WILLIAMS (JORDAN): telephone with defendant regarding proposed settlement and Rule 16 conference (.4).	1.6	\$396.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
3/28/2011	JJP	WOF: Research issues and arguments raised in defendant's motion to dismiss (3.1); WOF: draft opposition to defendant's motion to dismiss (5.0).	8.1	\$2,004.75
3/28/2011	RJ	OPM ALPHA: Correspondence with M. Lamont and G. Morello regarding defendant's motion for default judgment, and prepare same (.7); OPM ALPHA: preparation of Receiver's Affidavit in support of motion for default judgment (1.0).	1.7	\$328.95
3/29/2011	GM	V. LEE: Addressed matters regarding case (.2); V. LEE: reviewed proposed resolution documents with respect to certain defendants (.3); KOUVANT: reviewed proposed settlement papers (.1); V. LEE: communications with P. Thanasides regarding motion to limit discovery (.2).	0.8	\$252.00
3/29/2011	ML	G. BECKER: Drafted motion to approve settlement regarding defendant (.3); G. BECKER: drafted notice of settlement (.2); V. KOUVANT: revised settlement agreement (.4); drafted motion for default judgment (.7); receive and review correspondence from P. Thanasides regarding motion to limit discovery (.1); M. CORCIONE: drafted motion to dismiss (.3); exchange correspondence with D. Maglich's office regarding new dates (.2); EFG BANK: work on settlements with EFG Bank (.5).	2.7	\$729.00
3/29/2011	AV	V. KOUVANT: review and revise settlement (.4); V. KOUVANT: correspondence with B. Dooley regarding settlement (.1); GROUP 2: draft confidentiality agreements (.3); D. BOSHART: telephone call to defendant regarding motion for summary judgment (.2); MUNSONS: correspondence to G. Morello regarding discovery and response to defendants' motion to quash (.1); GROUP 2: work on initial disclosures (.5).	1.6	\$396.00
3/29/2011	JDM	Research caselaw regarding severability presupposes existence of valid contract (1.3).	1.3	\$251.55
3/29/2011	JJP	WOF: Research issues and arguments raised in defendant's motion to dismiss (5.4); WOF: draft opposition to motion to dismiss (2.2).	7.6	\$1,881.00
3/29/2011	RJ	OPM ALPHA: Revise motion for default judgment (.1); research regarding service of process in France under Hague Convention (.5).	0.6	\$116.10
3/29/2011	RJ	Confer with M. Lockwood regarding SEC filing (.2).	0.2	\$38.70
3/30/2011	GM	Reviewed case law regarding arbitration (.7); HILL: considered status of case and next steps (.1); BOSHART: work on response to motion for summary judgment (2.1).	2.9	\$913.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
3/30/2011	ML	EFG BANK: Drafted settlement agreement (.7); CARRELAGE: drafted settlement agreement (.5); analyze pending cases (.3); telephone call with chambers regarding Rule 16 conferences (.3); drafted motions to dismiss without prejudice (.4); consider legal strategy with Receiver (.5); G. HILL: drafted correspondence to G. Hill regarding dismissal of E. Hill case (.1); WOF: drafted opposition to motion to compel (4.0); exchange correspondence with K. Mather regarding settlement (.2); receive and review notice of hearing regarding motions to compel arbitration (.1).	7.1	\$1,917.00
3/30/2011	AV	D. BOSHART: research case law on probate and bank account ownership issues (1.5); D. BOSHART: review evidence provided by J. Rizzo regarding same (.2).	1.7	\$420.75
3/30/2011	DEH	KARLSSON: Prepare materials for service of individuals in Spain through the Hague Convention and confer briefly with R. Jamieson regarding same (.4).	0.4	\$77.40
3/30/2011	RJ	KARLSSON and MASONS: Research Hague convention requirements for service of process in Spain and France for Karlsson suit and Mason suit (1.5).	1.5	\$290.25
3/31/2011	GM	Considered motion regarding preclusive effect of guilty plea (.5); SEWELL: revised letter C. Sewell regarding resolution of case (.2); reviewed various case management orders (.2); V. LEE: communications with P. Thanasides regarding discovery (.1); revised motion to approve settlement (.3); considered amending certain complaints (.3); considered discovery matters (.8); addressed matters regarding initial disclosures (.2).	2.6	\$819.00
3/31/2011	ML	Legal research regarding jurisdiction (1.5); drafted amended complaints (3.0); EFG BANK: drafted correspondence to counsel for defendant regarding amend complaint (.2); WOF: drafted opposition to motion to compel arbitration (3.5); drafted correspondence to E. Assouline regarding settlement agreement (.2); analyze replies in support of motions to compel arbitration (.4).	8.8	\$2,376.00
3/31/2011	AV	J. WARREN Cases: Correspondence with J. Warren regarding confidentiality agreements (.1); GROUP 2: review and revise initial disclosures (.5).	0.6	\$148.50
3/31/2011	JJP	OMNIBUS: Researching omnibus motion for summary judgment regarding Nadel's guilty plea (7.4).	7.4	\$1,831.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/31/2011	RJ	Research regarding personal jurisdiction under Florida long arm statute for foreign entities conducting business in Florida (3.0); OPM ALPHA: revise Motion for Default Judgment and Affidavit in Support (.8); MASON: review and analyze complaint to determine translation needs for French service (.2).	4.0	\$774.00
3/31/2011	JR	D. BOSHART: Review of documentation related to contributions and distributions of investor, per request of Mr. Villoch (.3); D. BOSHART: review response to motion for summary judgment (.2).	0.5	\$70.00
4/1/2011	GM	BOSHART: Work on response to defendant's motion for summary judgment (2.7); OPM ALFA: revised default judgment motion against defendant (.2); OMNIBUS: work on motion for partial summary judgment (3.4).	6.3	\$1,984.50
4/1/2011	ML	OPM ALPHA: Drafted motion for default (.5); WOF: drafted opposition to motion for summary judgment (4.5); D. ZAK: telephone call with counsel for defendant regarding supplement to motion to compel arbitration (.2); D. ZAK: draft correspondence to counsel for defendant regarding scope of supplement (.2); telephone call with M. Burgess regarding settlement papers (.1); M. BURGESS: drafted correspondence to defendant regarding supplement (.1); R. FAGIN: draft motion to dismiss (.1); drafted correspondence to E. Gluck regarding dismissal (.1); legal research regarding statute of limitations (1.0); consider legal issues with Receiver (.4); EFG BANK: revise amended complaint (.7).	7.9	\$2,133.00
4/1/2011	AV	D. BOSHART: Review, revise and reorganize response to motion for summary judgment (2.7).	2.7	\$668.25
4/1/2011	JJP	OMNIBUS: Research omnibus motion for summary judgment regarding Nadel's guilty plea (7.7).	7.7	\$1,905.75
4/1/2011	RJ	R. FAGIN: Prepare dismissal to complaint (.2).	0.2	\$38.70
4/1/2011	JR	Confirm investor settlement checks have cleared and prepare memo to Mr. Lamont, Mr. Morello, Mr. Jamieson and Ms. Rehus regarding same (.2).	0.2	\$28.00
4/2/2011	AV	D. BOSHART: Review, revise and reorganize response regarding defendant's motion for summary judgment (1.1).	1.1	\$272.25
4/4/2011	GM	BOSHART: work on response to defendant's motion for summary judgment (7.8); considered strategy relating to certain clawback cases (1.0); communications with P. Thanasides regarding motion to compel discovery (.3).	9.1	\$2,866.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
4/4/2011	ML	HAILEY, WHITLOCK, SWENSON: Analyze investor files (1.0); consider legal strategy with Receiver (.5); HAILEY, WHITLOCK, SWENSON: drafted amended complaints (2.5); WOF: drafted opposition to motion to compel arbitration (3.0); J, COOK: telephone call with defendant regarding dismissal (.1); drafted correspondence to B. Kirtley regarding dismissal (.1); B. BLACK: drafted correspondence to O. Rarric regarding settlement (.1); EFG BANK: revised settlement (.3); S. ELLIS: analyze financial statement and supporting documents (.5).	8.1	\$2,187.00
4/4/2011	AV	D. BOSHART: Draft, review, and revise Receiver's Declaration in support of response to Boshart's motion for summary judgment (.5); D. BOSHART: draft, review, and revise Morello Declaration in support of response to Boshart's motion for summary judgment (.6); D. BOSHART: prepare and finalize response to motion for summary judgment regarding Boshart (3.0).	4.1	\$1,014.75
4/4/2011	JJP	OMNIBUS: Draft omnibus motion for summary judgment regarding Nadel's guilty plea (8.5).	8.5	\$2,103.75
4/5/2011	GM	WARREN Cases: Reviewed correspondence from J. Warren regarding initial disclosures (.1); J. CLOUD: considered request for extension (.1); MUNSONS: considered service of process issues (.3); LEE/MORGAN/MEEKER: considered proposed stipulation to amend answers (.2).	0.7	\$220.50
4/5/2011	GM	Reviewed correspondence from K. Evans regarding S. Moody Colorado home (.2).	0.2	\$63.00
4/5/2011	ML	J. WARREN, T. BARLOW, and WOF cases: Draft opposition to motion to compel arbitration (3.0); receive and review correspondence from L. Pinkington regarding initial disclosures (.1); work on amended complaints (.5); consider legal strategy with Receiver (.5).	4.1	\$1,107.00
4/5/2011	AV	MUNSONS: telephone with S. Bennett with Bolter & Carr regarding service on defendants (.2); MUNSONS: review returns of service and affidavits (.2); DANCING \$: research case law regarding defendant's motion to dismiss (1.4).	1.8	\$445.50
4/5/2011	JJP	OMNIBUS: Draft omnibus motion for summary judgment regarding Nadel's guilty plea (5.5).	5.5	\$1,361.25
4/6/2011	GM	LEE: reviewed draft motion by defendant to extend deadline (.1); DANCING \$: reviewed proposed case management report (.1); TERELL/GRIER: revised settlement documents and drafted correspondence to G. Aaronson regarding same (2.6); reviewed caselaw regarding motions for partial summary judgment (4.3).	7.1	\$2,236.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
4/6/2011	ML	J. WARREN, T. BARLOW, and WOF cases: Draft opposition to motion to compel arbitration (4.0); legal research regarding in pari delicto (1.5); prepare for oral argument (1.0); EFG BANK: exchange correspondence with counsel for defendant regarding amending complaint (.2); EFG BANK: draft amended complaint (.5).	7.2	\$1,944.00
4/6/2011	AV	Review investor files (.6), correspondence with private investigator (.3), correspondence with process servers (.1), H. BUHL: review defendant's motion to dismiss (.5); V. KOUVANT: revise and finalize defendant's settlement and correspondence to W. Dooley regarding same (.4).	1.9	\$470.25
4/6/2011	RJ	Review and analyze B. Karlsson and M. and C. Mason complaints (.5); correspondence with E. Svensson regarding Swedish complaint (.2); correspondence with M. Kippen regarding French complaint (.2); comparison of English and Swedish complaints (.2); comparison of French and English complaints (.2).	1.3	\$251.55
4/6/2011	RJ	TERRELL and JOHN GRIER CONST.: Interest and installment payment calculations for defendants' settlement payments (.6).	0.6	\$116.10
4/6/2011	MG	KARLSSON: Research for contact information on defendant (.8).	0.8	\$112.00
4/7/2011	GM	Revised settlement agreements (.2); OPM ALFA: addressed matters regarding service of process (.3); D. CLOUD: reviewed answer (.2); WOF: work on response to motion to compel arbitration (6.0).	6.7	\$2,110.50
4/7/2011	ML	EFG BANK: Revised settlement agreement (.4); CARRELAGE: revised settlement agreement (.4); EFG BANK: draft correspondence to counsel for EFG Bank regarding proposed settlement agreement (.2); drafted opposition to motion to compel arbitration (1.0); prepare for oral argument (.5); drafted amended complaints (.8); S. ELLIS: analyze documents produced by defendant (.5); S. ELLIS: draft correspondence to H. Haskins regarding defendant's documents (.2); CLOUD: receive and review motions for enlargement of time (.2); D. CLOUD: receive and review answer and affirmative defenses (.4); S. MORGAN: analyze client file (.5).	5.1	\$1,377.00
4/7/2011	AV	DANCING \$: Review, revise and finalize case management report (.4); MUNSONS: correspondence and telephone call with private investigator regarding location and service on the defendants (.4); correspondence and telephone call with process server regarding same (.2).	1.0	\$247.50

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
4/7/2011	RJ	MASONS: Correspondence with M. Kippen regarding French translation of complaint and review of Hague requirements for service in France (.3); B. KARLSSON: correspondence with E. Svensson regarding Swedish translation of complaint and review of requirements for service in Sweden (.3); B. KARLSSON: review and analyze file for identifiable information and assessment of various methods of service in Sweden (.5); S. ELLIS: review and analyze investor file, financial statements, complaint, financial affidavit, and research property ownership (1.0).	2.1	\$406.35
4/7/2011	JR	LOFGREN: Receipt of information regarding wire transfer (.1); LOFGREN: communicate with Mr. Lamont, Mr. Jamieson, Mr. Morello Ms. Rehus and Sharon at PDR regarding same (.1).	0.2	\$28.00
4/8/2011	GM	EFG BANK: Revised amended complaint against defendant (3.4); revised settlement agreement (.3); SHEADE: reviewed amended scheduling order (.1); DANCING \$: reviewed scheduling order (.1); S. MOODY: prepared correspondence to S. Moody regarding Colorado home (.3).	4.2	\$1,323.00
4/8/2011	ML	J. WARREN, T. BARLOW, and WOF cases: Legal research regarding cases cited by defendants in support of motion to compel arbitration (2.5); J. WARREN, T. BARLOW, and WOF cases: draft opposition to motion to compel (1.2); J. WARREN, T. BARLOW, and WOF cases: consider legal strategy regarding motion to compel arbitration (1.5); receive and review orders regarding enlargement of time (.1); receive and review amended scheduling order (.2); CARRELAGE: revise settlement agreement (.4); EFG BANK: draft amended complaint (.7); EFG BANK: exchange correspondence with counsel for defendant regarding response to complaints (.2).	6.8	\$1,836.00
4/8/2011	AV	D. CLOUD: Correspondence and telephone call with opposing counsel regarding case management report (.3); MUNSONS: correspondence and telephone call with private investigators (.3); DANCING \$: research case law regarding defendant's motion to dismiss (1.1).	1.7	\$420.75
4/8/2011	JDM	Research caselaw regarding ultra vires goes to existence of contract (1.0).	1.0	\$215.00
4/8/2011	RJ	KCL CORP: Prepare notice of failure to mediate (.2); M. JOUBERT: prepare notice of failure to mediate (.2); B. LINSTED: prepare notice of failure to mediate (.2); research regarding personal jurisdiction over foreign scoop investors (1.7).	2.3	\$445.05

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
4/8/2011	JR	Confirm investor checks and cleared and communicate with Mr. Lamont, Mr. Morello, Mr. Jamieson and Ms. Rehus regarding same (.1).	0.1	\$14.00
4/11/2011	GM	MASONS: Addressed service of process matters (.3); WOF: prepared response to motion to compel arbitration (8.8).	9.1	\$2,866.50
4/11/2011	ML	J. WARREN, T. BARLOW, and WOF cases: Draft opposition to motion to compel arbitration (.5); J. WARREN, T. BARLOW, and WOF cases: prepare for oral argument (.5).	1.0	\$270.00
4/11/2011	AV	D. CLOUD: Correspondence and telephone call with opposing counsel regarding case management report (.2); D. CLOUD: review and revise case management report (.3); B. MEEKER and D. BOSHART: draft confidentiality agreements (.4); SETTLAGE: telephone with B. White and L. Starr regarding bankruptcy (.3); H. BUHL: research case law regarding motion to dismiss (1.3).	2.5	\$618.75
4/11/2011	JDM	Research caselaw regarding ultra vires goes to existence of contract (2.7).	2.7	\$580.50
4/12/2011	GM	WOF: Drafted response to defendant's motion to compel arbitration (7.5); SEWELL: reviewed correspondence from C. Sewell (.2); reviewed scheduling order (.1); preliminary review of discovery requests (.3).	8.1	\$2,551.50
4/12/2011	ML	J. WARREN, T. BARLOW, and WOF cases: Draft opposition to motion to compel (.5); J. WARREN, T. BARLOW, and WOF cases: reviewed cases cited by defendants (1.5); J. WARREN, T. BARLOW, and WOF cases: prepare for oral argument (1.0); S. RICHTER: telephone call with K. Mather regarding settlement (.2); S. RICHTER: revised settlement agreement (.2); S. RICHTER: draft correspondence to K. Mather regarding revised settlement agreement (.1); B. LINSTAD: draft notice of failure to mediate (.1); SEWELL: receive and review correspondence from C. Sewell regarding dismissal (.2); SEWELL: draft correspondence to C. Sewell regarding settlement (.4); J. WARREN, T. BARLOW, and WOF cases: receive and review motion to supplement motion to compel arbitration (.2); D. ZAK: telephone call with counsel for defendant regarding motion (.2); D. ZAK: draft correspondence to counsel for defendant confirming conversation (.2); S. RICHTER: consider settlement issues with Receiver regarding defendant (.3); S. RICHTER: exchange correspondence with K. Mather regarding revisions to settlement agreement (.2).	5.3	\$1,431.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET		Asset Analysis and Recovery		
4/12/2011	AV	Review consolidated financial statements (.5); GIRLS, INC.: telephone call to M. Low at PDR consultants regarding Girls, Inc.'s financial condition (.1).	0.6	\$148.50
4/12/2011	JDM	Research caselaw regarding ultra vires goes to existence/authority of contract (2.0).	2.0	\$430.00
4/12/2011	RJ	MASONS: correspondence with M. Kippen regarding French complaint and service in France (.3); MASONS: research regarding service of process in France, use of huissiers, service through central authority and service by mail (1.2); B. KARLSSON: research regarding service of process in Sweden, service via mail and service via central authority (.5); S. RICHTER: revise settlement agreement and calculate interest on settlement payments (.3); B. LINSTEAD: research regarding personal jurisdiction for motion to dismiss (1.0).	3.3	\$638.55
4/13/2011	GM	SETTLAGE: Considered matters regarding S. Settlege bankruptcy (.3); S. MOODY: communications with K. Evans regarding Colorado home (.1); reviewed certain documents regarding Nadel trading documents (.5); SEWELL: reviewed correspondence regarding resolving claims (.1); considered matters regarding proposals for settlement (1.1); WOF: prepared response to motion to compel arbitration (6.3).	8.4	\$2,646.00
4/13/2011	ML	C. SEWELL: Drafted correspondence to C. Sewell regarding settlement (.2); S. RICHTER: telephone call with K. Mather regarding settlement agreement (.2); S. RICHTER: revised settlement agreement (.4); S. RICHTER: drafted correspondence to K. Mather regarding agreement (.2); work on proposals for settlement (.8); revised amended complaints (1.); consider legal strategy with Receiver regarding amended complaints (.4); analyze transcript of R. Lundenberg of Barrett Capital (2.0); V. KOUVANT: exchange correspondence with S. Masel regarding settlement (.2); J. WARREN, T. BARLOW, and WOF cases: drafted response to motion to compel arbitration (1.5); J. WARREN, T. BARLOW, and WOF cases: prepare for oral argument (.4).	7.1	\$1,917.00
4/13/2011	AV	V. KOUVANT: Correspondence with W. Dooley (.3); draft motion to approve settlement (.2); GIRLS, INC.: telephone to J. Patterson and request financial information for mediation (.2); correspondence with W. Sypherd and R. Wilkes regarding deficiency judgments (.2); H. BUHL: research case law regarding motion to dismiss (.7).	1.6	\$396.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
4/13/2011	JR	Review of documentation regarding recovery of jewelry from S. Moody per request of Mr. Morello (.2); communicate with Mr. Morello regarding recovery of jewelry from S. Moody (.1).	0.3	\$42.00
4/14/2011	GM	WOF: Finalized response to motion to compel arbitration (10.1); ZAK: reviewed supplements to motion to compel arbitration filed by defendant (.3).	10.4	\$3,276.00
4/14/2011	ML	D. ZAK: Receive and review supplement to motion to compel arbitration (.2); D. ZAK: drafted opposition to motion to compel arbitration (8.5); D. ZAK: legal research regarding arbitration (2.0); exchange correspondence with T. Barlow regarding mediation (.2).	10.9	\$2,943.00
4/14/2011	AV	Review and finalize initial disclosures regarding Meeker, Lawrence, Schneiderman, and Boshart (.5); telephone with W. Sypherd regarding deficiency judgment (.2); review order denying Holmes' motion to quash (.2); D&E UNIT TRUST: draft motion for limited discovery (.8); GIRLS, INC.: correspondence with J. Patterson regarding Girls, Inc.'s financials (.2); correspondence with M. Low regarding same (.1).	2.0	\$495.00
4/14/2011	JDM	Research caselaw regarding duties of court in reviewing motion to compel arbitration and compose email to M. Lamont (.5).	0.5	\$96.75
4/14/2011	RJ	B. KARLSSON: multiple emails with E. Svensson regarding Swedish complaint (.4); MASONS: email M. Kippen regarding complaint in French and service in France by huissiers (.2); B. KARLSSON: research regarding validity of service of process by mail in Sweden (2.0).	2.6	\$503.10
4/15/2011	GM	Reviewed various initial disclosures (.3); LINSTAD: reviewed motion to dismiss based on lack of personal jurisdiction (.2); TERRELL/GRIER: communications with G. Aaronson regarding settlement (.1); OMNIBUS: work on motion for partial summary judgment (5.8); considered strategy for proposals for settlement (.7).	7.1	\$2,236.50
4/15/2011	ML	Drafted amended complaints (2.0); consider proposals for settlement with Receiver (.5); drafted proposals for settlement (.5).	3.0	\$810.00
4/15/2011	AV	EFG BANK and D&E UNIT TRUST: draft subpoena to D. Holmes and B. Segal (.7); GIRLS, INC.: telephone with PDR accountants (.3); GIRLS, INC.: prepare for mediation conference (1.0); H. BUHL: research case law regarding motion to dismiss (1.0); W. SYPHERD: telephone call and correspondence with W. Sypherd regarding settlement (.2).	3.2	\$792.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	ASSET	Asset Analysis and Recovery		
4/15/2011	RJ	B. LINSTEAD: Research regarding personal jurisdiction for opposition to motion to dismiss (1.8); B. KARLSSON: Research regarding foreign service of process by mail for complaint (.8).	2.6	\$503.10
4/16/2011	GM	LINSTEAD: Considered response to motion to dismiss (.2).	0.2	\$63.00
4/16/2011	RJ	Research regarding personal jurisdiction over foreign Ponzi scheme investors (1.0); B. LINSTEAD: review and analyze motion to dismiss for lack of personal jurisdiction (1.2); B. LINSTEAD: review and analyze case law cited in motion (2.8).	5.0	\$967.50
4/17/2011	AV	GIRLS, INC.: Review documents and financial records regarding mediation (1.0).	1.0	\$247.50
4/18/2011	GM	TERRELL: Revised settlement agreement (2.2); reviewed amended complaints (.8); revised proposals for settlement (.4); communications with P. Grilli regarding mediation of Girls, Inc. matter (.3); EFG BANK: research regarding "mere conduct" defense raised by defendant (1.2).	4.9	\$1,543.50
4/18/2011	ML	Drafted amended complaints (1.0); B. LINSTEAD: receive and review motion to dismiss (.5); B. LINSTEAD: legal research regarding cases cited by defendant (1.0); B. BLACK: telephone call to O. Rarric regarding settlement (.1); EFG BANK: exchange correspondence with A. Newman regarding extension of time for defendant to respond (.2); EFG BANK: drafted correspondence to K. Mather regarding wire instructions (.1); SCHNEIDERMAN: drafted correspondence to counsel for defendant regarding documents (.2); K. LAWRENCE: receive and review correspondence from counsel for defendant regarding documents (.1); T. BARLOW, J. WARREN and WOF cases: legal research regarding arbitration (1.5); T. BARLOW, J. WARREN and WOF cases: prepare for hearing on motions to compel arbitration (1.5).	6.2	\$1,674.00
4/18/2011	AV	GIRLS, INC.: Prepare for and attend mediation conference (5.5).	5.5	\$1,361.25
4/18/2011	RJ	GIRLS, INC.: Calculate interest on distributions for mediation (.4); B. LINSTEAD: research regarding personal jurisdiction to prepare opposition to motion to dismiss (2.6); M. JOUBERT: prepare motion for clerk's default (.3); KCL CORP.: prepare motion for clerk's default (.4); M. JOUBERT: prepare motion for default judgment (.3); KCL CORP.: prepare motion for default judgment (.3).	4.3	\$832.05
4/19/2011	GM	OMNIBUS: Revised motion for partial summary judgment (7.7); revised motions regarding proposals for summary judgment (.8); TERRELL/GRIER: communications with G. Aaronson regarding settlement (.1).	8.6	\$2,709.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
4/19/2011	ML	Legal research regarding prejudgment interest (3.5); proposals for settlement (1.0); consider proposals for settlement with Receiver (.4); draft proposals for settlement (1.0); KCL CORP. and M. JOUBERT: draft motions for clerk's default (.6); G. HILL: exchange correspondence with Mr. Hill regarding settlement payment (.2); EFG BANK: exchange correspondence with K. Mather regarding settlement agreement (.2).	6.9	\$1,863.00
4/19/2011	AV	V. KOUVANT: Correspondence with W. Dooley regarding settlement (.1); W. SYPHERD: draft letter to defendant regarding receipt of final settlement payment (.6); V. LEE: correspondence with P. Thanasides and G. Morello regarding V. Lee and omnibus motion to limit discovery (.2); H. BUHL: draft response to motion to dismiss (1.7).	2.6	\$643.50
4/19/2011	RJ	B. LINSTEAD: research regarding personal jurisdiction in connection with motion to dismiss (3.0).	3.0	\$580.50
4/20/2011	GM	WARREN, BARLOW and WOF Cases: Prepared for oral argument on motions to compel arbitration (8.4); BARLOW Cases: reviewed declarations regarding motions to compel arbitration (1.0); WARREN Cases: communications regarding amended complaints (.1).	9.5	\$2,992.50
4/20/2011	ML	Drafted motion to serve proposals for settlement (2.0); drafted proposal for settlement and settlement agreement (1.0); legal research re: proposals (.5).	3.5	\$945.00
4/20/2011	AV	H. BUHL: Draft, review and revise response to motion to dismiss (5.0).	5.0	\$1,237.50
4/20/2011	JJP	OMNIBUS: Edit partial summary judgment motion regarding Nadel's guilty plea (6.2).	6.2	\$1,534.50
4/20/2011	RJ	B. KARLSSON: Correspondence with E. Svensson regarding service on defendant (.4); research regarding imputed knowledge from broker to customer (.3); B. LINSTEAD: research regarding personal jurisdiction for opposition to motion to dismiss and preparation of memo (2.5).	3.2	\$619.20

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
4/21/2011	GM	WARREN, BARLOW and WOF Cases: Prepared for oral argument on motions to compel arbitration (4.3); OMNIBUS: work on motion for partial summary judgment (3.5); LEE: communications with P. Thanasides regarding motion to limit discovery (.1); WOF: reviewed reply regarding motion to compel arbitration (.3); WARREN Cases: reviewed defendants' notice regarding judicial notice relating to motions to compel arbitration (.3); WARREN Cases: finalized motions for leave to file amended complaints (.7); BARLOW Cases: reviewed declaration relating to motions to compel arbitration (.2); LAWRENCE: reviewed declaration regarding motion to compel arbitration (.1).	9.5	\$2,992.50
4/21/2011	ML	Receive and review order regarding approval to serve proposals for settlement (.1); WOF: drafted proposal for settlement (.3); WOF: analyze Defendant's Reply in Support of Motion to Compel Arbitration and cases cited therein (2.5); WOF: legal research regarding arbitration (1.0); T. BARLOW cases: receive and review Declaration regarding T. Barlow clients (1.4); J. WARREN cases: receive and review notice of filing regarding J. Warren cases (1.0); drafted motions for leave to file amended complaints (1.5); T. BARLOW, J. WARREN and WOF cases: prepare for hearing regarding motions to compel arbitration (2.0).	9.8	\$2,646.00
4/21/2011	AV	H. BUHL: Draft, review, and revise response to motion to dismiss (3.5); M. MUNSON: telephone call and correspondence with Alaska private investigator (.4).	3.9	\$965.25
4/21/2011	JJP	OMNIBUS: Edit partial summary judgment motion regarding Nadel's guilty plea (3.3).	3.3	\$816.75
4/21/2011	RJ	B. LINSTEAD: Research regarding personal jurisdiction for Opposition to Motion to Dismiss (.3).	0.3	\$58.05
4/22/2011	GM	WARREN, BARLOW and WOF Cases: prepared for oral argument on motions to compel arbitration (9.3); communications with S. Masel regarding motions to compel arbitration (.1); OPM ALFA: reviewed default judgments (.1); LAWRENCE: reviewed defendant's reply regarding motions to compel arbitration (.2); SCHNEIDERMAN: reviewed defendant's declaration (.2); RUSSELL: reviewed declaration (.1).	10.0	\$3,150.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
4/22/2011	ML	T. BARLOW cases: Drafted proposals for settlement (3.6); J. WARREN cases: drafted proposals for settlement (3.0); DANCING \$: drafted proposal for settlement (.3); H. BUHL: drafted proposal for settlement (.3); T. BARLOW, J. WARREN and WOF cases: prepare for hearing on motions to compel arbitration (1.5); T. BARLOW, J. WARREN and WOF cases: telephone call with SEC regarding motions to compel arbitration (.5).	9.2	\$2,484.00
4/22/2011	JDM	WARREN, BARLOW Cases: Motion to Compel Arbitration - Research caselaw regarding joint separability of settlement proposals (.8); research FL and DE statutes for LP and LLC's regarding purpose of organization (.5).	1.3	\$279.50
4/22/2011	RJ	B. KARLSSON: Email E. Svensson regarding defendant's address information (.2); KCL CORP. and M. JOUBERT: prepare motions for entry of default judgment and Affidavits of Receiver in support (2.8).	3.0	\$580.50
4/23/2011	GM	WARREN, BARLOW and WOF Cases: prepared for oral argument on motions to compel arbitration (5.1).	5.1	\$1,606.50
4/23/2011	ML	T BARLOW, J. WARREN and WOF cases: Prepare for hearing on motions to compel arbitration (3.5).	3.5	\$945.00
4/24/2011	GM	WARREN, BARLOW and WOF Cases: prepared for oral argument on motions to compel arbitration (6.5).	6.5	\$2,047.50
4/24/2011	ML	T. BARLOW, J. WARREN and WOF cases: Prepare for hearing on motions to compel arbitration (3.0).	3.0	\$810.00
4/25/2011	GM	WARREN, BARLOW and WOF Cases: Prepared for and attended oral argument on motions to compel arbitration (4.9).	4.9	\$1,543.50
4/25/2011	ML	T. BARLOW, J. WARREN and WOF cases: Prepare for and attend hearing on motions to compel arbitration (6.0); T. BARLOW, J. WARREN and WOF cases: legal research regarding inherent conflict with arbitration (2.5); T. BARLOW, J. WARREN and WOF cases: exchange correspondence with counsel regarding response date (.2).	8.7	\$2,349.00
4/25/2011	AV	M. MUNSON: Review memo from McMillian Associates, private investigator (.3).	0.3	\$74.25
4/25/2011	JJP	T. BARLOW, J. WARREN and WOF cases: research issues related to motions to compel arbitration for additional briefing requested by Court (6.5).	6.5	\$1,608.75
4/25/2011	RJ	Review final default judgments and requirements for recording in other states (.2).	0.2	\$38.70

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
4/26/2011	GM	TERRELL/GRIER: Reviewed notice of settlement regarding defendants (.1); WARREN, BARLOW and WOF Cases: communications with S. Masel regarding argument on motions to compel arbitration (.2); WARREN, BARLOW and WOF Cases: reviewed caselaw regarding supplement in opposition to motions (4.4); LAWRENCE: considered settlement communications with defense counsel (.2); CARRELAGE: reviewed revisions to settlement agreement (.2); BUHL: revised draft response to motion to dismiss (.4).	5.5	\$1,732.50
4/26/2011	ML	S. MORGAN: Prepare for and attend mediation (5.0); T. BARLOW, J. WARREN and WOF cases: legal research regarding conflict with arbitration (3.0); K. LAWRENCE: exchange multiple correspondence with P. Watson regarding settlement (.3); K. LAWRENCE: analyze defendant's investor file (.4); V. KOUVANT and BECKER: drafted motions to approve settlement (.5); V. KOUVANT and BECKER: drafted correspondence to S. Masel regarding motions to approve (.1); V. KOUVANT and BECKER: receive and review orders approving settlement (.1).	9.4	\$2,538.00
4/26/2011	AV	G. BECKER: Draft motion to approve settlement (.3); V. KOUVANT: review and revise motion to approve settlement (.2); M. MUNSON: correspondence with private investigator and review memo from private investigator in Alaska regarding service of process in Cold Bay, Alaska (.5); H. BUHL: review case law cited in motion to dismiss (3.0).	4.0	\$990.00
4/26/2011	JJP	OMNIBUS: Researching issues related to motions to compel arbitration for additional briefing requested by Court (9.2).	9.2	\$2,277.00
4/26/2011	RJ	S. MORGAN: Review complaint and prepare calculation of interest due on damages (.5); KCL CORP. and M. JOUBERT: finalize Motions for Default Judgment and supporting Affidavits of Receiver (.5); research regarding personal jurisdiction (.5).	1.5	\$290.25
4/27/2011	GM	BUHL: Prepared response to motion to dismiss (7.8); BUHL: prepared motion for extension of time (.3); WARREN, BARLOW and WOF Cases: work on supplement in opposition to motions to compel arbitration (.6).	8.7	\$2,740.50
4/27/2011	ML	T. BARLOW, J. WARREN and WOF cases: Legal research regarding forclosing arbitration; powers of Receivership court (5.0); T. BARLOW, J. WARREN and WOF cases: drafted supplemental brief (2.0).	7.0	\$1,890.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
4/27/2011	AV	MUNSONS: Correspondence with A. Klamser regarding service of process (.2); H. BUHL: review and revise response to motion to dismiss (1.5); DIOCESE OF VENICE: telephone call with C. Person regarding case management deadlines and mediation (.2).	1.9	\$470.25
4/27/2011	JJP	J. WARREN, T. BARLOW and WOF cases: Research issues related to motions to compel arbitration for additional briefing requested by Court (8.4).	8.4	\$2,079.00
4/27/2011	RJ	B. LINSTEAD: Review complaint (.4); B. LINSTEAD: prepare amended complaint (1.5); KCL CORP: revise defendant's motion for default judgment (.4); B. LINSTEAD: review and analyze defendant's investor file (1.2).	3.5	\$677.25
4/28/2011	GM	SEWELLS: Addressed matters regarding resolving case (.3); BUHL: prepared response to motion to dismiss (9.5); J. WILLIAMS: considered dismissal of claims (.1).	9.9	\$3,118.50
4/28/2011	ML	T. BARLOW, J. WARREN and WOF cases: Legal research regarding inherent equitable power of Receivership court (2.0); T. BARLOW, J. WARREN and WOF cases: drafted supplemental brief regarding arbitration (1.0); drafted correspondence to P. Thanasides regarding ability to pay of defendants, extension for Meeker to serve initial disclosures (.3); J. WILLIAMS (JORDAN): drafted motion to dismiss; (.2); SEWELLS POINT: drafted motion to dismiss (.2); telephone call with H. Haskins regarding transfers of money to house (.2); B. LINSTEAD: drafted amended complaint (.5).	4.4	\$1,188.00
4/28/2011	AV	J. WILLIAMS (JORDAN): Telephone with J. Williams regarding notice of dismissal with prejudice (.2); MUNSONS: correspondence with M. Lamont regarding response to motion to quash (.1); D&E UNIT TRUST: draft motion for extension of time to serve (.5).	0.8	\$198.00
4/28/2011	JJP	J. WARREN, T. BARLOW and WOF cases: Research and draft supplemental brief requested by Court on motions to compel arbitration (10.0).	10.5	\$2,598.75
4/29/2011	GM	BUHL: Prepared response to defendant's motion to dismiss (10.0).	10.0	\$3,150.00
4/29/2011	ML	T. BARLOW, J. WARREN and WOF cases: Legal research regarding inherent conflict of FAA (2.5); T. BARLOW, J. WARREN and WOF cases: drafted supplemental brief regarding forclose arbitration (4.7); D&E UNIT TRUST: drafted motion for extension of time to serve D&E Unit Trust Associates c/o D. Ehrlich (.3).	7.5	\$2,025.00

SERVICES

Date	TKPR	Description of Services	Hours	Amount
	ASSET	Asset Analysis and Recovery		
4/29/2011	AV	H. BUHL: Review and revise response to motion to dismiss (5.0); H. BUHL: draft declaration regarding same (.4).	5.4	\$1,336.50
4/29/2011	JJP	J. WARREN, T. BARLOW and WOF cases: Research and draft supplemental brief requested by Court on motions to compel arbitration (8.8).	8.8	\$2,178.00
4/29/2011	RJ	B. LINSTEAD: Research regarding personal jurisdiction for opposition to motion to dismiss (3.0); R. SHEADE: correspondence with A. Miller regarding scheduling mediation (.2).	3.2	\$619.20
Total: Asset Analysis and Recovery			1,702.00	\$441,817.25
Total Professional Services			1,702.0	\$441,817.25

DISBURSEMENTS

Date	Description of Disbursements	Amount
E101	Photocopies	
4/26/2011	Photocopies @ .15 each (252 @ \$0.15)	\$37.80
E112	Court Fees	
1/17/2011	Clerk, U.S. District Court - Clerk of Court - Certified copies of Order Approving Settlement with S. Moody (DKT. 517)	\$18.20
E124	Other	
1/7/2011	Register of Deeds, Claiborne County, TN - Miscellaneous fees associated with recording Warranty Deed (Mason - Tazewell, TN property)	\$265.62
Total Disbursements		\$321.62

Total Services	\$441,817.25
Total Disbursements	\$321.62
Total Current Charges	\$442,138.87
Previous Balance	\$295,906.79
Less Payments	(\$295,906.79)
PAY THIS AMOUNT	\$442,138.87

TASK RECAP

Services

<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
NADEL - ASSET	1702	\$441,817.25
	0	\$0.00
	0	\$0.00
	<u>1702.00</u>	<u>\$441,817.25</u>

Disbursements

<u>Project No.</u>	<u>Amount</u>
Photocopies	\$37.80
Court Fees	\$18.20
Other	\$265.62
	<u>\$321.62</u>

BREAKDOWN BY PERSON

<u>Person</u>	<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
ML Michael Lamont	NADEL - ASSET	606.5	\$163,755.00
GM Gianluca Morello	NADEL - ASSET	422.8	\$133,182.00
DEH Dominique E. Heller	NADEL - ASSET	0.4	\$77.40
RJ Robert Jamieson	NADEL - ASSET	135.2	\$26,161.20
JDM Jordan D. Maglich	NADEL - ASSET	143.4	\$28,457.40
JJP Jared J. Perez	NADEL - ASSET	137.8	\$34,105.50
AV Al Villoch	NADEL - ASSET	190.7	\$46,950.75
MG Mary Gura	NADEL - ASSET	24.9	\$3,486.00
JWH Jeffrey W. Harris	NADEL - ASSET	5.7	\$798.00
JR Jeffrey Rizzo	NADEL - ASSET	23.6	\$3,304.00
MRS Maria R. Santiago	NADEL - ASSET	11	\$1,540.00
		<u>1702.00</u>	<u>\$441,817.25</u>