

HOLLAND & HART LLP  
Doyle S. Byers, #11440  
Cory A. Talbot, #11477  
Engels J. Tejada, #11427  
Chelsea J. Davis, #16436  
222 S. Main Street, Suite 2200  
Salt Lake City, Utah 84101  
Telephone: (801) 799-5800  
Facsimile: (801) 799-5700

*Attorneys for David K. Broadbent as Court-Appointed Receiver*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

---

FEDERAL TRADE COMMISSION; and  
UTAH DIVISION OF CONSUMER  
PROTECTION,

Plaintiffs,

vs.

ZURIXX, LLC, a Utah limited liability company; CARLSON DEVELOPMENT GROUP, LLC, a Utah limited liability company; CJ SEMINAR HOLDINGS, LLC, a Utah limited liability company; ZURIXX FINANCIAL, LLC, a Utah limited liability company; CHRISTOPHER A. CANNON, individually and as an officer of ZURIXX, LLC; JAMES M. CARLSON, individually and as an officer of ZURIXX, LLC; and JEFFREY D. SPANGLER, individually and as an officer of ZURIXX, LLC,

Defendants.

---

**RECEIVER’S THIRD APPLICATION  
FOR COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR  
THE RECEIVER AND RETAINED  
PROFESSIONALS**

Case No. 2:19-cv-00713-DAK-DAO

David K. Broadbent, as receiver (the “Receiver”) for Defendants Zurixx, LLC and related entities (collectively, “Zurixx”), submits this Third Application for Compensation and

Reimbursement of Expenses for the Receiver and Retained Professionals (the “Third Application”). The Receiver requests an Order approving payment of fees and expenses incurred in the months of March through June 2020 (the “Application Period”). In advance of this filing, the Receiver provided to the Federal Trade Commission and the Utah Division of Consumer Protection copies of the invoices attached hereto, and counsel for each have indicated to the Receiver that they do not have any objections to this Third Application.

**APPLICATION FOR RECEIVER AND RETAINED PROFESSIONALS**

1. On November 1, 2019, the Court entered its Stipulated Preliminary Injunction (Dkt. No. 54) (the “Receiver Appointment Order”). The Receiver Appointment Order appointed David K. Broadbent as the “receiver over the Receivership Entities with full powers of an equity receiver,” (Section XIV).

2. The Receiver Appointment Order imposed various duties on the Receiver (*see* generally Sections XV-XXIII). It also authorized the Receiver to “choose, engage, and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Receiver deems advisable or necessary in the performance of duties and responsibilities under the authority granted by this Order,” (Section XV E).

3. The Receiver Appointment Order also provides that “the Receiver and all personnel hired by the Receiver . . . including counsel to the Receiver and accountants, are entitled to reasonable compensation for the performance of duties pursuant to this Order and for the cost of actual out-of-pocket expenses incurred by them, from the Assets now held by, in the possession or control of, or which may be received by, the Receivership Entities,” (Section XXI). It is pursuant to this provision that the Receiver makes this Third Application.

4. Pursuant to the authority granted by the Receiver Appointment Order, the Receiver retained the law firm of Holland & Hart, LLP (“H&H”) to serve as his counsel, and Rocky Mountain Advisory, LLC (“RMA”) to serve as his accountants.

5. During the Application Period, the Receiver and his professionals worked to, *inter alia*, accomplish the following: continue to secure the assets of the Receivership Entities, including bank accounts, approximately \$4.5 million in reserves held by merchant bankers, and equipment held by various parties; communicate with consumers regarding experiences with Zurixx as well as consumers, vendors, and creditors regarding the status of a potential claims process; analyze potential claims against third-parties that may be brought by the Receiver and work on drafting related complaints and demands; respond to threatened and filed litigation and claims to stay such claims in light of the Court’s orders; work on tax returns and to provide tax documentation to employees and independent contractors; conference with the FTC and the Utah Division of Consumer Protection regarding various issues, potential claims against third-parties and additional defendants, and the status of the case; work with the FTC and the Utah Division of Consumer Protection in gathering information from Zurixx records; work to provide information and access to Zurixx databases to plaintiffs and defendants; work on gathering information from third-parties; negotiations with parties that have violated court orders and work on and file motion for contempt related to the same.

6. During the Application Period, the Receiver and his retained professionals incurred the following in fees and expenses (collectively, the “Receiver’s Fees and Expenses”):

	<u>Fees Requested</u>	<u>Expense Reimbursement Requested</u>	<u>Total</u>
Receiver	\$25,854.20	\$0.00	\$25,854.20
H&H	\$169,538.25	\$1,364.46	\$170,902.71
RMA	\$14,635.50	\$1,528.01	\$16,163.51
<b>Total</b>	<b>\$210,027.95</b>	<b>\$2,892.47</b>	<b>\$212,920.42</b>

7. Invoices detailing the work performed by the Receiver, H&H, and RMA during the Application Period are attached hereto as **Exhibits A, B, and C**, respectively. The invoices also detail the professionals that performed the work and the hourly rate of each of the professionals.

8. The compensation requested for the work performed during the Application Period is reasonable compensation for the services performed, which services have been actually and necessarily rendered in this case.

9. The Receiver respectfully requests that the Court approve the Receiver's Fees and Expenses as reasonable compensation and authorize the Receiver to make payments in the amounts as outlined above.

### CONCLUSION

For the foregoing reasons, the Receiver respectfully requests that the Court enter an order approving the amounts outlined above for the Receiver's Fees and Expenses as reasonable compensation and authorizing the Receiver to make payments in such amounts.

RESPECTFULLY SUBMITTED this 6th day of August, 2020.

HOLLAND & HART LLP

/s/ Doyle S. Byers

Doyle S. Byers

Cory A. Talbot

Engels J. Tejada

Chelsea J. Davis

*Attorneys for David K. Broadbent as the Court-Appointed Monitor*

**INDEX OF EXHIBITS**

- A - Receiver Invoice.
- B - H&H Invoice.
- C - RMA Invoice.

15011817\_v1

**EXHIBIT “A”**



IRS EMPLOYER NO. 84-0382505  
 PLEASE REMIT TO:  
 P.O. BOX 17283  
 DENVER, CO 80217-0283

**July 22, 2020**

Broadbent, David, as Receiver for Zurixx, LLC David K. Broadbent 222 S. Main Street, Suite 2200 Salt Lake City, UT 84101	Invoice No. H&H Ref. No. Client No. Attorney:	1828406 3353981 107333 DKBroadbent
---	--	---

**Regarding: Matter No. 0001 - Receiver Services**

**Invoice Summary**

<b>Current fees</b>	<b>\$25,854.20</b>
<b>Current charges this invoice</b>	<b>\$25,854.20</b>

**ACH / Wire Instructions – Please Remit in US Dollars**

UMB Bank, N.A.  
 1670 Broadway, Denver, CO 80202  
 ABA# 101000695  
 Holland & Hart Operating Account  
 Acct # 6971172602  
 Swift Code UMKCUS44  
 Please include invoice #1828406 on payment.



IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828406 3353981
---	-----------------------------	--------------------

For professional services rendered through June 30, 2020

**Itemized Fees**

<b>Description of Work</b>	<b>Date</b>	<b>Tkpr</b>	<b>Hours</b>
Conference with Mr. Topete, claimant, regarding credit card issues and Foundation Funding; review transcript of promotional seminar; review and respond to emails; establish post office box for various Zurixx entities;	03/02/20	DKB	2.30
Conference with CATalbot and DSByers; review Foundation Funding materials received from claimant; conference with Source Capital;	03/03/20	DKB	0.80
Review and respond to emails; conference with customer claimants;	03/05/20	DKB	0.40
Telephone conference with Mr. Pahnke; follow-up on access to documents;	03/09/20	DKB	0.20
Review motion for contempt and discuss recommended changes with CATalbot; review and respond to emails;	03/10/20	DKB	0.20
Conference regarding Alvarez v. Success Formula Friedman, Framme and Thrush; review and evaluate email correspondence;	03/12/20	DKB	0.20
Review and evaluate email correspondence, Conference with CATalbot regarding DeCosta lease,	03/13/20	DKB	0.10
Conference with DSByers; review and evaluate email correspondence and respond;	03/16/20	DKB	0.50
Conference with Mr. Doan, review issues regarding trusts and investments in limited liability companies;	03/17/20	DKB	0.60
Conference with Mr. Ramirez regarding claim issues;	03/18/20	DKB	0.20
Review and evaluate email correspondence and respond;	03/23/20	DKB	0.20
Review and evaluate email correspondence and respond regarding pending motions;	03/25/20	DKB	0.50
Conference with Mr. Curtis regarding tax issues; review and evaluate email correspondence and respond to Zurixx customer issues; conference with DSByers regarding obtaining transcripts of sales and training presentations;	03/26/20	DKB	0.50

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828406 3353981
---	-----------------------------	--------------------

review materials from Mr. Curtis regarding account transfers;

Conference with Mr. Mozingo regarding claim and Mr. John involvement;	03/28/20	DKB	0.30
---	----------	-----	------

Conference with DSByers and Mr. Doan, review potential claims;	03/31/20	DKB	0.50
--	----------	-----	------

Conferences with CATalbot and DSByers; conference with FTC attorneys and Robert Wing; review information on Reyes Trust; review and evaluate email correspondence; contact First Bank of Puerto Rico; conference with Mr. Curtis;	04/01/20	DKB	1.80
---	----------	-----	------

Review information regarding Reyes trust; review and evaluate email correspondence and respond;	04/02/20	DKB	0.60
---	----------	-----	------

Conference with DSByers; review merchant bank issues;	04/03/20	DKB	0.20
---	----------	-----	------

Review and evaluate email correspondence and respond regarding Puerto Rico registrations and demands for merchant banking account reserves, review proposed demand letter;	04/06/20	DKB	0.50
--	----------	-----	------

Conference with DSByers; review and process payments;	04/07/20	DKB	0.30
---	----------	-----	------

Review financial and entity information on assets that may be recovered and liquidated by the receiver; conference with FTC, Mr. Wing, CATalbot and DSByers; conference with Mr. Miller regarding additional assets, insurance and liquidation issues; conference with Bill Pizza of Cottonwood Insurance regarding insurance issues; analyze assets to determine appropriateness for receivership; conference with Dana at Bennett accounting regarding claimant's request for information; conference with DSByers regarding merchant account issues and demand;	04/08/20	DKB	4.20
--	----------	-----	------

Conference with Bill Pizza of Cottonwood Insurance; review stipulation for settlement; review asset list and assess necessary steps; conference with FTC attorneys and Mr. Wing; conferences with DSByers regarding merchant accounts; conference with Mr. Nuhaven, claimant; review demand from Utah Labor commission and discuss with CATalbot; review proposed response;	04/09/20	DKB	2.70
---	----------	-----	------

Review revised stipulation and respond; review	04/10/20	DKB	0.40
--	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828406 3353981
---	-----------------------------	--------------------

supplementary authority filed by FTC;

Review and respond to emails, review bank records;	04/13/20	DKB	0.20
Review and evaluate email correspondence and respond regarding merchant accounts;	04/14/20	DKB	0.50
Conference with Mr. Courville, claimant; conference with DSByers and CATalbot regarding Puerto Rico employee claims and W-2 statements; review emails and respond regarding recovery of merchant accounts;	04/15/20	DKB	0.50
Conference with DSByers regarding merchant bank response and settlement proposal;	04/17/20	DKB	0.20
Review and evaluate email correspondence; conference with DSByers; review limited liability company transfer and ownership issues;	04/20/20	DKB	0.80
Review Utah and Delaware limited liability company acts regarding transfer of membership interests; conference with FTC attorneys regarding treatment of possible settlement transfers and deliveries;	04/21/20	DKB	1.60
Review and evaluate email correspondence; conference with Mr. Wing, Ms. Veillette; CATalbot and DSByers; follow-up call with Messrs. Talbot and Byers;	04/22/20	DKB	0.80
Conferences with Mr. Doan and Mr. Wing; conference with DSByers; prepare proposed modification to settlement stipulation to deal with expansion of receivership;	04/23/20	DKB	5.80
Review and evaluate email correspondence; coordinate call on third-party claims; conference with DSByers regarding merchant bank reserve and Richardson Law Group; conference with Mr. Goodman, Murfree & Goodman firm;	04/24/20	DKB	0.80
Conferences with FTC attorneys and Utah Division of Consumer Protection attorneys; conferences with CATalbot and DSByers; review issues related to Puerto Rico properties;	04/27/20	DKB	2.50
Review and evaluate email correspondence; review motions and proposed order regarding turnover of reserves;	04/28/20	DKB	0.40
Conference with DSByers; review and evaluate email correspondence regarding Puerto Rico property, transfer of reserve funds and respond;	04/30/20	DKB	0.80

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828406 3353981
---	-----------------------------	--------------------

Conference with Rochelle Stoner and Doug McBean; review and respond to FTC's questions regarding modified order to deal with additional assets;	05/01/20	DKB	0.60
Review and evaluate email correspondence; investigate Chase Bank account payments;	05/04/20	DKB	0.60
Coordinate closing of Puerto Rico accounts; review and evaluate email correspondence and respond regarding tax filings;	05/06/20	DKB	1.20
Review and evaluate email correspondence and respond; conference with Electronic Payment processing regarding charge backs; review charge back notices; review bank account materials; review amended complaint;	05/11/20	DKB	2.10
Conference with David Mazingo regarding Daymond John's claims; review Hamilton v. El Moussa TCPA case complaint;	05/12/20	DKB	0.30
Conference with Ciara Corr, claimant; review and evaluate email correspondence;	05/13/20	DKB	0.40
Conferences with CATalbot; conference with John Curtis; review tax issues; review claims and correspondence regarding charge backs and ACH issues;	05/14/20	DKB	0.90
Review and evaluate email correspondence; conference with CATalbot and JCStark; review RE Cash Source mortgage loan issues;	05/15/20	DKB	0.70
Conference with claimant, Randy Slokowski regarding his claims and involvement of Lending Point in making loan used to pay Global Learning Alliance; review and evaluate email correspondence regarding merchant bank accounts; research and correspondence regarding Lending Point;	05/20/20	DKB	0.70
Review and evaluate email correspondence and respond;	05/21/20	DKB	0.20
Review and evaluate email correspondence; conference with claimant and review claims; review correspondence regarding third-party claims;	05/22/20	DKB	0.90
Conferences with claimants and respond to claimant emails;	05/26/20	DKB	0.40
Review materials on tax reporting; correspondence with John Curtis and Denise Easter; review and evaluate email correspondence regarding Puerto Rico claims;	05/28/20	DKB	0.30

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828406 3353981
---	-----------------------------	--------------------

Conference with Robert Wing; review and process payments for data, web and other services; review and evaluate email correspondence;	06/01/20	DKB	0.60
Review and evaluate email correspondence; review and provide comments on proposed protective order;	06/03/20	DKB	0.80
Review and analyze merchant bank and fraudulent transfer claims; review and evaluate email correspondence;	06/04/20	DKB	1.00
Review materials on possible celebrity claims. Conference with DSByers and CATalbot; review and evaluate email correspondence and respond;	06/05/20	DKB	1.50
Review proposed response regarding statute of limitations; review and evaluate email correspondence;	06/08/20	DKB	0.20
Conference with Tyler Simmons; review and approve payment for storage; review and evaluate email correspondence;	06/15/20	DKB	0.30
Conference with DSByers and CATalbot; review proposed complaint for fraudulent transfer; review relevant cases on fraudulent transfer and forward to DSByers; review and evaluate email correspondence and respond regarding Cash Source debt payment and respond to CATalbot;;	06/17/20	DKB	2.40
Review complaint and relevant cases; conference with DSByers; review and evaluate email correspondence and respond;	06/18/20	DKB	2.00
Conference with Anya Wedderburn, claimant;	06/22/20	DKB	0.20

---

**Total Current Fees: \$25,854.20**

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Tkpr ID</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
DKBroadbent	5140	503.00	51.40	25,854.20
			<b>51.40</b>	<b>\$25,854.20</b>



IRS EMPLOYER NO. 84-0382505  
PLEASE REMIT TO:  
P.O. BOX 17283  
DENVER, CO 80217-0283

**July 22, 2020**

Broadbent, David, as Receiver for Zurixx, LLC David K. Broadbent 222 S. Main Street, Suite 2200 Salt Lake City, UT 84101	Invoice No. H&H Ref. No. Client No. Attorney:	1828406 3353981 107333 DKBroadbent
---	--	---

**Regarding: Matter No. 0001 - Receiver Services**

**Invoice Summary**

<b>Current fees</b>	<b>\$25,854.20</b>
<b>Current charges this invoice</b>	<b>\$25,854.20</b>

Thank you for your prompt payment. Questions regarding this invoice should be directed to the attorney responsible for your account, or Carla Norton, Billing Specialist in our Salt Lake City office, at (801) 799-5815 or [cnorton@hollandhart.com](mailto:cnorton@hollandhart.com).

**Due On Receipt**

Please return this page with your remittance.

# **EXHIBIT “B”**



IRS EMPLOYER NO. 84-0382505  
 PLEASE REMIT TO:  
 P.O. BOX 17283  
 DENVER, CO 80217-0283

**July 22, 2020**

Broadbent, David, as Receiver for Zurixx, LLC David K. Broadbent 222 S. Main Street, Suite 2200 Salt Lake City, UT 84101	Invoice No. H&H Ref. No. Client No. Attorney:	1828407 3354002 107333 DKBroadbent
---	--	---

**Regarding: Matter No. 0002 - Zurixx Monitor - Attorneys**

**Invoice Summary**

<b>Current fees</b>	<b>\$169,538.25</b>
<b>Current disbursements</b>	<b>\$1,364.46</b>
<b>Current charges this invoice</b>	<b>\$170,902.71</b>

**ACH / Wire Instructions – Please Remit in US Dollars**

UMB Bank, N.A.  
 1670 Broadway, Denver, CO 80202  
 ABA# 101000695  
 Holland & Hart Operating Account  
 Acct # 6971172602  
 Swift Code UMKCUS44  
 Please include invoice #1828407 on payment.



IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

For professional services rendered through June 30, 2020

**Itemized Fees**

<b>Description of Work</b>	<b>Date</b>	<b>Tkpr</b>	<b>Hours</b>
Correspondence with claimant; telephone conference with claimant regarding tax issues; review and edit draft motion; address Puerto Rico property issues;	03/02/20	CAT	1.90
Correspondence with Mr. Marinello regarding producing documents previously produced to the receiver; correspondence with BBLarsen regarding the same; message from former in-house counsel for Zurixx regarding transcripts of events;	03/02/20	DSB	0.50
Conferences with DSByers regarding request from Mr. Marinello; gather documents to send to Mr. Marinello; conference with DKBroadbent regarding same; forward documents to Mr. Marinello; conference with DKBroadbent regarding Receivership PO Box;	03/02/20	BBL	0.40
Meeting with DKBroadbent and DSByers regarding status; work on motion for contempt; letter to counsel regarding claims against receivership estate;	03/03/20	CAT	1.50
Correspondence with Datalyst regarding request for transcripts; conference with DKBroadbent and CATalbot regarding strategy and status of case and particularly third-party claims; correspondence with Mr. Biglin regarding reimbursement for costs of receivership to benefit PaySafe;	03/03/20	DSB	1.30
Coordinate regarding motion to hold Mr. Efron in contempt;	03/04/20	CAT	0.40
Review correspondence with Mr. Efron; discuss the same with EJTejeda and CATalbot;	03/04/20	CJD	0.40
Review and comment on motion to hold Mr. Efron in contempt regarding Puerto Rico lease; exchange emails with CJDavis, local counsel in Puerto Rico, and CATalbot regarding Mr. Efron's violation of the order appointing the receiver;	03/04/20	EJT	1.20
Conference with DSByers regarding transcript issues; conference with EJTejeda regarding motion for contempt; email with counsel regarding same;	03/05/20	CAT	0.60

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Work on obtaining tax returns and other information requested by Mr. Wing and arrange to forward to Mr. Wing; correspondence with Mr. Curtis and BBLarsen regarding the same; conference with Datalyst regarding obtaining transcripts prepared for Zurixx and follow-up correspondence regarding the same;	03/05/20	DSB	2.30
Conferences with DSByers and DKBroadbent; address tax returns of Zurixx and related entities; forward tax returns to Mr. Wing and Ms. Veillette;	03/05/20	BBL	0.30
Work on analyzing and gathering information requested by plaintiffs and correspondence with Mr. Curtis regarding the same;	03/06/20	DSB	0.60
Message from counsel for defendants regarding request for information from Zurixx server; work on analyzing and pulling together information requested by Plaintiffs and correspondence with Mr. Curtis regarding the same;	03/09/20	DSB	1.20
Email with counsel regarding claims and invoice; letter to Ms. DelCanto regarding prepaid lease; revise and edit motion for contempt;	03/09/20	CAT	3.50
Follow-up regarding Puerto Rican equipment;	03/09/20	EJT	0.20
Review emails requiring attention; forward certain email to CATalbot and DSByers regarding same;	03/09/20	BBL	0.50
Revise and edit motion for contempt; telephone conference with DKBroadbent regarding same; email with customer regarding claims issues; email with counsel regarding litigation stay;	03/10/20	CAT	0.80
Review and analyze motion to hold landlord in Puerto Rico in contempt and conference with CATalbot regarding the same; correspondence with RMA regarding reimbursement from PaySafe for Ms. Easter's time; analyze various issues regarding which Plaintiffs seek information and conferences with Mr. Cantarero regarding the same;	03/10/20	DSB	4.80
Work on analyzing pulling information requested by AG's office and conference with receiver regarding the same;	03/11/20	DSB	0.80
Revise, finalize, and file motion regarding contempt; conference with CJDavis regarding research for motion regarding contempt; telephone conference with DKBroadbent regarding same and regarding customer	03/11/20	CAT	1.10

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

inquiries;

Edit and incorporate notes from CATalbot and DKBroadbent on the motion for contempt; research the enforcement of a contempt order in Puerto Rico; discuss the same with CATalbot;	03/11/20	CJD	1.30
Email with Ms. DelCosta regarding lease issues; email with team regarding same;	03/12/20	CAT	0.40
Address shipment of equipment from Puerto Rico;	03/12/20	BBL	0.20
Email with Ms. DelConto regarding lease issues; telephone conference with DKBroadbent regarding same; review of materials regarding potential third-party claims; telephone conference with Puerto Rico counsel regarding service issues;	03/13/20	CAT	2.10
Work on gathering information from Zurixx's server requested by UT AG's office and FTC; correspondence with Mr. Cantarero regarding the same and locating transcripts on server; correspondence with Mr. Shah of Datalyst regarding production of transcripts;	03/13/20	DSB	0.60
Teleconference with attorneys in Puerto Rico regarding serving Mr. Efron with the motion for contempt; discuss the same with CATalbot and EJTejeda;	03/13/20	CJD	0.50
Call with Puerto Rican local counsel regarding motion to compel against Puerto Rican landlord;	03/13/20	EJT	0.30
Email with counsel regarding motion for contempt; review correspondence regarding wage claims; email with DKBroadbent regarding same;	03/16/20	CAT	0.50
Review and analyze information on Zurixx server and work with Mr. Cantarero to identify additional documents for review; work on second fee application and expanding it to include February; conferences with Mr. Curtis and receiver regarding the same; correspondence with FTC counsel to schedule a call to discuss coordination; conference and correspondence with Mr. Greenland and Ms. Easter regarding road crew personnel that may have equipment and analyze method for making demand;	03/16/20	DSB	3.00
Work on second fee application and correspondence with receiver regarding the same; conference with FTC and	03/17/20	DSB	4.80

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

receiver regarding potential settlement with defendants and assets for receiver to liquidate; review scope of transcripts on Zurixx's server and review and analyze several such transcripts; correspondence with Mr. Cantarero regarding the same; work on demand letter to parties who may have equipment owned by receivership and correspondence with Ms. Easter regarding employee and independent contractor lists;

Letter to Utah Labor Commission regarding wage claims, including review of correspondence; email with team regarding same; telephone conference with DKBroadbent regarding same and regarding conference call; review and edit draft demand letter regarding return of equipment;	03/17/20	CAT	1.70
---	----------	-----	------

Email with counsel regarding wage claims; analysis of third-party claims;	03/18/20	CAT	0.70
---	----------	-----	------

Work on demand to road crew personnel and other employees to return equipment; conferences with Mr. Greenland regarding the same and analyze methods for enforcement; analyze and review transcripts of events and strategy for procuring evidence for third-party claims;	03/18/20	DSB	2.80
--	----------	-----	------

Work on second fee application and correspondence with receiver regarding the same; finalize demand letters to be sent to former employees that may have equipment and work with staff to organize delivery of the same; correspondence from counsel for defendants regarding requested information; work with BBLarsen regarding discovery subpoenas for third parties;	03/19/20	DSB	3.40
--	----------	-----	------

Research registered agent for Datalyst, LLC; draft subpoena to same; forward subpoena to DSByers for review and revision;	03/19/20	BBL	0.30
---	----------	-----	------

Telephone conference with Ms. Simpson regarding wage claims;	03/20/20	CAT	0.20
--	----------	-----	------

Correspondence with Mr. Greenland regarding recovery of equipment; correspondence with road crew personnel regarding the same;	03/20/20	DSB	0.80
--	----------	-----	------

Conferences with TNeve regarding verification of inventory of shipment from Puerto Rico; report results to EJTejeda;	03/20/20	BBL	0.30
--	----------	-----	------

Email with counsel regarding wage claims; email with customer regarding claims issues; email with DKBroadbent	03/23/20	CAT	0.60
---	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

regarding same; telephone conference with DSByers regarding document issues;

Work on fee application and correspondence with client regarding the same; forward Second Fee Application to Plaintiffs for review and comment; conference and correspondence with Datalyst regarding lack of cooperation in providing transcripts and work with BBLarsen regarding subpoena; correspondence from road crew personnel regarding equipment and begin tracking such responses; analyze third-party claims;	03/23/20	DSB	3.20
Prepare change of address forms for DKBroadbent signature; provide forms to DKBroadbent;	03/23/20	BBL	1.00
Analyze and research claims against third parties; work with BBLarsen on strategy with respect to third-party discovery related to transcripts of events; correspondence and conference with numerous road crew personnel regarding equipment;	03/24/20	DSB	3.30
Conferences with DSByers regarding subpoena for service in NYC; revise subpoena; communications with process server regarding currently available services in NYC; report findings to DSByers;	03/24/20	BBL	0.30
Telephone conference with counsel for defendants regarding document and data production; telephone conference with DSByers regarding same;	03/25/20	CAT	0.40
Analyze requests by defendants' counsel regarding access to information and data; conference with client regarding the same; conference with Mr. Pahnke regarding the same; analyze methods of providing access and conference with Mr. Cantarero regarding the same; correspondence with Ms. Roman regarding equipment for road crew and her position regarding the same; analyze strategy for obtaining evidence to support third-party claims;	03/25/20	DSB	4.20
Email with FTC regarding financial information; email with team, including RMA, regarding same; email with team regarding document review;	03/26/20	CAT	0.40
Correspondence regarding claim made to The Hartford on telemarketing bonding company; work to locate former in-house counsel's laptop and correspondence with BBLarsen regarding the same; conference with DKBroadbent	03/26/20	DSB	2.80

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

regarding strategy with respect to third party claims; correspondence regarding accounts transferred to receivership; correspondence with members of road crews regarding return of equipment; correspondence with receiver regarding granting access to Zurixx database to counsel for defendants;

Conference with DSByers regarding transcripts of Zurixx presentations; locate Surface Pro laptop in equipment received; coordinate delivery of laptop to DSByers;	03/26/20	BBL	0.30
Correspondence with Mr. Doan from the FTC regarding second fee application; correspondence with Mr. Shah regarding obtaining transcripts from Datalyst; correspondence with road crew personnel regarding recovery of equipment;	03/27/20	DSB	0.60
Review report requested by FTC; Email with FTC personnel regarding same;	03/30/20	CAT	0.20
Correspondence with CATalbot and FTC regarding accounts recovered by receiver; correspondence with road crew members regarding recovery of equipment; correspondence with Mr. Cantarero and Mr. Pahnke regarding access to Zurixx's database; correspondence with receiver regarding status of fee applications and approval from FTC;	03/30/20	DSB	2.00
Review correspondence regarding property issues in Puerto Rico;	03/31/20	CAT	0.30
Work on recovery of road crew equipment; Conference with DKBroadbent and Mr. Doan of FTC regarding various issues; continued conferences with DKBroadbent and CATalbot regarding the same; coordinate call with larger group from receiver's team, the FTC and the UT AG's office;	03/31/20	DSB	2.10
Telephone conference with DKBroadbent and DSByers regarding status and strategy; review materials regarding third-party claims for conference call; telephone conference with FTC personnel, Division of Consumer Protection personnel, DKBroadbent, and DSByers regarding status and questions;	04/01/20	CAT	2.10
Meet with Mr. Satiu to obtain equipment; correspondence with other personnel regarding return of equipment; review	04/01/20	DSB	5.60

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

and analyze information on former in-house counsel's laptop; conference with CWarnick regarding issues with trust owning interests in business; conference with CATalbot and Receiver regarding strategy and coordination with plaintiffs in case; conference with FTC counsel, Mr. Wing, Receiver, and CATalbot regarding strategy of case and coordination of efforts; analyze claims and targets for third-party claims; analyze status of merchant accounts and reserves;

Email with counsel regarding invoice and Puerto Rico property issues; email with Mr. Curtis regarding same; review and analyze documents regarding Puerto Rico property;	04/02/20	CAT	0.70
--	----------	-----	------

Work on fee application and correspondence with Mr. Doan and receiver regarding the same; analyze status of merchant accounts and current ownership of merchant processors; conferences with Messrs. Magistro, Saka, and Curtis regarding the same; correspondence with various merchant bankers;	04/02/20	DSB	4.20
---	----------	-----	------

Analyze status of merchant accounts and reserves held by merchant banks and correspondence with various merchant banks regarding the same; conferences with receiver regarding the same; research regarding reserve accounts and work on demand for turnover of reserve funds and correspondence with receiver regarding the same; correspondence with various road crew personnel regarding return of equipment; analyze strategy to procure transcripts of events; correspondence with Mr. Cantarero and Mr. Pahnke regarding defendants' access to server;	04/03/20	DSB	5.20
---	----------	-----	------

Work on fee application; conference with receiver regarding draft demand letter to merchant banks and begin repurposing for various merchant banks; correspondence with merchant banks regarding status of accounts and analyze documentation regarding the same; correspondence with road crew personnel;	04/06/20	DSB	3.20
--	----------	-----	------

Work on, finalize, and file Second Fee Application; correspondence with road crew personnel regarding return of equipment and analyze status of the same; analyze shipping options for return of equipment; analyze merchant account information and work on demands related to turnover of reserve funds; analyze status of electronically	04/07/20	DSB	5.60
---	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

stored information and strategy for accessing the same related to potential third-party disputes and correspondence with Mr. Cantarero regarding the same;

Email with FTC personnel, Division of Consumer Protection personnel, DKBroadbent, and DSByers regarding settlement issues; review and analyze asset lists regarding same; telephone conference with DKBroadbent and DSByers regarding same;	04/08/20	CAT	1.60
---	----------	-----	------

Correspondence with FTC counsel to arrange call; review and analyze information regarding principal's assets and participate in telephone conference with FTC counsel regarding potential settlement with defendants and the possible transfer and liquidation of certain assets; analyze issues regarding the Reyes Trust and conference with receiver regarding the same; correspondence with road crew personnel regarding equipment and analyze status of gathering the same; analyze status of various merchant bank reserve accounts; correspondence with Mr. Doan and various merchant banks regarding the same; analyze needed information to bring third-party claims;	04/08/20	DSB	6.30
---	----------	-----	------

Conference with DSByers; address principal assets received from FTC;	04/08/20	BBL	0.20
--	----------	-----	------

Conference with Mr. Doan from the FTC regarding merchant account reserves; conference with client regarding the same and work on demands for turnover of the same; review and analyze documents received from FTC regarding merchant banks; correspondence with various merchant banks; analyze information on Zurixx's general counsel's laptop; analyze third-party claims and potential defendants;	04/09/20	DSB	6.20
--	----------	-----	------

Review correspondence from Labor Commission; respond to same; analysis of third-party claims;	04/09/20	CAT	1.00
---	----------	-----	------

Conferences with DSByers regarding communications with Merchant Banks and CATalbot regarding response to wage claim;	04/09/20	BBL	0.30
--	----------	-----	------

Work on finalizing demand letters to merchant banks regarding reserves and send out the same; continue research regarding other possible merchant accounts and correspondence with merchants regarding the same; review and analyze documents received from various parties and documents on former general counsel's computer;	04/10/20	DSB	4.20
---	----------	-----	------



IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1828407
	H&H Ref. No.	3354002

correspondence with road crew personnel regarding return of equipment; correspondence with Mr. Doan from the FTC regarding merchant account issues;

Correspondence with Mr. Marshall regarding Paysafe and Qualpay and demands for turnover of funds to each; continue review of documents from ERSP and in-house counsel's laptop computer;	04/13/20	DSB	4.80
--	----------	-----	------

Review correspondence regarding asset recovery; update outline of legal claims;	04/14/20	CAT	0.80
---	----------	-----	------

Work with Messrs. Curtis and Magistro to identify merchant IDs and analyze status of merchant accounts; correspondence with Ms. Irby regarding accounts with Priority Payment Systems; correspondence from EMS regarding response to demand for turnover of funds and conference and correspondence with Receiver, FTC counsel, and Mr. Wing regarding the same; correspondence with Mr. Pahnke and conference and correspondence with Mr. Cantarero regarding defendants' access to information; conference with Messrs. Watkins and Clawson regarding return of equipment; review documents and search for transcripts of events;	04/14/20	DSB	6.20
---	----------	-----	------

Email with team regarding tax issues; telephone conference with team regarding same; review correspondence regarding lease issues;	04/15/20	CAT	0.80
--	----------	-----	------

Work on analyzing issues relating to merchant account reserves; conference and correspondence with Priority Payment Systems regarding accounts it holds, and finalize and forward demand to it for turnover of reserve funds; telephone conference with counsel for Qualpay and Paysafe regarding response to demand for turnover and possible agreement regarding the same; conference with client regarding various tasks and strategy; conference and correspondence with Mr. Curtis regarding W-2 issuance for Puerto Rican employees and correspondence with one such employee regarding the same; work on third-party claims; review and analysis of documents for evidence to support claims;	04/15/20	DSB	6.80
--	----------	-----	------

Exchange emails with DKBroadbent, CATalbot and DSByers regarding Puerto Rican W2s;	04/15/20	EJT	0.10
--	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Work on recovering property from road crews and analyze shipping options; correspondence with Mr. Curtis and Ms. Easter regarding W-2 issue for Puerto Rican employees; work on request to submit for fee application and proposed order; work on negotiating transfers of reserve funds from merchant banks and correspondence with banks regarding the same;; correspondence with Mr. Curtis regarding the same; analyze third-party claims and conference with Receiver regarding the same;	04/16/20	DSB	6.40
Complete remaining change of address forms;	04/16/20	BBL	0.40
Correspondence with Cynergy/Priority Payments regarding reserve accounts; correspondence and conference with counsel for Qualpay and Paysafe regarding reserves and negotiations regarding possible resolution of disputes; correspondence with counsel for EMS regarding receipt of wire transfers; conference with Receiver regarding the status related to merchant reserves and strategy for negotiations regarding the same; work on communicating with road crew personnel regarding the return of equipment; work on analyzing and preparing third-party complaints;	04/17/20	DSB	5.80
Analyze issues regarding RLG and conference with Receiver regarding the same; correspondence with Mr. Curtis, FTC, and Mr. Wing regarding the same; correspondence with Mr. Marshall regarding Qualpay and Paysafe, and their willingness to turnover reserve funds; review and analyze proposed stipulated order regarding the same and correspondence with Receiver regarding the same; conference with road crew personnel regarding return of equipment; work on review of documents related to third-party claims;	04/20/20	DSB	4.80
Prepare for, and participate in, conference call regarding settlement; email with Mr. Wing and DKBroadbent regarding potential claims against celebrities; review case law regarding same;	04/21/20	CAT	1.00
Correspondence with counsel for merchant banks regarding reserve accounts; work on proposed stipulation regarding transfer of reserve accounts; analyze connection of Richardson Law Group to Zurixx and gather evidence of the same; correspondence with Mr. Curtis and FTC counsel regarding the same; telephone conference with counsel for	04/21/20	DSB	5.40

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

FTC, UDCP, and the Receiver regarding possible settlement and inclusion of additional assets from defendants in receivership; work on return of equipment from road crew personnel; conference with Mr. Marshall regarding PPS, need for accounting of reserve account, and potential stipulated order;

Telephone conference with Mr. Wing, Ms. Villette, DKBroadbent, and DSByers regarding potential claims and new documents; telephone conference with DSByers and DKBroadbent regarding same; review materials regarding potential claims;	04/22/20	CAT	0.80
---	----------	-----	------

Prepare and file a request to submit Second Fee Application and proposed order; negotiations with counsel for merchant banks regarding turnover of reserve funds; work on stipulations regarding the same; analyze information regarding Richardson Law Group's connection to receivership entities; correspondence with counsel for FTC regarding arranging conference to discuss access to information; work on recovery of equipment from road crew personnel; obtain laptop from Mr. Clawson; analyze received bankruptcy notice for 4 West Holdings and investigate the same; review documents from ERSP;	04/22/20	DSB	6.80
--	----------	-----	------

Analyze Richardson Law Group's connection to Zurixx and evidence that merchant accounts were exclusively used for Zurixx; correspondence with Messrs. Kennedy and Vanderhoof regarding the same; work on draft complaint and analyze targets for third-party claims; conference with Messrs. Doan and Kaplan regarding FTC's need for access to emails and computer files; correspondence with client regarding order granting fee application; conference with Receiver, Mr. Wing, and Ms. Viellette from UDCP regarding document review and evidence and potential third-party claims;	04/23/20	DSB	5.30
--	----------	-----	------

Telephone conference with DKBroadbent regarding ownership of LLC interests;	04/23/20	GEL	0.20
---	----------	-----	------

Conference with DSByers; research Richardson Law Group; forward findings to DSByers;	04/23/20	BBL	0.40
--	----------	-----	------

Review spreadsheet regarding third-party claims; telephone conference with DSByers regarding same and regarding merchant account issues; review materials regarding same;	04/24/20	CAT	1.20
---	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Conferences and correspondence with counsel for merchant banks regarding reserve accounts; conference with Messrs. Garrell and Kennedy regarding Richardson Law Group status; work on stipulations and proposed orders regarding turnover of reserve funds; correspondence with FTC and Mr. Wing regarding the same; work on analyzing and drafting third-party claims; correspondence with road crew personnel regarding return of equipment; correspondence with FTC regarding needed access to email and other information, and conference with Mr. Cantarero regarding the same;	04/24/20	DSB	7.10
Prepare for, and participate in, conference call with FTC, Division of Consumer Protection, DKBroadbent, and DSByers; telephone conference with DKBroadbent and DSByers; email with various team members regarding tax and account issues;	04/27/20	CAT	1.50
Conference with FTC and UDCP regarding status and analysis of third-party claims; extended conference with CATalbot and Receiver regarding the same; forward information regarding transfers to FTC and UDCP; negotiations with merchant banks regarding turnover of reserve funds; correspondence with FTC and UDCP regarding draft stipulations for turnover of reserve funds; analyze evidence of ownership of accounts by Zurixx; correspondence with Receiver regarding status and strategy with respect to the same; correspondence with counsel for merchant banks regarding stipulations and proposed orders; analyze status of return of equipment and correspondence with road crew personnel regarding the same; correspondence with BBLarsen regarding various communications from consumers, employees, and vendors regarding claims;	04/27/20	DSB	5.40
Review emails/voice mail messages received on Receiver email account; conferences with CATalbot and DSByers regarding messages received;	04/27/20	BBL	0.40
Finalize and arrange for filing of stipulations and proposed orders regarding turnover of funds from merchants; review signed orders and forward to counsel for merchants at issue to arrange for turnover of funds; additional correspondence with counsel for merchant banks regarding request for information regarding chargebacks and reserves;	04/28/20	DSB	4.60

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

correspondence with counsel for the FTC regarding the same; correspondence with IT personnel regarding the transmission of copies of server containing email files to counsel for defendants and the FTC; review memorandum decision and order regarding certification for appeal and stay of discovery and forward copy of the same to Receiver for review;

Review of correspondence regarding Puerto Rico Broker Opinion of Value; call with Judd Tidwell, CBRE, regarding same;	04/28/20	SAC	0.20
---	----------	-----	------

Email with counsel regarding real estate transaction; email with DKBroadbent regarding same;	04/29/20	CAT	0.50
--	----------	-----	------

Correspondence with counsel for Paysafe and Qualpay regarding orders entered by the court and wiring instructions for transfer of reserve funds; analyze merchant account in the name of Richardson Law Group and possible evidence to establish connection to receivership and correspondence with Mr. Curtis regarding the same; correspondence with BBLarsen regarding need to locate California action administering RLG; correspondence with counsel for Priority Payment Systems regarding requests for information regarding RLG account and negotiations regarding possible stipulation regarding the same; draft stipulation and proposed order and correspondence with Receiver regarding the same; review and analyze status of return of equipment by road crew personnel;	04/29/20	DSB	6.80
--	----------	-----	------

Conference with DSByers regarding Richardson Law Group;	04/29/20	BBL	0.20
---	----------	-----	------

Review and analyze mortgage documents; telephone conference with DKBroadbent regarding same;	04/30/20	CAT	0.80
--	----------	-----	------

Continue analyzing issues related to RLG merchant account; telephone conference with counsel for RLG regarding the same; correspondence with counsel for EMS regarding chargebacks and forward the same to FTC counsel; work on draft complaint against third-parties;	04/30/20	DSB	3.80
--	----------	-----	------

Research and correspondence with real estate brokerages to provide opinion of value for property located in Puerto Rico;	04/30/20	SAC	0.70
--	----------	-----	------

Search California court options; conference with Library	04/30/20	BBL	0.30
--	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Services regarding case involving Richardson Law Group;

Telephone conference with Mr. Magistro regarding RE Cash Source loan issues; email with Mr. Curtis regarding same; review documents regarding same;	05/01/20	CAT	1.30
Work on draft complaint for use against third-parties; respond to various messages from former employees and consumers regarding tax information and potential claims process; correspondence with Receiver regarding proposed stipulation for PPS and turnover of reserve funds;	05/01/20	DSB	3.20
Call with Margaret Pena Juvelier regarding Puerto Rico broker opinion of value; correspondence with DKBroadbent regarding same;	05/01/20	SAC	0.30
Conferences with DSByers regarding email/voice mail messages received in Receivership;	05/01/20	BBL	0.20
Email with team regarding RE Cash Source issues; review documents regarding same;	05/04/20	CAT	0.60
Work to get return labels to road crew personnel for return of equipment; work on issues regarding delay of tax documents for contractors and employees and correspondence with Mr. Curtis, Ms. Easter, BBLarsen, and various former employees regarding the same; confirmation of wire of funds from merchant bank Qualpay; work on negotiations for turnover for additional merchant banks and draft stipulation regarding the same; correspondence with client regarding the same; correspondence with counsel for PPS regarding status of requested accounting and negotiations regarding turnover of reserve funds;	05/04/20	DSB	4.60
Email with team regarding loan payoff and related RE Cash Source business;	05/05/20	CAT	0.40
Correspondence with road crew personnel regarding return of equipment; correspondence with counsel for merchant banks regarding status of requested information and negotiations regarding potential stipulation to transfer reserve funds;	05/05/20	DSB	1.20
Telephone conference with DKBroadbent regarding loan issues; email with counsel regarding Spitzer loan; prepare letter to counsel regarding loan payoff, including review of documents;	05/06/20	CAT	2.00

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Correspondence with client and counsel for defendants regarding tax documents and modifications to website to include defensive pleadings; correspondence with counsel for PPS regarding reserve account and accounting of the same and negotiations regarding potential stipulation for turnover of remaining funds; conference with Mr. Curtis regarding accounting; analyze strategy with respect to PPS and RLG representatives; correspondence with road crew personnel regarding return of equipment; analyze various transfers to third-parties and conference with Mr. Curtis regarding the same;	05/06/20	DSB	4.80
Correspondence with DKBroadbent and Margaret DeJuvelier regarding Puerto Rico broker opinion of value;	05/06/20	SAC	0.20
Analyze strategy with respect to reserve account held by Priority Payment Systems and further analyze accounting of the same; correspondence with Mr. Curtis regarding the same; continue research and analysis of RLG's connection to Zurixx and evidence for the same; work on stipulation with PPS regarding transfer of remaining reserve funds and correspondence and conferences with client and counsel regarding the same; work on third-party claims; conference and correspondence with Messrs. Kennedy and Garrell regarding RGL and review and analyze documents received from them regarding the same;	05/07/20	DSB	4.30
Conference with DSByers regarding Richardson Law Group;	05/07/20	BBL	0.20
Further analyze issues regarding Priority Payments reserve accounts; correspondence with its counsel regarding negotiations and proposed stipulation regarding turnover of remaining reserve funds; follow-up with merchant banks regarding report on chargeback issues; work on return of equipment from road crew personnel and correspondence with several personnel regarding the same; work on draft complaint against third-parties;	05/08/20	DSB	2.90
Letter to counsel regarding mortgage payoff issue; email with DKBroadbent regarding same;	05/11/20	CAT	0.30
Review amended complaint; review and analyze claims made against celebrities in other actions and analyze relation to client's potential claims; correspondence with LKelly and BBLarsen regarding needed updates to website	05/12/20	DSB	2.60

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

to include additional pleadings; correspondence with counsel for PPS regarding status of requested information and negotiations regarding stipulation regarding turnover of funds;

Work on negotiations for stipulation related to PPS reserve funds and correspondence with PPS counsel regarding the same; analyze and edit draft stipulation and related order; correspondence with FTC, UDCP, and client regarding the same; additional correspondence with merchant banks regarding accounting of chargebacks; review information forwarded from client regarding chargebacks; work on updating website to provide pleadings and correspondence with BBLarsen and LKelly regarding the same; correspondence from Mr. Ockner regarding status of claims procedures;	05/13/20	DSB	4.80
--	----------	-----	------

Conferences with DSByers and LSKelly regarding Zurixx website updates;	05/13/20	BBL	0.20
--	----------	-----	------

Review and analyze documents regarding real property issues; telephone conference with DKBroadbent regarding same;	05/14/20	CAT	0.60
--	----------	-----	------

Finalize and file stipulation regarding reserve funds with Priority Payment Systems; correspondence with Ms. Guerard and Mr. Wing regarding the same; conference with client and LKelly regarding modification of website to include pleadings; correspondence with counsel for defendants regarding providing email backup files; review correspondence regarding a Garnet Real Estate and analyze relationship to receivership entities; conference with CATalbot regarding the same; review signed order from Court regarding turnover of reserve funds and correspondence with client regarding the same; analyze strategy for service of the same; telephone conference with Mr. Ockner regarding status of claims procedures;	05/14/20	DSB	5.30
---	----------	-----	------

Conferences with TNeve regarding mail delivered to PO Box; forward bankruptcy notice to DSByers and CATalbot;	05/14/20	BBL	0.30
---	----------	-----	------

Review documents regarding RE Cash Source issues; telephone conference with DKBroadbent and JCStark regarding RE Cash Source issues; telephone conference with Mr. Magistro regarding same; email with team regarding same;	05/15/20	CAT	1.20
---	----------	-----	------



IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Correspondence regarding update to website; conference with client, CATalbot, and JCStark regarding investigation of mortgagor interests owned by Zurixx and related entities; correspondence with counsel for merchant banks regarding transfer of reserve funds; analyze issues related to RLG and service of order entered by the Court on the same; correspondence with Mr. Cantarero and counsel for defendants regarding providing copy of email server; correspondence with Mr. Segal regarding return of equipment;	05/15/20	DSB	3.20
Zurixx call; Review excel notebook;	05/15/20	JCS	1.40
Review and analyze claims against Zurixx entities for use in third-party claims; email with team regarding lending issues; email with JCStark regarding same;	05/18/20	CAT	2.10
Correspondence with team regarding updates to Zurixx website; correspondence with CATalbot and Mr. Cantarero regarding accessing Zurixx files for asset analysis and recovery;	05/18/20	DSB	1.60
Research Garnet Real Estate;	05/18/20	JCS	1.10
Letter to Washington Court of Appeals regarding status of receivership action; coordinate with JCStark regarding lending issues; email with Mr. Magistro regarding same; review materials regarding same;	05/19/20	CAT	1.90
Correspondence with counsel for Paysafe regarding chargeback information and review and analyze the same; correspondence with counsel for UCPA and FTC regarding the same; analyze status of transfers for reserve funds from merchant banks and correspondence with Mr. Curtis regarding the same; correspondence regarding defendants' counsel's access to server; analyze notice and account statements for entities and whether such entities are affiliated with Zurixx;	05/19/20	DSB	3.40
Review Washington State Court of Appeal's quarterly update order and email CATalbot regarding same;	05/19/20	KS	0.40
Search electronic folders for Garnet Real Estate documents;	05/19/20	JCS	1.20
Email with BBLarsen and DSByers regarding correspondence to Zurixx entities and notice of receivership;	05/20/20	CAT	1.30

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

email with Mr. Magistro regarding lending issues; email with JCStark regarding project; review case documents for use in third-party claims;

Correspondence with Mr. Cantarero and counsel for defendants regarding access to CRM; analyze status of transfers of reserve funds from merchant banks and correspondence with Mr. Curtis and client regarding the same; correspondence with counsel for merchant banks regarding the same; analyze lenders who lent to consumers to purchase Zurixx products and review interview notes regarding the same; correspondence with client and CATalbot regarding the same; analyze chargeback information and notice and correspondence with counsel for EMS regarding the same; correspondence with BBLarsen and CATalbot regarding the same;	05/20/20	DSB	4.20
--	----------	-----	------

Draft order on Motion for Contempt for David Efron and Efron Dorado, S.E.;	05/20/20	CJD	4.50
--	----------	-----	------

Conferences with DSByers and CATalbot regarding mail forward to Receiver PO Box;	05/20/20	BBL	0.30
--	----------	-----	------

Work on recovery of equipment from road crew and correspondence with Mr. Segal regarding the same; correspondence with counsel for EMS regarding notice received regarding chargebacks; analyze issues for third-party claims and work on draft complaint;	05/21/20	DSB	2.40
--	----------	-----	------

Correspondence with practice administrator for RGL regarding PPS reserve account and order from court; work on gathering evidence of Zurixx's exclusive use of the account; conference with Ms. Grier of FTC regarding requested information regarding Zurixx personnel, and begin efforts to locate and forward such information; correspondence with counsel for merchant banks regarding requested information and continued negotiations regarding potential compromise regarding reserve funds; review and analyze Utah Supreme Court case as it relates to potential claims against third parties;	05/22/20	DSB	4.20
--	----------	-----	------

Correspondence with consumers regarding claims process and status;	05/25/20	DSB	0.30
--	----------	-----	------

Email with JCStark regarding research issues; email with Mr. Magistro regarding entity issues;	05/26/20	CAT	0.40
--	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Research specific information regarding various third-parties against whom Receiver may bring claims and correspondence with Mr. Curtis regarding the same; analyze RLG account and obtaining information requested by RLG's representative; correspondence with Ms. Grier regarding research related to personnel files for employees and contractors; correspondence with consumers regarding potential claims process;	05/26/20	DSB	3.90
Conference with JCStark regarding research issues; email with Mr. Magistro regarding same;	05/27/20	CAT	0.30
Correspondence regarding update to website and inclusion of pleadings on the same; follow up on status of return of equipment and strategy for liquidation of all equipment recovered; search for statements for PPS account and correspondence with Messrs Magistro and Curtis regarding the same; analyze and search for personnel files for employees and contractors and correspondence with Mr. Cantarero regarding the same;	05/27/20	DSB	3.00
Address service issues regarding motion for contempt, including telephone conference with EJTejeda; telephone conference with DSByers regarding third-party complaints; analysis of potential claims, including review of research;	05/28/20	CAT	1.90
Research issues related to merchant accounts and correspondence with Messrs. Curtis and Magistro regarding the same; research files kept by Zurixx regarding personnel; correspondence with road crew personnel regarding equipment return;	05/28/20	DSB	3.80
Discuss personal service for the motion for contempt of David Efron and Efron Dorado, S.E. with EJTejeda and CATalbot; research and analyze the civil procedural rules and case law governing service on third-parties;	05/28/20	CJD	1.90
Conference with DSByers and CATalbot regarding Zurixx received mail;	05/28/20	BBL	0.20
Email with Mr. Magistro regarding lending issues;	05/29/20	CAT	0.20
Analyze account information related to the RLG merchant account and correspondence with Mr. Magistro and Mr. Curtis regarding the same; correspondence with road crew personnel regarding return of equipment;	05/29/20	DSB	1.50

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Correspond with attorneys in Puerto Rico regarding personal service of the motion for contempt; research and identify the physical address for Efron Dorado, S.E. and send to attorneys in Puerto Rico;	05/29/20	CJD	1.00
Follow-up with CJDavis regarding service of process of motion in Puerto Rico;	05/29/20	EJT	0.20
Telephone conference with JCStark regarding lending research; email with team regarding service issues;	06/01/20	CAT	0.60
Correspondence with Ms. Guzman regarding return of equipment; review and analyze detailed cash reports for Zurixx relating to merchant accounts and conference and correspondence with Messrs Magistro and Curtis regarding the same; analyze correspondence regarding RECash and potential assets to recover and correspondence with CATalbot and JCStark regarding the same; correspondence regarding notice of withdraw of defendants' counsel;	06/01/20	DSB	2.00
Address Zurixx forwarded mail;	06/01/20	BBL	0.20
Telephone call with Matt Magistro to review Excel workbook for RECash Source; Prepare e-mail to summarize information	06/01/20	JCS	2.60
Analysis of lending issues, including email with JCStark; review and analysis of documents, and telephone conference with DSByers;	06/02/20	CAT	1.70
Correspondence with former employee regarding status of claims process; analyze account with PPS related to RLG and correspondence with Messrs Magistro and Curtis regarding the same; analyze issues related to possible real estate related assets and the liquidation of the same and correspondence with CATalbot regarding the same; coordinate with road crew personnel regarding return of equipment;	06/02/20	DSB	2.20
Correspond with attorneys in Puerto Rico regarding service of the motion for contempt;	06/02/20	CJD	0.30
Review RECash workbook for outstanding loans;	06/02/20	JCS	1.00
Review and edit draft protective order; email with consumer regarding claims process; telephone conference with DKBroadbent regarding draft protective order and third-	06/03/20	CAT	2.40

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

party claims; review variety of correspondence to receivership; address service issues in Puerto Rico;

Correspondence with BBLarsen and Mr. Curtis regarding status of W2s and 1099s, as well as addressing other correspondence from potential claimants; analyze proposed protective order and correspondence with client and CATalbot regarding the same; analyze and work on third-party complaint;	06/03/20	DSB	3.20
--	----------	-----	------

Discuss the status of service of the motion for contempt with Puerto Rico attorneys and schedule teleconference;	06/03/20	CJD	0.30
--	----------	-----	------

Address forwarded mail and review Receivership email requiring action; conferences with CATalbot and DSByers regarding same; communication with Mr. Curtis and Ms. Easter regarding status of emails received regarding 1099s and W-2s;	06/03/20	BBL	0.40
---	----------	-----	------

Email with team regarding protective order; revise and edit draft protective order; review and respond to correspondence; review and edit draft complaint;	06/04/20	CAT	2.20
--	----------	-----	------

Correspondence with Mr. Kennedy regarding analysis of PPS account for RLG; correspondence and conferences with Messrs Magistro and Curtis regarding the same; review and analyze documents related to potential third-party defendants and work on draft complaint related to the same; analyze strategy with respect to identification and liquidation of real estate related assets and correspondence with CATalbot and client regarding the same; correspondence with CATalbot, client and Mr. Doan regarding proposed draft protective order;	06/04/20	DSB	4.60
--	----------	-----	------

Teleconference with CATalbot and Puerto Rico attorney regarding service of the motion for contempt; prepare copies of the motion for contempt to be served by mail;	06/04/20	CJD	1.00
---	----------	-----	------

Telephone conference with DSByers and DKBroadbent regarding status and strategy; email with Mr. Magistro regarding entity issues; draft correspondence regarding inquiries to receivership; prepare status report;	06/05/20	CAT	3.10
--	----------	-----	------

Conference with client and CATalbot regarding status and strategy with respect to various tasks in the case; analyze bankruptcy notices received and correspondence with Mr. Magistro regarding the same; analyze status of fee	06/05/20	DSB	4.60
---	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

application and review invoices for professionals; analyze notice of appearances for defendants; analyze and research parties for third-party complaints; correspondence with Mr. Kennedy regarding RLG and potential claim to reserve funds; analyze and review Zurixx files regarding personnel and correspondence with Ms. Easter regarding the same; attention to website updates and correspondence with LKelly and BBLarsen regarding the same;

Email with counsel regarding limitation issues; review tax correspondence; email with Mr. Doan regarding draft protective order;	06/08/20	CAT	0.60
--	----------	-----	------

Correspondence with Ms. Easter regarding location and existence of various Zurixx files; follow-up on status of return of equipment; correspondence with Mr. Curtis regarding payments made by Zurixx and source of funds related thereto;	06/08/20	DSB	1.30
--	----------	-----	------

Analyze Zurixx financial records regarding payments to third-parties and correspondence with Mr. Curtis regarding the same; correspondence with BBLarsen regarding updates to the website;	06/09/20	DSB	0.80
--	----------	-----	------

Conference with DSByers and LSKelly regarding Zurixx website;	06/09/20	BBL	0.20
---	----------	-----	------

Email with counsel, former employees, consumers, and contractors regarding receivership questions; prepare status report;	06/10/20	CAT	2.00
---	----------	-----	------

Analyze Zurixx files related to personnel and conferences with Ms. Easter regarding the same; analyze status of gathering equipment from road crew personnel; conference with Ms. Grier with the FTC regarding files and possible production of the same; work on draft third-party complaint;	06/10/20	DSB	4.20
--	----------	-----	------

Discuss status of serving the motion for contempt on Mr. Efron;	06/10/20	CJD	0.30
---	----------	-----	------

Prepare status report; review of draft complaint; email with tax authorities regarding Zurixx entities;	06/11/20	CAT	2.60
---	----------	-----	------

Work on draft third-party complaint and research issues related to the same; conferences with client, and Messrs Curtis and Magistro regarding facts of case and other information related to third-party claims; forward draft complaint to client for review;	06/11/20	DSB	7.20
---	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Coordinate service of motion for contempt with attorney in Puerto Rico;	06/11/20	CJD	0.30
Revise and edit draft complaint; email with team regarding same; address legal questions regarding service issues in Oregon and Puerto Rico; address property tax issues;	06/12/20	CAT	4.00
Work on formatting of website and correspondence with BBLarsen and LKelly regarding the same; analyze draft complaint against third-party and correspondence with CATalbot regarding the same; research issues related to third-party claims; correspondence with Mr. Kennedy regarding RLG accounts;	06/12/20	DSB	2.30
Review declaration from the Puerto Rico process server regarding the motion for contempt; draft affidavit of service; research alternative service procedural requirements; discuss the same with CATalbot; coordinate with attorneys in Puerto Rico to attempt service on Mr. Efron again as soon as possible;	06/12/20	CJD	1.00
Research issues regarding pleading requirements for third[-party claims; analyze documents related to third parties who are potential targets of claims; correspondence with BBLarsen and LKelly regarding website; correspondence with BBLarsen regarding disputes regarding Education Services and connection to Zurixx;	06/15/20	DSB	3.60
Telephone conference with DSByers regarding draft complaint; review correspondence to receivership;	06/15/20	CAT	0.40
Address forwarded mail and conferences with DSByers and CATalbot regarding same; conference with DSByers and LSKelly regarding Zurixx Receivership website;	06/15/20	BBL	0.40
Prepare status report, including review of documents; review and respond to correspondence to receiver;	06/16/20	CAT	2.50
Analyze accounting information for RLG account and analyze strategy for resolving potential dispute regarding the same; analyze strategy with respect to PPS and demand for turnover of funds removed from merchant reserve account as well as resolution to remaining claims by merchants generally; correspondence with consumers regarding potential claims process;	06/16/20	DSB	4.40
Work on draft complaint against third-parties and	06/17/20	DSB	3.90

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

conference with CATalbot and DKBroadbent regarding the same; conference with BBLarsen and LKelly regarding changes to website; correspondence with Mr. Kennedy regarding RLG accounts; conference with Mr. Curtis regarding the same and draft response to Mr. Kennedy forwarding accounting information;

Email with EJTejeda, DSByers, and DKBroadbent regarding Canadian legal issues; telephone conference with DKBroadbent regarding same; telephone conference with DKBroadbent and DSByers regarding draft complaint; research regarding loan issues, including email with Mr. Curtis and DKBroadbent; prepare status report;	06/17/20	CAT	3.40
---	----------	-----	------

Conference call with DSByers and LSKelly regarding Zurixx Receivership website;	06/17/20	BBL	0.40
---	----------	-----	------

Work on draft complaint against third-party and conference with client regarding the same; analyze and review relevant authorities regarding the same; analyze and review Zurixx files regarding support for third-party claims and correspondence with Mr. Cantarero regarding location of additional files; work on fee application; review status of responses and equipment received from road crew personnel;	06/18/20	DSB	4.30
--	----------	-----	------

Prepare status report; revise correspondence regarding loan issues; telephone conference with DKBroadbent regarding potential claims; review case law regarding same;	06/18/20	CAT	3.20
---	----------	-----	------

Review lending documents; email with Mr. Cantarero regarding same; prepare status report; telephone conference with CJDavis regarding research issues;	06/19/20	CAT	1.20
--	----------	-----	------

Finalize draft complaint against third-party, conference with client regarding the same, and forward to counsel for FTC and UDCP for input; analyze issues related to RLG accounts and conference with counsel for RLG regarding negotiations to resolve potential dispute; work on related declarations; review and analyze existence and location of Zurixx documents related to potential third-party claims and conferences with Mr. Cantarero regarding the same;	06/19/20	DSB	4.10
--	----------	-----	------

Discuss researching aiding and abetting claims with CATalbot;	06/19/20	CJD	0.40
---	----------	-----	------

Review email from local Canadian counsel regarding	06/21/20	EJT	0.30
--	----------	-----	------



IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Advanced Education lawsuit; review motion to declare subsidiary part of the receivership;

Coordinate with team on Puerto Rico service issues; letter to counsel regarding property sale, including review of financial information and loan documents; prepare status report;	06/22/20	CAT	2.90
---	----------	-----	------

Negotiations with counsel for RLG regarding resolution of dispute over reserve account; work on collection of equipment from former road crews; work on third party complaints;	06/22/20	DSB	4.30
---	----------	-----	------

Draft Motion for Alternative Service; coordinate with local counsel in Puerto Rico to obtain final declarations from the process servers;	06/22/20	CJD	3.50
---	----------	-----	------

Review declarations; review, edit, and finalize draft motion; email with CJDavis regarding same; revise draft status report;	06/23/20	CAT	1.40
--	----------	-----	------

Analyze status of return of equipment and conference with Mr. Bueche regarding the same; analyze strategy for liquidation of equipment; work on analyzing third-party claims and potential defendants;	06/23/20	DSB	3.60
--	----------	-----	------

Finalize the Motion for Alternative Service and prepare for filing with the Court;	06/23/20	CJD	0.40
--	----------	-----	------

Review and analyze draft discharge of mortgage document; email with team regarding service issues;	06/24/20	CAT	0.50
--	----------	-----	------

Analyze issues regarding RLG account and work with Mr. Curtis on his declaration regarding accounting information; correspondence with counsel for RLG regarding the same;	06/24/20	DSB	2.00
--	----------	-----	------

Correspond with local attorneys in Puerto Rico regarding declaration from the process servers;	06/24/20	CJD	0.20
--	----------	-----	------

Address service issues; review documents regarding lending issues; update and draft status report; analysis of fraudulent transfer issue;	06/25/20	CAT	1.90
---	----------	-----	------

Finalize and send declaration of Mr. Curtis to counsel for RLG regarding RLG account and correspondence with counsel regarding the same; work on third party claims and correspondence with Mr. Wing regarding the same; analyze claims and potential targets of third-party claims; analyze status of funds received from merchant banks and orders	06/25/20	DSB	4.20
--	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

related to the same and correspondence with counsel for merchant banks regarding failure to transfer all funds pursuant to orders;

Serve Motion to Hold Mr. Efron and Efron Dorado in Contempt of Court; research and analyze case law discussing potential aiding and abetting claims raised by a Receiver; locate and prepare receipts showing service of the Motion by U.S. Mail;	06/25/20	CJD	2.10
---	----------	-----	------

Review and analyze opposition to motion for contempt; telephone conference with CJDavis regarding same; follow-up regarding lending issues with counsel; review and edit draft protective order;	06/26/20	CAT	2.40
--	----------	-----	------

Analyze and conference with counsel for RLG regarding resolution of dispute over reserve account; analyze proposed protective order in case; review and analyze opposition to motion for sanctions and conference with CATalbot regarding strategy regarding the same;	06/26/20	DSB	2.40
--	----------	-----	------

Review and analyze Mr. Efron's opposition to the Motion for Contempt; discuss the same with CATalbot; continue to research and analyze case law discussing potential aiding and abetting claims against third parties;	06/26/20	CJD	4.80
--	----------	-----	------

Prepare reply regarding motion for contempt, including review of correspondence and legal authorities; email with team regarding same;	06/27/20	CAT	2.30
--	----------	-----	------

Discuss strategy for responding to Mr. Efron's opposition with CATalbot and EJTejeda;	06/27/20	CJD	0.30
---	----------	-----	------

Prepare reply in support of motion for contempt; telephone conference with DSByers regarding same; revise and edit draft protective order;	06/29/20	CAT	2.40
--	----------	-----	------

Analyze proposed protective order and conference with CATalbot regarding the same; analyze draft third party complaint and correspondence with FTC counsel regarding the same; analyze various issues related to third-party claims including pleading and potential targets; analyze jurisdictional issues regarding motion for sanctions and conference with CATalbot regarding the same; correspondence with Mr. Carlson regarding tax returns; correspondence with Ms. Easter regarding locating information regarding employees and contractors;	06/29/20	DSB	3.80
---	----------	-----	------

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Review deadlines for responding to Mr. Efron's opposition to the Motion for Contempt;	06/29/20	CJD	0.20
Revise and edit draft protective order; email with team regarding same;	06/30/20	CAT	0.40
Correspondence with client and counsel for RLG regarding issues related to RLG account; review appearance of counsel for defendants; correspondence with counsel for various merchant banks regarding information requested from merchant banks and regarding status of transfer of reserve funds; analyze issues regarding various potential third-parties related to claims against the same;	06/30/20	DSB	2.30

**Total Current Fees: \$169,538.25**

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Tkpr ID</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
JCStark	2008	76.50	7.30	558.45
BBLarsen	2172	265.50	8.80	2,336.40
GELindley	5172	472.50	0.20	94.50
DSByers	5654	402.00	306.10	123,052.20
CATalbot	5657	408.00	88.70	36,189.60
EJTejeda	5852	292.50	2.30	672.75
CJDavis	5960	247.50	24.70	6,113.25
KSSargsian	5974	279.00	0.40	111.60
SAClayton	6080	292.50	1.40	409.50
			<b>439.90</b>	<b>\$169,538.25</b>

**Disbursements**

<b>Description of Disbursements</b>	<b>Date</b>	<b>Amount</b>
Outside Fees: VENDOR: DigitalOcean.com; INVOICE#: 412591192; DATE: 12/1/2019 - Website renewals related to Doyle Byers client	12/01/19	354.60
Outside Fees: VENDOR: DNH*GODADDY.COM; INVOICE#: 1598028307; DATE: 12/6/2019 - Website renewals related to Doyle Byers client	12/06/19	62.73

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1828407 3354002
---	-----------------------------	--------------------

Other Charges: 03/02/2020 - Amex - Other Client Charges - Post office box for Zurixx mail (paid for one year).	03/02/20	318.00
United Parcel Service: COM. GROUND, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9095317098	04/20/20	84.79
United Parcel Service: COM. GROUND, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9095350873	04/20/20	86.00
United Parcel Service: COM. GROUND, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9097290701	04/20/20	87.57
United Parcel Service: COM. GROUND, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9099718924	04/20/20	22.64
United Parcel Service: SHIPPING CHRG CORRECTION, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9095350873	04/20/20	3.74
United Parcel Service: SHIPPING CHRG CORRECTION, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9099718924	04/20/20	2.68
United Parcel Service: COM. GROUND, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9095791316	04/21/20	17.35
United Parcel Service: COM. GROUND, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9091627091	04/23/20	35.72
United Parcel Service: COM. GROUND, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9094574106	04/23/20	74.83
United Parcel Service: COM. GROUND, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9095970480	04/23/20	80.93
United Parcel Service: SHIPPING CHRG CORRECTION, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9091627091	04/23/20	15.21
United Parcel Service: SHIPPING CHRG CORRECTION, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9095970480	04/23/20	13.97
Computerized Research: VENDOR: LexisNexis (294) INVOICE #: 3092601221 DATE: 04/30/2020; Courtlink usage performed by ALindquist	04/30/20	50.44
United Parcel Service: COM. GROUND, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9090595172	05/22/20	39.57

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1828407
	H&H Ref. No.	3354002

United Parcel Service: SHIPPING CHRG CORRECTION, 05/22/20 13.69  
SLC, Holland & Hart LLP, Salt Lake City, UT,  
1Z59E98W9090595172

---

**Total Current Disbursements: \$1,364.46**



IRS EMPLOYER NO. 84-0382505  
PLEASE REMIT TO:  
P.O. BOX 17283  
DENVER, CO 80217-0283

**July 22, 2020**

Broadbent, David, as Receiver for Zurixx, LLC David K. Broadbent 222 S. Main Street, Suite 2200 Salt Lake City, UT 84101	Invoice No. H&H Ref. No. Client No. Attorney:	1828407 3354002 107333 DKBroadbent
---	--	---

**Regarding: Matter No. 0002 - Zurixx Monitor - Attorneys**

**Invoice Summary**

<b>Current fees</b>	<b>\$169,538.25</b>
<b>Current disbursements</b>	<b>\$1,364.46</b>
<b>Current charges this invoice</b>	<b>\$170,902.71</b>

Thank you for your prompt payment. Questions regarding this invoice should be directed to the attorney responsible for your account, or Carla Norton, Billing Specialist in our Salt Lake City office, at (801) 799-5815 or [cnorton@hollandhart.com](mailto:cnorton@hollandhart.com).

**Due On Receipt**

Please return this page with your remittance.

# **EXHIBIT “C”**

**Rocky Mountain** **RMA**  
 ADVISORY

215 South State Street  
 Suite 550  
 Salt Lake City, UT 84111  
 801.428.1600

Mr. David Broadbent, Receiver  
 Holland & Hart  
 222 South Main Street, Suite 220  
 Salt Lake City, UT 84101

July 17, 2020

Invoice # 14466

Billing for: 03/01/20 to 06/30/20

RE: Federal Trade Commission v ZURIXX

Previous balance	\$15,302.97
4/28/2020 Payment - Thank You. Check No. 250	(\$15,292.97)
	(\$15,292.97)
Total payments and adjustments	(\$15,292.97)

Professional Services Summary

Name	Hours	Rate	
Gil A. Miller	0.50	365.00	\$182.50
John H. Curtis	41.20	260.00	\$10,712.00
Josh Gifford	15.30	205.00	\$3,136.50
Jordan Colohan	3.10	195.00	\$604.50

Professional Services Detail

Date	Init.	Description	Hours	
03/03/20	JG	File 2019 Extensions.	0.20	\$41.00
	JHC	Searched for Brand Management tax information, requested the same from M. Magistro. Reviewed and searched for Brand Management tax ID number and provided to J. Gifford for tax preparation.	0.60	\$156.00
03/05/20	JHC	Call with D. Byers regarding investigation needs. Began analysis of payments to various payees requested by D. Byers.	0.80	\$208.00
03/06/20	JHC	Reviewed data to prepare cash disbursements summaries and reports to provide to counsel for various payees.	0.90	\$234.00
03/09/20	JHC	Prepared cash disbursement summaries and detailed report for D. Byers related to distributions, transfers and payroll payments to owners and other payees of interest.	1.50	\$390.00
03/26/20	JG	Call with J. Curtis and Zurixx owners and tax preparers regarding 2019 tax returns.	0.80	\$164.00



Mr. David Broadbent, Receiver

July 17, 2020

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
03/26/20	JHC	Call with D. Broadbent regarding tax return. Attended conference call with J. Carlson and others to discuss tax returns. Prepared list of funds recovered to date through Receivership and provided to C. Talbot.	2.10	\$546.00
03/27/20	JHC	Email communications with Receiver regarding revisions to report of cash amounts collected and outstanding. Revised cash schedule and resent. Reviewed email from J. Carlson regarding tax preparation and followed up with J. Gifford.	1.10	\$286.00
04/01/20	JHC	Call with D. Broadbent regarding payments to Reyes Trust. Email communication to M. Magistro regarding payments to Reyes Trust. Responded to Receiver regarding search.	0.70	\$182.00
04/02/20	JHC	Prepared and sent response to D. Broadbent incorporating M. Magistro comments relative to money sent to the Reyes Trust. Reviewed JOFCO invoice and sent to R. Erekson with instructions. Provided reserve account details and information to D. Byers.	0.90	\$234.00
04/03/20	JHC	Email communications with D. Byers regarding reserve account balances. Provided additional information to him and followed up with deposits into receivership.	0.60	\$156.00
04/06/20	JHC	Email correspondence with Receiver and J. Carlson regarding registration fees. Reviewed and responded to inquiries.	0.40	\$104.00
04/07/20	JHC	Prepared tax data for the Receivership for the period October to December 2019 and provided to M. Magistro and tax preparer for preparation of initial draft.	1.20	\$312.00
04/08/20	GAM	Call with Receiver regarding liquidation of assets and recommendations for professionals.	0.30	\$109.50
04/14/20	JHC	Reviewed and responded to Receiver email regarding reserve accounts and incoming wires. Reviewed account for possible wire. Searched for and attempted login to obtain additional information on remaining reserve account.	1.70	\$442.00
04/15/20	JHC	Call with D. Byers regarding Puerto Rico W-2's. Follow up with D. Easter regarding completion of W-2's for Puerto Rico employees.	0.50	\$130.00
04/16/20	JHC	Reviewed bank accounts for incoming wire from EMS. Received and recorded wire from EMS for reserve funds, setup separate account and transferred funds to segregated account. Email to Receiver regarding receipt of funds.	0.70	\$182.00
04/17/20	JHC	Reviewed and received \$2.4 million wire of reserve funds, recorded the same and updated Receiver and D. Byers. Email correspondence with D. Byers regarding funds and source of the same from EMS.	0.50	\$130.00
04/21/20	JHC	Analyzed and researched information on Richardson Law Group reserve account through review of historical financial information, responses from M. Magistro and inquiry with M. Magistro. Email communications with D. Byers regarding Richardson Law Group reserve account reserves and information.	1.50	\$390.00
04/24/20	JHC	Searched for charitable contributions and prepared summary of the same. Submitted summary of donations to D. Byers for review.	0.60	\$156.00
04/29/20	JHC	Searched for Richardson Law Group transactions and related history. Reviewed weekly financial packages for evidence of RLG merchant accounts being used for Zurixx. Provided data and information to counsel.	0.70	\$182.00

Mr. David Broadbent, Receiver

July 17, 2020

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
05/04/20	JHC	Email communications with D. Easter regarding W-2's for Puerto Rico employees. Continued follow up regarding W-2 completion. Reviewed incoming deposit, recorded deposit and requested information from counsel. Analyzed RE Cash Source documents and data to respond to C. Talbot. Requested RE Cash Source information from M. Magistro.	2.10	\$546.00
05/05/20	JHC	Reviewed M. Magistro email regarding RE Cash Source mortgages and related documents. Responded to C. Talbot. Email communications with D. Easter regarding Puerto Rico W-2's and responses to other employees.	0.50	\$130.00
05/06/20	JHC	Email communications with D. Easter regarding W-2 inquiries and related responses. Email communications with D. Broadbent regarding Puerto Rico W-2 status and ongoing work to get filed.	0.50	\$130.00
05/07/20	JHC	Reviewed RLG reserve account transaction detail produced by merchant bank. Call with D. Byers to review and discuss account balances, transaction history and response to merchant bank.	0.60	\$156.00
05/12/20	JHC	Reviewed documentation on Reichard and Escalara payments and provided information to Receiver. Email communications with D. Easter regarding W-2's for Puerto Rico and getting drafts to employees.	0.60	\$156.00
05/20/20	JHC	Reviewed and recorded large deposits related to turnover of merchant account balances. Email correspondence with Receiver and counsel regarding deposits. Transferred merchant reserve funds to segregate money. Ensured segregation of all merchant reserve funds.	0.70	\$182.00
05/28/20	JHC	Reviewed Puerto Rico W-2 filings and requested information for check to the IRS. Reviewed emails from D. Byers and M. Magistro and worked on determining responses to the same. Reviewed report of cash disbursements and responded to D. Byers.	1.40	\$364.00
05/29/20	JHC	Provided directions to R. Ereksom regarding IRS payment and email communications regarding the same.	0.30	\$78.00
06/02/20	JHC	Analyzed and reviewed weekly financial packages for RLG reserve account activity reported as Zurixx activity. Responded to D. Byers and M. Magistro with possible response to merchant bank and RLG with declaration from M. Magistro.	0.60	\$156.00
06/03/20	JHC	Correspondence with B. Larsen regarding responses to employee inquiries. Call with Cubes storage regarding invoices and prepayment plan.	0.30	\$78.00
06/04/20	JHC	Call with D. Byers and M. Magistro regarding financial data showing transactions through RLG/Cynergy merchant account and Chase RLG bank account. Prepared report showing Zurixx transactions through merchant account and bank account in RLG name and provided to D. Byers. Call with D. Byers regarding report provided and explanation of the same.	1.60	\$416.00
06/05/20	JHC	Provided financial information to D. Byers on entities receiving payment. Reviewed information on FlipItForward property and provided response to C. Talbot.	0.60	\$156.00

Mr. David Broadbent, Receiver

July 17, 2020

Date	Init.	Description	Hours	
06/09/20	JHC	Reviewed data and reports of W2 and 1099 employee and contractor payments from Zurixx for entity to determine paying entity. Follow up and call with M. Magistro regarding entity paying employees and contractors. Email to D. Byers providing information on paying entities for recovery complaints.	1.10	\$286.00
06/12/20	JHC	Reviewed data for recovery complaints and responded to D. Byers with information.	0.40	\$104.00
06/17/20	JC	Call with J. Curtis to discuss addresses and review schedules including the same.	0.40	\$78.00
	JHC	Searched for and reviewed RE Cash Source documents for interest rate information. Researched IRS interest rate information to assist with RE Cash Source loan payoff. Prepared data files and searched for payee information for filing of complaints. Directed J. Colohan in compiling payee information to enable filing of complaints.	1.50	\$390.00
06/18/20	JG	Review income and expenses on 2019 Zurixx, LLC tax return.	4.60	\$943.00
	JC	Review documents for vendor and employee addresses and compile in summary schedule.	0.80	\$156.00
06/23/20	JHC	Analyzed and reviewed data to determine report of tele sales by month and how to prepare report requested by FTC. Email to M. Magistro requesting assistance with analysis and calculations.	1.70	\$442.00
06/24/20	JC	Review additional schedules containing vendor and employee addresses and include in related schedules. Prepare email to J. Curtis regarding the same.	0.80	\$156.00
	JHC	Call with M. Magistro regarding preparation of report of tele sales and net deposits by month and type. Analyzed data to prepare report and made various changes to pivot table and query to prepare report for FTC. Call with D. Byers regarding declaration related to Richardson Law Group (RLG) reserve account. Reviewed declaration and exhibit.	2.60	\$676.00
06/25/20	JG	Review V. Kamdar's work papers and reconcile to tax return drafts. Compile list of questions for V. Kamdar.	3.20	\$656.00
	JHC	Finalized, signed and submitted declaration related to Richardson Law Group reserve account and transactions relative to the same. Analyzed data to determine tele sales by month and type. Communications with M. Magistro, former CFO, regarding generating report of tele sales and data fields. Prepared summary report of tele sales by month and by real estate and entrepreneurship categories. Updated accounting for reserve funds based on information from D. Byers, Receiver's counsel. Call with D. Byers.	4.70	\$1,222.00
06/26/20	JC	Review various records, schedules and workbooks to identify vendor and employee addresses.	1.10	\$214.50
	JHC	Revised summary report of tele sales to include total for period May 2017 to October 2019 and submitted report in Excel format.	0.70	\$182.00
	GAM	Work on getting telesales information to FTC.	0.20	\$73.00
06/29/20	JG	Re-calculate liquidation journal entries and add to list of questions for V. Kamdar.	2.20	\$451.00
	JHC	Reviewed D. Easter invoices and email communications regarding the same. Reviewed invoices from LLMD for preparation of Puerto Rico tax returns. Directed R. Erekson in preparation of checks paying invoices.	0.60	\$156.00

Mr. David Broadbent, Receiver

July 17, 2020

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
06/30/20	JG	Discuss tax return review with J. Curtis. Draft email to V. Kamdar regarding review. Respond to V. Kamdar request for document.	4.30	\$881.50
	JHC	Meeting with J. Gifford to review tax returns and discuss revisions and comments. Reviewed and responded to J. Carlson regarding LLMD Puerto Rico tax returns for 2018. Reviewed Kamdar invoices and requested additional information on significant fees for liquidation.	1.10	\$286.00
Total for professional services rendered			60.10	\$14,635.50

## Expenses

<u>Date</u>	<u>Init.</u>	<u>Description</u>		
03/03/20	JG	Tax extension - Brand Management		\$68.96
	JG	Tax extension - Zurixx		\$68.96
03/31/20	RE	Copying cost (7 copies at \$.15 per copy)		\$1.05
04/01/20	JHC	Payment to Digital Ocean for website support fees and services.		\$66.43
	JHC	Digital Ocean payment for website support fees and services		\$308.00
04/30/20	RE	Postage		\$3.00
	RE	Courier Service		\$125.75
05/01/20	JHC	Website volume usage charges		\$66.43
	JHC	Website volume usage charges		\$308.00
05/31/20	RE	Copying cost (16 copies at \$.15 per copy)		\$2.40
	RE	Postage		\$0.50
	RE	Courier Service		\$87.25
06/01/20	JHC	Data Backup charges		\$308.00
	JHC	Data backup charges		\$66.43
06/30/20	RE	Copying cost (3 copies at \$.15 per copy)		\$0.45
	RE	Postage		\$7.90
	RE	Courier Service		\$38.50
Total expenses				\$1,528.01
Total new charges				\$16,163.51
Balance due				\$16,173.51