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Attorneys for David K. Broadbent as Court-Appointed Receiver

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

<p>FEDERAL TRADE COMMISSION; and UTAH DIVISION OF CONSUMER PROTECTION,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>ZURIXX, LLC, a Utah limited liability company; <i>et al.</i>,</p> <p>Defendants.</p>	<p>RECEIVER’S FOURTH APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE RECEIVER AND RETAINED PROFESSIONALS</p> <p>Case No. 2:19-cv-00713-DAK-DAO</p>
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David K. Broadbent, as receiver (the “Receiver”) for Defendants Zurixx, LLC and related entities (collectively, “Zurixx”), submits this Fourth Application for Compensation and Reimbursement of Expenses for the Receiver and Retained Professionals (the “Fourth Application”). The Receiver requests an Order approving payment of fees and expenses incurred in the months of July through October, 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 Fourth 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 Fourth 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; further analyze potential claims against third-parties that may be brought by the Receiver; work on drafting and filing related complaints against presenters, tele-sales agents, and celebrity endorsers, and draft demands and negotiate tolling agreements with others; respond to threatened and filed litigation and claims to stay such claims in light of the Court's orders; participate in litigation with landlord in Puerto Rico in the District Court and the Tenth Circuit; 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; and work on gathering information from third-parties.

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")¹:

¹ There are two invoices for H&H because, in late July, 2020, H&H began separately tracking time and expenses for analyzing, negotiating, and filing claims the Receiver has against other parties. The chart included herein combines the amounts from the two invoices.

	<u>Fees Requested</u>	<u>Expense Reimbursement Requested</u>	<u>Total</u>
Receiver	\$32,435.00	\$0.00	\$32,435.00
H&H	\$272,061.90	\$6,660.56	\$278,722.46
RMA	\$13,783.50	\$1,582.92	\$15,366.42
Total	\$318,280.40	\$8,243.48	\$326,523.88

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 18th day of December, 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 Invoices.

C - RMA Invoice.

15560083_v2

EXHIBIT “A”



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

November 12, 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:	1853088 3421982 107333 DKBroadbent
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Regarding: Matter No. 0001 - Receiver Services

Invoice Summary

Current fees	\$32,435.00
Current charges this invoice	\$32,435.00

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 #1853088 on payment.

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853088 3421982
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For professional services rendered through October 31, 2020

Itemized Fees

Description of Work	Date	Tkpr	Hours
Review and evaluate email correspondence and respond regarding Richardson Law Group's claims to reserve funds; conference with Collot Guerard;	07/02/20	DKB	0.20
Review and evaluate email correspondence; conference with Collot Guerard;	07/02/20	DKB	0.40
Review payment requests; conference with Ryan Panke, attorney for defendants, conference with John Curtis regarding tax preparation fees and obligations; conference with DSByers regarding fraudulent transfer complaint and payment obligations; conference with Robert Wing and DSByers regarding fraudulent transfer complaint;	07/07/20	DKB	1.50
Conference with DSByers; review complaint issues;	07/16/20	DKB	0.40
Review and evaluate email correspondence; review order on contempt; conference with CATalbot and EJTejeda regarding next steps to recover property and deposit in Puerto Rico;	07/30/20	DKB	0.60
Review notices from FTC; conference with Collot Gerard; conference with DSByers; review and evaluate email correspondence;	07/31/20	DKB	0.80
Review and evaluate email correspondence and respond; conference with Brian Steffensen;	08/03/20	DKB	0.80
Review and evaluate email correspondence and respond, review payment information for Centerpiece Properties, LLC property in Buffalo, New York, conference with Gil Miller regarding payment of mortgage;	08/05/20	DKB	0.70
Review and evaluate email correspondence and respond;	08/06/20	DKB	0.20
Letter to Anderson Karrenberg, letter to Bernice L. C. Krause; review CSC bills; review tax and business information request from State of Utah; discussion with State of Utah Department of Workforce Services; review claim information and respond;	08/07/20	DKB	1.40

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853088 3421982
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Review and evaluate email correspondence; review Zurixx related entities and correspond with CSC regarding registered agent issues and termination;	08/10/20	DKB	0.50
Conferences with DSByers and CATalbot; review and evaluate email correspondence;	08/11/20	DKB	0.90
Conference with Robert Wing; review and evaluate email correspondence to FTC attorneys; review preliminary injunction regarding disposition of defendant's assets; review limited liability company act regarding distribution requirements; conference with SAClayton regarding distributee liability for illegal distributions; review and edit receiver's report; review tax accountant's request for payment and invoices; forward questions regarding taxes to John Curtis of Rocky Mountain Advisory;	08/12/20	DKB	2.60
Conferences with CATalbot; conference with DSByers; review and edit receiver's report; conference with Robert Wing; review and evaluate email correspondence and respond; research regarding merchant bank reserve accounts; research regarding distribution issues; review Zurixx financial audit materials; call to Squire & Company; review materials and analyze issue of RE Cash Source tax return preparation, respond to John Curtis;	08/13/20	DKB	5.50
Conference with Robert Wing, Josh Doan, Leigh Veillette; review property records regarding Harvard residence; review and evaluate email correspondence; review merchant bank agreement and cases;	08/14/20	DKB	1.90
Conferences with Robert Wing; review financial statements and real property records; conference with Alex Trumbo; forward PI order and audited financial statements, review and evaluate email correspondence;	08/17/20	DKB	2.50
Conference with Robert Wing; review defendants' motion to dismiss and motion for stay; review JSS trust agreement;	08/18/20	DKB	1.30
Conference with CATalbot and DSByers regarding motion to dismiss and motion to stay; conference with Robert Wing;	08/19/20	DKB	0.60
Conference with CATalbot; conference with DSByers; conference with Robert Wing; review and edit receiver's report and Rocky Mountain Advisory financial report; review and evaluate email correspondence;	08/20/20	DKB	2.80

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853088 3421982
Review revised statement of receipts and disbursement; review and edit receiver's status report; review and evaluate email correspondence regarding CSC charges and cancel payments;	08/21/20	DKB 0.40
Review Efron's motion to reconsider and attachments dealing with Puerto Rico claims; prepare email to CATalbot and EJTejega outlining proposed response to motion to reconsider;	08/24/20	DKB 0.50
Review and evaluate email correspondence from Collot Guerard regarding stay of third-party actions; conference with CATalbot regarding stayed actions; review and evaluate email correspondence from John Curtis; review revised statement of cash receipts and disbursements;	08/24/20	DKB 0.30
Conference with Ryan Pahnke; review payment request;	08/25/20	DKB 0.20
Conference with CATalbot and DSByers; review and evaluate email correspondence; conference with Jesus Villegas, claimant;	08/26/20	DKB 0.40
Conference with Kathy Morgan, claimant, conference with DSByers; review and evaluate email correspondence;	08/28/20	DKB 0.50
Conference with DSByers regarding Chuckanut Bay Investments; investigation regarding Chuckanut;	08/31/20	DKB 0.60
Conference with claimant; review and evaluate email correspondence;	09/01/20	DKB 0.10
Review response to motion for reconsideration; review and evaluate email correspondence;	09/02/20	DKB 0.30
Review and evaluate email correspondence and respond to Alex Trumbo; review audit materials on Zurixx Financial (Puerto Rico); review proposed letter regarding charitable contributions;	09/08/20	DKB 1.00
Conference with EJTejeda; conferences with DSByers; review merchant bank proposal for settlement of reserve account claims; review authorities on ownership and treatment of reserve accounts and fraudulent transfer claims; review and edit letter regarding possible settlement of Puerto Rico claims;	09/10/20	DKB 1.90
Review tax returns; information from accountants;	09/11/20	DKB 0.70

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853088 3421982
Conference with DSByers; review merchant bank settlement proposal; review cases on treatment of merchant bank processors in receiverships and bankruptcy cases;	09/16/20	DKB 4.40
Review and evaluate email correspondence and respond;	09/18/20	DKB 0.30
Conference with FTC, Robert Wing; DSByers and John Curtis; review corporate documents for additional entities; - review and evaluate email correspondence;	09/21/20	DKB 1.70
Conference with CATalbot; DSByers and EJTejega regarding Puerto Rico issues and Canada litigation issues;	09/22/20	DKB 0.70
Review FTC letter regarding request for updated financial information and compliance with preliminary injunction; review and evaluate email correspondence regarding Canadian litigation; review letters and proposed tolling agreements for charitable contribution recipients; review emails and pleadings regarding Puerto Rico eviction action; review proposed response to motion to stay; respond to Michael Olsen's letter regarding possible recovery; attempt to reach Brian Steffenson; email to Axel Trumbo regarding Squire audit;	09/29/20	DKB 1.40
Review correspondence regarding fraudulent transfer claims; respond to Michael Olson regarding claims process; review and evaluate email correspondence regarding FTC position on foreign claimants; review Kamdar correspondence and fee request;	09/30/20	DKB 0.60
Review and evaluate email correspondence regarding responses to tolling agreement letters, conference with CATalbot and DSByers regarding treatment of charitable contributions and dealing with Canadian litigation; review emails regarding accounting and payment for Zurixx accounting;	10/01/20	DKB 1.10
Review letter regarding tolling agreement, tolling agreement and draft complaint regarding celebrity payments; review and evaluate email correspondence; review response to stay motion;	10/02/20	DKB 0.60
Review garnishment notice; email to CATalbot and DSByers; review information on charitable contributions; conference with John Curtis;	10/05/20	DKB 0.50
Review and evaluate email correspondence and respond;	10/06/20	DKB 0.50

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Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1853088
	H&H Ref. No.	3421982

review notice from 10th Circuit; review demand letters;

Review garnishment issue; review proposed letter regarding response to garnishment; conference with Ron Zarback regarding fraudulent transfer claim against his charity;	10/07/20	DKB	0.30
Review and evaluate email correspondence and demand letters; review notices received from court of appeals;	10/09/20	DKB	0.30
Review defendants' reply to FTC's response to defendants' motion to dismiss; review FTC response; review Chad Olson's motion to dismiss in receiver's case against him;	10/12/20	DKB	0.90
Conference with Robert Wing; conference with Vin Kamdar regarding accounting issues;	10/13/20	DKB	0.70
Review and execute tolling agreements; conference with CATalbot; conference with Robert Wing; review and evaluate email correspondence; review bank statements; conference with EJTejeda; review reply materials on motion to dismiss;	10/14/20	DKB	1.30
Conference with CATalbot and DSByers regarding motion to dismiss; review transferee issues; conference with DSByers regarding tolling agreement for additional entities;	10/15/20	DKB	0.80
Conference with Robert Wing; conferences with CATalbot and DSByers; conference with CATalbot, DSByers, CJDavis, BTChristensen and BJMerrill regarding fraudulent transfer complaint, research regarding fraudulent transfer issues;	10/16/20	DKB	2.10
Review fraudulent transfer issues; conference with DSByers;	10/19/20	DKB	0.40
Review and evaluate email correspondence regarding tax and other issues; review research on appellate jurisdiction;	10/20/20	DKB	0.60
Review notice from 10th Circuit regarding appeal, obtain and forward materials on appellate jurisdiction to attorneys; conference with CATalbot and Robert Wing regarding voidable transfer issues; review pleadings on voidable transfer cases;	10/21/20	DKB	1.80
Conference with CATalbot, DSByers, CJDavis, BJMerrill and BTChristensen, review pleadings and cases on expanded causes of action;	10/22/20	DKB	1.20

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853088 3421982
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Conference with DSByers and CATalbot regarding outstanding demands, tolling agreements and appeal; conference with BJMerrill, CJDavis; BTChristensen, DSByers;	10/23/20	DKB	1.10
Conference with John Campos, Diversified Insurance; review claim filed by James Carlson; review insurance policy; conference with CATalbot and DSByers regarding possible celebrity claims and tolling agreements; review and execute tolling agreements;	10/26/20	DKB	2.70
Attend hearing on motion to dismiss an motion for stay; review potential claims against celebrities and facilitators; conferences with CATalbot and DSByers; review Williams and Dockstader opinions regarding fraudulent transfer claims;	10/27/20	DKB	2.60
Conference with DSByers regarding tolling agreement and forbearance requests;	10/28/20	DKB	0.20
Review and edit first amended Young complaint; conference with CJDavis, DSByers and CATalbot;	10/29/20	DKB	1.50
Review and evaluate email correspondence; review complaints and amended complaints; conference with CATalbot and DSByers;	10/30/20	DKB	1.80

Total Current Fees: \$32,435.00

Timekeeper Summary

Timekeeper	Tkpr ID	Rate	Hours	Amount
DKBroadbent	5140	502.09	64.60	32,435.00
			64.60	\$32,435.00



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

November 12, 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:	1853088 3421982 107333 DKBroadbent
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Regarding: Matter No. 0001 - Receiver Services

Invoice Summary

Current fees	\$32,435.00
Current charges this invoice	\$32,435.00

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.

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

November 12, 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:	1853089 3421999 107333 DKBroadbent
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Regarding: Matter No. 0002 - Zurixx Monitor - Attorneys

Invoice Summary

Current fees	\$125,036.25
Current disbursements	\$926.36
Current charges this invoice	\$125,962.61

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 #1853089 on payment.

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1853089
	H&H Ref. No.	3421999

For professional services rendered through October 31, 2020

Itemized Fees

Description of Work	Date	Tkpr	Hours
Address revisions to protective order, including email with Mr. Doan;	07/01/20	CAT	0.50
Follow up with Ms. Easter regarding contact information for various presenters and telesales team members; work on third-party complaints;	07/01/20	DSB	2.30
Revise draft reply brief;	07/02/20	CAT	0.40
Correspondence with receiver regarding possible stipulation with RLG regarding extension and possible claims; correspondence with counsel for RLG regarding the same;	07/02/20	DSB	0.60
Revise and edit draft reply brief; review and respond to customer correspondence, including review of supporting documents; email with BBLarsen regarding same; email with EJTejeda regarding Canadian litigation status and next steps;	07/03/20	CAT	4.40
Correspondence with former employee regarding claims process; correspondence with counsel for RLG regarding possible stipulation regarding claims and stipulation regarding extension on deadline to file a claim; correspondence with counsel for PPS regarding payment of reserve funds; work on third-party claims and correspondence with Ms. Easter regarding contact information for service of the same; correspondence with Mr. Carlson regarding potential buyer for domain;	07/03/20	DSB	2.70
Review and respond to correspondence; telephone conference with DSByers regarding same; email with Mr. Doan regarding protective order;	07/06/20	CAT	1.10
Prepare and file request to extend claim deadline for RLG to file claim and proposed order and correspondence with RLG regarding the same; email correspondence regarding requests for W2s; analyze payments from merchant banks and strategy for collection of shortfall;	07/06/20	DSB	3.80
Draft Reply in Support of Motion for Contempt; research	07/06/20	CJD	5.70

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1853089
	H&H Ref. No.	3421999

and analyze case law interpreting the court's jurisdiction over property in a receivership; research and analyze the effect of a receivership on existing contractual relationships; draft argument opposing Mr. Effron's arguments in his opposition;

Review case docket, correspondence and order and draft motion and proposed order regarding Advanced Education;	07/06/20	EJT	0.80
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Review mail forwarded to Receivership PO Box; review Zurixx emails and voice mail messages and forward to appropriate individuals;	07/06/20	BBL	1.30
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Review and respond to multiple messages from customers; email with counsel regarding non-receivership businesses of Messrs. Carlson and Cannon; respond to Labor Commission inquiry; respond to Department of Workforce Services inquiry; revise and edit draft reply in support of motion to hold in contempt; email with team regarding same; revise and edit draft motion to add receivership entity; email with EJTejeda regarding same;	07/07/20	CAT	3.80
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Analyze strategy for third-party claims and conferences with receiver and counsel for UDCP regarding the same; work on third-party complaints; correspondence with counsel for RLG regarding court grant of extension on claim deadline; conference with CATalbot regarding reply in support of motion for sanctions; conference with client regarding verification of whether payment to accountants is for post or pre-receivership work;	07/07/20	DSB	3.80
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Email attorneys of record regarding motion and stipulation to add Advanced Education as a Receivership Entity;	07/07/20	EJT	0.40
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Address mail forwarded to PO Box;	07/07/20	BBL	0.20
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Email with counsel regarding California litigation issues; review and analyze draft protective order; email with Mr. Doan regarding same; email with counsel for Messrs. Carlson and Cannon regarding receivership questions; email with counsel regarding proposed stipulation;	07/08/20	CAT	2.40
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Analyze draft protective order and conference with CATalbot regarding the same; conference with CATalbot regarding pending litigation and strategy with respect to stay of the same;	07/08/20	DSB	0.80
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IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853089 3421999	
Review incoming emails requiring attention; conferences with CATalbot and DSByers regarding same;	07/08/20	BBL	0.30
Email with counsel regarding California litigation issues;	07/09/20	CAT	0.20
Review correspondence from CATalbot regarding the reply brief; return from claimant to Receiver; discuss the same with CATalbot;	07/09/20	CJD	0.20
Revise, finalize, and file reply in support of motion for contempt; email with counsel regarding receivership asset questions; email with potential buyer regarding property sales;	07/10/20	CAT	2.60
Analyze and edit reply in support of motion for sanctions and correspondence with CATalbot regarding the same; analyze issues regarding mail received by receivership addresses; correspondence with individuals with equipment to return and make arrangements for the same; correspondence with counsel for FTC regarding conference call to discuss third party claims; review and analyze strategy for third-party claims and work on the same; correspondence with potential buyer of domain name;	07/10/20	DSB	4.50
Review and finalize reply brief; discuss the same with CATalbot;	07/10/20	CJD	0.60
Email with Washington counsel regarding litigation; email with team regarding adding receivership entity; review correspondence regarding bankruptcy issues;	07/13/20	CAT	0.80
Analyze and work on third party complaints and conference with Mr. Doan and Ms. Guerard regarding the same, as well as need for information regarding CRM; correspondence with Mr. Cantarero regarding the same; conference with consumer regarding status of case and potential claims process; analyze bankruptcy case and whether receivership should make a claim by deadline;	07/13/20	DSB	4.20
Follow-up regarding motion to include Advanced Education in the receivership;	07/13/20	EJT	0.70
Respond to correspondence regarding claims process;	07/14/20	CAT	0.30
Review and analyze accounting invoices as to whether they may be paid or are subject to a claim and conference with client regarding the same; work on third-party claims;	07/14/20	DSB	4.60

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1853089
	H&H Ref. No.	3421999

correspondence with Mr. Bueler regarding return of equipment; correspondence with counsel for merchant banker regarding reserve funds and analyze strategy with respect to the same; review bankruptcy notice regarding whether claim should be made;

Conference with Mr. Doan regarding issues related to third-party complaints and regarding FTC's access to CRM database; correspondence with counsel for RLG regarding potential stipulation; analyze potential additional claims to bring and work on third-party complaints;	07/16/20	DSB	3.70
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Review emails regarding Canadian lawsuit;	07/16/20	EJT	0.50
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Work on analyzing status of return of equipment; work on third-party complaints and strategy for filing and serving the same and conferences with client regarding the same; analyze potential stipulation with counsel for RLG and conference with client regarding the same; message to counsel for RLG regarding the same; work on fee application for receiver's professionals; analyze status of funds from merchant bankers and strategy with respect to recovering additional funds and potential stipulations regarding funds already turned over; correspondence with FTC counsel regarding access to information in Zurixx CRM and correspondence with Mr. Cantarero regarding scheduling of a call to discuss;	07/17/20	DSB	6.20
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Email with counsel regarding stipulated motion; review correspondence in P.O. Box; email with team regarding same;	07/20/20	CAT	0.30
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Review answer to amended complaint; work on fee applications and correspondence with Mr. Curtis regarding the same; arrange call with FTC and Mr. Cantarero to discuss CRM access issues; correspondence with Mr. Kennedy regarding issues with respect to RLG; analyze additional entities and possible connection to Zurixx and correspondence with Mr. Curtis regarding the same;	07/20/20	DSB	2.80
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Review bill from attorneys in Puerto Rico; discuss the same with CATalbot;	07/20/20	CJD	0.50
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Review and approve invoice from Puerto Rican counsel; follow-up with Defendants' counsel regarding stipulation to add Advanced Education to receivership;	07/20/20	EJT	0.20
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IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853089 3421999
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Review bankruptcy filings to determine whether any action should be taken; analyze possible connection Real Estate Digital may have with receivership entities and correspondence with Mr. Curtis regarding the same;	07/21/20	DSB	2.60
Submit motion and proposed order to add Advanced Education to the Receivership;	07/21/20	EJT	0.20
Address forwarded mail; conferences with CATalbot and DSByers regarding same;	07/21/20	BBL	0.30
Address correspondence to receivership; coordinate regarding Canadian litigation;	07/22/20	CAT	1.60
Work on analyzing strategy for serving third party defendants and correspondence with BBLarsen regarding the same; analyze whether claims must be amended if adding additional parties; work on fee applications; conference with FTC counsel and Mr. Cantarero regarding access and search capabilities for the CRM; correspondence with Mr. Curtis regarding Great Plains database and accessing the same; correspondence from defendants' counsel regarding requested access to website and correspondence with Mr. Cantarero regarding the same; analyze status of reserve accounts and additional needed information and correspondence with Mr. Curtis regarding the same; follow up on reimbursement from Paysafe for Ms. Easter's work;	07/22/20	DSB	6.40
Work with BBLarsen on identifying and locating various potential defendants for third party claims in preparation for service to the same; analyze draft complaint and potential edits to the same; conference and correspondence with Mr. Curtis regarding the same; work on third fee application and conference and correspondence with client regarding the same; forward draft fee application to Plaintiffs' counsel for review; conference with counsel for RLG regarding client's position on requested stipulation and potential claim; review information from Mr. Curtis regarding funds received related to merchant reserve accounts; correspondence with Mr. Cantarero regarding information requested by defendants' counsel;	07/23/20	DSB	6.60
Conference with DSByers; update chart of individuals/entities to be named in pending lawsuits with current service addresses;	07/23/20	BBL	1.20

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Analyze status of various third party defendants and edit complaints to include additional parties; work on obtaining information requested by defendants counsel;	07/24/20	DSB	3.80
Review and analyze sur-reply; email with team regarding same and regarding potential motion to strike; telephone conference with DSByers regarding same; review and analyze order; email with team regarding same;	07/27/20	CAT	1.10
Analyze website and related information requested by defendants' counsel and correspondence with Mr. Cantarero and receiver regarding the same; review changes made to receivership website and correspondence with LKelly regarding the same; review and analyze sur-reply regarding motion for contempt and conference with CATalbot regarding strategy with respect to the same; review and analyze ruling from court on motion for contempt and conference with CATalbot regarding the same; correspondence with counsel for RLG regarding potential claim; analyze entity potentially related to Zurixx and correspondence with Mr. Curtis regarding the same;	07/27/20	DSB	4.80
Review Mr. Effron's sur-reply; discuss the same with CATalbot;	07/27/20	CJD	0.40
Correspondence regarding follow-up following court's ruling for contempt against landlord; correspondence with auctioneer regarding auction of additional personal property and analyze status of collection of property;	07/28/20	DSB	0.90
Email attorneys in Puerto Rico regarding obtaining the Zurixx assets; discuss the same with EJTejeda and CATalbot;	07/28/20	CJD	0.30
Telephone conference with DSByers regarding draft complaint; email with team regarding Puerto Rico property issues;	07/29/20	CAT	0.40
Analyze issues regarding Puerto Rico landlord and contempt order; conference with CATalbot regarding the same;	07/29/20	DSB	0.40
Coordinate regarding potential settlement with Mr. Effron, including review of financial information and telephone conference with DKBroadbent and EJTejeda; email with CJDavis regarding same; email with Messrs. Curtis and Magistro regarding same; review and edit draft complaints;	07/30/20	CAT	2.70

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Correspondence with Ms. Kananen to coordinate conference call regarding possible settlement with merchant banks; analyze various potential disputes with merchant banks regarding turn over of funds and ultimate disposition of funds;	07/30/20	DSB	0.60
Review Puerto Rico lease; calculate security deposit; discuss the same with CATalbot;	07/30/20	CJD	0.30
Review financial information regarding Puerto Rico lease issues;	07/31/20	CAT	0.90
Correspondence with Mr. Buckmiller regarding Zurixx in North Carolina; attention to fee application; correspondence with counsel for merchant banks; analyze status of equipment return and correspondence with various individuals regarding the same;	07/31/20	DSB	1.40
Review Zurixx emails and forward counsel request to DSByers;	07/31/20	BBL	0.20
Gather US Federal Court Summons form to prepare summons for newly filed lawsuits;	08/02/20	BBL	0.10
Email with team regarding Puerto Rico financial information; review correspondence to receiver;	08/03/20	CAT	0.60
Correspondence with potential claimants regarding possible claims procedure; correspondence with Ms. Kananen to arrange conference call to discuss possible compromise with merchant service providers; analyze issues regarding providing FTC access to CRM; analyze additional entities and possible connection to Zurixx;	08/03/20	DSB	3.20
Conferences with DSByers and CATalbot; address mail forwarded to Receiver;	08/03/20	BBL	0.20
Email with team regarding Puerto Rico financial issues; telephone conference with CJDavis regarding same; review invoices regarding Parr Brown request for payment;	08/04/20	CAT	1.30
Correspond with Mr. Curtis regarding Zurixx's rental payments in Puerto Rico;	08/04/20	CJD	0.20
Conferences with CATalbot regarding Parr Brown invoices; research vendor spreadsheet of potential claims regarding same;	08/04/20	BBL	0.30
Telephone conference with DSByers regarding service	08/05/20	CAT	1.10

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issues; prepare status report; email with California counsel regarding stay issues;

Analyze various outstanding issues with various merchant service providers and draft correspondence to counsel for such providers regarding the same; analyze needed information to consider possible compromise regarding merchant reserve accounts; analyze potentially related third party entities and correspondence with Mr. Curtis regarding the same; analyze issues regarding PPS reserve account and correspondence with Mr. Curtis regarding the same; correspondence with Messrs Hoffmann and Buechele regarding return of equipment;	08/05/20	DSB	4.40
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Discuss rental payments for the Puerto Rico property with Mr. Curtis and CATalbot;	08/05/20	CJD	0.20
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Prepare status report; analysis of Zurixx financial documents regarding Puerto Rico lease issues;	08/06/20	CAT	1.50
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Analyze various outstanding issues with merchants and conference with their counsel regarding the same; review merchant services agreements and analyze productions made related thereto; correspondence with BBLarsen regarding the same; conference with Mr. Wing from the UDCP and Mr. Doan from the FTC regarding the status of various tasks and regarding fee application; finalize and file third fee application; correspondence with Mr. Hoffmann regarding return of equipment; follow up on status of return of equipment by various others; correspondence with Mr. Greenland regarding website bio and work to disable the same;	08/06/20	DSB	5.10
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Review email correspondence with Mr. Curtis;	08/06/20	CJD	0.20
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Email with Mr. Curtis regarding accounting and tax issues; review correspondence regarding documenting property sale; prepare status report;	08/07/20	CAT	1.80
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Analyze payments made to various third parties and correspondence with Mr. Curtis regarding the same; conference with CATalbot regarding RE Cash Source and analyze whether additional assets exist for recovery; prepare draft order on fee application and request to submit; conference with Mr. Cantarero regarding providing access to FTC to database and CRM; analyze status of discussions	08/07/20	DSB	4.60
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with Datalyst and forward information to Mr. Doan of FTC; work on reviewing agreements with merchant service providers in anticipation of negotiations over reserve funds;

Correspondence regarding property sale; 08/10/20 CAT 0.30

Analyze merchant account issues and correspondence with counsel for merchant service providers regarding various issues, particularly with respect to PPS; correspondence with FTC counsel and Mr. Cantarero regarding access to CRM; follow up on issues related to websites and other information to provide to parties; 08/10/20 DSB 3.40

Telephone conference with DKBroadbent and DSByers regarding case status and strategy; prepare status report; address RE Cash Source questions; address Puerto Rico property issues; work on claims regarding charitable donations; 08/11/20 CAT 2.90

Correspondence regarding draft status report; conference with receiver and CATalbot regarding various tasks and strategy regarding case; follow up correspondence regarding the same; conference and correspondence with Mr. Curtis regarding merchant accounts and analyze issues related to the same; 08/11/20 DSB 3.10

Conference with DSByers regarding service of Summonses and Complaint; address merchant service agreements; 08/11/20 BBL 0.20

Review materials regarding Puerto Rico financial issues; email with counsel regarding litigation stays; prepare correspondence regarding charitable contributions; 08/12/20 CAT 2.30

Analyze issues related to access to information for parties and conference with Mr. Cantarero regarding the same; correspondence with counsel for FTC regarding the same; attention to status report and correspondence with CATalbot and receiver regarding the same; correspondence with counsel for FTC regarding third-party discovery; arrange for return of equipment; 08/12/20 DSB 1.80

Call with DKBroadbent regarding knowledge standard associated with distributions from an insolvent limited liability company; 08/12/20 SAC 0.20

Coordinate with Mr. Curtis regarding RE Cash Source issues; telephone conference with Mr. Larson regarding 08/13/20 CAT 2.90

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same; telephone conference with DKBroadbent regarding status report; revise and edit same; email with Mr. Curtis regarding same;

Analyze merchant service agreements and issues related to potential compromise with merchant service providers; conferences and correspondence with receiver regarding issues related to merchant services; analyze issues regarding distributions made by company and potential for recovery of the same; analyze issues related to RE Cash Source and access to related documents; correspondence with CATalbot regarding the same; conference with CATalbot regarding status report;	08/13/20	DSB	3.40
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Analysis of knowledge standard applied to prohibited limited liability company distributions; federal case law research regarding same; review of uniform law commissioner notes regarding same; composition of email to DKBroadbent regarding same;	08/13/20	SAC	5.00
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Research case files regarding assets left in Puerto Rico, research value of assets, and email CATalbot regarding same;	08/13/20	EJT	2.30
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Review and analyze materials regarding Puerto Rico assets and claims; email with team regarding same; revise and edit draft status report; email with Mr. Curtis regarding same;	08/14/20	CAT	1.20
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Correspondence with consumers regarding potential claim process; analyze status of equipment return from road crew members and follow up with several regarding the same; analyze issues regarding merchant accounts and review various agreements to identify controlling documents; conference with Mr. Cantarero regarding access to various databases;	08/14/20	DSB	2.50
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Review and analyze Puerto Rican Lease's treatment of fixtures per CATalbot's request and email summary to CATalbot, DKBroadbent and CJDavis regarding same;	08/14/20	EJT	0.60
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Review and respond to receivership correspondence; outline proposed settlement regarding Puerto Rico assets;	08/17/20	CAT	0.60
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Analyze issues regarding service of original appointment order on various banks and correspondence with receiver regarding the same; analyze various merchant service agreements and correspondence with receiver regarding the	08/17/20	DSB	5.00
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same; correspondence with counsel for merchant service providers regarding need for information regarding controlling agreements; analyze various communications regarding merchant accounts as potential evidence related to potential disputes; correspondence with BBLarsen regarding the same; correspondence with FTC regarding access to and location of CRM; review motion to dismiss case file by several defendants;

Revise and draft status report; review financial analysis regarding same; respond to correspondence regarding receivership; email with counsel regarding receivership entity questions; conference with EJTejeda regarding Puerto Rico assets; review materials regarding same;	08/18/20	CAT	5.00
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Correspondence with client regarding need to prepare to be able to send notice to consumers and determine the logistics for doing so; correspondence with Mr. Cantarero regarding the same; analyze motion to stay proceedings and potential response to the same; analyze additional entities and potential connection to receivership estate; review motion to dismiss filed by some defendants;	08/18/20	DSB	3.70
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Conferences with CATalbot regarding pending mail; forward response email to CT Corp;	08/18/20	BBL	0.30
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Telephone conference with DKBroadbent and DSByers regarding status and strategy issues, including Puerto Rico assets and motion to stay; prepare status report, including review of documents and financial information; respond to receivership correspondence;	08/19/20	CAT	3.50
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Analyze motion to stay and conference with client and CATalbot regarding strategy of whether and how to respond; correspondence with technical staff regarding recovery of website and correspondence with counsel for defendants regarding the same; analyze access to CRM and consumer contact information for providing notice to the same;	08/19/20	DSB	3.40
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Prepare status report, including review of documents and financial information, telephone conference with DKBroadbent, and email with Mr. Curtis regarding financial matters; respond to consumer inquiries; review and analyze charitable donations; telephone conference with CJDavis regarding same;	08/20/20	CAT	4.90
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Attention to status report and correspondence with CATalbot regarding the same; analyze and review merchant services agreements and analyze strategy for resolution of dispute with merchant service providers; correspondence with receiver regarding the same;	08/20/20	DSB	2.70
Prepare status report; address settlement regarding Puerto Rico assets;	08/21/20	CAT	3.20
Conference with receiver regarding status of negotiations with merchant service providers; correspondence with counsel for merchant providers regarding the same and response to various requests; attention to third fee application and submit order to court; work on editing status report and correspondence with CATalbot regarding the same; analyze issues regarding potential claims to recover charitable donations and correspondence with receiver and CATalbot regarding the same;	08/21/20	DSB	3.20
Revise and edit draft status report; email with team regarding same; telephone conference with DKBroadbent regarding identifying claims; review and analyze filing; email with team regarding same;	08/24/20	CAT	2.40
Conference with Receiver regarding pending actions that were stayed; analyze motion for reconsideration and correspondence with Receiver and CATalbot regarding the same; order granting fee application and correspondence with Receiver and Mr. Curtis regarding the same; correspondence with CATalbot regarding status report; correspondence with road crew members regarding return of equipment;	08/24/20	DSB	1.80
Telephone conference with counsel regarding potential litigation matter; email with counsel regarding same; prepare materials regarding stayed litigation for FTC; revise draft status report;	08/25/20	CAT	1.40
Review and analyze correspondence from counsel to various merchant service providers regarding proposed stipulations regarding reserve funds and analyze facts related thereto and strategy for response; correspondence regarding whether to continue insurance coverage; correspondence with consumer regarding potential claims procedure; analyze status of return of equipment from road crews and correspondence with individuals regarding the same;	08/25/20	DSB	4.00

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Conferences with CATalbot and VLRobinson regarding new vendor claim;	08/25/20	BBL	0.20
Finalize and submit status report; telephone conference with DKBroadbent and DSByers regarding ancillary litigation matters; review materials regarding same; review status of third-party litigation matters;	08/26/20	CAT	1.60
Review notice of appeal from Mr. Effron and conference with Receiver and CATalbot regarding the same; conference with CATalbot regarding status report; conference with receiver and CATalbot regarding various tasks and status of receivership;	08/26/20	DSB	2.00
Discuss Motion to Reconsider with CATalbot;	08/26/20	CJD	0.30
Review and analyze materials regarding appeal; telephone conference with DKBroadbent regarding same; analyze response to motion for reconsideration;	08/27/20	CAT	1.10
Review correspondence related to notice of appeal; notice of appearance in 10th Cir. appeal; analyze order from 10th Cir. regarding appeal; conference with Receiver regarding the same and status of negotiations with merchant service providers;	08/27/20	DSB	1.40
Email with Mr. Curtis and BBLarsen regarding receivership correspondence;	08/28/20	CAT	0.20
Correspondence regarding declaration from Mr. Miller regarding motion to stay proceedings; analyze issues related to merchant service providers and proposed resolution of disputes from several of the same;	08/28/20	DSB	2.30
Address merchant agreement correspondence; address mail forward to Receivership PO Box;	08/28/20	BBL	0.40
Conferences with DSByers and CATalbot regarding forwarded mail;	08/31/20	BBL	0.20
Respond to receivership correspondence; email with Mr. Curtis regarding same;	09/01/20	CAT	0.60
Correspondence with Mr. Hoffmann regarding return of equipment; correspondence with potential claimants regarding possible claims process; review opposition to motion to stay;	09/01/20	DSB	0.70

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Address mail received in PO Box;	09/01/20	BBL	0.20
Prepare opposition to motion for reconsideration; email with team regarding same; email with team regarding settlement with Puerto Rico landlord; address status of appeal, including finalizing notice of appearance; address litigation stay issues in Puerto Rico; review and edit demand letters;	09/02/20	CAT	5.40
Review and analyze draft response to motion to reconsider ruling holding landlord in contempt and conference with CATalbot regarding the same; attention to notice of appearance for 10th Cir. appeal;	09/02/20	DSB	0.80
Revise, finalize, and file opposition to motion for reconsideration;	09/03/20	CAT	0.80
Edit response to Motion to Reconsider; discuss the same with CATalbot;	09/03/20	CJD	1.00
Conference with Mr. Doan regarding transactions made by Zurixx; conference with Mr. Curtis regarding the same;	09/04/20	DSB	0.50
Review stay materials for preparing a pleading to stay the eviction proceedings in Puerto Rico;	09/04/20	CJD	1.00
Review court filings by Mr. Effron and draft letter to Mr. Effron inviting him to make an offer under Rule 408 for almost half-million worth of property in his possession or control;	09/04/20	EJT	2.60
Address mail received in PO Box;	09/04/20	BBL	0.20
Revise and edit draft settlement letter; revise and edit draft demand letters; email with team regarding same; analysis of appellate issues;	09/08/20	CAT	1.80
Analyze distributions made by Zurixx and conference with Mr. Doan regarding the same; conference with Mr. Curtis regarding the same and needed additional information regarding distributions;	09/08/20	DSB	1.30
Review and edit draft tolling agreement;	09/09/20	CAT	0.50
Analyze copies of merchant agreements and status of reserve accounts; follow up on return of equipment and strategy for finalizing the same; respond to consumer regarding status of case;	09/09/20	DSB	1.90

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Email with counsel regarding stayed litigation issues;	09/10/20	CAT	0.30
Analyze issues regarding merchant reserve accounts and conference with client regarding the same; correspondence with counsel for merchant service providers regarding proposed compromise and needed information;	09/10/20	DSB	1.40
Call with DKBroadbent and finalize letter to Mr. Effron regarding settlement discussions under Rule 408;	09/10/20	EJT	0.50
Communications with payment processing firms regarding checks to IAC; conferences with CATalbot regarding same;	09/10/20	BBL	0.40
Analyze issues regarding merchant accounts and conference with client regarding the same; follow up on the return of equipment from road crews;	09/11/20	DSB	1.80
Revise and edit draft filing regarding Puerto Rico action; email with team regarding employee questions;	09/11/20	CAT	1.10
Conferences with CATalbot regarding receivership mail and voice mail; forward receivership voice mail message to Mr. Curtis and Ms. Easter; address checks forwarded to receivership PO Box to be returned to sender;	09/11/20	BBL	0.30
Review opposition to motion to dismiss; correspondence with counsel for merchant service providers regarding possible compromise; conference with client regarding the same;	09/14/20	DSB	1.60
Prepare and submit status report to Washington Court of Appeals; email with counsel regarding same;	09/15/20	CAT	1.70
Analyze distributions and other transfers by receivership entities and review related reports; conference with counsel for FTC regarding the same; conference with Mr. Curtis regarding the same; follow up with various individuals regarding return of equipment and analyze liquidation of the same; analyze strategy with respect to reserve account disputes;	09/15/20	DSB	3.80
Address mail received in Receivership PO Box; address pleadings in Washington appeal; conferences with CATalbot regarding same;	09/15/20	BBL	0.30
Respond to receivership inquiries;	09/16/20	CAT	0.80
Conference with receiver regarding status and strategy of	09/16/20	DSB	3.60

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various matters in receivership case; analyze issues regarding distributions and correspondence with Mr. Curtis and counsel for FTC regarding scheduling call to discuss the same; analyze status of issues regarding merchant reserve accounts and potential compromise regarding the same; correspondence with Ms. Kananen regarding status of response to information requested by receiver;

Letter to court regarding litigation stay; 09/17/20 CAT 0.20

Correspondence with receiver, Mr. Curtis, and counsel for plaintiffs to arrange call to discuss distributions from Zurixx; analyze information regarding the same and conference with Receiver regarding need for tolling agreements; 09/17/20 DSB 0.80

Review and analyze motion to stay; email with team regarding same; 09/18/20 CAT 1.70

Review and analyze motion filed by Mr. Efron and conference with CATalbot and receiver regarding the same; review and analyze reply in support of motion to stay; correspondence with potential claimants regarding potential claim process; review additional entities and possible connection to receivership estate; 09/18/20 DSB 3.20

Review Mr. Efron's Motion to Stay; 09/18/20 CJD 0.40

Review correspondence and filings in Canadian litigation; email with team regarding same; prepare response to motion to stay; 09/21/20 CAT 0.90

Conference with Receiver, Mr. Curtis and counsel for plaintiffs regarding various issues; analyze issues regarding corporate documents for various entities and correspondence with receiver regarding the same; analyze issues regarding motion filed by Mr. Efron and conference with CATalbot regarding the same; review correspondence from Plaintiffs counsel to Defendants counsel; 09/21/20 DSB 3.40

Identification of operating agreements and correspondence with DKBroadbent regarding summary status of same; review of file for operating agreement of Carlson Development Group, LLC; 09/21/20 SAC 0.80

Telephone conference with team regarding Puerto Rico property issues and Canadian litigation; prepare response to 09/22/20 CAT 3.10

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motion to stay; conference with EJTejeda regarding Canadian litigation; email with EJTejeda, DKBroadbent, and Canadian counsel regarding same;

Analyze issues regarding landlord dispute and motion for contempt and conference with receiver and team regarding the same; correspondence with road crew members regarding delivery of equipment;	09/22/20	DSB	1.00
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Research and analyze case law evaluating procedural stays; discuss the same with CATalbot;	09/22/20	CJD	1.40
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Review emails from Canadian counsel regarding Advanced Education and motion for summary judgment filed in Alberta; prepare for and attend call with DKBroadbent, CATalbot, DSByers, and CJDavis regarding response to Mr. Effron's motion;	09/22/20	EJT	1.20
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Address mail received in Receivership PO Box;	09/22/20	BBL	0.20
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Prepare opposition to motion to stay; email with CJDavis regarding research; review and analyze related filings and correspondence;	09/23/20	CAT	3.80
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Work on fee application for professionals; work on locating operating agreements and conference with counsel for defendants regarding providing missing agreements;	09/23/20	DSB	1.30
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Continue to research and analyze case law providing for procedural stays; discuss the same with CATalbot;	09/23/20	CJD	2.40
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Prepare opposition to motion to stay, including review of research; email with team regarding same;	09/24/20	CAT	2.00
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Review draft response to motion to dismiss and conference with CATalbot regarding the same; analyze status of return of equipment from various individuals; analyze tolling agreements for potential claims besides claw back actions;	09/24/20	DSB	2.80
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Respond to correspondence;	09/28/20	CAT	0.30
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Conference with Mr. Curtis regarding potential expert reports needed for various issues and analyze potential needed discovery for the same;	09/28/20	DSB	0.40
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Address mail received in Zurixx Receivership PO Box; conferences with CATalbot and DSByers regarding same;	09/28/20	BBL	0.20
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Review and analyze reply in support of motion to dismiss; correspondence with team regarding status of motion to stay contempt matter; correspondence with Puerto Rican counsel regarding status of motion to stay state court proceeding filed by landlord;	09/29/20	DSB	1.60
Revise and edit draft response to motion to stay; email with team regarding same;	09/29/20	CAT	1.00
Email communication with CJDavis regarding claw back litigation;	09/29/20	BJM	0.20
Revise and edit response to motion to stay; email with team regarding same;	09/30/20	CAT	0.80
Analyze FTC position on potential claims procedure and conference with CATalbot regarding the same;	09/30/20	DSB	0.20
Revise and edit draft response to motion for stay; review and edit correspondence regarding same;	10/01/20	CAT	1.00
Search for and contact chapter 7 trustees for referral to auctioneer; drat letter for Mr. Effron; drat response to Canadian counsel; exchange email emails with CATalbot regarding same; revise response to Mr. Effron's latest filing;	10/01/20	EJT	2.20
Revise, finalize, and file opposition to motion to stay;	10/02/20	CAT	1.00
Review response to motion to stay and correspondence with Receiver and CATalbot regarding the same; correspondence to Mr. Effron regarding proposed settlement;	10/02/20	DSB	0.30
Review correspondence regarding garnishment; email with team regarding same;	10/05/20	CAT	0.30
Correspondence with CATalbot and receiver regarding garnishment and strategy for response, as well as issues regarding demand on charties; conference and correspondence with Mr. Curtis regarding potential needed information and analyze strategy for non-party discovery;	10/05/20	DSB	0.80
Letter to Mr. Constantinos regarding garnishment; email with team regarding same;	10/06/20	CAT	0.70
Notice from 10th Cir. regarding deficiency; correspondence with counsel for defendants regarding operating agreements and review document received from the same; work with team on update to receivership website; correspondence with counsel for merchant service providers and analyze	10/06/20	DSB	2.30

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information received from the same;

Conferences with DSByers regarding website updates;	10/06/20	BBL	0.20
Respond to inquiries regarding receivership;	10/07/20	CAT	0.20
Review and analyze filings; correspondence with counsel regarding strategy; correspondence with customers regarding claims issues;	10/08/20	CAT	3.00
Address mail forwarded to Receivership PO Box; conference with CATalbot and DSByers regarding same;	10/08/20	BBL	0.20
Review tenth circuit minute order;	10/09/20	DSB	0.20
Review court filings (Oregon);	10/12/20	CAT	0.20
Work on fee application;	10/12/20	DSB	0.30
Filing of Carlson Development Group LLC Operating Agreement and related correspondence;	10/12/20	SAC	0.10
Email with counsel regarding litigation stay; review filings;	10/13/20	CAT	0.30
Review and address mail received in Receivership PO Box; conference with LKelly regarding website updating;	10/13/20	BBL	0.60
Work on fee application; work on following up on equipment return;	10/14/20	DSB	0.80
Review order denying motion for reconsideration and appellate papers; email with team regarding same and regarding Puerto Rico property status;	10/20/20	CAT	0.60
Correspondence regarding appeal from landlord and effort to obtain personal property;	10/20/20	DSB	0.30
Review cases regarding appellate jurisdiction;	10/21/20	CAT	0.40
Analyze strategy with respect to appeal from landlord and correspondence with Receiver and CATalbot regarding the same;	10/21/20	DSB	0.60
Review filings in the Tenth Circuit Court of Appeals regarding Mr. Effron's appeal;	10/21/20	CJD	0.20
Research regarding appellate jurisdiction; email with	10/22/20	CAT	1.20

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SMMasciocchi regarding same;

Read email from CATalbot and attached Tenth Circuit order; exchange e-mail messages with CATalbot regarding possible motion to dismiss for lack of jurisdiction;	10/22/20	SGM	0.30
Prepare motion to dismiss appeal; telephone conference with DSByers and DKBroadbent regarding status and strategy;	10/23/20	CAT	5.80
Correspondence with counsel for merchant bankers regarding additional information provided and settlement proposals; analyze issues regarding appeal from landlord and conference with receiver and CATalbot regarding the same;	10/23/20	DSB	1.20
Conference with Ms. Robinson regarding voice mail messages received by Zurixx Receivership; forward verifications of employment requests to Mr. Curtis and Ms. Easter; conference with CATalbot regarding email regarding renewal of domain;	10/23/20	BBL	0.30
Outline strategy for receivership next steps;	10/24/20	CAT	0.50
Update spreadsheet tracking responses from charities;	10/25/20	CJD	0.20
Telephone conference with DSByers and DKBroadbent regarding status and strategy; email with counsel regarding potential claims issues;	10/26/20	CAT	2.90
Conference with receiver and CATalbot regarding status and strategy regarding various tasks in receivership; work on fee application; attention to information sought by FTC;	10/26/20	DSB	1.20
Address Puerto Rico property issues, including email with team and telephone conference with EJTejeda;	10/27/20	CAT	0.70
Follow-up with Chapter 7 trustees in Puerto Rico regarding referrals for liquidation agents;	10/27/20	EJT	1.80
Conference with Ms. James; update Zurixx website pleadings;	10/29/20	BBL	0.90
Work on fee application; review and analyze motion for relief from PI filed by defendants in the case;	10/30/20	DSB	1.00

Total Current Fees: \$125,036.25

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1853089
	H&H Ref. No.	3421999

Timekeeper Summary

Timekeeper	Tkpr ID	Rate	Hours	Amount
SGMasciocchi	0622	544.50	0.30	163.35
BBLarsen	2172	265.50	9.40	2,495.70
DSByers	5654	402.00	169.60	68,179.20
CATalbot	5657	408.00	108.90	44,431.20
EJTejeda	5852	292.50	14.00	4,095.00
CJDavis	5960	247.50	15.50	3,836.25
SAClayton	6080	292.50	6.10	1,784.25
BJMerrill	6137	256.50	0.20	51.30
			324.00	\$125,036.25

Disbursements

Description of Disbursements	Date	Amount
Outside Fees: VENDOR: LexisNexis (Risk Solutions); INVOICE#: 1083600-20200731; advanced person search	07/31/20	15.14
United Parcel Service: COM. NEXT DAY AIR, , Nate Holzapfel, PROVO, UT, 1Z59E98W0191672422	10/07/20	9.25
United Parcel Service: NEXT DAY AIR, Lani Polluck, Chuckanut Bay Investments L, MANHATTAN BEACH, CA, 1Z59E98W2490176383	10/07/20	24.47
United Parcel Service: NEXT DAY AIR, , Grant T. Cardone, SUNNY ISLES BEACH, FL, 1Z59E98W2490416284	10/07/20	28.10
United Parcel Service: COM. NEXT DAY AIR, c/o Secretary of Sta, Tony Robbins Productions, I, CARSON CITY, NV, 1Z59E98W2490512367	10/07/20	19.62
United Parcel Service: COM. NEXT DAY AIR, Blumbergexcelsior Co, 331G Corp LLC, WILMINGTON, DE, 1Z59E98W2491032268	10/07/20	23.24
United Parcel Service: NEXT DAY AIR, , Bill Zanker, Park City, UT, 1Z59E98W2491217274	10/07/20	24.07
United Parcel Service: COM. NEXT DAY AIR, Business Filings Inc, Global Learning Partners, WILMINGTON, DE, 1Z59E98W2492104447	10/07/20	23.24

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Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853089 3421999
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United Parcel Service: COM. NEXT DAY AIR, National Registered, Chuckanut Bay Investments L, WILMINGTON, DE, 1Z59E98W2492129395	10/07/20	23.24
United Parcel Service: NEXT DAY AIR, , Anthony Jay Robbins, LANTANA, FL, 1Z59E98W2492504345	10/07/20	28.10
United Parcel Service: COM. NEXT DAY AIR, Sam Georges, Tony Robbins Productions, I, ESCONDIDO, CA, 1Z59E98W2492837370	10/07/20	20.61
United Parcel Service: COM. NEXT DAY AIR, LEARNING ANNEX HOLDI, LEARNING ANNEX, WILMINGTON, DE, 1Z59E98W2493081434	10/07/20	23.24
United Parcel Service: COM. NEXT DAY AIR, Corpor, Cardone Training Technologi, LAS VEGAS, NV, 1Z59E98W2493097310	10/07/20	19.62
United Parcel Service: NEXT DAY AIR, , Grant T. Cardone, AVENTURA, FL, 1Z59E98W2493229294	10/07/20	28.10
United Parcel Service: NEXT DAY AIR, , Nate Holzapfel, LAS VEGAS, NV, 1Z59E98W2493277410	10/07/20	24.47
United Parcel Service: NEXT DAY AIR, Scott L. Soelberg, P, Nate Holzapfel LLC, OREM, UT, 1Z59E98W2493296408	10/07/20	19.53
United Parcel Service: COM. NEXT DAY AIR, , Anthony Jay Robbins, SAN DIEGO, CA, 1Z59E98W2493601354	10/07/20	20.61
United Parcel Service: COM. NEXT DAY AIR, Corporate Creations, Cardone Training Technologi, NORTH PALM BEACH, FL, 1Z59E98W2494256306	10/07/20	23.24
United Parcel Service: COM. NEXT DAY AIR, , Anthony Jay Robbins, PALM BEACH, FL, 1Z59E98W2494352327	10/07/20	23.24
United Parcel Service: SHIPPING CHRG CORRECTION, Lani Polluck, Chuckanut Bay Investments L, MANHATTAN BEACH, CA, 1Z59E98W2490176383	10/07/20	7.23
United Parcel Service: SHIPPING CHRG CORRECTION, c/o Secretary of Sta, Tony Robbins Productions, I, CARSON CITY, NV, 1Z59E98W2490512367	10/07/20	7.23
United Parcel Service: COM. NEXT DAY AIR, , Barbara Corcoran, Bay Shore, NY, 1Z59E98W2495370501	10/08/20	23.24
United Parcel Service: NEXT DAY AIR, , Alana LeBlanc,	10/08/20	25.76

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FRANKLIN, TN, 1Z59E98W2495443558

United Parcel Service: COM. NEXT DAY AIR, U.S. Corporation Age, Listed Sisters, CHATTANOOGA, TN, 1Z59E98W2495939166 10/08/20 22.47

United Parcel Service: NEXT DAY AIR, Lex LeBlanc, Alexya (Lex) LeBlanc, FRANKLIN, TN, 1Z59E98W2496518725 10/08/20 25.76

United Parcel Service: COM. NEXT DAY AIR, Robert A. Flutie, Flutie Entertainment, North Hollywood, CA, 1Z59E98W2496611383 10/08/20 19.62

United Parcel Service: COM. NEXT DAY AIR, Michael Bryan Baird, Baird Investments & Properi, SANDY, UT, 1Z59E98W2497850677 10/08/20 14.67

United Parcel Service: COM. NEXT DAY AIR, Creative Artists Age, Alana LeBlanc, LOS ANGELES, CA, 1Z59E98W2497974945 10/08/20 19.62

United Parcel Service: NEXT DAY AIR, , Barbara Corcoran, INC., NEW YORK, NY, 1Z59E98W2498330281 10/08/20 28.10

United Parcel Service: NEXT DAY AIR, , Gerald Martin, LAKE MARY, FL, 1Z59E98W2498361775 10/08/20 28.10

United Parcel Service: COM. NEXT DAY AIR, The Prentice-Hall Co, Build Your Life Foundation, SACRAMENTO, CA, 1Z59E98W2498472459 10/08/20 19.62

United Parcel Service: COM. NEXT DAY AIR, , Build Your Life Foundation, SHERMAN OAKS, CA, 1Z59E98W2499198067 10/08/20 19.62

United Parcel Service: NEXT DAY AIR, , Barbara Corcoran, NEW YORK, NY, 1Z59E98W2499536898 10/08/20 28.10

United Parcel Service: COM. NEXT DAY AIR, Corporation Service, Flutie Entertainment, TALLAHASSEE, FL, 1Z59E98W2499587995 10/08/20 22.47

United Parcel Service: COM. NEXT DAY AIR, Creative Artists Age, Alexya (Lex) LeBlanc, LOS ANGELES, CA, 1Z59E98W2499633336 10/08/20 19.62

United Parcel Service: COM. NEXT DAY AIR, , Alexya (Lex) LeBlanc, BROOKLYN, NY, 1Z59E98W2499731113 10/08/20 23.24

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853089 3421999
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United Parcel Service: ADDR. CORR. NEXT DAY A, , TONY ROBBINS PRODUCTIONS, I, SAN DIEGO, CA, 1Z59E98W2492837370	10/09/20	21.85
United Parcel Service: NEXT DAY AIR, c/o Tracy Fries, Boise Boys, Inc., MERIDIAN, ID, 1Z59E98W2495114654	10/09/20	21.40
United Parcel Service: NEXT DAY AIR, Hank's Home LLC, Luke Caldwell, BOISE, ID, 1Z59E98W2496764432	10/09/20	21.40
United Parcel Service: COM. NEXT DAY AIR, c/o Luke Caldwell, Invest In Boise Inc., BOISE, ID, 1Z59E98W2496876044	10/09/20	16.55
United Parcel Service: 3DAY SELECT, , HOLLAND & HART LLP, SALT LAKE CITY, UT, 1Z59E98W1295443553	10/20/20	12.05
United Parcel Service: COM. GROUND, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9093711361	10/21/20	22.66
United Parcel Service: SHIPPING CHRG CORRECTION, SLC, Holland & Hart LLP, Salt Lake City, UT, 1Z59E98W9093711361	10/21/20	15.14
United Parcel Service: COM. NEXT DAY AIR, Robert Dale Shemin, Robert Shemin Worldwide LLC, LAS VEGAS, NV, 1Z59E98W2497483976	10/27/20	19.71

Total Current Disbursements: \$926.36



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

November 12, 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:	1853089 3421999 107333 DKBroadbent
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Regarding: Matter No. 0002 - Zurixx Monitor - Attorneys

Invoice Summary

Current fees	\$125,036.25
Current disbursements	\$926.36
Current charges this invoice	\$125,962.61

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.

Due On Receipt

Please return this page with your remittance.



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

November 12, 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:	1853090 3422519 107333 DSByers
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Regarding: Matter No. 0003 - Third-Party Claw Back

Invoice Summary

Current fees	\$147,025.65
Current disbursements	\$5,734.20
Current charges this invoice	\$152,759.85

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 #1853090 on payment.

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853090 3422519
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For professional services rendered through October 31, 2020

Itemized Fees

Description of Work	Date	Tkpr	Hours
Analyze defendants for third-party claims and work on draft complaints related to the same;	07/28/20	DSB	1.40
Work on finalizing complaints for filing and analyze and research information regarding each of the defendants; analyze additional entities to add;	07/29/20	DSB	5.30
Work on complaints for eight lawsuits and related filing documents; correspondence with court regarding ancillary filings; conference with client regarding the filing; correspondence with plaintiffs' counsel regarding filing of complaints; analyze status of sealed filings and order regarding the same;	07/30/20	DSB	6.20
Work on filing of complaints; conference with client regarding the same and possibility of delaying filing; conference with FTC counsel regarding the same; confirm filings and status of the same; correspondence with BBLarsen regarding service of complaints;	07/31/20	DSB	2.20
Analyze issues regarding service of complaints and correspondence with BBLarsen regarding the same; analyze strategy of seeking acceptance of service from various defendants;	08/03/20	DSB	1.20
Conferences with DSByers; prepare Summonses for various claw back cases and forward to court clerk for issuance;	08/03/20	BBL	1.40
Analyze strategy for service of complaints; conference with BBLarsen regarding the same; conference with court regarding various filings;	08/04/20	DSB	1.30
Conferences with DSByers regarding Summons and Complaint and acceptance of service;	08/04/20	BBL	0.20
Attention to service of complaints;	08/05/20	DSB	0.30
Work on possible agreements related to service of complaints and research issues related to service; conference with BBLarsen regarding service;	08/06/20	DSB	0.80

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Correspondence with court regarding assignment of third-party claims cases and procedure regarding the same; correspondence with counsel for the FTC and UCPA regarding third-party claims and case numbers; analyze whether to seek acceptance of service or formally serve defendants; analyze potential claims against additional third-parties;	08/10/20	DSB	3.20
Conference with BBLarsen regarding service of complaints and analyze strategy regarding the same; analyze claims for additional cases and work on pleadings related to the same;	08/11/20	DSB	2.20
Work on analyzing claims against endorsers and other third-parties; work on draft complaints;	08/12/20	DSB	2.20
Analyze issues regarding additional third-party claims and work on draft complaint related to the same; conference with CATalbot regarding various potential claims and strategy related thereto; conference with client regarding the same;	08/13/20	DSB	2.60
Work on service of defendants for which complaints have been filed; conference with BBLarsen regarding the same; analyze additional third-party claims; work on draft complaints; analyze additional transfers and possible claims related thereto;	08/14/20	DSB	3.80
Submit Summonses for Matt Davis and MJA31-PR, LLC; communications with Court OPS regarding service of summonses and complaint; conference with CArnold regarding service of summons and complaint in the Reno area; create tracking log of status of service; conferences with DSByers regarding service;	08/14/20	BBL	0.80
Review orders reassigning pending cases and reaffirming referral to magistrate judges; work on analyzing additional claims for additional causes of actions and work on the same;	08/17/20	DSB	1.20
Conferences with Court OPS regarding out-of-state service of Summonses and Complaints;	08/17/20	BBL	0.20
Analyze orders in various cases to propose schedule; follow up on service of complaints; analyze financial data regarding payments made to various third-parties and analyze whether to bring claims to recover the same; correspondence with Mr. Curtis regarding the same;	08/18/20	DSB	2.20

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107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853090 3422519
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Work on draft complaint for claims against additional parties; analyze potential targets;	08/19/20	DSB	1.20
Follow up on service of complaints; correspondence with receiver regarding cases and additional third-party claims; correspondence with FTC counsel regarding status of service and reassignment of third-party claims to Judge Kimball; analyze draft demand letters and tolling agreement and correspondence with CATalbot regarding the same; analyze and investigate information related to various potential defendants for additional third-party claims; correspondence with Mr. Curtis regarding the same;	08/20/20	DSB	4.20
Review documents regarding third party clawback; discuss the same with CATalbot;	08/20/20	CJD	0.60
Conferences with DSByers; forward proof of service for New Vision Financial to BNoble for filing with the Court;	08/20/20	BBL	0.20
Outline demand letters regarding charitable contributions;	08/21/20	CAT	0.30
Analyze status and strategy for service of filed complaints; analyze issues regarding claims against other third-parties and analyze list of potential defendants; work on draft complaint related to the same;	08/21/20	DSB	3.00
Conferences with DSByers and Court OPS regarding status of service of Summonses and Complaints;	08/21/20	BBL	0.30
Attention to service of complaints; analyze parties for additional claims and work on draft complaints;	08/24/20	DSB	0.80
Conferences with Court OPS regarding service of Summonses and Complaints; conferences with DSByers and BNoble regarding same;	08/24/20	BBL	0.30
Analyze status of service and tasks following service in pending third-party actions; conference with BBLarsen regarding status of service; correspondence with CJDavis regarding preparation of proposed schedules for defendants and keeping up on deadlines; analyze other potential assets as well as potential parties from which to seek recovery of voidable transfers;	08/25/20	DSB	3.40
Conference with Receiver and CATalbot regarding potential additional third-party claims; work on complaints;	08/26/20	DSB	0.80
Analyze potential targets for additional complaints to	08/27/20	DSB	3.00

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recover voidable transfers and conference call with Receiver and CATalbot regarding the same; investigation into various transfers and involvement by various potential third-parties;

Draft demand letter to charities; send to CATalbot for review; 08/27/20 CJD 1.10

Communications with Court OPS regarding status of service of Summonses and Complaints; 08/27/20 BBL 0.20

Analyze potential targets for additional claims by the Receiver and investigate facts related to the same; work on additional complaints; 08/28/20 DSB 2.20

Analyze and research various potential parties for third-party claims and correspondence with BBLarsen, Receiver and Mr. Curtis regarding the same; work on drafting related pleadings; correspondence from counsel representing several of the third-party claims defendants regarding the answer deadline; analyze strategy with respect to service and correspondence with BBLarsen regarding the same; 08/31/20 DSB 4.40

Conferences with Court OPS regarding service of Summonses and Complaints; conference with DSByers regarding new complaints; 08/31/20 BBL 0.20

Review and analyze various transactions with respect to whether receiver has claims to recover transfers and correspondence with Mr. Curtis regarding the same; analyze involvement with receivership entities by various individuals and third-party entities; correspondence with Mr. Lahti regarding request for extension of answer deadline and correspondence with receiver regarding the same; 09/01/20 DSB 3.20

Conference with Mr. Stirba regarding request for extension to answer and possible settlement discussions; 09/02/20 DSB 0.30

Correspondence and conference with counsel for various defendants regarding requests for extensions on answer deadlines; 09/03/20 DSB 0.30

Prepare draft letters and tolling agreements re charitable claims; telephone conference with DSByers re tolling agreements with principals; 09/04/20 CAT 2.40

Analyze various transfers and potential claims against third parties; conferences and correspondence with Mr. Curtis 09/04/20 DSB 3.80

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regarding investigation into the same; review draft letter requesting tolling agreement from potential targets; correspondence and conferences with various counsel representing defendants in lawsuits already filed regarding case and requests for extensions of answer deadlines;

Review and edit letter requesting tolling agreement for potential parties from which Receiver may seek recovery of transfers; correspondence with counsel for defendant parties to third-party lawsuits regarding extensions for answer deadlines and discuss merits of case; analyze transfers to various parties and whether receivership has claim for recovery of the same and correspondence with Mr. Curtis regarding the same;	09/08/20	DSB	4.80
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Conferences and correspondence with counsel for various third-party defendants regarding requests for extensions of answer deadlines as well as merits of claims; review and approved proposed stipulated motions regarding the same; analyze schedules and deadlines and correspondence with CJDavis and BBLarsen regarding the same; work on analyzing information regarding additional potential targets for third-party claims and contact information for each; work on draft complaints and tolling agreements;	09/09/20	DSB	3.80
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Review and analyze procedural deadlines; prepare spreadsheet tracking procedural deadlines; discuss status of service with DSByers and BBLarsen;	09/09/20	CJD	2.80
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Conferences with Court OPS regarding service of Summonses and Complaints; conferences with DSByers and CJDavis regarding status of service;	09/09/20	BBL	0.40
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Revise and edit draft tolling agreement;	09/10/20	CAT	0.80
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Analyze status and strategy of service on various defendants for third-party claims and conference with BBLarsen regarding the same; work on draft complaints for additional lawsuits and analyze strategy for reaching out to potential defendants for early settlement negotiations;	09/10/20	DSB	2.60
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Review template notice and request for stay documents in California;	09/10/20	CJD	0.20
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Conferences with Court OPS and DSByers regarding service of Mr. Hrisiko, Mr. Davis, the PR entity and Swails proof of service; forward Swails proof of service to WCrizer	09/10/20	BBL	0.50
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for filing with the court;

Analyze issues regarding service of remaining defendants; analyze issues regarding additional complaints and work on drafting the same;	09/11/20	DSB	2.20
Draft notice of litigation and request for stay for the Puerto Rico eviction matter; email attorneys in Puerto Rico regarding the same;	09/11/20	CJD	1.00
Conferences with Court OPS regarding Declaration of Non-Service for Matt Davis and MJA31-PR, LLC; communications with Puerto Rico process servers regarding service of Summonses and Complaints in PR; begin researching contact/service address for parties identified by DSByers to be named in claw back lawsuits;	09/11/20	BBL	1.80
Revise and edit draft demand letters and tolling agreements; email with team regarding same;	09/14/20	CAT	1.30
Attention to service of complaints; review draft tolling agreement and letters to charitable organizations and correspondence with CATalbot regarding the same; conference with counsel for several defendants in third-party actions regarding merits of claims and possible resolution;	09/14/20	DSB	3.00
Continue researching contact and service addresses for pending third-party claw back law suits;	09/14/20	BBL	2.20
Conference with counsel for defendants regarding answer deadline; continue research and analysis of transfers and transferees to analyze potential additional claims and defendants; correspondence with CJDavis regarding deadlines in various matters; work on draft documents related to the same;	09/15/20	DSB	2.80
Review and update guide for procedural deadlines;	09/15/20	CJD	0.50
Conferences with DSByers; continue researching contact/service addresses for pending third-party complaints; confirm findings for entities and locate personal addresses for individuals; forward spreadsheet of contact information to DSByers for review;	09/15/20	BBL	2.40
Work on draft documents related to additional claims and analyze transfers made to various parties; correspondence	09/16/20	DSB	2.60

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with Mr. Curtis regarding the same;

Analyze status and strategy of service for remaining parties that have not been served and conference with BBLarsen regarding the same; work on analyzing potential additional claims against additional parties;	09/17/20	DSB	3.20
Conferences with Court OPS; address Hrisko Declaration of Service; conference with DSByers regarding same;	09/17/20	BBL	0.20
Review and analyze answer filed by Mr. Young; analyze contact information and research regarding various additional possible defendants for additional claims and conference with BBLarsen regarding the same; conference with Receiver regarding status of potential claims;	09/18/20	DSB	3.00
Conferences with DSByers regarding service of Summonses and Complaints in Puerto Rico and pending complaints for service; communications with additional process servers in Puerto Rico regarding service;	09/18/20	BBL	0.40
Conference with Puerto Rican process service regarding service of Summonses and Complaint; forward documents for service and provide service details;	09/21/20	BBL	0.30
Work on pleadings and related documents for potential new lawsuits to file;	09/22/20	DSB	0.80
Correspondence with opposing counsel regarding stipulation to extend deadline for answer; work on additional demands related to additional claw back claims;	09/23/20	DSB	1.60
Conferences with Mr. Medina regarding service of Summonses and Complaint in Puerto Rico;	09/23/20	BBL	0.40
Review orders granting answer extensions; correspondence with counsel for defendants regarding claims and possible settlement; review and analyze additional claims to bring against additional parties and work on related documents;	09/24/20	DSB	2.40
Review and analyze answers filed in claw back actions;	09/25/20	DSB	1.00
Prepare letters and tolling agreements regarding charitable organizations; email with team regarding same;	09/28/20	CAT	1.40
Analyze status of deadlines and attorney planning meetings for each of the existing claw back actions and conference with CJDavis regarding strategy for the same;	09/28/20	DSB	3.40

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107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853090 3422519
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correspondence with CATalbot regarding status of pending claw back cases; due diligence on counsel for various defendants;

Draft attorney planning meeting reports for the eight clawback suits; discuss the same with DSByers; review and discuss letters to charities with BBLarsen and CATalbot;	09/28/20	CJD	2.60
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Research contact information for charitable entities to receive demand letter and Tolling Agreement; conferences with CATalbot and CJDavis regarding same;	09/28/20	BBL	2.60
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Revise and finalize letters and tolling agreements regarding charitable organizations; email with team regarding same; coordinate with team regarding scheduling and planning meeting issues;	09/29/20	CAT	2.10
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Analyze status of service of Mr. Davis and his entity and correspondence with BBLarsen regarding the same; analyze strategy related to attorney planning meetings for each of the pending claw back cases and conference and correspondence with CJDavis regarding the same; correspondence with team regarding demand to charities; work on draft documents for demands on various other parties who received transfers from Zurixx;	09/29/20	DSB	4.30
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Review and discuss tolling agreements with DKBroadbent; teleconference with DSByers regarding the Attorney Meeting Reports; draft and finalize the attorney meeting reports for the 8 clawback cases; discuss the same with BTChristensen and BJMerrill;	09/29/20	CJD	4.20
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Draft letters to charitable entities regarding Tolling Agreement and receivership; draft Tolling Agreements for charitable entities; forward to DKBroadbent, CATalbot and CJDavis for review and revision;	09/29/20	BBL	4.60
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Revise, finalize, and issue demand letters and proposed tolling agreements; email with team regarding same; email with organizations regarding same;	09/30/20	CAT	2.40
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Work on draft demand letters, tolling agreements, and complaints related to various recipients of transfers from Zurixx and analyze strategy with respect to the same; analyze scheduling in each of the existing claw back actions and correspondence and conferences with CJDavis, BTChristensen and BJMerrill regarding strategy for meet	09/30/20	DSB	6.30
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Holland & Hart LLP

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and confer communications with opposing counsel; analyze whether insurance exists for claims against former employees; analyze issues related to demands made on charities related to transfers made to them and conference with CATalbot regarding the same;

Email communication with CJDavis and BTChristensen regarding claw back cases and next steps; draft notices of appearance in Atamirano and Grow cases; review complaints;	09/30/20	BJM	1.50
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Review background documents and pleadings; draft attorney meeting reports; correspond with opposing counsel regarding the same;	09/30/20	BTC	2.30
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Email opposing counsel regarding scheduling meet and confer conferences; edit and finalize attorney planning meeting reports; discuss the same with DSByers and BTChristensen;	09/30/20	CJD	0.80
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Conferences with CATalbot and BNoble regarding demand letters and Tolling Agreements; perform additional research on Ricky Martin Foundation for demand letter;	09/30/20	BBL	0.50
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Telephone conference with DSByers regarding demand letters and complaints; email with counsel for Christian Angel Smile Foundation; telephone conference with counsel for Celtic FC; email with team regarding same; telephone conference with DSByers and DKBroadbent regarding same;	10/01/20	CAT	3.10
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Work on demand and related documents to send to various recipients of transfers from Zurixx and correspondence with CATalbot and Receiver regarding the same; conference with team regarding need to negotiate schedules with various defendants in pending clawback actions; conference with Receiver and CATalbot regarding responses from charities to demands;	10/01/20	DSB	2.40
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Discuss email to opposing counsel with BJMerrill;	10/01/20	CJD	0.20
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File Notice of Appearance in Grow and Atamirano cases; draft email communication to opposing counsel sending draft Attorney Planning Meeting Report and requesting Rule 26(f) meet and confer; analyze Uniform Voidable Transactions Act and claims against Grow and Atamirano;	10/01/20	BJM	1.50
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Correspond with opposing counsel regarding meet and confer;	10/01/20	BTC	0.20
Communications with CIG regarding service of Summonses and Complaint in Puerto Rico; draft correspondence and coordinate shipment to Puerto Rico; conferences with DSByers regarding same;	10/01/20	BBL	1.20
Telephone conference with Mr. Saxton regarding tolling agreement; email with Mr. Saxton regarding same; review draft complaint and tolling agreement;	10/02/20	CAT	1.70
Work on draft demand letters, complaints and tolling agreements and conference and correspondence with CATalbot and Receiver regarding the same; analyze connection of charity that received transfers and other purported vendors; conference with CJDavis, BTChristensen, and BJMerrill regarding scheduling negotiations in each of the pending claw back actions; correspondence with various opposing counsel regarding the same; correspondence with CATalbot and Receiver regarding demands made to various charities regarding transfers they received;	10/02/20	DSB	5.20
Teleconference with opposing counsel for the Olson matter regarding deadlines; discuss the same with DSByers; draft Motion tor Extension of Time for the Young matter; send motion to opposing counsel for stipulation;	10/02/20	CJD	2.50
Conference with DSByers and others regarding case background and strategy;	10/02/20	BTC	0.50
Telephone conference with DSByers, CJDavis, and BTChristensen to discuss claw back cases and next steps;	10/02/20	BJM	0.50
Conferences with court reporter regarding service of Summons and Complaint in Virginia; conference with BNoble regarding same;	10/02/20	BBL	0.20
Email opposing counsel regarding meet and confer scheduling;	10/03/20	CJD	0.20
Review documents regarding charitable organizations; review and edit draft complaints;	10/05/20	CAT	1.30
Continue work on demand letters, draft complaints, and tolling agreements and send to various parties who received transfers from Zurixx; analyze strategy with respect to	10/05/20	DSB	5.30

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scheduling in pending claw back actions and conferences with team regarding the same and negotiations with opposing counsel in each matter;

Schedule meeting for meet and confer; prepare and file motion for extension of time; review documents from Entreamigos; discuss the same with CATalbot;	10/05/20	CJD	1.10
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Draft motions to extend time and proposed orders; correspond with opposing counsel regarding the same; file the same;	10/05/20	BTC	2.50
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Draft Stipulated Motions to Extend Deadline to file Attorney Planning Meeting Report and Proposed Schedule and email communication with opposing counsel regarding same in Atamirano and Grow matters;	10/05/20	BJM	1.70
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Conferences with Mr. Medina regarding service of Summonses and Complaints in Puerto Rico;	10/05/20	BBL	0.20
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Prepare for, and participate in, conference call with Mr. Samuels regarding EntreAmigos; prepare for, and participate in, conference call with Ms. Jackson regarding Houston Habitat for Humanity; telephone conference with DSByers regarding draft complaint allegations; review and analyze documents regarding EntreAmigos; email with Mr. Curtis regarding Houston Habitat for Humanity; review documents regarding same;	10/06/20	CAT	2.50
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Continue work on demand letters, draft complaints, and tolling agreements; work with team and counsel in various matters regarding scheduling agreements for pending cases; correspondence with Mr. Curtis regarding demands and analysis of transfers to charity;	10/06/20	DSB	5.30
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Review correspondence with charity organizations;	10/06/20	CJD	0.30
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Review stipulated motion to extend answer deadline;	10/06/20	BTC	0.20
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Review communication from opposing counsel and proposed changes to draft Attorney Planning Meeting Report in Atamirano and Grow matters; communicate about same with DSByers and with BBLarsen; telephone conference with opposing counsel to hold Rule 26(f) conference in Atamirano and Grow matters;	10/06/20	BJM	2.40
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Conferences with BJMerrill regarding production protocols;	10/06/20	BBL	0.30
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provide standard production language to same;

Review financial data regarding donations; email with counsel for various charitable organizations regarding same; email with Mr. Curtis regarding same; telephone conference with CJDavis regarding same and next steps;	10/07/20	CAT	2.90
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Work on numerous demand letters with draft complaints and tolling agreements for potential claw back claims and work on sending them out; attention to scheduling negotiations on pending cases and conferences with team regarding the same; correspondence and conference with various parties and their counsel regarding demands already sent; analyze strategy for scheduling in pending filed cases and conferences with team regarding the same;	10/07/20	DSB	6.70
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Teleconference with opposing counsel on the Young matter regarding proposed scheduling order; discuss the same with DSByers;	10/07/20	CJD	2.50
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Telephone conferences and email communication with BBLarsen to discuss opposing counsel's changes to Electronically Stored Information production of documents and whether proposed changes will work with our database system in Atamirano and Grow matters;	10/07/20	BJM	0.50
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Research apartment number for Tony Robbins service address; conference with DSByers regarding same; conference with BJMerrill regarding production protocols for third party claw back cases; conference with LitTeam regarding best practices for Relativity;	10/07/20	BBL	0.40
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Work on finalizing draft complaints and tolling agreements with related demand letters and arrange for sending of the same; conference with representative of Chuckanut Bay regarding demand and negotiate regarding tolling agreement; correspondence and conferences with counsel for recipients of demands regarding potential claims, tolling agreements and timing for potential resolution;	10/08/20	DSB	7.00
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Review Entreamigos documents; discuss the same with CATalbot;	10/08/20	CJD	1.70
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Conferences with DSByers; research service addresses for Barbara Cocoran and Gerald Martin; report findings to DSByers;	10/08/20	BBL	0.40
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Review and analyze motion to dismiss;	10/09/20	CAT	1.10
Review and analyze motion to dismiss in Olson matter and conference with CATalbot and receiver regarding the same; correspondence with CJDavis regarding scheduling in Young matter; review caselaw regarding third-party claims; attention to service of demand letters to various potential defendants for additional third-party claims; finalize additional demand and draft complaint to additional potential party; telephone conferences with counsel for recipients of demands for payment and requests for tolling agreement; analyze strategy regarding demands that have been made and tracking responses to the same; attention to service of Davis complaint and correspondence with BBLarsen regarding the same;	10/09/20	DSB	6.20
Draft motion for scheduling conference for the Young matter; discuss the same with opposing counsel and DSByers; prepare motion and attorney planning meeting report for filing;	10/09/20	CJD	3.70
Review opposing counsel's changes to attorney planning meeting report and coordinate with assistant to file report and proposed scheduling orders in Atamirano and Grow matters; review upcoming docketing deadlines and note upcoming initial disclosure deadlines;	10/09/20	BJM	0.60
Conferences with CATalbot and DSByers regarding claw back communications and documentation; gather and organize documents;	10/09/20	BBL	0.60
Review and analyze motion to dismiss (Olson);	10/12/20	CAT	1.10
Conference with representative from Boise Boys regarding possible claims and tolling agreement; correspondence with Mr. Kaplan and review signed tolling agreement from his client; conference with Ms. Pollock regarding potential claims and tolling agreement; analyze motion to dismiss in Olson case and conference with CATalbot and receiver regarding the same; analyze additional possible claims against additional parties;	10/12/20	DSB	5.30
Email with counsel regarding tolling agreements and related issues; review correspondence regarding jurisdictional claim; telephone conference with DSByers regarding same;	10/13/20	CAT	1.60

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Correspondence with team regarding document management and strategy for responding to motions and complying with deadlines in each case; correspondence with Mr. David regarding demand made on his client and request for tolling agreement; correspondence and conference with Ms. Chou regarding the same with respect to her client; correspondence with Ms. Laine regarding the same with respect to her; correspondence with Mr. Fletcher regarding RE Education;	10/13/20	DSB	6.60
Correspond with BBLarsen regarding establishing a tracking spreadsheet for correspondence with charities;	10/13/20	CJD	0.90
Review scheduling order from court in Atamirano and Grow matters and confirm deadlines are correct;	10/13/20	BJM	0.30
Conferences with DSByers and Covert Intelligence regarding service of Summonses and Complaints in Puerto Rico; conferences with CJDavis regarding charitable donations claw back matters;	10/13/20	BBL	0.60
Telephone conference with counsel for Mr. Souhleris and related entities regarding claims; telephone conference with DSByers regarding same; email with counsel for Susan G. Komen Foundation regarding same; review research regarding standing; email with counsel regarding tolling agreement issues;	10/14/20	CAT	3.00
Call with Mr. Fletcher and CATalbot regarding potential claims against Mr. Fletcher's clients and proposed tolling agreements; correspondence with other parties regarding draft tolling agreement and review executed versions from a few parties; conference with Mr. David regarding his client and negotiations over tolling agreement; analyze and review motion to dismiss and analyze strategy for response; analyze status and strategy of service of Davis complaint; analyze strategy for initial disclosures in various pending cases and conference with CJDavis regarding the same; conference with Boise Boys regarding unrelated entity;	10/14/20	DSB	7.00
Review pleadings and procedural rules; discuss pleading deadlines with internal teams;	10/14/20	CJD	0.90
Telephone conference with counsel for Jane Stern Dorado Community Library regarding tolling agreement and related matters; telephone conference with counsel for Susan G. Komen Foundation regarding same; telephone conference	10/15/20	CAT	3.20

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with DSByers and DKBroadbent regarding motion to dismiss; review motion to dismiss;

Conference with Receiver and CATalbot regarding pending motion to dismiss and strategy with respect to the same; work on draft tolling agreement for parties receiving distributions; attention to service of Davis complaint and conference with BBLarsen regarding the same; conferences with various counsel regarding proposed tolling agreements; edit tolling agreements pursuant to requested edits; conference with CATalbot regarding claims related to charitable contributions; analyze potential claims against owners and related entities and individuals and conference with Mr. Curtis regarding the same;	10/15/20	DSB	6.80
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Teleconference with DSByers regarding research for the opposition to the motion to dismiss; arrange internal meeting regarding necessary research;	10/15/20	CJD	0.80
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Conferences with Covert Intelligence Group regarding service of Summonses and Complaints in Puerto Rico;	10/15/20	BBL	0.30
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Telephone conference with team re opposition to motion to dismiss; review and analyze additional motions to dismiss;	10/16/20	CAT	1.80
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Review and analyze latest motions to dismiss in existing third-party actions; work on draft tolling agreements with additional parties and correspondence with counsel for the FTC regarding the same; conference and correspondence with counsel for defendants in main action regarding potential tolling agreement; telephone conference with Receiver and legal team regarding strategy for pending actions and response to motion to dismiss filed in Olson matter; correspondence regarding research regarding the same; correspondence with various parties regarding requested tolling agreements and substance of potential underlying claims; work with Mr. Curtis to gather documentation as support for potential claims;	10/16/20	DSB	7.20
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Teleconference with DSByers, CATalbot, DKBroadbent, BTChristensen, and BJMerrill regarding research for drafting the motion to dismiss; review and prepare initial disclosures;	10/16/20	CJD	1.20
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Telephone conference with DKBroadbent, DSByers, CATalbot, CJDavis, and BTChristensen to discuss motions to dismiss and initial disclosures; email communication with	10/16/20	BJM	1.30
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CJDavis regarding call notes from customer recordings;
review memos regarding legal elements;

Conference with the team regarding the motion to dismiss; 10/16/20 BTC 0.80

Continue reviews of motions to dismiss; telephone conference with DSByers regarding same; telephone conference with counsel for Christian Angel Smile Foundation; email with other counsel regarding tolling agreements; 10/19/20 CAT 2.90

Review and analyze additional filed motions to dismiss and conference with CATalbot regarding the same; analyze whether amendment to complaints necessary and conference and correspondence with BJMerrill regarding the same; correspondence and conferences with various counsel regarding potential claims and requests for tolling agreements and review and analyze requested edits to tolling agreement; correspondence to Messrs. Pahnke and Moss regarding request for tolling agreements; correspondence with Ms. Pollock regarding request for tolling agreement and refer her to counsel for representation; correspondence with Mr. Curtis regarding supporting information for claims against specific parties and conference with opposing counsel regarding the same; analyze needed research regarding claims and conferences with team regarding the same; attention to service of Davis complaint and analyze possible alternative service motion; work on proposed tolling agreement for those who received distributions and conference with receiver and CATalbot regarding the same; 10/19/20 DSB 6.00

Discuss research and strategy to draft opposition to Motion to Dismiss with BJMerrill; 10/19/20 CJD 0.80

Analyze whether complaints should be amended to include Uniform Fraudulent Transfer Act for transfers made before May 9, 2017 and email and telephone communication with DSByers regarding same; analyze whether unjust enrichment claims need to be amended; telephone conference with CJDavis regarding reasonably equivalent value standards; 10/19/20 BJM 2.70

Telephone conference with counsel regarding tolling agreement; review motions to dismiss; 10/20/20 CAT 1.00

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Analyze strategy with respect to service of Davis; analyze need for motion for alternative service; phone call with Mr. Davis and his counsel regarding acceptance of service; prepare and forward proposed acceptance of service; correspondence with various parties regarding tolling agreements; correspondence with Mr. Curtis regarding various receivership entities;	10/20/20	DSB	4.80
Telephone conference with CATalbot to discuss how to respond to defendant's argument regarding statute of limitations and tolling issue and research and analyze same;	10/20/20	BJM	1.00
Research and analyze federal case law interpreting pleading standards under the Utah Voidable Transfers Act; research and download copies of Complaints alleging the Utah Voidable Transfers Act that have survived a Motion to Dismiss;	10/20/20	CJD	5.60
Telephone conference with Mr. Roberts regarding tolling agreement and additional information; review case law regarding expert disclosure; review and prepare oppositions to motions to dismiss; email with team regarding research;	10/21/20	CAT	3.30
Correspondence with counsel for Davis regarding acceptance of service of complaint; analyze strategy for initial disclosures in pending lawsuits and conferences with CJDavis regarding the same; analyze issues regarding additional types of transfers for the benefit of parties and need to search the same; analyze status of potential claims and negotiations with charities and correspondence with CATalbot and Receiver regarding the same; work on negotiating tolling agreements with various parties; analyze strategy with respect to motions to dismiss and conferences with team regarding the same;	10/21/20	DSB	4.40
Analyze statute of limitations tolling issue and telephone conference with CATalbot and DSByers regarding same;	10/21/20	BJM	0.80
Continue to research pleading standards for the Utah Voidable Transfers Act; draft analysis of research and recommendations and send to CATalbot, DSByers, and DKBroadbent;	10/21/20	CJD	1.50
Telephone conference with Mr. Glass regarding Ricky Martin Foundation donation and tolling agreement; telephone conference with team regarding motions to dismiss; analysis of motions to dismiss;	10/22/20	CAT	2.90

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Attention to filing of acceptance of service from Davis; work on tolling agreements with various parties including recipients of distributions and correspondence with receiver and CATalbot regarding the same; analyze receivership entities and whether additional entities should formally be added and conference with Mr. Curtis regarding the same; conference with team regarding strategy for amending third-party complaints and strategy for additional new complaints; analyze legal issues regarding amendment of claims and other issues related to claims;	10/22/20	DSB	4.80
Conference with the H&H team regarding the motions to dismiss; research the statute of limitations for voidable transfers act claims;	10/22/20	BTC	2.20
Telephone conference with CATalbot to discuss tolling agreement issue; telephone conference with team to discuss motions to dismiss and amended complaints; analyze time to amend complaint as a matter of right and email communication with team regarding same;	10/22/20	BJM	2.70
Conferences with CATalbot and Docketing regarding addition of Utah Consumer Protection addition to court notices;	10/22/20	BBL	0.30
Conferences with CATalbot regarding filings to be sent to Utah Division of Consumer Protection;	10/22/20	BBL	0.30
Revise and edit tolling agreement (Christian Angel Smile Foundation, et al.); email with counsel regarding same;	10/23/20	CAT	1.00
Conferences with various parties and their counsel to negotiate tolling agreements; analyze strategy for amending complaints and preparing and filing additional complaints for preservation of claims; conference with Mr. Curtis regarding the same and insolvency analysis; begin working on amended complaint for Olson; conference with CJDavis regarding strategy for amended complaint and additional complaints; analyze research regarding amending complaint and issues raised in motions to dismiss;	10/23/20	DSB	4.60
Teleconference with DSByers regarding amending the Complaints; review financial transfer documents for including in the Complaint;	10/23/20	CJD	0.60
Conferences with CATalbot regarding pleadings to Utah Division of Consumer Protection; gather pleadings in third-	10/23/20	BBL	0.30

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party actions and forward to Mr. Wing;

Analyze strategy for filing of lawsuits against parties who do not respond to demands and do not execute a tolling agreement; conferences and correspondence with various parties and counsel for various parties regarding tolling agreements; analyze strategy with respect to making additional efforts to contact those for whom no response has been received; correspondence with CJDavis regarding amendment of complaints already filed; analyze amendments to make to existing complaints and conferences with Mr. Curtis regarding the same; review information received from Mr. Curtis;	10/26/20	DSB	3.60
Search to find VesCor case brought against law firm and communicate with CATalbot and library services regarding same;	10/26/20	BJM	0.90
Conferences with DSByers; gather additional contact information for certain entities/individuals in connection with potential claw back lawsuits;	10/26/20	BBL	0.40
Continue working with counsel for various parties to negotiate tolling agreements; analyze strategy with respect to several parties who have not responded to demands and work on additional efforts to contact the same; begin efforts to prepare complaints and related documents for filing of additional clawback actions; correspondence with receiver regarding status of various tolling agreements including with the defendants in the main action and related entities that received distributions; review and analyze caselaw regarding clawback claims; correspondence with CJDavis regarding scheduling conference in Young matter;	10/27/20	DSB	5.30
Email communication with DKBroadbent regarding VesCor third party case and search for pleadings in case and send to DKBroadbent;	10/27/20	BJM	0.40
Research Tenth Circuit and other law regarding the attachment and incorporation of exhibits to a complaint;	10/27/20	BTC	5.20
Attend scheduling conference; draft and send summary of hearing to CATalbot, DSByers, and DKBroadbent;	10/27/20	CJD	2.50
Email with charities and team regarding tolling agreements;	10/28/20	CAT	0.40

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Continue negotiations with various parties and their counsel regarding tolling agreements; analyze tolling agreements and work on editing them pursuant to negotiations; review and analyze amended complaint for Young matter and analyze additional edits for the same and other complaints; analyze solvency issues and creditor issues for complaints and conferences with Mr. Curtis regarding the same;	10/28/20	DSB	5.20
Draft amended complaint;	10/28/20	CJD	4.00
Use Bloomberg Law and PACER Pro to research and pull filings for case, 2:09-cv-00399-DB Wing v. Williams, in the United States District Court, Utah, forward requested materials via e-mail for BJMerrill;	10/28/20	THP	0.60
Outreach to counsel and parties regarding tolling agreements; telephone conference with DKBroadbent, DSByers, and CJDavis regarding revised complaints; prepare third-party complaints;	10/29/20	CAT	3.10
Negotiate with various counsel regarding several tolling agreements; work on preparing to file lawsuits for those that will not agree to tolling agreements; conferences with CATalbot and CJDavis regarding the same; conference with Receiver regarding status of various items; analyze strategy with respect to initial disclosures and correspondence with CJDavis regarding the same; review and analyze draft amended complaint for Olson matter and telephone conference with receiver and team regarding the same and strategy for making similar amendments in other cases; preparation for filing of the same; analyze research regarding pleading standards for claims; analyze issues regarding solvency and correspondence and conferences with Mr. Curtis regarding the same;	10/29/20	DSB	6.80
Draft initial disclosures; teleconference with DSByers, CATalbot, and DKBroadbent regarding amended complaints; edit complaints against celebrity endorsers;	10/29/20	CJD	8.60
Review filings in third-party lawsuits; forward additional pleading to Utah Division of Consumer Protection;	10/29/20	BBL	0.30
Prepare, finalize, and file third-party complaints, including email with organizations, telephone conferences with DKBroadbent and DSByers, email with team, and email	10/30/20	CAT	6.20

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with Rocky Mountain Advisory; review and edit draft disclosures (Young); review and analyze defendant's disclosures (Young);

Work on finalizing various tolling agreements and communications with various counsel regarding the same; work on finalizing and filing various complaints to recover transfers made to various parties and correspondence and conference with team regarding the same; work on finalizing and filing amended complaint in Olson matter and amended complaints in other matters for filing in coming weeks; analyze issues regarding initial disclosures in filed cases and conference and correspondence with team regarding the same;	10/30/20	DSB	6.80
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Discuss initial disclosures with CATalbot, DSByers, and DKBroadbent; edit and finalize complaints against celebrity endorsers; discuss and assist with finalizing complaints for filing;	10/30/20	CJD	3.30
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Research Tax ID number of Wasatch High School Rugby; conference with NRRunyan regarding same; gather entity information requested by CATalbot for complaints; conference with Puerto Rico process server;	10/30/20	BBL	1.20
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Total Current Fees: \$147,025.65

Timekeeper Summary

Timekeeper	Tkpr ID	Rate	Hours	Amount
BBLarsen	2172	265.50	27.10	7,195.05
THPhalen	2200	170.00	0.60	102.00
DSByers	5654	400.50	237.80	95,238.90
CATalbot	5657	405.00	54.80	22,194.00
CJDavis	5960	247.50	56.70	14,033.25
BTChristensen	5961	247.50	13.90	3,440.25
BJMerrill	6137	256.50	18.80	4,822.20
			409.70	\$147,025.65

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Disbursements

Description of Disbursements	Date	Amount
Filing, Recording, Docket Fees: VENDOR: COURTS/USDC-UT-PG; INVOICE#: AUTDC-3667964; DATE: 7/31/2020 - Filing	07/31/20	400.00
Filing, Recording, Docket Fees: VENDOR: COURTS/USDC-UT-PG; INVOICE#: AUTDC-3667984; DATE: 7/31/2020 - Filing	07/31/20	400.00
Filing, Recording, Docket Fees: VENDOR: COURTS/USDC-UT-PG; INVOICE#: AUTDC-3667994; DATE: 7/31/2020 - Filing	07/31/20	400.00
Filing, Recording, Docket Fees: VENDOR: Courts/USDC-UT; INVOICE#: BUTDC-3668037; DATE: 7/31/2020 - Filing Fee - Complaint - Claude Alan Swails	07/31/20	400.00
Filing, Recording, Docket Fees: VENDOR: Courts/USDC-UT; INVOICE#: AUTDC-3668051; DATE: 7/31/2020 - Filing Fee - Complaint - Christopher Young	07/31/20	400.00
Filing, Recording, Docket Fees: VENDOR: Courts/USDC-UT; INVOICE#: AUTDC-3668014; DATE: 7/31/2020 - Filing Fee	07/31/20	400.00
Filing, Recording, Docket Fees: VENDOR: Courts/USDC-UT; INVOICE#: AUTDC-3668029; DATE: 7/31/2020 - Filing Fee	07/31/20	400.00
Filing, Recording, Docket Fees: VENDOR: Courts/USDC-UT; INVOICE#: AUTDC-3668024; DATE: 7/31/2020 - Filing Fee	07/31/20	400.00
Process Service Fee/Cost: VENDOR: Reno Carson Messenger Service, Inc.; INVOICE#: R105662-01; New Vision Financial	08/17/20	92.59
Process Service Fee/Cost: VENDOR: Court OPS; INVOICE#: DS063876; Christopher Young, Chad Olsen, Daniel Altamirano	08/24/20	207.60
Process Service Fee/Cost: VENDOR: Court OPS; INVOICE#: DS063889; Success Technologic (VA)	08/24/20	145.00
Process Service Fee/Cost: VENDOR: Court OPS; INVOICE#: DS063891; David Freier	08/25/20	150.00
Outside Fees: VENDOR: Court OPS; INVOICE#: DS063942; DATE: 8/31/2020	08/31/20	38.00

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Process Service Fee/Cost: VENDOR: Court OPS; INVOICE#: DS064034; Clade Alan Swails	09/10/20	105.00
Process Service Fee/Cost: VENDOR: Court OPS; INVOICE#: DS064038; Matt Davis, MJA31-PR, LLC	09/11/20	92.40
Process Service Fee/Cost: VENDOR: Court OPS; INVOICE#: DS064071; Mark Hrisko	09/17/20	145.00
Outside Fees: VENDOR: LexisNexis (Risk Solutions); INVOICE#: 1083600-20200930; advanced person searches	09/30/20	221.54
Outside Fees: VENDOR: NIC Utah; INVOICE#: 3949550; business entity search/principals	09/30/20	5.00
Process Service Fee/Cost: VENDOR: CIG, LLC; INVOICE#: 100120; service in Puerto Rico	10/01/20	292.50
United Parcel Service: COM. NEXT DAY AIR, Fidalgo Diaz, CIG, LLC, CAROLINA, PR, 1Z59E98W0199928472	10/01/20	33.26
United Parcel Service: NEXT DAY AIR, , David J. Seymour, DANVERS, MA, 1Z59E98W2490536001	10/06/20	28.10
United Parcel Service: NEXT DAY AIR, Christina Haack Chri, CHRISTINA EL MOUSSA, NEWPORT BEACH, CA, 1Z59E98W2490991966	10/06/20	24.47
United Parcel Service: COM. NEXT DAY AIR, ROGER N. BEHLE, JR., T&B SEMINARS, INC., COSTA MESA, CA, 1Z59E98W2491376914	10/06/20	19.62
United Parcel Service: COM. NEXT DAY AIR, Roger N. Behle, Jr., T&C Seminar Group, Inc., COSTA MESA, CA, 1Z59E98W2492095903	10/06/20	19.62
United Parcel Service: NEXT DAY AIR, Tarek Gustave El Mou, Tarek El Moussa, COSTA MESA, CA, 1Z59E98W2493103946	10/06/20	24.47
United Parcel Service: COM. NEXT DAY AIR, Katie Sterling, Christina Entertainment, In, IRVINE, CA, 1Z59E98W2494071925	10/06/20	19.62
United Parcel Service: COM. NEXT DAY AIR, ROBERT BERRY, RE EDUCATION, LLC (NEVADA), PEABODY, MA, 1Z59E98W2494535988	10/06/20	23.24
United Parcel Service: COM. NEXT DAY AIR, Robert Berry, RE Education, LLC, PEABODY, MA, 1Z59E98W2494756972	10/06/20	23.24

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1853090 3422519
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United Parcel Service: COM. NEXT DAY AIR, ROGER N. BEHLE, JR., Tarek El Moussa Design Buil, COSTA MESA, CA, 1Z59E98W2494780936	10/06/20	19.62
United Parcel Service: NEXT DAY AIR, , Peter A. Souhleris, BOXFORD, MA, 1Z59E98W2494928992	10/06/20	32.64
United Parcel Service: COM. NEXT DAY AIR, Douglas Neil Hopkins, Douglas Neil Hopkins, MESA, AZ, 1Z59E98W2490096086	10/07/20	19.62
United Parcel Service: NEXT DAY AIR, Daymond John Aurum, Daymond John Aurum, STATEN ISLAND, NY, 1Z59E98W2490376103	10/07/20	34.30
United Parcel Service: COM. NEXT DAY AIR, , Robert Herjavec, WEST HOLLYWOOD, CA, 1Z59E98W2490729197	10/07/20	19.62
United Parcel Service: NEXT DAY AIR, Hilary Farr, Hilary Farr, RALEIGH, NC, 1Z59E98W2490901133	10/07/20	27.32
United Parcel Service: COM. NEXT DAY AIR, Robert Herjavec, Reg, Herjavec Entertainment Corp, WEST HOLLYWOOD, CA, 1Z59E98W2490997175	10/07/20	19.62
United Parcel Service: COM. NEXT DAY AIR, SHEHYAR BUTT, REGIST, HERJAVEC ENTERTAINMENT CORP, WEST HOLLYWOOD, CA, 1Z59E98W2491616208	10/07/20	19.62
United Parcel Service: NEXT DAY AIR, Hilary Farr, Hilary Farr, RALEIGH, NC, 1Z59E98W2491937111	10/07/20	27.32
United Parcel Service: COM. NEXT DAY AIR, c/o Doug Hopkins, Property Farm, LLC, MESA, AZ, 1Z59E98W2492104045	10/07/20	19.62
United Parcel Service: COM. NEXT DAY AIR, Douglas Neil Hopkins, Douglas Neil Hopkins, PAYSON, AZ, 1Z59E98W2492177075	10/07/20	30.04
United Parcel Service: COM. NEXT DAY AIR, Creative Artists Age, Hilary Farr Entertainment I, LOS ANGELES, CA, 1Z59E98W2492504149	10/07/20	19.62
United Parcel Service: COM. NEXT DAY AIR, Creative Artists/Mic, Hilary Farr Entertainment I, LOS ANGELES, CA, 1Z59E98W2492952165	10/07/20	19.62
United Parcel Service: NEXT DAY AIR, Hilary Farr Enterp/H, Hilary Farr Entertainment I, RALEIGH, NC,	10/07/20	27.32

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1853090
	H&H Ref. No.	3422519

1Z59E98W2493321157

United Parcel Service: COM. NEXT DAY AIR, Learning Annex/BUSIN, LEARNING ANNEX, WILMINGTON, DE, 1Z59E98W2493561237 10/07/20 23.24

United Parcel Service: COM. NEXT DAY AIR, Schissel & Co. LLP, Shark Branding Corp., NEW YORK, NY, 1Z59E98W2493912125 10/07/20 23.24

United Parcel Service: COM. NEXT DAY AIR, Learning Annex GP, L, LEARNING ANNEX, WILMINGTON, DE, 1Z59E98W2494304245 10/07/20 23.24

United Parcel Service: COM. NEXT DAY AIR, , Robert Herjavec, Hidden Hills, CA, 1Z59E98W2494317213 10/07/20 19.62

United Parcel Service: COM. NEXT DAY AIR, Daymond John Aurum, Daymond John Aurum, PLEASANT VALLEY, NY, 1Z59E98W2495896524 10/07/20 32.64

United Parcel Service: NEXT DAY AIR, Daymond John Aurum, Daymond John Aurum, PLEASANT VALLEY, NY, 1Z59E98W2498471138 10/07/20 32.64

United Parcel Service: COM. NEXT DAY AIR, Flutie Entertainment, Two Chicks And A Hammer, In, NORTH HOLLYWOOD, CA, 1Z59E98W2495156967 10/08/20 19.62

United Parcel Service: NEXT DAY AIR, Robert Dale Shemin, Robert Dale Shemin, MIAMI, FL, 1Z59E98W2495202237 10/08/20 28.10

United Parcel Service: NEXT DAY AIR, Candis Meredith, Candis Meredith, AMERICAN FORK, UT, 1Z59E98W2496840019 10/08/20 19.53

United Parcel Service: NEXT DAY AIR, c/o Candis Meredith, Old Home Love, Corp., AMERICAN FORK, UT, 1Z59E98W2497185799 10/08/20 19.53

United Parcel Service: NEXT DAY AIR, Andy Meredith, Andy Meredith, AMERICAN FORK, UT, 1Z59E98W2497249407 10/08/20 19.53

United Parcel Service: COM. NEXT DAY AIR, c/o Alexa Howell, Two Chicks And A Hammer, In, INDIANAPOLIS, IN, 1Z59E98W2497749180 10/08/20 20.91

United Parcel Service: NEXT DAY AIR, Mina Starsiak Hawk, Mina Starsiak Hawk, INDIANAPOLIS, IN, 1Z59E98W2498272746 10/08/20 25.76

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1853090
	H&H Ref. No.	3422519

United Parcel Service: NEXT DAY AIR, Karen E. Jensen, Karen E. Laine, INDIANAPOLIS, IN, 1Z59E98W2499201356	10/08/20	25.76
United Parcel Service: NEXT DAY AIR, Robert Shemin Worldw, Robert Shemin Worldwide LLC, MIAMI, FL, 1Z59E98W2499857621	10/08/20	28.10
United Parcel Service: ADDR. CORR. NEXT DAY A, , ROBERT HERJAVEC, HIDDEN HILLS, CA, 1Z59E98W2494317213	10/08/20	17.00
United Parcel Service: COM. NEXT DAY AIR, c/o Tax Care Celebra, Robert Shemin Worldwide LLC, SWEETWATER, FL, 1Z59E98W2496773842	10/08/20	23.24
United Parcel Service: ADDR. CORR. NEXT DAY A, , HILARY FARR, RALEIGH, NC, 1Z59E98W2490901133	10/09/20	17.00
United Parcel Service: ADDR. CORR. NEXT DAY A, , HILARY FARR, RALEIGH, NC, 1Z59E98W2493321157	10/09/20	17.00
United Parcel Service: COM. NEXT DAY AIR, Beulah Land Holdings, Clint Robertson, BOISE, ID, 1Z59E98W2495879829	10/09/20	16.55
United Parcel Service: 3DAY SELECT, , HOLLAND & HART LLP, SALT LAKE CITY, UT, 1Z59E98W1296773847	10/15/20	12.97
United Parcel Service: 3DAY SELECT, , HOLLAND & HART LLP, SALT LAKE CITY, UT, 1Z59E98W1292177070	10/20/20	12.05
United Parcel Service: 3DAY SELECT, , HOLLAND & HART LLP, SALT LAKE CITY, UT, 1Z59E98W1293103941	10/30/20	12.11

Total Current Disbursements: \$5,734.20



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

November 12, 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:	1853090 3422519 107333 DSByers
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Regarding: Matter No. 0003 - Third-Party Claw Back

Invoice Summary

Current fees	\$147,025.65
Current disbursements	\$5,734.20
Current charges this invoice	\$152,759.85

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.

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

October 26, 2020
 Invoice # 14710

Billing for: 07/01/20 to 09/30/20

RE: Federal Trade Commission v ZURIXX

2:19-cv-00713
 District Court

Previous balance	\$16,173.51
8/28/2020 Payment - Thank You. Check No. 275	(\$16,173.51)
Total payments and adjustments	(\$16,173.51)

Professional Services Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	
Gil A. Miller	1.10	365.00	\$401.50
John H. Curtis	48.70	260.00	\$12,662.00
Josh Gifford	1.80	205.00	\$369.00
Jennie Messer	1.80	195.00	\$351.00

Professional Services Detail

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
07/06/20	JHC	Reviewed, received and recorded wire from Priority Payment Systems; updated Receiver regarding deposit. Reviewed invoices and submitted to R. Ereksen for payment.	0.60	\$156.00
07/07/20	JHC	Directed R. Ereksen regarding payment of expenses. Reviewed invoices and directed payment. Call with D. Broadbent regarding tax preparation invoices by Puerto Rico firm and Receivership order. Reviewed Receivership order and PR invoices.	0.80	\$208.00
07/15/20	JHC	Reviewed Databank bill and researched payment of the same. Email communications with D. Easter regarding invoices and followed up with D. Broadbent.	0.40	\$104.00
07/16/20	JHC	Reviewed invoice from vendors and directed R. Ereksen in making payment. Followed up with D. Easter regarding payments.	0.40	\$104.00

Mr. David Broadbent, Receiver

October 26, 2020

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
07/21/20	JHC	Searched for information on Real Estate Digital entity relative to funds that may be receivership assets. Emailed M. Magistro and obtained information. Provided response to D. Byers.	1.30	\$338.00
07/23/20	JHC	Prepared report of all wires received from merchant reserve account turnovers and sent report to D. Byers. Reviewed invoices and prepared calculation of total paid to D. Easter related to Paysafe work. Call with D. Byers regarding merchant reserve account balances. Reviewed listing of individuals and entities to be sent demand letters and recovery complaints and determined actual payee through review of tax records, W-2 forms, 1099 forms and other information. Call with D. Byers to discuss payees and complaints to be filed for recovery of payments.	3.60	\$936.00
08/03/20	JHC	Searched for security deposit and Puerto Rico lease information. Analyzed and reviewed payments for Puerto Rico lease, including payment summaries. Prepared response to C. Talbot and request from D. Easter for information on Puerto Rico lease payments and reviewed response to the same.	1.10	\$286.00
08/04/20	JHC	Reviewed invoices for Databank and payments related to the same and responded to Databank. Searched files for information on Crescent Rock Capital. Email communications with C. Talbot on lease payments.	0.90	\$234.00
08/05/20	JHC	Prepared payment history of Puerto Rico lease payments to various entities and sent to C. Talbot. Prepared analysis of Priority Payment Systems merchant reserve balance as of inception of receivership and reductions since that date and provided to D. Byers.	2.40	\$624.00
08/07/20	JHC	Email correspondence regarding RE Cash Source deposit. Searched for and analyzed payments to RLG, Richardson Law Group and Reyes Trust and provided information to counsel. Reviewed V. Kamdar invoice and supporting detail for tax work and sent to Receiver with explanation for payment.	2.10	\$546.00
08/10/20	JG	Review revised Zurixx tax returns.	1.10	\$225.50
	JHC	Reviewed tax returns, responded to J. Carlson. Directed J. Gifford in final review of tax returns and obtaining signatures for filing.	0.60	\$156.00
08/11/20	JG	Review and forward updated tax returns to D. Broadbent for signature.	0.30	\$61.50
	JHC	Researched contact and other information on Dave Larson as requested by counsel. Searched Zurixx data for RE Cash Source information. Requested copy of server documents from C. Talbot.	0.80	\$208.00
08/13/20	JHC	Call with V. Kamdar regarding tax return preparation and fees. Reviewed invoices. Email correspondence with C. Talbot regarding RE Cash Source books and information. Email communications with Receiver regarding preparation of RE Cash Source tax returns. Prepared accounting data for preparation of summary report of cash receipts and disbursements for interim report. Directed J. Messer in preparation of report. Searched for D. Larson contact information in records and forms 1099 and provided to C. Talbot.	3.40	\$884.00

Mr. David Broadbent, Receiver

October 26, 2020

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
08/13/20	JM	Analyzed the general ledger detail of Zurixx, LLC. Began preparing a schedule of cash receipts and disbursement from November 2019, to August 2020.	0.40	\$78.00
08/14/20	JM	Prepared a cash receipts and disbursement schedule from November 2019, to August 2020. Sent cash receipts and disbursements schedule to J. Curtis for his review. Updated the cash receipts and disbursement schedules to reflect changes noted by J. Curtis.	1.40	\$273.00
	JHC	Requested RE Cash Source files from U. Cantarero. Reviewed summary of cash receipts and disbursements and requested changes from J. Messer. Made revisions and updates to cash receipts and disbursements summary for interim report.	1.60	\$416.00
08/17/20	JHC	Searched for Zurixx financial statements and Dorado audit and financial statements and provided to D. Broadbent.	0.50	\$130.00
08/18/20	JHC	Prepared cash receipts and disbursements summary for Receivership. Reviewed summary report with G. Miller and discussed updates. Requested additional information from C. Talbot for summary report.	1.70	\$442.00
	GAM	Review cash flow summary and speak with staff about possible revision.	0.20	\$73.00
08/19/20	JHC	Reviewed celebrity payments and responded to D. Byers. Analyzed files for royalty and celebrity payments.	0.70	\$182.00
08/20/20	JG	Review 1099 filing requirements.	0.40	\$82.00
	JHC	Prepared data for D. Byers regarding payments for royalties and to celebrities and provided report to D. Byers with explanatory email. Email communications with D. Easter regarding payee to vendors for royalty payments. Updated summary report of cash receipts and disbursements for interim report of Receivership and provided to C. Talbot. Call with D. Broadbent and C. Talbot regarding changes to report.	2.60	\$676.00
	GAM	Review update cash flow report and discuss with staff; email with receiver's counsel regarding same.	0.30	\$109.50
08/21/20	JHC	Call with D. Broadbent and C. Talbot regarding summary report and questions regarding Receivership transactions. Email communications with Receiver and counsel regarding changes. Reviewed transactions to make changes to cash receipts and disbursements summary report. Reviewed fee applications and payments to determine remaining reserve related to Receivership fees. Prepared revised report and sent to Receiver.	2.10	\$546.00
08/24/20	JHC	Made final revisions to cash receipts and disbursements report based on comments from C. Talbot. Submitted changes to C. Talbot. Call with D. Byers regarding payments for fees.	0.80	\$208.00
08/25/20	JHC	Email communications regarding insurance renewal. Reviewed past emails and correspondence regarding renewal and termination of insurance.	0.60	\$156.00
08/26/20	JHC	Downloaded RE Cash Source data for files from U. Cantrell. cursory review of data produced.	0.60	\$156.00

Mr. David Broadbent, Receiver

October 26, 2020

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
08/28/20	JHC	Drafted declaration regarding telemarketing sales from real estate products. Calls with G. Miller regarding declaration. Reviewed emails from FTC to prepare declaration. Reviewed analysis of telemarketing sales and source data to prepare declaration. Submitted draft declaration to G. Miller.	2.80	\$728.00
	GAM	Work on declaration for ETC and send.	0.40	\$146.00
08/31/20	GAM	Review, sign and scan declaration and send to FTC.	0.20	\$73.00
09/01/20	JHC	Call with D. Byers regarding Chechanut Bay Investment payments and related information. Requested information from M. Magistro and D. Easter relative to the same. Reviewed and searched for information on Checkanut entity payments and provided update to D. Byers.	1.30	\$338.00
09/04/20	JHC	Prepared report of owner distributions. Call with D. Byers regarding report and information needed.	1.30	\$338.00
09/08/20	JHC	Analyzed accounting and cash disbursements data to prepare reports of owner distributions and payments. Prepared detailed reports of owner distributions and payments for owner entities. Analyzed Chuckanut Bay payments and prepared detailed report. Provided reports to D. Byers as requested.	4.70	\$1,222.00
09/10/20	JHC	Call with V. Kamdar regarding tax returns for Zurixx. Email to Receiver requested signature on e-filing documents for tax returns.	0.40	\$104.00
09/15/20	JHC	Email communications with M. Magistro regarding Chuckanut Bay payments. Provided information to D. Byers with further explanation on Chuckanut Bay payments. Analyzed distributions and payments to owners and prepared summary by US and Puerto Rico entities Zurixx entities. Searched for information on owner entities receiving distributions. Prepared reports and provided to D. Byers.	3.90	\$1,014.00
09/16/20	JHC	Email communications with D. Byers regarding meeting with FTC on payments and distributions to owners. Provided information to D. Byers as requested.	0.50	\$130.00
09/21/20	JHC	Prepared for call on owner payments and distributions through review of reports and data. Call with D. Byers, D. Broadbent, FTC attorneys and State of Utah. Reviewed notes from meeting.	2.10	\$546.00
09/28/20	JHC	Prepared request to D. Byers for subpoenas and preparing discovery requests. Searched for entity information and responded to C. Talbot.	0.60	\$156.00
09/29/20	JHC	Worked on extracting RE Cash Source files from Zip folder. Contacted U. Contaro to request functioning files to access RE Cash Source transactions. Email correspondence and call with V. Kamdar regarding tax returns and outstanding bills. Email communications with Receiver regarding tax invoices.	0.90	\$234.00
09/30/20	JHC	Reviewed Kamdar tax fees to prepare for call with D. Broadbent. Email communications with D. Broadbent regarding fees.	0.60	\$156.00
Total for professional services rendered			53.40	\$13,783.50

Mr. David Broadbent, Receiver

October 26, 2020

Expenses

<u>Date</u>	<u>Init.</u>	<u>Description</u>	
07/01/20	JHC	Website volume usage charges	\$66.43
	JHC	Website volume usage charges	\$308.00
08/11/20	JHC	Website and data volume usage charges	\$66.43
	JHC	Website and data volume usage charges	\$308.00
08/31/20	RE	Copying cost (9 copies at \$.15 per copy)	\$1.35
	RE	Postage	\$2.20
	RE	Courier Service	\$77.00
	RE	PACER	\$2.50
09/01/20	JHC	Website volume usage charges	\$308.00
	JHC	Website usage support charges	\$66.43
09/30/20	RE	Copying cost (1 copy at \$.15 each)	\$0.15
	RE	Postage	\$2.00
	JHC	Website volume usage charges	\$308.00
	JHC	Website usage support charges	\$66.43
Total expenses			\$1,582.92
Total new charges			\$15,366.42
Balance due			\$15,366.42