

# EXHIBIT 13

# Wiand Guerra King P.L.

3000 Bayport Drive

Suite 600

Tampa, FL 33607

Telephone: 813-347-5100

Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand

**Attention: Burton W. Wiand**

Wiand Guerra King, P.L.

3000 Bayport Drive, Ste. 600

Tampa, FL 33607

August 09, 2012

Client: 025305

Matter: 000167

Invoice #: 4076

Page: 1

RE: Scoop Legal Team - Holland & Knight

For Professional Services Rendered Through March 31, 2012

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## SERVICES

Date	TKPR	Description of Services	Hours	Amount
	<b>ASSET</b>	<b>Asset Analysis and Recovery</b>		
12/1/2011	JR	Review and organization of proof of claim forms for production (.2); communicate with Mr. Morello and Ms. Gura regarding status of review and organization of proof of claims (.1); receipt and review of additional documentation from Foley & Lardner and transfer to system (.1); update chart of documents produced by non-parties (.1); organization of proof of claims sent in preparation for Bates labeling (.5); telephone call to Mr. Coleman regarding production of proof of claims (.1).	1.1	\$154.00
12/2/2011	JR	Communicate with Mr. Coleman regarding status of review and production of proof of claim forms (.2); organization and bates labeling of proof of claim materials for production and preparation of CD label (1.5).	1.7	\$238.00
12/5/2011	JR	Review and organization of proof of claim materials for production (4.0).	4.0	\$560.00
12/6/2011	JR	Review and organization of proof of claim materials for production (2.5).	2.5	\$350.00
12/7/2011	GM	Reviewed certain documents in preparation for production (4.1).	4.1	\$1,291.50

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**SERVICES**

<b>Date</b>	<b>TKPR</b>	<b>Description of Services</b>	<b>Hours</b>	<b>Amount</b>
<b>ASSET</b>	<b>Asset Analysis and Recovery</b>			
12/7/2011	JR	Review and organization of proof of claim materials for production (2.0); receipt and review of correspondence from Mr. Coleman regarding mediation and status of proof of claims production (.1); prepare reply to Mr. Coleman regarding status of proof of claims production (.1).	2.2	\$308.00
12/9/2011	GM	Reviewed documents for production (.5).	0.5	\$157.50
12/9/2011	JR	Review and organization of proof of claim materials for production (4.0); communicate with Mr. Morello and Mr. Coleman regarding status of proof of claim production (.3); prepare production CDs (.3).	4.6	\$644.00
12/12/2011	GM	Addressed matters regarding Holland & Knight discovery (.2).	0.2	\$63.00
12/12/2011	JR	Review and organization of proof of claim materials for production (.8); communicate with Mr. Morello and Mr. Coleman regarding proof of claims production (.1).	0.9	\$126.00
12/14/2011	GM	Reviewed documents for production (5.1).	5.1	\$1,606.50
12/14/2011	JR	Communicate with Mr. Coleman and Mr. Morello regarding status of remainder of proof of claims production (.1); communicate with Mr. Perez regarding Locova (.1).	0.2	\$28.00
12/14/2011	JR	Review and organization of proof of claim materials for production (3.5).	3.5	\$490.00
12/15/2011	JR	Communicate with Mr. Coleman regarding production of proof of claims (.1); receipt and review of correspondence from Mr. Burns to counsel for Holland & Knight regarding production (.1).	0.2	\$28.00
12/16/2011	GM	Addressed discovery matters (.3).	0.3	\$94.50
12/16/2011	JR	Receipt and review of correspondence from Mr. Coleman regarding Holland & Knight's counsel's request for list of investor names/numbers submitted under seal with claims determination (.1).	0.1	\$14.00
1/3/2012	GM	Addressed discovery matters (.1).	0.1	\$31.50
1/3/2012	JR	Receipt and review of correspondence from Mr. Coleman regarding production of investor/creditor list (.1).	0.1	\$14.00
1/4/2012	GM	Addressed discovery-related matters (.2).	0.2	\$63.00
1/4/2012	JR	Receipt of correspondence from Mr. Coleman and Mr. Morello regarding production of creditor list (.1); retrieval of creditor list and Bates label in preparation for production (.2).	0.3	\$42.00
1/5/2012	JR	Prepare correspondence to Mr. Coleman regarding creditor list per conference with Mr. Morello (.2).	0.2	\$28.00

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**SERVICES**

<b>Date</b>	<b>TKPR</b>	<b>Description of Services</b>	<b>Hours</b>	<b>Amount</b>
<b>ASSET</b>	<b>Asset Analysis and Recovery</b>			
1/13/2012	JR	Communicate with Mr. Coleman regarding deposition transcripts (.1).	0.1	\$14.00
1/16/2012	GM	Work on responses to requests for production (.3); addressed matters regarding witness list (.2).	0.5	\$157.50
1/16/2012	JR	Review proposed responses to Defendants' 3rd Request for Production of Documents per request of Mr. Coleman and Mr. Morello (.2); prepare memo regarding proposed responses to Defendants' 3rd Request for Production of Documents (.3); retrieval and organization of documents for production per conferences with Mr. Morello and Mr. Coleman (.4); receipt and review of correspondence from Mr. Burns to Holland & Knight's counsel regarding witnesses (.1).	1.0	\$140.00
1/17/2012	JR	Organization of miscellaneous documents for production (.4); prepare CDs and CD labels (.2); communicate with Mr. Coleman and Mr. Morello regarding documents to be produced (.1).	0.7	\$98.00
1/19/2012	GM	Addressed matters regarding Receiver's deposition (.1).	0.1	\$31.50
1/20/2012	JR	Receipt of deposition transcripts from Johnson Pope and organize and transfer to system (.2).	0.2	\$28.00
1/23/2012	JR	Receipt and review of deposition transcripts from Johnson Pope and transfer to system (.2).	0.2	\$28.00
1/24/2012	JR	Receipt and review of deposition transcripts from Johnson Pope and transfer to system (.2); receipt and review of correspondence from Holland & Knight regarding discovery (.1).	0.3	\$42.00
1/27/2012	JR	Receipt of CD of deposition materials from Johnson Pope and transfer to system (.1).	0.1	\$14.00
1/31/2012	JR	Receipt and review of correspondence from Mr. Coleman regarding discovery issues and Fabre defendants (.1).	0.1	\$14.00
2/1/2012	JR	Receipt and review of correspondence from Mr. Burns regarding Fabre defendants (.1).	0.1	\$14.00
2/3/2012	GG	Review correspondence from Mr. Rizzo regarding Neil Moody settlement with Receiver (in connection with discovery request in H&K matter) (.1).	0.1	\$32.50
2/3/2012	JR	Communicate with Mr. Coleman regarding settlement agreements (.1).	0.1	\$14.00
2/6/2012	JR	Communicate with Mr. Coleman regarding settlement with N. Moody (.1); receipt and review of Defendants' Motion for Leave to Amend Affirmative Defense No. 8 (.2).	0.3	\$42.00
2/7/2012	GM	Assist Receiver with preparation for deposition (5.2).	5.2	\$1,638.00

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**SERVICES**

<b>Date</b>	<b>TKPR</b>	<b>Description of Services</b>	<b>Hours</b>	<b>Amount</b>
<b>ASSET</b>	<b>Asset Analysis and Recovery</b>			
2/7/2012	JR	Review and retrieval of information related to Shoreline accounts and testimony per request of Mr. Morello and Receiver in preparation of deposition (.4); review of documentation from Moodys regarding disbarment of Nadel (.5).	0.9	\$126.00
2/8/2012	GM	Attended deposition of Receiver (6.6).	6.6	\$2,079.00
2/8/2012	JR	Communicate with Mr. Burns and Receiver regarding Riverside Financial analysis of accounts (.1).	0.1	\$14.00
2/9/2012	GM	Attended continued deposition of Receiver (6.5).	6.5	\$2,047.50
2/10/2012	JR	Review of case materials for memo regarding solicitation referenced in deposition per request of Mr. Morello and Mr. Burns (1.5).	1.5	\$210.00
2/14/2012	JR	Receipt and review of deposition notice regarding N. Moody (.1).	0.1	\$14.00
2/15/2012	JR	Communicate with Mr. Coleman regarding M. Munson (.1); retrieval and organization of proof of claims related to various investors per conference with Ms. Robinson at Johnson Pope (.5); retrieval of documentation related to Nadel criminal sentencing per conference with Mr. Burns and Mr. Coleman (.3).	0.9	\$126.00
2/16/2012	JR	Review and prepare CD of Profit and Loss analysis prepared by Riverside Financial per request of Mr. Burns (.5).	0.5	\$70.00
2/17/2012	GM	Reviewed and considered latest document requests from defendants (.2).	0.2	\$63.00
2/20/2012	JR	Receipt and review of Defendants' Fourth Request for Production of Documents to Plaintiffs (.2); communicate with Mr. Coleman regarding CD of analyses of accounts prepared by Riverside (.1).	0.3	\$42.00
2/21/2012	GM	Addressed Holland & Knight document request (.2).	0.2	\$63.00
2/21/2012	JR	Communicate with Mr. Coleman, Mr. Morello and Mr. Lamont regarding list of clawback cases in preparation for meeting with expert (.1); receipt and review of correspondence from Mr. Coleman regarding deposition dates for Receiver and McLeod (.1).	0.2	\$28.00
2/22/2012	JR	Review of case materials for documents requested in Holland & Knight's 4th request for production per correspondence from Mr. Coleman (.5); receipt and review of deposition notices for Wiand and MacLeod (.1).	0.6	\$84.00
2/23/2012	JR	Communicate with Mr. Robinson regarding Andy Martin and Michael Zucker contact information (.1); receipt and review of request for admissions (.1).	0.2	\$28.00

**SERVICES**

<b>Date</b>	<b>TKPR</b>	<b>Description of Services</b>	<b>Hours</b>	<b>Amount</b>
<b>ASSET</b>	<b>Asset Analysis and Recovery</b>			
2/27/2012	PBK	Telephone call with Guy Burns regarding potential witnesses (.3).	0.3	\$94.50
3/6/2012	JR	Investigate service of notice of Goldman Sachs settlement/bar order on Holland & Knight per conference with Mr. Coleman (.2).	0.2	\$28.00
3/7/2012	GM	H&K: Addressed matters regarding notice of GSEC settlement (.2).	0.2	\$63.00
3/7/2012	JR	Communicate with Mr. Coleman and Mr. Morello regarding preparation of affidavit regarding Receiver's notice sent to Holland & Knight regarding Goldman Sachs settlement (.2); search for information related to Don Rowe per request of Ms. Robinson at Johnson Pope (.2).	0.4	\$56.00
3/12/2012	GM	Reviewed defendants' fourth requests for production (.1).	0.1	\$31.50
3/12/2012	JR	Communicate with Mr. Coleman regarding documentation responsive to Defendants' 4th Request for Production (.4).	0.4	\$56.00
3/13/2012	GM	Addressed discovery matters (.4).	0.4	\$126.00
3/13/2012	JR	Receipt and review of Defendant Holland & Knight's reply memorandum in support of motion to compel and memorandum in support of motion for leave to amend affirmative defenses (.3).	0.3	\$42.00
3/14/2012	JR	Receipt and review of proposed responses to Defendants' 4th Request for Production (.2).	0.2	\$28.00
3/15/2012	JR	Communicate with Mr. Morello regarding production of documents in connection with Holland & Knight's motion to compel (.1).	0.1	\$14.00
3/16/2012	GM	Reviewed draft discovery responses (.2).	0.2	\$63.00
3/19/2012	GM	Communications with G. Burns regarding Fabre matters (.2); addressed matters regarding document production (.1).	0.3	\$94.50
3/19/2012	JR	Receipt and review of correspondence regarding proof of claims for missing page/handwritten notes of claimant (.3).	0.3	\$42.00
3/20/2012	JR	Communicate with Mr. Burns and Mr. Coleman regarding deposition transcript of Neil Moody and related exhibits (.2); communicate with Mr. Coleman regarding document production (.1).	0.3	\$42.00
3/21/2012	GM	Addressed production of documents (.1).	0.1	\$31.50
3/21/2012	JR	Communicate with Mr. Coleman and Mr. Morello regarding supplemental production of proof of claim documentation (.2).	0.2	\$28.00
3/22/2012	GM	Addressed discovery matters (.2).	0.2	\$63.00

**SERVICES**

Date	TKPR	Description of Services	Hours	Amount
<b>ASSET</b>		<b>Asset Analysis and Recovery</b>		
3/23/2012	GM	Addressed discovery matters (.2).	0.2	\$63.00
3/23/2012	JR	Preparation of chart of recoveries and pending claims related to Fabre defendants (1.5).	1.5	\$210.00
3/27/2012	JR	Receipt and review of correspondence from Mr. Coleman regarding production of settlement communications between Receiver and Goldman Sachs, et al. (.1); receipt and review of order extending mediation deadline (.1).	0.2	\$28.00
3/28/2012	GM	Addressed matters regarding response to document requests (.3).	0.3	\$94.50
3/28/2012	JR	Communicate with Mr. Coleman and Mr. Morello regarding document production per Order (.1); review of documents related to production of GSEC, Shoreline and GSEC, et al. settlement documents per communications with Mr. Coleman and Mr. Morello (.5); communicate with attorneys and attorney staff regarding collection of correspondence in preparation for production (.3); receipt and review of correspondence from Mr. Burns to Holland & Knight's counsel regarding bar grievances (.1); telephone conference with Mr. Burns regarding Chris Moody (.2).	1.2	\$168.00
3/29/2012	JR	Communicate with Mr. Coleman, Mr. Morello and Receiver regarding Chris Moody deposition testimony (.1).	0.1	\$14.00
3/30/2012	DMM	Office conference regarding gathering and preparing documents for production to Holland & Knight (.5); begin to review and gather documents from secretaries and attorney's regarding same (3.5).	4.0	\$560.00
3/30/2012	JR	Conference with Ms. Mitchell, Ms. Cook and Ms. Madison regarding settlement related correspondence document production (.5).	0.5	\$70.00
3/30/2012	JR	Retrieval of information related to claimants per request of Mr. Coleman (.5).	0.5	\$70.00
<b>Total: Asset Analysis and Recovery</b>			<b>72.70</b>	<b>\$15,814.00</b>
<b>Total Professional Services</b>			<b>72.7</b>	<b>\$15,814.00</b>
Total Services			\$15,814.00	
Total Current Charges				\$15,814.00
Previous Balance				\$5,054.00
<i>Less Payments</i>				<i>(\$5,054.00)</i>
<b>PAY THIS AMOUNT</b>				<b>\$15,814.00</b>

**TASK RECAP**

**Services**

<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
ASSET - ASSET	72.7	\$15,814.00
	<u>72.70</u>	<u>\$15,814.00</u>

**Disbursements**

<u>Project No.</u>	<u>Amount</u>
	\$0.00
	<u>\$0.00</u>

**BREAKDOWN BY PERSON**

<u>Person</u>	<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
GG George Guerra	ASSET - ASSET	0.1	\$32.50
PBK Peter B. King	ASSET - ASSET	0.3	\$94.50
GM Gianluca Morello	ASSET - ASSET	31.8	\$10,017.00
DMM Dione M. Mitchell	ASSET - ASSET	4	\$560.00
JR Jeffrey Rizzo	ASSET - ASSET	36.5	\$5,110.00
		<u>72.70</u>	<u>\$15,814.00</u>