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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 SIXTH 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 Sixth Application for Compensation and Reimbursement of Expenses for the Receiver and Retained Professionals (the “Sixth Application”). The Receiver requests an Order approving payment of fees and expenses incurred from April 1, 2021, through July 31, 2021 (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 Sixth 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 Sixth 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 work to secure the assets of the Receivership Entities, including equipment held by various parties; communicate with consumers regarding experiences with Zurixx, as well as 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 demands and negotiate tolling agreements with respect to various parties; work on pending litigation, including propounding and responding to discovery and briefing requested by the Court; respond to threatened and filed litigation and efforts 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. The Receiver has not recovered or obtained turnover of additional funds since the filing of the Fifth Application on June 8, 2021.

7. Prior to the Application Period, the following amounts have been approved by the Court for previous fee applications:

<u>Receiver (David Broadbent, Holland & Hart)</u>	Total Payments
First Fee Application	\$ 31,590.50 ¹
Second Fee Application	\$ 37,575.90
Third Fee Application	\$ 25,854.20
Fourth Fee Application	\$ 32,435.00
Fifth Fee Application	<u>\$ 22,606.50²</u>
Total Receiver Fees and Costs	\$150,062.10

<u>Holland & Hart</u>	
First Fee Application	\$ 90,161.01
Second Fee Application	\$159,018.55
Third Fee Application	\$170,902.71
Fourth Fee Application	\$278,722.46
Fifth Fee Application	<u>\$370,969.81</u>
Total Receiver's Counsel Fees and Costs	\$1,069,774.54

<u>Rocky Mountain Advisory, Accountants</u>	
First Interim Fee Application	\$ 15,214.62
Second Interim Fee Application	\$ 15,292.97
Third Interim Fee Application	\$ 16,173.51
Fourth Interim Fee Application	\$ 15,366.42
Fifth Interim Fee Application	<u>\$ 22,148.36</u>
Total Accountant to Receiver Fees and Costs	\$ 84,195.88

8. During the Application Period, the Receiver and his retained professionals incurred the following in fees and expenses (collectively, the "Receiver's Fees and Expenses"):

	<u>Fees Requested</u>	<u>Expense Reimbursement Requested</u>	<u>Total</u>
Receiver	\$7,786.35	\$1,000.00	\$8,786.35
H&H	\$187,917.20	\$733.65	\$188,650.85
RMA	\$15,947.00	\$2,083.63	\$18,030.63
Total	\$211,650.55	\$3,817.28	\$215,467.83

¹ Defendants brought to the Receiver's attention that his rate was inadvertently increased for the month of November, 2019, resulting in an overcharge for that month of \$1,903. The Receiver credited this amount to the amounts due for the Fifth Application.

² This amount, less the \$1,903 discussed in footnote 1, was paid for the Fifth Application.

9. 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.

10. 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.

11. 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 31st day of August, 2021.

HOLLAND & HART LLP

/s/ Doyle S. Byers

Doyle S. Byers

Cory A. Talbot

Engels J. Tejada

Michelle L. Quist

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

INDEX OF EXHIBITS

A - Receiver Invoice.

B - H&H Invoices.

C - RMA Invoice.

17171441_v1

EXHIBIT “A”



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

August 11, 2021

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:	1915369 3585363 107333 DKBroadbent
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Regarding: Matter No. 0001 - Receiver Services

Invoice Summary

Current fees	\$7,786.35
Current disbursements	\$1,000.00
Current charges this invoice	\$8,786.35

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 #1915369 on payment.

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1915369 3585363
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For professional services rendered through July 31, 2021

Itemized Fees

Description of Work	Date	Tkpr	Hours
Conference with DSByers and FTC attorneys regarding credit card merchant bank claims; conference with DSByers and CATalbot;	04/05/21	DKB	0.40
Review and evaluate email correspondence; address settlement issues;	04/07/21	DKB	0.10
Conference with Mr. Wing; review McNamera case; review and evaluate email correspondence regarding settlement with merchant bank processors;	04/09/21	DKB	0.60
Review and evaluate email correspondence; conference with DSByers; review class action complaint;	04/12/21	DKB	0.30
Review and evaluate email correspondence regarding Mr. Cardone; conference with Mr. Holzapfel;	04/13/21	DKB	0.40
Review and evaluate email correspondence; conferences with CATalbot; email to claimant; conference with DSByers;	04/14/21	DKB	0.30
Review supplemental authority memo and edits;	04/19/21	DKB	0.20
Review and evaluate email correspondence; review Mr. McNeil's response to supplemental authority filing; conference with EJTejeda and CATalbot regarding recovery of Puerto Rico assets and auction; conferences with court chambers; conference with DSByers regarding merchant credit card processors;	04/21/21	DKB	1.10
Review AMG Capital/FTC case; conference with Mr. Wing; review and evaluate email correspondence;	04/22/21	DKB	0.40
Review and evaluate email correspondence; conference with Mr. Wing;	04/26/21	DKB	0.20
Review and evaluate email correspondence from Mr. Curtis; conference with Mr. Wisbey of Stretto Bank;	04/30/21	DKB	0.30
Conference with CATalbot and DSByers regarding outstanding litigation matters;	05/04/21	DKB	0.40
Attend hearing on motion to dismiss counterclaims; review	05/05/21	DKB	0.70

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1915369
	H&H Ref. No.	3585363

and evaluate email correspondence and work with Stretto Bank to change bank accounts;

Review and evaluate email correspondence regarding Stetto Bank conversion; review and complete required forms; review proposed discovery responses;	05/07/21	DKB	0.50
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Review bank statements and Delaware entity reports;	05/10/21	DKB	0.40
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Conference with CATalbot and DSByers; review discovery issues and approach, review response to court's request regrading AMG case effects, conference with Mr. Wing; review motion to intervene;	05/11/21	DKB	1.30
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Review and evaluate email correspondence; review briefs filed in response to AMG case;	05/21/21	DKB	0.70
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Review proposed tolling agreement; review and evaluate email correspondence from RMA;	05/25/21	DKB	0.30
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Review response to court order regarding AMC case impact;	05/28/21	DKB	0.30
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Review response to Efron contempt motion; review and evaluate email correspondence; conference with CATalbot;	06/10/21	DKB	0.40
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Conference with CATalbot and DSByers; conference with Ms. House regarding Zurixx claims;	06/15/21	DKB	0.50
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Conference with DSByers and CATalbot regarding pending motions and responses;	06/22/21	DKB	0.40
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Conferences with CATalbot and DSByers;	06/23/21	DKB	0.40
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Review and evaluate email correspondence; conference with CATalbot and DSByers regarding pending motions and settlement discussions;	06/29/21	DKB	0.20
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Review PaySafe proposed modifications to settlement agreement and discuss with DSByers;	07/07/21	DKB	0.20
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Review and edit response to motion for stay; review and evaluate email correspondence; respond to Zurixx client inquiry; review and pay receivership bills;	07/08/21	DKB	0.40
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Conference with Mr. Doan; obtain requested information; conference with CATalbot;	07/12/21	DKB	0.50
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Review account and other asset summary prepared for FTC, conference with DSByers;	07/14/21	DKB	0.30
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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.	1915369 3585363
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Conference with FTC attorneys, Mr. Wing and Mr. Melton; conference with DSByers; email regarding merchant bank issues;	07/15/21	DKB	0.80
Conference with DSByers; review settlement proposals and respond; conference with CATalbot;	07/16/21	DKB	0.40
Review and evaluate email correspondence, obtain requested information and respond;	07/19/21	DKB	0.40
Conference with Mr. Wing; review materials and spreadsheet regarding consumer claims;	07/26/21	DKB	0.30
Review letter from counsel and proposed stipulation in the Ms. Hansen class action filed in New Jersey; conference with DSByers regarding our response; conference with DSByers regarding celebrity claim;	07/30/21	DKB	0.20

Total Current Fees: \$7,786.35

Timekeeper Summary

Timekeeper	Tkpr ID	Rate	Hours	Amount
DKBroadbent	5140	544.50	14.30	7,786.35
			14.30	\$7,786.35

Disbursements

Description of Disbursements	Date	Amount
Other Charges: Other Client Charges - Auction fee for auction of Zurixx office furniture.	05/11/21	1,000.00

Total Current Disbursements: \$1,000.00



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

August 11, 2021

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:	1915369 3585363 107333 DKBroadbent
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Regarding: Matter No. 0001 - Receiver Services

Invoice Summary

Current fees	\$7,786.35
Current disbursements	\$1,000.00
Current charges this invoice	\$8,786.35

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

August 11, 2021

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:	1915370 3585374 107333 DKBroadbent
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Regarding: Matter No. 0002 - Zurixx Monitor - Attorneys

Invoice Summary

Current fees	\$88,474.55
Current charges this invoice	\$88,474.55

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 #1915370 on payment.

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1915370 3585374
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For professional services rendered through July 31, 2021

Itemized Fees

Description of Work	Date	Tkpr	Hours
Work on production of website materials; correspondence with Mr. Cantarero regarding Defendants access to materials; work on fee application and conference with Mr. Curtis regarding the same; correspondence with Mr. Pahnke regarding backup of email server;	04/01/21	DSB	1.30
Address additional data received from Mr. Canterero;	04/01/21	BBL	0.40
Analyze settlement regarding reserve funds and conference with client regarding the same; coordinate call with FTC regarding the same;	04/02/21	DSB	0.30
Address additional files received from Mr. Canterero;	04/02/21	BBL	0.50
Analyze strategy for settlement with merchant providers and conferences with Receiver and counsel for the FTC regarding the same; work with BBLarsen on production of website materials; correspondence with Mr. Wing regarding the same;	04/05/21	DSB	3.00
Email with KSargsian regarding Washington Court of Appeals issues;	04/05/21	CAT	0.40
Review voicemail from Washington Court of Appeals; call WA clerk and discuss issue raised; email CATalbot regarding same; email correspondence with CATalbot regarding status report due date;	04/05/21	KS	0.60
Conference with DSByers regarding production to FTC;	04/05/21	BBL	0.10
Negotiations with Mr. Marshall regarding settlement with respect to reserve funds; correspondence and conferences with Receiver regarding the same; correspondence with FTC regarding the same; analyze class action lawsuit filed and forward to Receiver for review; work with BBLarsen on production of website materials to Plaintiffs and Defendants; correspondence with Receiver regarding former employee claims;	04/06/21	DSB	3.80

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Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1915370 3585374
Review updated status report and prepare to file;	04/06/21	KS 0.30
Conferences with DSByers; gather files received from Mr. Cantarero and forward to the FTC, Utah AG, RQN, and AT, LLP;	04/06/21	BBL 1.20
Settlement negotiations with Mr. Marshall regarding reserve funds; correspondence with Receiver regarding the same; work with BBLarsen to produce information to plaintiffs and defendants in main action;	04/07/21	DSB 1.80
Conferences with Ms. Ostler; forward Zurixx documents to Ms. Walker at the Utah AG's office;	04/07/21	BBL 0.30
Call with Mr. Roger, counsel for Holzatzfel, regarding extension of time to issue initial disclosures; email DSByers, CATalbot and MLQuist regarding same;	04/09/21	EJT 0.20
Correspondence with Mr. Ostrove regarding class action;	04/12/21	DSB 0.30
Address mail received in PO Box;	04/13/21	BBL 0.30
Review and analyze supplemental authorities; telephone conference with DKBroadbent regarding same; telephone conference with DSByers regarding same; telephone conference with JLin regarding same and regarding research; email with MLQuist regarding same;	04/14/21	CAT 1.00
Analyze strategy for settlements and confidentiality of the same; conference with Mr. Doan regarding the same and review materials forwarded by Mr. Doan; conference with Receiver regarding the same;	04/14/21	DSB 0.80
Prepare notices of supplemental authority, including review of cases;	04/15/21	CAT 2.20
Correspondence with Ms. Grier regarding materials produced to FTC and Defendants; work on fee application;	04/15/21	DSB 0.80
Prepare notice of supplemental authority;	04/16/21	CAT 0.60
Work on fee application; analyze strategy for settlement related to reserve accounts; correspondence with Ms. Grier with FTC regarding production of Zurixx website material;	04/16/21	DSB 1.20
Prepare notices of supplemental authority, including review of caselaw; email with MLQuist and DSByers regarding	04/17/21	CAT 1.40

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Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1915370
	H&H Ref. No.	3585374

same;

Update Zurixx website pleadings;	04/17/21	BBL	0.40
Address documents received from Mr. Curtis to support solvency analysis;	04/18/21	BBL	0.30
Correspondence regarding employment verification for former Zurixx employees; correspondence with Mr. Marshall regarding settlement status;	04/19/21	DSB	0.50
Review emails and forward employment inquiries to Ms. Easter;	04/19/21	BBL	0.30
Review correspondence from Mr. Efron regarding property issues; email with team regarding same; review Washington filing issues;	04/20/21	CAT	1.00
Correspondence from Mr. Efron and analyze strategy with respect to the same; analyze status of tolling agreements and strategy for settlement discussions regarding the same; correspondence with Mr. Aramburu regarding tolling agreement with his client; correspondence with Mr. Ostrove regarding class action lawsuit; review correspondence from defendants regarding Zurixx website;	04/20/21	DSB	3.60
Address Puerto Rico issues, including telephone conference with DKBroadbent and EJTejeda;	04/21/21	CAT	0.60
Correspondence regarding dispute with landlord in Puerto Rico; analyze class action lawsuit and involvement of named defendants with Zurixx, and conference with Mr. Curtis regarding the same; work on settlements with merchant providers; conference with Receiver regarding strategy for settlements and confidentiality for the same;	04/21/21	DSB	2.30
Review and analyze new case law and correspondence with Receiver and CATalbot regarding the same and potential impact on receivership case; work on fee application;	04/22/21	DSB	1.60
Work on fee application and correspondence with Mr. Curtis and Ms. Norton regarding the same; correspondence with Ms. Grier regarding production of information related to Zurixx website; analyze issues regarding dispute with landlord;	04/23/21	DSB	1.80
Review status of stayed litigation matters;	04/26/21	CAT	0.40

IRS EMPLOYER NO. 84-0382505

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107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1915370 3585374
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Correspondence with Mr. Aramburu regarding tolling agreement and possible extension of the same; correspondence with BBLarsen regarding class action lawsuit; work on fee application and correspondence with Receiver regarding the same; conference with Mr. Cantarero regarding zurixspeaks website;	04/26/21	DSB	2.40
Address Receivership mail; conferences with DSByers regarding pleadings received and FTC hard drive;	04/26/21	BBL	0.40
Telephone conference with DSByers and DKBroadbent regarding status and strategy; email with consumer regarding claims issues; review correspondence regarding issues in Puerto Rico;	04/27/21	CAT	1.40
Conference with Receiver and CATalbot regarding status and strategy of various tasks in receivership case; conference with counsel for the FTC regarding discovery issues and providing information to plaintiffs and defendants; conference and correspondence with Mr. Cantarero regarding the same; analyze class action lawsuit and strategy with respect to the same; correspondence regarding status and strategy of dispute with landlord in Puerto Rico; correspondence with Mr. Ostrove to schedule a call to discuss class action lawsuit; correspondence with Mr. Cantarero regarding requests for information from Mr. Carlson; correspondence with RMA regarding fee application;	04/27/21	DSB	4.80
Calls with Puerto Rican auctioneer, exchange emails with local counsel and the receiver, regarding auction of property at Efron premises;	04/27/21	EJT	1.20
Email with Rhode Island Attorney General's office regarding hearing; address Puerto Rico property and auction issues;	04/28/21	CAT	0.90
Correspondence with Mr. Ostrove regarding class action lawsuit; analyze issues regarding website issues and access to materials by Defendants and conference with Mr. Cantarero regarding the same; conference with Receiver regarding various pending issues and strategy with respect to the same; correspondence with MLQuist regarding preparation on motion to dismiss counterclaims against Receiver;	04/28/21	DSB	3.40
Follow-up via email with local counsel, DSByers and CATalbot, regarding retention of auctioneer;	04/28/21	EJT	0.20

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Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1915370 3585374
Conference with CATalbot; confirm receipt of communications with Mr. Shalford; report findings to CATalbot;	04/28/21	BBL 0.30
Address litigation issues in New Jersey and Rhode Island matters;	04/29/21	CAT 0.50
Work on fee application; analyze strategy and work on discovery to gather Zurixx financial information, including bank statements; correspondence with Mr. Cantarero regarding Zurixx information and producing to defendants and plaintiffs; conference with Mr. Ostrove regarding class action lawsuit and request to accept service and possible tolling agreement; work on draft settlement agreements for various disputes;	04/29/21	DSB 4.20
Work on settlement agreements and correspondence with Mr. Marshall regarding the same; analyze strategy with respect to litigation filed against Zurixx and correspondence with team regarding the same;	04/30/21	DSB 2.10
Forward information requested by defendants to Mr. Pahnke and correspondence with him regarding the same; analyze obtaining additional financial information from banks; work on moving accounts to new bank and conference with Receiver regarding the same;	05/03/21	DSB 1.20
Follow-up with Ms. Pino regarding auction in Puerto Rico; exchange emails with team regarding same; locate inventory of items to be auctioned;	05/03/21	EJT 1.60
Telephone conference with DKBroadbent and DSByers regarding status and strategy; address Puerto Rico property issues;	05/04/21	CAT 0.70
Correspondence with Mr. Pahnke and Mr. Cantarero regarding call to assist in accessing call recordings; meeting with Receiver and CATalbot regarding various tasks and strategy;	05/04/21	DSB 1.30
Exchange multiple emails and revise engagement agreement with auctioneer;	05/04/21	EJT 3.40
Address Rhode Island claims and administrative hearing; email with counsel regarding same;	05/05/21	CAT 1.50
Correspondence with opposing counsel regarding Cardillo case against Zurixx and application of stay; conference with	05/05/21	DSB 3.80

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Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1915370
	H&H Ref. No.	3585374

Ms. Guerard regarding various tasks performed in receivership; work with Mr. Curtis to gather information for report to Court; correspondence with team regarding dispute with landlord in Puerto Rico; correspondence with BBLarsen regarding production of documents to parties; correspondence with Mr. Cantarero regarding locating and pulling documents for production and regarding recovery of website materials;

Communications with Ms. Shiller regarding Zurixx documents; resend documents to same, via BDS;	05/05/21	BBL	0.30
Correspondence with counsel for defendants regarding access to call recordings; correspondence with Messrs Kelly and Cantarero regarding access to Zurixx website materials; review order from Court regarding request for briefing on AMG case and correspondence with team regarding the same; correspondence from Defendants' counsel requesting backup dated related to declaration and correspondence with team regarding the same;	05/06/21	DSB	4.30
Correspondence with Receiver regarding auction of personal property;	05/07/21	DSB	0.20
Review Receivership emails and incoming mail; forward employment verification to Ms. Easter; forward email and mail to CATalbot and DSByers;	05/09/21	BBL	0.30
Respond to correspondence;	05/10/21	CAT	0.20
Correspondence with potential claimants regarding claims against estate; correspondence with Mr. Cantarero regarding locating information for production;	05/10/21	DSB	0.80
Review and forward to Receiver Auction Procedures;	05/10/21	EJT	0.30
Conference with DSByers and DKBroadbent regarding status and strategy; review status of pending stayed litigation; review documents regarding same;	05/11/21	CAT	1.70
Review motion to intervene; correspondence regarding auction of receivership property;	05/11/21	DSB	1.20
Review and analyze motions filed in receivership case;	05/12/21	CAT	1.00
Review motion to modify PI and motion for partial summary judgment; analyze strategy with respect to briefs regarding	05/12/21	DSB	3.50

IRS EMPLOYER NO. 84-0382505

Holland & Hart LLP

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1915370
	H&H Ref. No.	3585374

AMG case and correspondence with team regarding the same; work with Mr. Cantarero regarding pulling documentation for discovery; correspondence with counsel for Defendants regarding requests for information; correspondence with Mr. Curtis and BBLarsen regarding the same;

Prepare for and attend virtual Puerto Rican auction; review post-auction results, research effect of default;	05/12/21	EJT	2.70
Work with BBLarsen and Mr. Curtis on production of documents to defendants in main action;	05/13/21	DSB	0.70
Conferences with DSByers; address documents received from Mr. Curtis; prepare production documents; forward production to Mr. Pahnke, FTC and Utah AG's office;	05/13/21	BBL	0.90
Email with team regarding auction results; analyze impact of same;	05/14/21	CAT	0.40
Work on production of materials to defendants counsel and conference with BBLarsen regarding the same; correspondence with defendants' counsel regarding the same; correspondence with Mr. Curtis regarding expenditures of receivership; analyze dispute with landlord in Puerto Rico and correspondence with team regarding the same;	05/14/21	DSB	4.00
Conferences with DSByers; resend production documents to Mr. Pahnke;	05/14/21	BBL	0.30
Correspond with consumers regarding questions;	05/17/21	CAT	0.70
Conference with Mr. Cantarero regarding site issues and potential discovery issues and strategy for locating documents; analyze strategy for obtaining additional banking records;	05/17/21	DSB	1.30
Exchange emails regarding payment with auctioneer, receiver;	05/17/21	EJT	0.20
Review filings; email with team regarding same;	05/18/21	CAT	0.30
Analyze issues relating to recovering website information and correspondence with Messrs Kelly and Cantarero regarding the same; correspondence with Mr. Curtis and Receiver regarding retention of tax experts; correspondence with FTC regarding potential briefing;	05/18/21	DSB	2.20

IRS EMPLOYER NO. 84-0382505

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107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1915370 3585374
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Telephone conference with FTC and UDCP personnel regarding motion to modify preliminary injunction; email with team regarding same; review briefing; telephone conference with DSByers regarding same;	05/19/21	CAT	2.20
Work with Mr. Curtis regarding retaining tax consultants in Puerto Rico; analyze strategy of potentially responding to motion to modify stipulated preliminary injunction and conferences with team regarding the same;	05/19/21	DSB	1.60
Email with FTC regarding briefing; telephone conference with DSByers regarding same; email with counsel regarding same;	05/20/21	CAT	1.00
Conferences with Ms. Easter and Mr. Curtis regarding former Zurixx employee inquires received in Receivership email; address mail received in PO Box; update Zurixx website with pleadings;	05/20/21	BBL	0.70
Review and analyze briefing regarding AMG Capital; review filings; email with team regarding same; email with counsel regarding same;	05/21/21	CAT	1.70
Analyze strategy with respect to briefs in various matters regarding AMG case and conference with Receiver and CATalbot regarding the same;	05/21/21	DSB	0.60
Conference with DKBroadbent and DSByers regarding status and strategy; email with agencies regarding same; prepare filing regarding AMG Capital case, including review of materials;	05/24/21	CAT	2.50
Analyze Receiver's role in Court's requested briefing and correspondence with client and CATalbot regarding the same;	05/24/21	DSB	0.60
Review and edit draft brief regarding AMG Capital decision; email with team regarding same; telephone conference with DSByers and MLQuist regarding same;	05/25/21	CAT	2.20
Conferences with VLRobinson regarding Cardillo claim;	05/25/21	BBL	0.20
Review and edit draft submission regarding AMG Capital; email with team regarding same;	05/26/21	CAT	1.60
Review and edit filings regarding AMG Capital case; email with team regarding same;	05/27/21	CAT	2.00

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107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1915370 3585374
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Conferences with DSByers regarding Declaration of Mr. Miller; forward produced spreadsheet to Mr. Miller;	05/27/21	BBL	0.30
Review filings related to AMG case; review motion for summary judgment;	05/28/21	DSB	0.80
Review and analyze filing (Efron); email with team regarding same; telephone conference with DSByers regarding settlement; address claims issues;	06/01/21	CAT	2.80
Correspondence with Mr. Ostrove regarding Hansen case; correspondence with counsel for merchants regarding settlements and correspondence with Receiver regarding the same; review filing from Mr. Efron and correspondence with team regarding strategy with respect to the same;	06/01/21	DSB	3.20
Address remaining auction issues;	06/02/21	CAT	0.20
Work on subpoenaing bank records; correspondence with Mr. Marshall regarding settlement with merchants;	06/02/21	DSB	1.00
Follow-up on auction issues; email with FTC regarding filings;	06/03/21	CAT	0.30
Conference with Mr. Curtis regarding financial information for receivership;	06/03/21	DSB	0.40
Draft Reply to Further Motion in Opposition for Contempt of Court;	06/03/21	MLQ	1.00
Email with FTC personnel regarding filings; review and analyze filings;	06/04/21	CAT	0.70
Conference with attorneys for Plaintiffs regarding requested information about the assets and other information about the receivership and conference with Receiver and his accountants regarding the same; correspondence with FTC regarding requested documents and verification that they have already been produced to all parties;	06/04/21	DSB	2.20
Conferences with DSByers regarding production of documents; provide BDS receipt of delivery to same identifying recipients;	06/04/21	BBL	0.30
Review filings in main receivership action;	06/07/21	CAT	0.50
Analyze issues regarding disputes with Mr. Efron and correspondence with team regarding the same; correspondence with Mr. Curtis regarding needed	06/07/21	DSB	1.30

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information for declarations; work on settlements with merchant banks;

Review reply to opposition to intervenor complaint / motion for allowance of administrative expense for lease;	06/07/21	EJT	0.80
Draft Reply to supplementary briefing;	06/07/21	MLQ	4.50
Finalize application for compensation of professionals; analyze issue regarding dispute with Mr. Efron and conference with team regarding the same; correspondence with Mr. Behle regarding mediation;	06/08/21	DSB	2.10
Meeting with team regarding strategy and Reply to Further Motion in Opposition to Second Motion for Contempt;	06/08/21	MLQ	0.30
Conference regarding motion for contempt related to Mr. Efron; correspondence with Mr. Epstein regarding Hansen matter; correspondence with counsel for merchant banks regarding settlement;	06/09/21	DSB	1.70
Revise draft Reply to Second Motion for Contempt;	06/09/21	MLQ	0.20
Revise and edit draft reply (Efron); email with team regarding same;	06/10/21	CAT	1.90
Review draft reply brief for contempt motion; correspondence with counsel for merchant banks regarding finalizing settlements;	06/10/21	DSB	1.80
Revise Reply in Support of Second Motion for Contempt;	06/10/21	MLQ	0.40
Analyze issues regarding settlement with merchant banks; conference with counsel for merchant banks regarding the same; follow-up with client regarding the same; correspondence with Mr. Ostrove regarding Hansen matter; correspondence with Ms. Guerard regarding contact information for Mr. Shemin and correspondence with BJMerrill regarding the same;	06/11/21	DSB	4.20
Finalize for filing Reply to Further Opposition to Second Motion for Contempt;	06/11/21	MLQ	1.00
Conferences with MLQuist regarding Puerto Rico case;	06/11/21	BBL	0.30
Correspondence with Mr. Ostrove regarding Hansen matter; correspondence with auctioneer regarding need for	06/14/21	DSB	0.70

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additional auction;

Review incoming emails to Receivership Outlook account; forward employment-related emails to Ms. Easter and Mr. Curtis;	06/14/21	BBL	0.30
Telephone conference with DSByers and DKBroadbent regarding status and strategy; review filings;	06/15/21	CAT	0.90
Conference with Mr. Epstein regarding class action case and possible tolling agreement or stay of matter; analyze issues regarding settlement with merchant banks;	06/15/21	DSB	2.20
Draft Request to Submit;	06/15/21	MLQ	0.40
Revise and edit request to submit; email with MLQuist regarding same and regarding recent filings;	06/16/21	CAT	0.30
Analyze possible auction of equipment and conference with auctioneer regarding the same; correspondence regarding motion for contempt regarding Mr. Efron; correspondence with Mr. Panke regarding requested audit reports; conference with Mr. Curtis regarding the same and forward copies as requested;	06/16/21	DSB	3.80
Revise and finalize Request to Submit Second Motion for Contempt;	06/16/21	MLQ	0.30
Review filings regarding receiver's actions; email with DKBroadbent and DSByers regarding same;	06/18/21	CAT	1.20
Conference with Receiver regarding various issues; review filings in main action and conference with CATalbot regarding the same;	06/18/21	DSB	0.80
Telephone conference with DKBroadbent and DSByers regarding status and strategy; review materials regarding same;	06/22/21	CAT	0.90
Analyze status and strategy for various tasks and conference with Receiver and CATalbot regarding the same;	06/22/21	DSB	1.20
Telephone conference with DKBroadbent and DSByers regarding status and strategy; review receivership filings;	06/23/21	CAT	1.30
Order granting fee application; correspondence with Mr. Panke regarding the same; conferences with Receiver and CATalbot regarding various issues in receivership; review filings in main case;	06/23/21	DSB	1.60

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Update Zurixx.com website pleadings;	06/23/21	BBL	0.40
Review filings; email with DSByers regarding same;	06/24/21	CAT	0.40
Email with team regarding filings;	06/25/21	CAT	0.30
Conferences with CATalbot and Receiver regarding overall issues in case; conference with Mr. Panke regarding fee applications; review filings in main matter; correspondence with Mr. Epstein regarding class action case;	06/25/21	DSB	2.30
Revise and edit draft appellate notice (Washington); email with team regarding same;	06/28/21	CAT	0.30
Conference with Mr. Curtis regarding need for bank records for tax returns; review filings in case;	06/28/21	DSB	0.60
Draft updated 90-day required report for Washington State Court of Appeals regarding the Deloriea v. Zurixx matter; email same to CATalbot;	06/28/21	KS	0.20
Telephone conference with DSByers and DKBroadbent regarding status and strategy; review and analyze motion to stay; telephone conference with JLin regarding same;	06/29/21	CAT	0.80
Conference with Receiver and CATalbot regarding pending tasks and strategy; review and analyze appellate motion filed by Mr. Efron; analyze issue regarding insurance for storage and conference with Mr. Curtis regarding the same;	06/29/21	DSB	2.00
Telephone conference with CATalbot regarding strategy/plan for response to Efron's Motion to Stay (10th Circuit);	06/29/21	JL	0.10
Initial review/assessment of Efron's Motion to Stay (10th Circuit) and brief review of underlying procedural history relating to pending motion for contempt (D. Utah); initial research/evaluation of applicable provisions of FRAP and 10th Circuit local rules; begin draft response (regarding components and compliances per FRAP/10th local rules);	06/29/21	JL	1.10
Review and analyze appellate motion; email with JLin regarding same;	06/30/21	CAT	0.80
Begin to identify/review/evaluate district court filings, arguments, and findings relevant to Motion/response and stay issue;	06/30/21	JL	0.90

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Review Motion to Stay filed in 10th Circuit;	06/30/21	MLQ	0.20
Respond to consumer inquiries regarding receivership;	07/01/21	CAT	0.40
Prepare for doc review team webex, including telephone call with AKBaker regarding key/pertinent updates/developments and review/coding issues encountered during production process to be addressed and emphasized; attend doc review team webex meeting regarding updates/review/privilege issues, production schedule, new reviewers joining team, certain coding issues, and respective schedules and bandwidth of reviewers in upcoming week(s); break off meeting with BCassity, AKBaker, and SCMorrill regarding action items for immediate focus, second level review shift, and delegating respective roles and tasks, as well as production issues (regarding privileges belonging to individuals, sequestered docs, and logistics therefor) and updates/changes to production set and accompanying logs necessary for today's production; follow up call with SCMorrill regarding coding and logistics for sequestered items to be separated from production set and updated production set;	07/01/21	JL	1.60
Continue to identify/review/evaluate underlying filings in district court relevant to Efron's Motion and the current factual and procedural posture of the relevant issues determined vs pending at district and appellate level (regarding AMG, jurisdiction, etc.); identify/review/evaluate potential points and contentions and initial legal research/analyses regarding the same; begin to outline key points/facts/arguments for response;	07/01/21	JL	1.80
Review and comment on draft outline to appellate motion to stay; email with JLin regarding same;	07/02/21	CAT	0.40
Continue to identify/consider counter arguments to/defects of Motion for Stay and review/evaluate potential points and authorities against stay and analyze/outline supportable points and contentions for response, including continuing to identify/review and evaluate underlying district court filings/documents addressing issues/findings relevant/pertinent to matters at issue in Motion for Stay and opposition thereto, as well as to appeal as applicable (regarding briefing/orders for motions for contempt (1st),	07/02/21	JL	5.80

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contempt (2nd), stays, and reconsideration), preliminary legal research/analyses relating to Efron's Motion (regarding AMG) and stay issues, and identify/assess state of and issues on appeal and the current appellate record; email correspondences with CATalbot regarding updates to strategy/plan for response (and coordinating internal review schedule in light of 7/9 deadline) and current status thereof (and attaching annotated outline of response arguments/points for review/additional thoughts);

Begin to review/draft Response to Efron's Motion to Stay based on outline and preliminary analyses; legal research/analyses regarding requests for stay before appellate court as relating to appeals of interlocutory orders (contempt vs injunction), potential relief available alternative to/in conjunction with stay; search/identify relevant parts of record/docs explicitly contradicting assertions made in Motion;	07/02/21	JL	4.90
Email with JLin regarding opposition to motion to stay (Efron);	07/03/21	CAT	0.20
Conference with Mr. Curtis regarding tax issues;	07/06/21	DSB	0.20
Continue to review/draft Response to Motion to Stay; review/identify exhibits to be attached to Response and incorporate relevant quotations/citations thereto; review/evaluate prior legal research results and FRAP and local 10th circuit rules applicable to Response; email correspondence to CATalbot regarding the same;	07/06/21	JL	4.30
Conference with Mr. Curtis regarding tax issues;	07/07/21	DSB	0.40
Revise and edit draft response to motion to stay; email with team regarding same;	07/08/21	CAT	2.30
Review draft of response to motion for stay and correspondence with team regarding the same;	07/08/21	DSB	0.40
Review/evaluate/respond to email correspondences with CATalbot, DKBroadbent, DSByers, and MLQuist regarding comments/revisions to Response to Efron's Motion for Stay; review/revise update Response; review/cite check references/quotations to district court filings/proceedings against corresponding exhibits (and developing the same); review/analyze applicable provisions of local/federal rules	07/08/21	JL	1.40

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governing format/contents/requirements for motions/responses, exhibits, and conform accordingly as needed;

Edit draft settlement agreement with merchant bank and correspondence with Receiver and opposing counsel regarding the same; review briefing in main case; correspondence regarding briefing on motion to stay at 10th Circuit; correspondence with FTC regarding call to discuss status of various issues pending settlement conference;	07/09/21	DSB	2.80
Revise, finalize, and file response to motion to stay (Efron);	07/09/21	CAT	0.80
Review/revise/finalize Response to Motion for Stay; review/evaluate/respond to email correspondences with CATalbot (and H&H team) addressing final edits/comments to Response and exhibits and effectuating filing;	07/09/21	JL	0.80
Correspondence from Mr. Carlson requesting chargeback information and follow up regarding the same;	07/11/21	DSB	0.20
Review correspondence regarding call with FTC; respond to consumer inquiries;	07/12/21	CAT	0.40
Conference with Mr. Panke regarding fee applications and access to receivership records; correspondence with Receiver and Mr. Curtis regarding the same; correspondence with Zurixx consumer regarding various issues; review and analyze correspondence and proposed consent of stay from counsel in Hansen matter; correspondence with counsel for FTC regarding status of various issues;	07/12/21	DSB	4.20
Telephone conference with DKBroadbent and DSByers regarding status and strategy;	07/13/21	CAT	0.20
Analyze various data regarding status of receivership case including financial information and conference with Mr. Curtis regarding the same; analyze projected costs; analyze status of tolling agreements and correspondence with BBLarsen and Mr. Doan regarding the same; correspondence with Ms. Chase regarding scheduling of call;	07/13/21	DSB	1.40
Conferences with DSByers; prepare list of parties for which a tolling agreement has been entered;	07/13/21	BBL	0.60
Correspondence with merchant banks regarding settlement negotiations and correspondence with Receiver regarding the same; correspondence with Receiver regarding financial	07/14/21	DSB	1.60

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status of receivership;

Correspondence with merchant bankers regarding request for information regarding chargebacks; correspondence with Mr. Marshall regarding scheduling a call to discuss settlement; call with FTC regarding status of case and information for settlement conference; pull information regarding chargebacks from merchants and provide to defendants counsel; conferences with Receiver regarding the same; correspondence with team regarding updates on various tasks;	07/15/21	DSB	3.60
Conference with Receiver regarding settlements regarding merchant reserve accounts; settlement conference with counsel for merchant service providers regarding the same; correspondence with counsel regarding Hansen litigation; correspondence with FTC regarding pending matters and status regarding each;	07/16/21	DSB	2.30
Conference with CATalbot regarding Fortis invoices; address Receiver email log;	07/16/21	BBL	0.30
Email with team regarding claims asserted against Zurixx; telephone conference with DKBroadbent regarding same;	07/19/21	CAT	0.20
Conferences with DKBroadbent regarding consumer complaints;	07/20/21	BBL	0.30
Email with customer regarding claims issues;	07/23/21	CAT	0.20
Review invoices from Puerto Rican counsel and submit same for payment;	07/26/21	EJT	0.20
Conferences with DKBroadbent regarding consumer complaints;	07/26/21	BBL	0.10
Email with customers regarding questions; review correspondence to receivership;	07/27/21	CAT	0.60
Correspondence with Mr. Curtis and Mr. Carlson regarding tax issues; correspondence regarding various entities and relation to receivership entities;	07/27/21	DSB	0.80
Correspondence with Mr. Marshall regarding settlements with merchants banks and review proposed agreements; correspondence with Ms. Pavely regarding Hansen lawsuit and potential stipulation regarding stay of the same;	07/28/21	DSB	1.80

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Review and work on proposed settlements with merchants and conferences with opposing counsel and Receiver regarding the same; correspondence with Mr. Curtis regarding tax issues; analyze stipulation in class action matter and correspondence with Receiver regarding the same; correspondence with Mr. Ostrove regarding the same;

07/30/21 DSB 3.50

Total Current Fees: \$88,474.55

Timekeeper Summary

Timekeeper	Tkpr ID	Rate	Hours	Amount
BBLarsen	2172	279.00	10.10	2,817.90
DSByers	5654	418.50	124.40	52,061.40
CATalbot	5657	427.50	49.40	21,118.50
EJTejeda	5852	306.63	10.80	3,311.60
KSargsian	5974	292.50	1.10	321.75
JLin	6148	292.50	22.70	6,639.75
MLQuist	6209	265.50	8.30	2,203.65
			226.80	\$88,474.55



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

August 11, 2021

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:	1915370 3585374 107333 DKBroadbent
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Regarding: Matter No. 0002 - Zurixx Monitor - Attorneys

Invoice Summary

Current fees	\$88,474.55
Current charges this invoice	\$88,474.55

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

August 11, 2021

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:	1915394 3585592 107333 DSByers
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Regarding: Matter No. 0003 - Third-Party Claw Back

Invoice Summary

Current fees	\$99,442.65
Current disbursements	\$733.65
Current charges this invoice	\$100,176.30

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 #1915394 on payment.

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107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1915394 3585592
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For professional services rendered through July 31, 2021

Itemized Fees

Description of Work	Date	Tkpr	Hours
Review discovery requests and responses; email with team regarding same; review and edit draft disclosures;	04/01/21	CAT	1.10
Review responsive documents for discovery requests in the third-party claw back actions; discuss the same with MLQuist;	04/01/21	CJD	0.50
Draft Initial Disclosures for Houston Habitat and emails regarding documents; emails regarding calendar and new counsel in Young;	04/01/21	MLQ	1.80
Conferences with CJDavis and MLQuist regarding productions in third-party actions;	04/01/21	BBL	0.30
Revise and edit draft disclosures; email with MLQuist regarding same; email with counsel regarding settlement;	04/02/21	CAT	0.70
Correspondence regarding initial disclosures and production in claw back cases; analyze whether additional protective order is necessary and correspondence with MLQuist regarding the same; correspondence with opposing counsel in Young matter regarding additional attorneys and outstanding discovery;	04/02/21	DSB	1.70
Revise initial disclosures for Houston Habitat and finalize for service; emails to opposing counsel in Young case regarding extension time and new counsel; review confidentiality issue;	04/02/21	MLQ	3.40
Conferences with project assistants to assist with redactions; gather payroll documents for redaction work;	04/02/21	BBL	1.20
Redact payroll records of Mr. Altamirano in preparation for production;	04/02/21	TLN	1.10
Correspondence with BJMerrill regarding responding to written discovery requests; correspondence with Mr. Behle regarding possible settlement/ mediation;	04/05/21	DSB	0.60
Review draft responses to Altamirano and Grow's discovery requests and email correspondence with MLQuist and DSByers regarding same;	04/05/21	BJM	1.00

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Review initial disclosures submitted by Houston Habitat;	04/05/21	MLQ	0.30
Redact payroll records of Mr. Altamirano in preparation for production;	04/05/21	TLN	2.20
Conferences with CGDunne regarding redaction project;	04/06/21	BBL	0.20
Redact documents;	04/06/21	CGD	4.30
Redact payroll records of Mr. Altamirano in preparation for production;	04/06/21	TLN	2.00
Analyze strategy of producing documents and confidentiality agreement and correspondence with team regarding the same; work on editing draft discovery responses; correspondence with Mr. Curtis regarding financial information and production of documents;	04/07/21	DSB	3.60
Redact documents;	04/07/21	CGD	5.00
Conferences with JLSanderson and ESalverson regarding status of redactions;	04/07/21	BBL	0.30
Redact payroll records of Mr. Altamirano in preparation for production;	04/07/21	TLN	4.20
Redact documents;	04/08/21	CGD	3.30
Redact payroll records of Mr. Altamirano in preparation for production;	04/08/21	TLN	3.40
Review and analyze case law related to claw back claims; correspondence with BJMerrill and MLQuist regarding discovery responses; correspondence with Mr. Curtis regarding needed information for discovery production; conference with Mr. Doan regarding settlement agreements; correspondence with counsel for Mr. Holzapfel regarding extension to deadlines;	04/09/21	DSB	3.20
Conferences with project assistants and DSByers regarding redaction of payroll records;	04/09/21	BBL	0.40
Analyze and work on discovery responses and production; correspondence with Mr. Cantarero regarding the same; correspondence with Mr. Behle regarding possible settlement/mediation; correspondence with opposing counsel in Young matter regarding extension of schedule;	04/12/21	DSB	1.90

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Emails with opposing counsel regarding scheduling matters; draft protective order;	04/12/21	MLQ	1.10
Conferences with BJMerrill and MLQuist regarding payroll records for redaction; conferences with JCWilliams, THowell, CFries, regarding redaction project; provide direction on redaction of payroll records; conferences with TLNeve and CGDunne regarding same;	04/12/21	BBL	0.90
Redact documents;	04/12/21	CGD	4.00
Analyze discovery requests and work on responses; conference and correspondence with MLQuist and BJMerrill regarding the same; correspondence with Mr. Cantarero regarding needed information; correspondence with Mr. Behle regarding possible settlement/mediation;	04/13/21	DSB	2.60
Review DSByers comments to draft discovery responses and telephone conference with DSByers and MLQuist to discuss responses to Altamirano and Grow's discovery requests;	04/13/21	BJM	1.50
Emails regarding payroll records redactions; review of and conference call with team regarding discovery responses;	04/13/21	MLQ	1.70
Conferences with redaction team regarding locked PDFs; conferences with MLQuist regarding documents in database for review;	04/13/21	BBL	0.40
Redact documents;	04/13/21	CGD	5.50
Review and redact files;	04/13/21	DM	1.00
Review documents and redact information not related to Mr. Atlamirano;	04/13/21	CLF	2.00
Analyze supplemental authority and conference with Receiver and CATalbot regarding the same; correspondence with team regarding the same; attention to preparation and redaction of documents for production and correspondence with team regarding the same; correspondence with Mr. Curtis and BBLarsen regarding financial documentation;	04/14/21	DSB	1.80
Telephone conference with CATalbot regarding background/strategy regarding legal research relating to standing issue;	04/14/21	JL	0.20

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Legal research/analyses regarding standing to assert fraudulent/voidable transfer claims in non-ponzi scheme receivership; review/evaluate McNamara case from UCPA/CATalbot email; telephone conference with MLQuist regarding coordinating research efforts;	04/14/21	JL	2.70
Emails regarding discovery documents; calls and emails regarding supplemental authority; research and draft regarding supplemental authority;	04/14/21	MLQ	2.50
Redact documents;	04/14/21	CGD	5.00
Review documents and redact information not related to Mr. Altamirano;	04/14/21	CLF	0.70
Redact payroll records of Mr. Altamirano in preparation for production;	04/14/21	TLN	0.50
Review draft supplement regarding authorities on motions to dismiss and correspondence with CATalbot regarding the same; correspondence with Mr. Behle regarding settlement discussions;	04/15/21	DSB	2.00
Continue legal research/analyses regarding standing to assert fraudulent/voidable transfer claims in non-ponzi scheme receivership; review/evaluate research results, as well as cases found/comments by MLQuist; summarize cases found and legal analyses/conclusions as to applicability thereof to present case; draft case citations with corresponding parentheticals providing relevant findings/holdings therein regarding receiver standing for inclusion in notice of supplemental authorities; email correspondences with CATalbot regarding the same;	04/15/21	JL	4.80
Review of research and email regarding and draft excerpt for Supplement;	04/15/21	MLQ	0.50
Conferences with redaction team regarding status of redactions on payroll records for production in Altamirano and Grow cases;	04/15/21	BBL	0.30
Review and redact files;	04/15/21	DM	3.80
Redact documents;	04/15/21	CGD	3.50
Review documents and redact information not related to Mr. Altamirano;	04/15/21	CLF	0.90

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Redact payroll records of Mr. Altamirano in preparation for production;	04/15/21	TLN	1.80
Analyze issues regarding discovery in various disputes; analyze strategy with respect to settlement of various disputes; conferences with counsel for parties subject to tolling agreements regarding the same;	04/16/21	DSB	3.60
Review documents and redact information not related to Mr. Altamirano;	04/16/21	CLF	4.40
Analyze supplementing authorities for motions to dismiss and correspondence with CATalbot and MLQuist regarding the same;	04/17/21	DSB	0.40
Research caselaw on standing issue;	04/17/21	MLQ	0.80
Update pleadings in third-party clawback actions; forward pleadings to Mr. Wing (Utah AG's office);	04/17/21	BBL	0.40
Review and redact files;	04/17/21	DM	1.80
Prepare notices of supplemental authority, including review of case law;	04/19/21	CAT	2.70
Attention to preparation of documents for production in claw back actions and correspondence with BBLarsen regarding the same; analyze draft supplement regarding additional authorities and correspondence with Receiver and CATalbot regarding the same;	04/19/21	DSB	0.80
Review cases in supplemental filing to determine whether ponzi related;	04/19/21	MLQ	0.20
Redact documents;	04/19/21	CGD	6.00
Review and redact documents;	04/19/21	DM	1.30
Analyze tele-sales teams and discovery regarding claw back actions; correspondence with team regarding the same;	04/20/21	DSB	0.60
Telephone conference with MLQuist to discuss responses to Grow and Altamirano's discovery requests; search for documents that identify tele-sales teams and email correspondence with DSByers regarding same;	04/20/21	BJM	0.70
Review documents from vendor and emails regarding discovery;	04/20/21	MLQ	0.80

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Redact documents;	04/20/21	CGD	6.00
Conferences with redaction team regarding status of redactions; reassign redaction sets; address files received from Mr. Cantarero;	04/20/21	BBL	0.60
Review and analyze responses filed to supplemental authority filed related to motions to dismiss and correspondence with team regarding the same; conference with Mr. Magistro regarding Zurixx financial information and correspondence with Mr. Magistro and Mr. Curtis regarding follow up call regarding the same; analyze strategy for responding to discovery and correspondence with MLQuist and BJMerrill regarding the same and need for extension; correspondence with Receiver regarding preparation for hearing on motion to dismiss counterclaims in Young matter; review and analyze Zurixx records related to claw back actions;	04/21/21	DSB	4.40
Review objections regarding notice of supplemental authority;	04/21/21	CAT	0.30
Review response to Supplemental Authority filing; telephone calls and emails regarding discovery documents and discovery responses; revise Grow/Altamirano discovery responses; review docs from Uri;	04/21/21	MLQ	3.00
Redact documents;	04/21/21	CGD	2.50
Conferences with redaction team regarding finalization of redactions;	04/21/21	BBL	0.30
Conference with Messrs Curtis and Magistro regarding various issues regarding financial and payroll information related to defendants in claw back actions; work on discovery responses and analyze strategy for gathering additional information; correspondence with BJMerrill and MLQuist regarding the same; analyze transcript of tele-sales call and forward to team for production in claw back matter;	04/22/21	DSB	3.30
Email correspondence with opposing counsel in Altamirano and Grow matters regarding extension to respond to discovery requests; email correspondence with DSByers and MLQuist regarding responsive documents;	04/22/21	BJM	0.50
Gather redacted payroll records for Mr. Altamirano; prepare	04/22/21	BBL	2.10

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and process documents for production; conferences with BJMerril and MLQuist regarding production of documents;			
Redact documents;	04/22/21	CGD	0.40
Review and analyze oppositions; email with team regarding same;	04/23/21	CAT	0.60
Analyze discovery in claw back actions and strategy for responding to requests; conferences with MLQuist and Mr. Cantarero regarding the same; conference with Mr. Curtis regarding analyzing various accounting and payroll records for claw back actions and follow up correspondence regarding the same; analyze whether to file responses to filings made in response to notices of supplemental authority and conference with team regarding the same;	04/23/21	DSB	3.60
Emails regarding and review of files received regarding employee documents and Supplemental filing;	04/23/21	MLQ	0.40
Analyze discovery issues and strategy for gathering relevant information for claw back actions and correspondence with BJMerrill and MLQuist regarding the same; conference and correspondence with Mr. Cantarero regarding the same; analyze strategy for restoring email server and correspondence with BBLarsen regarding the same; correspondence with MLQuist regarding oral argument for motion to dismiss counterclaim hearing;	04/26/21	DSB	2.30
Emails regarding discovery and employment files for named Defendants; prepare binder for MTD oral argument;	04/26/21	MLQ	0.30
Correspondence regarding preparation for hearing on motion to dismiss counterclaims; analyze strategy with respect to potential discovery dispute in Young matter;	04/27/21	DSB	0.80
Use BriefCheck to pull cases in 3 briefs for LAHansen;	04/27/21	AML	0.60
Review email regarding amended scheduling order and respond to counsel;	04/28/21	MLQ	0.30
Analyze strategy for discovery in claw back actions and correspondence with MLQuist regarding the same;	04/30/21	DSB	0.60
Revise Grow/Altamirano discovery responses;	04/30/21	MLQ	1.20
Prepare for oral argument in Young Motion to Dismiss;	05/02/21	MLQ	1.30

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Analyze strategy for argument on motion to dismiss counterclaim in Young matter and conference with MLQuist regarding the same;	05/03/21	DSB	1.00
Review briefing on receiver's motion to dismiss Young's counterclaims and meet with MLQuist and DSByers to moot oral argument on motion;	05/03/21	BJM	1.90
Prepare for Young oral argument on Motion to Dismiss; moot argument; review statute of limitations response to Komen Foundation inquiry;	05/03/21	MLQ	3.60
Revise and edit draft discovery responses;	05/04/21	CAT	0.50
Analyze meet and conference letter in Young case and correspondence with MLQuist regarding the same; review draft responses in same matter; correspondence with Mr. Behle regarding possible mediation; analyze strategy for discovery and conference with client regarding the same; correspondence with Ms. Easter regarding various issues related to discovery in claw back cases;	05/04/21	DSB	2.80
Telephone call regarding discovery responses; edits to discovery responses; review meet and conference letter and send email with summary; review Young discovery responses and send email with summary;	05/04/21	MLQ	1.70
Conference with Mr. Aramburu regarding potential settlement with his client; correspondence with other tolling parties regarding possible settlement and extension of tolling agreements; hearing regarding motion to dismiss counterclaim in Young case; work on discovery responses in Grow matter and conference with team regarding the same; analyze existence of employment and other compensation agreements;	05/05/21	DSB	3.40
Email with MLQuist, BJMerrill, and DSByers regarding oral argument; review and edit discovery responses;	05/05/21	CAT	1.90
Prepare for oral argument hearing on Motion to Dismiss Young counterclaims; attend hearing and argue;	05/05/21	MLQ	3.70
Review orders regarding Supreme Court decision; review materials regarding same; review and edit draft discovery responses;	05/06/21	CAT	1.30
Finalize discovery responses in Grow and Altamirano cases	05/06/21	BJM	1.50

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and coordinate with BBLarsen to run document productions;

Telephone conference with DSByers regarding discovery; telephone conference with DKBroadbent regarding same; review and edit draft discovery responses;	05/07/21	CAT	0.60
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Work on discovery production in Altamirano and Grow matters and conference with BBLarsen and BJMerrill regarding the same; attention to discovery in Young matter as well and conference with MLQuist regarding the same and attention to response to meet and conference demand; correspondence with various counsel for celebrities regarding expiration of tolling agreements, settlement negotiations, and possible extension of tolling agreements;	05/07/21	DSB	3.20
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Continue finalizing discovery responses in Grow and Altamirano matters; coordinate with BBLarsen to identify and produce responsive documents; telephone conference with Mr. Curtis from Rocky Mountain Advisory to discuss excel documents and whether they are responsive or expert work product;	05/07/21	BJM	3.30
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Emails regarding meet and conference letter from Young;	05/07/21	MLQ	0.60
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Conferences with BJMerrill; prepare documents in Altamirano and Grow matters for production; redact certain documents; forward production documents to opposing counsel via BDS; conferences with MLQuist regarding Young production documents;	05/07/21	BBL	4.90
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Analyze overall strategy for claw back actions and potential claims against celebrities; correspondence with MLQuist and BBLarsen regarding production of documents in Young matter;	05/10/21	DSB	3.30
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Respond to discovery emails from opposing counsel;	05/10/21	MLQ	0.20
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Conferences with MLQuist; gather and resend Young production documents to Mr. Condos;	05/10/21	BBL	0.30
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Correspondence with celebrity's counsel regarding settlement negotiations and potential extension of tolling agreement; conference with Receiver regarding the same; work on gathering documents for discovery requests; conference with Receiver and CATalbot regarding strategy for claw back actions;	05/11/21	DSB	3.60
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Address settlement proposals, including analysis of defenses; email with counsel regarding same;	05/11/21	CAT	0.90
Review email to Susan Komen Foundation regarding statute of limitations response and settlement offer;	05/11/21	MLQ	0.10
Prepare brief regarding AMG Capital case, including analysis of case materials; email with team regarding same;	05/12/21	CAT	2.00
Review written discovery responses from Altamirano and Grow in response to the Receiver's discovery requests and identify follow up;	05/12/21	BJM	0.90
Review emails regarding AMG Capital case and Motion to Intervene and strategy regarding brief;	05/12/21	MLQ	0.50
Analyze strategy for discovery in Young action and conference with MLQuist regarding the same; correspondence with counsel for various parties subject to tolling agreements regarding potential settlements; analyze discovery strategy in Altamirano/Grow matters and correspondence with BJMerrill regarding the same;	05/13/21	DSB	3.10
Email correspondence with DSByers regarding whether to make additional discover requests to Altamirano and Grow;	05/13/21	BJM	0.40
Telephone conference with DSByers regarding discovery issues; review materials regarding brief on AMG Capital case;	05/14/21	CAT	0.30
Analyze discovery status in Grow and Altamirano matters and conference with BJMerrill regarding the same; correspondence with representative of celebrity regarding possible settlement;	05/14/21	DSB	1.60
Address discovery issues;	05/18/21	CAT	0.50
Analyze strategy for discovery issues in claw back actions and correspondence with BJMerrill regarding the same; analyze strategy in Old Home Love case and correspondence with MLQuist regarding the same;	05/18/21	DSB	1.20
Review Old Home Love discovery dates and send email regarding extension;	05/18/21	MLQ	0.50
Analyze strategy with respect to briefing ordered by the Court regarding AMG case and correspondence with CATalbot, MLQuist and Receiver regarding the same; correspondence with counsel for Old Home Love regarding	05/19/21	DSB	4.30

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deficiencies in disclosures; conferences with tolling parties regarding possible settlement and extensions to tolling agreements;

Email correspondence with MLQuist regarding supplemental briefing on AMG scotus case in Swails/Young/Hrisko/Freier/Davis cases;	05/19/21	BJM	0.20
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Review briefing regarding AMG Capital Case and communications regarding same; email to opposing counsel in Old Home Love regarding discovery deadlines;	05/19/21	MLQ	0.90
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Analyze strategy with respect to discovery issues including confidentiality related to audio recordings; correspondence with team regarding the same; correspondence with counsel for celebrity regarding possible settlement and tolling agreement; analyze strategy related to briefing on AMG case and correspondence with CATalbot and Receiver regarding the same;	05/20/21	DSB	4.20
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Review and analyze AMG scotus case in response to court's order for supplemental briefing in Swails/Young/Hrisko/Freier/Davis matters and discuss same with MLQuist;	05/20/21	BJM	1.70
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Review prior pleadings related to FTC issue and AMG Capital; review and respond to emails regarding protective order;	05/20/21	MLQ	0.50
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Correspondence with tolling agreement parties regarding extension of tolling period and potential settlements;	05/21/21	DSB	0.30
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Telephone conference with opposing counsel in Altamirano and Grow matters to discuss confidentiality of recordings on servers and draft follow up email confirming agreement;	05/21/21	BJM	0.40
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Review prior filings and draft response to;	05/22/21	MLQ	2.00
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Draft response to Court Order regarding AMG Capital;	05/23/21	MLQ	2.10
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Review motion to withdraw by opposing counsel in Old Home Love matter and conference with MLQuist regarding the same; work on amending tolling agreements;	05/24/21	DSB	0.80
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Research and draft Response to Court Order regarding AMG Capital;	05/24/21	MLQ	10.10
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Review and analyze draft brief requested by Court given	05/25/21	DSB	3.80
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AMG decision and conference with MLQuist and CATalbot regarding the same; draft amendments to tolling agreements and correspondence with various counsel for celebrities regarding the same and settlement negotiations;

Conference call regarding edits to draft Response to Court's Order regarding AMG Capital and edits to Response brief;	05/25/21	MLQ	2.30
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Analyze strategy with respect to Old Home Love case and correspondence with MLQuist regarding the same; correspondence with counsel for tolling parties regarding amendments to extend the same; analyze and edit brief for filing in various matters relating to AMG case;	05/26/21	DSB	3.60
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Revise Response to Court Order regarding AMG Capital and draft Declaration;	05/26/21	MLQ	5.00
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Work with tolling parties to extend agreements and to work on potential settlement; conferences with Mr. Miller regarding declaration and review data regarding the same; analyze and edit draft brief regarding AMG case and conferences with MLQuist and CATalbot regarding the same;	05/27/21	DSB	3.80
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Draft Non-Opposition to Motion to Withdraw in Old Home Love;	05/27/21	MLQ	0.60
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Conferences with DSByers; address Amended Tolling Agreement for Global Learning Partners;	05/27/21	BBL	0.20
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Review and edit draft filings; email with team regarding same;	05/28/21	CAT	1.20
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Work with various tolling parties to extend tolling agreements; prepare to file lawsuits against those who will not extend or are nonresponsive; work on brief for filing in each action related to Supreme Court Case as requested by Court; review and analyze briefs filed by other parties; correspondence with Ms. Grier regarding the same and declaration prepared by Mr. Miller; conference with Receiver regarding the same; review notice of non-opposition to withdrawal of counsel in Old Home Love matter and conference with MLQuist regarding the same;	05/28/21	DSB	4.60
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Revise and prepare Responses to Court's Order regarding AMG Capital case in 6 ancillary cases, draft Notice in FTC case regarding Receiver's submissions, review filings regarding AMG Capital filed by other parties, finalize filing	05/28/21	MLQ	4.70
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of Non-Opposition to Motion to Withdraw in Old Home Love case;

Address Amended Tolling Agreement for Flutie Entertainment;	05/28/21	BBL	0.20
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Finalize filings against Two Chicks;	06/01/21	DSB	0.40
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Review Complaint in Two Chicks case; review supplementary brief regarding contempt charges,	06/01/21	MLQ	0.50
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Review motion to withdraw as counsel in Old Home Love matter and correspondence with MLQuist regarding the same; correspondence with Mr. Behle regarding call to discuss settlement; correspondence with tolling parties regarding possible settlement and with agent for Two Chicks regarding the same; correspondence with Ms. Grier regarding possible requested information regarding receivership;	06/03/21	DSB	1.20
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Correspondence with BJMerrill regarding scheduling in Altamirano and Grow matters;	06/07/21	DSB	0.20
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Correspondence with opposing counsel in Altamirano and Grow matters regarding schedule and correspondence with BJMerrill regarding the same; correspondence with Mr. Panke regarding fee application, and correspondence with Receiver regarding the same; analyze issues regarding the same;	06/10/21	DSB	2.80
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Email correspondence with opposing counsel in Grow and Altamirano matters regarding discovery deadlines and depositions;	06/10/21	BJM	0.20
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Analyze deadlines in clawback actions and conference with BJMerrill regarding the same; correspondence with counsel in Grow and Altamirano matters regarding extending schedules; analyze strategy and schedule for settlement discussions with various celebrities;	06/14/21	DSB	2.30
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Draft stipulated motions and proposed orders extending discovery deadlines in Grow and Altamirano matters, email correspondence with opposing counsel regarding same, and coordinate with assistant to file;	06/14/21	BJM	0.30
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Conferences with tolling parties regarding settlement negotiations;	06/15/21	DSB	0.60
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Review filing; email with team regarding scheduling and strategy issues in multiple cases;	06/17/21	CAT	0.60
Analyze strategy for clawback actions; conference with MLQuist regarding Two Chicks matter; correspondence with Mr. Flutie regarding possible settlement; correspondence with Mr. Behle's office regarding scheduling a call to discuss possible mediation; correspondence with MLQuist and BJMerrill regarding status and deadlines in clawback actions;	06/17/21	DSB	4.20
Emails regarding case deadlines; arrange for service of Summons and Complaint on Two Chicks and a Hammer; review motion to quash subpoena of Mr. Davis;	06/17/21	MLQ	1.00
Conferences with MLQuist regarding issuance of Summonses and service of Summonses and Complaint; prepared Summonses and forward to the Court for issuance; conferences with Indiana process servers;	06/17/21	BBL	0.40
Correspondence with Mr. Behle's office regarding settlement conference; correspondence with other tolling parties regarding possible settlement and tolling agreements;	06/18/21	DSB	0.80
Conferences with process server regarding service of Summonses and Complaint; conferences with Indiana process server regarding service of Summonses and Complaint (Two Chicks and a Hammer);	06/21/21	BBL	0.40
Correspondence with tolling parties regarding amending tolling agreements and potential settlement;	06/22/21	DSB	0.30
Continue settlement discussions with various tolling parties;	06/23/21	DSB	0.80
Communications with Greenleaf Legal regarding service of Summonses and Complaints;	06/23/21	BBL	0.30
Settlement negotiations with several tolling parties; conference with Receiver regarding various issues including payment of fees to accounting firm;	06/24/21	DSB	3.20
Conferences with Greentree Legal regarding service of Summons and Complaints (Two Chicks and a Hammer, et. al.);	06/24/21	BBL	0.20
Settlement communications with tolling parties; draft and send amendments to tolling agreements to extend the same; conference with MLQuist regarding strategy in Old Home Love matter;	06/25/21	DSB	2.20

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Review options for default for Old Home Love and extension of fact discovery;	06/25/21	MLQ	1.60
Work on finalizing amended tolling agreements and work on settlement negotiations with tolling parties; correspondence with Receiver regarding the same;	06/28/21	DSB	0.80
Address Second Amended Tolling Agreements (Flutie Entertainment and Global Reading);	06/28/21	BBL	0.30
Correspondence with tolling parties regarding possible settlements; review and analyze draft motion for default in Old Home Love matter and correspondence with MLQuist regarding the same;	06/29/21	DSB	0.80
Revise and finalize Motion for Entry of Default in Old Home Love case; draft Amended Complaint for 2 Chicks case;	06/29/21	MLQ	3.90
Communications with Indiana process server regarding service of Summonses and Complaints (Two Chicks and a Hammer);	06/29/21	BBL	0.20
Correspondence regarding service of complaint on Two Chicks and regarding amendment of complaint in the same; conference with MLQuist regarding the same;	06/30/21	DSB	0.40
Conferences with Greentree Legal regarding service of Summonses and Complaint; forward Returns of Service to BKNoble for filing with the Court; conference with DSByers and MLQuist regarding non-service of Ms. Hawk and approach for service;	06/30/21	BBL	0.30
Correspondence regarding service of Two Chicks complaint; correspondence with tolling party regarding settlement negotiations;	07/01/21	DSB	0.80
Review Answer in Two Chicks and emails regarding Answer and time to file Amended Complaint and service of process;	07/01/21	MLQ	0.20
Run search for updated address of Ms. Hawk for service of Summons and Complaint; report findings to MLQuist and DSByers;	07/01/21	BBL	0.30
Review answer to complaint against Two Chicks; correspondence with opposing counsel regarding the same; analyze issues regarding pending claw back actions;	07/07/21	DSB	2.20
Correspondence with team and opposing counsel regarding acceptance of service and answer deadline;	07/08/21	DSB	0.40

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Attention to service of Two Chicks complaint;	07/09/21	DSB	0.30
Review Response Memo to Tenth Circuit regarding Motion to Stay;	07/09/21	MLQ	0.50
Email with counsel and team regarding scheduling; telephone conference with counsel regarding same;	07/15/21	CAT	0.40
Review and analyze draft amended complaint against Two Chicks and correspondence with MLQuist regarding the same; correspondence with opposing counsel regarding answer extension;	07/15/21	DSB	0.60
Draft summary of the status of each of the eleven third-party clawback cases and send to DSByers for review;	07/15/21	BJM	2.60
Analyze strategy regarding recently filed claw back action and correspondence with Receiver, CATalbot, and MLQuist regarding the same; correspondence with tolling parties regarding settlement negotiations;	07/16/21	DSB	1.70
Conferences with CATalbot, DSByers and MLQuist regarding service of Ms. Hawk and Two Chicks and a Hammer extension to Answer the complaint;	07/16/21	BBL	0.30
Coordinate service (Two Chicks and a Hammer);	07/20/21	CAT	0.20
Review draft complaint (Two Chicks and a Hammer); email with Mr. Curtis regarding transfers; email with MLQuist regarding same;	07/21/21	CAT	0.90
Revise Amended Complaint and prepare for filing, request Schedule of Transfers to use as Exhibit, email to opposing counsel requesting him to accept service;	07/21/21	MLQ	1.70
Conferences with MLQuist regarding Amended Complaint for Two Chicks and a Hammer matter; address exhibit to Amended Complaint;	07/21/21	BBL	0.40
Correspondence with Mr. Behle regarding scheduling settlement call and possible mediation; review and analyze recent decisions relating to claims; correspondence with Mr. Marshall regarding settlement of disputes with merchant bankers;	07/27/21	DSB	2.30
Email correspondence regarding conference with Mr. Behle regarding potential mediation and settlement; telephone conference with Mr. Behle; conference with Receiver	07/28/21	DSB	2.20

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regarding procedures for sharing information pre-litigation;
correspondence with Mr. Curtis regarding the same;

Telephone conference with DSByers regarding protective order;	07/29/21	CAT	0.20
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Draft amendments to tolling agreements and correspondence with tolling parties regarding the same and regarding settlement negotiations; correspondence with Receiver regarding the same;	07/29/21	DSB	1.20
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Correspondence with tolling parties regarding settlement negotiations and amending tolling agreements; correspondence with Receiver regarding the same;	07/30/21	DSB	1.40
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Total Current Fees: \$99,442.65

Timekeeper Summary

Timekeeper	Tkpr ID	Rate	Hours	Amount
CLFries	1354	75.00	8.00	600.00
CGDunne	2165	193.50	45.50	8,804.25
BBLarsen	2172	279.00	16.10	4,491.90
AMLindquist Mann	2275	180.00	0.60	108.00
TLNeve	2280	75.00	15.20	1,140.00
DMcDermaid	2782	198.00	7.90	1,564.20
DSByers	5654	418.50	120.50	50,429.25
CATalbot	5657	427.50	16.90	7,224.75
CJDavis	5960	261.00	0.50	130.50
BJMerrill	6137	270.00	17.10	4,617.00
JLin	6148	292.50	7.70	2,252.25
MLQuist	6209	265.50	68.10	18,080.55
			324.10	\$99,442.65

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Disbursements

Description of Disbursements	Date	Amount
Filing, Recording, Docket Fees: VENDOR: Utah District Court; INVOICE#: AUTDC-4019476; DATE: 6/1/2021 - Complaint	06/01/21	402.00
Process Service Fee/Cost: VENDOR: Greentree Legal, LLC; INVOICE#: 1295-5772; DATE: 6/24/2021 - Process Service Fee	06/24/21	331.65
Total Current Disbursements:		\$733.65



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

August 11, 2021

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:	1915394 3585592 107333 DSByers
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Regarding: Matter No. 0003 - Third-Party Claw Back

Invoice Summary

Current fees	\$99,442.65
Current disbursements	\$733.65
Current charges this invoice	\$100,176.30

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”



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

August 10, 2021
 Invoice # 15141

Billing for: 04/01/21 to 07/31/21

RE: Federal Trade Commission v. ZURIXX
 2:19-cv-00713
 District Court

Previous balance	\$22,148.36
6/30/2021 Payment - Thank You. Check No. 10317	(\$22,148.36)
Total payments and adjustments	(\$22,148.36)

Professional Services Summary

Name	Hours	Rate	
Gil A. Miller	0.90	365.00	\$328.50
John H. Curtis	31.40	260.00	\$8,164.00
Josh Gifford	26.70	205.00	\$5,473.50
Jennie Messer	0.10	195.00	\$19.50
Jordan Colohan	9.70	195.00	\$1,891.50
Raani Erekson	1.00	70.00	\$70.00

Professional Services Detail

Date	Init.	Description	Hours	
04/01/21	JC	Research tax returns of various entities and prepare document inventory.	1.20	\$234.00
04/02/21	JC	Continue reviewing documents provided by Zurixx and other parties and researching tax returns and Schedules K-1. Update document inventory accordingly.	4.20	\$819.00
04/05/21	JC	Continue researching tax returns and Schedule K-1s provided by client and other parties.	3.30	\$643.50
04/09/21	RE	Prepare vendor payment and document.	0.10	\$7.00
04/14/21	JHC	Reviewed financial information used in insolvency analysis and prepared documents to be uploaded and produced in support of insolvency analysis. Searched and reviewed files for additional supporting documents to be produced. Uploaded solvency documents to transfer portal.	2.10	\$546.00

Mr. David Broadbent, Receiver

August 10, 2021

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
04/21/21	JHC	Analyzed entities in recent litigation complaint for overlap and integration with Zurixx. Gathered information on Advanced Real Estate Education and Success Path entities to allow Receiver's response to plaintiff on stay related to the same. Email communications with D. Byers. Call with D. Byers regarding solvency analysis and documents available and relied upon to support the same.	1.80	\$468.00
04/22/21	JHC	Call with D. Byers and M. Magistro on telesales commissions and analysis and calculation of the same. Analyzed commissions and payroll data to determine extent of analysis necessary to find all entries related to certain commisssed salesperson payments and related persons.	2.60	\$676.00
04/23/21	JHC	Reviewed data and updated D. Byers on time and work necessary in producing subsets of payroll and commissions data related to certain defendants and related parties. Reviewed fee motion and provided confirmation of amounts and dates to D. Byers.	0.90	\$234.00
04/29/21	JC	Research tax returns, update inventory, and prepare a list of tax returns to request for J. Curtis review.	0.80	\$156.00
	JHC	Analyzed telesales data for M. Grow for litigation analysis.	0.70	\$182.00
05/03/21	JHC	Reviewed docket for filing of applications and case updates.	0.30	\$78.00
05/05/21	JHC	Reviewed detailed time entries and provided information to D. Byers on tax services provided during recent period of fee requested. Analyzed cash disbursements and fee applications and prepared summary for D. Byers of fee applications and amounts paid to receivership professionals prior to current fee application. Email communications with D. Byers.	1.70	\$442.00
05/10/21	JHC	Email to D. Broadbent with engagement letter for Puerto Rico firm. Responded to J. Carlson email regarding engagement. Reviewed email regarding employment verification and requested resolution from D. Easter.	0.40	\$104.00
05/12/21	JHC	Call with D. Byers regarding production of documents relative to Miller declaration on telesales. Reviewed data and analysis to determine data relied upon in order to produce the same. Email communications with D. Byers regarding the same.	0.80	\$208.00
05/13/21	JHC	Searched for and compiled general ledger and sales data supporting telesales analysis and G. Miller declaration as requested by defendants. Prepared supporting telesales data and documents for production to defendants. Reviewed files to ensure relevant data and source of data. Searched for and retrieved receivership bank statements for entire period of receivership and prepare for production to defendants. Reviewed bank statement files and prepared the same for production. Uploaded all receivership bank statements for production pursuant to defendants' request.	4.10	\$1,066.00
05/18/21	JHC	Follow up with D. Byers on Puerto Rico engagement letter for tax and accounting services. Directed R. Ereksom in payment of invoices. Reviewed bank account transition instructions and wire details and compared and confirmed to account balances.	0.80	\$208.00

Mr. David Broadbent, Receiver

August 10, 2021

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
05/20/21	JHC	Coordinate with D. Easter for providing form 1099 to employee. Reviewed wire transfer of funds to new Tri-State Bank accounts with R. Ereksion.	0.40	\$104.00
05/25/21	JHC	Updated bank accounts to reflect prior account names after transition to Tri-State Bank. Transferred funds to consolidate checking accounts. Discussed payments of expenses with R. Ereksion.	0.60	\$156.00
05/26/21	RE	Prepare checks for vendors and deliver to Receiver.	0.30	\$21.00
05/27/21	GAM	Work on new FTC declaration and revised exhibit.	0.90	\$328.50
06/07/21	RE	Prepare deposit of auction proceeds and document for file.	0.10	\$7.00
06/16/21	JHC	Searched for and produced audited financial statements for 2014 to 2018 and responded to counsel regarding audit work papers.	0.40	\$104.00
06/21/21	JHC	Reviewed outstanding checks and ensured stop payments to allow transfers of funds to Tri-State bank and transition of banking relationship.	0.50	\$130.00
06/23/21	JM	Spoke with J. Curtis and J. Gifford about outstanding items regarding the 2020 tax return.	0.10	\$19.50
06/24/21	JC	Prepare ledger data for J. Messer.	0.20	\$39.00
06/28/21	JHC	Email communications with J. Carlson regarding tax returns and chargebacks to be included. Searched data and documents for information on chargebacks and refunds from merchant accounts during 2020. Reviewed emails related to chargebacks and refunds for tax purposes.	2.60	\$676.00
06/30/21	JG	Prepare preliminary trial balance for 2020.	1.20	\$246.00
07/06/21	JHC	Reviewed tax information on potential chargebacks. Met with J. Gifford to review data and information on potential chargebacks for tax returns. Email communications with J. Carlson and call regarding chargebacks and tax returns. Email to M. Magistro requesting information on accounting for preparation of tax returns.	1.60	\$416.00
	JG	Discuss accounting with J. Curtis and prepare preliminary tax return.	4.50	\$922.50
07/07/21	JHC	Prepared for call with D. Byers. Call with D. Byers regarding Zurixx issues and need for documentation on chargebacks.	0.60	\$156.00
07/08/21	JG	Review prior returns regarding deferred revenue. Discuss with J. Curtis and draft email to M. Magistro.	2.70	\$553.50
	RE	Prepare vendor check for Receiver's signature.	0.10	\$7.00
07/09/21	JG	Research foreign controlled corporations and email L. Lomba regarding Dorado tax return.	1.70	\$348.50
07/12/21	JHC	Reviewed email and direction from D. Broadbent. Directed R. Ereksion in payment of Receiver and Receiver's counsel fees with holdback. Compiled documentation to support payment. Reviewed bank accounts and Receivership data and prepared report of funds available, reserve funds, other assets and additions and subtractions to the same for call with FTC. Ensured accounting for all invoices and expenses.	3.40	\$884.00
	RE	Prepare checks for Receiver and counsel for delivery to Holland & Hart.	0.20	\$14.00
07/13/21	JG	Follow up on outstanding questions.	0.20	\$41.00
	JHC	Reviewed and prepared report and summary of funds and assets available to Receivership and prepared for call with D. Byers. Call with D. Byers regarding available funds, future fees and expenses and	2.20	\$572.00

Mr. David Broadbent, Receiver

August 10, 2021

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
		related issues. Updated summary report with estimated fees and anticipated claims pay outs, revised and submitted to D. Broadbent for review.		
07/15/21	JG	Call with M. Magistro and update tax return.	1.30	\$266.50
07/19/21	JG	Prepare first draft of federal and state returns for Zurixx, LLC.	4.20	\$861.00
	JHC	Searched for Dorado transfer pricing memo and provided to J. Gifford. Reviewed draft 2020 tax return and met with J. Gifford to review. Analyzed tax issues for tax return.	1.40	\$364.00
07/20/21	JG	Email question to M. Magistro regarding restricted cash.	0.20	\$41.00
07/21/21	JHC	Prepared detailed report of payments and transfers to Two Chicks and a Hammer for litigation. Submitted report to C. Talbot.	0.80	\$208.00
07/22/21	JG	Discuss restricted cash with M. Magistro and prepare Zurixx Financial LLC and CJ Seminar LLC draft 2020 returns.	3.40	\$697.00
07/26/21	JG	Review and update Zurixx LLC, Zurixx Financial, LLC, and CJ Seminar, LLC 2020 tax returns.	4.50	\$922.50
07/27/21	JG	Discuss final drafts with J. Curtis and email draft returns.	1.20	\$246.00
	JHC	Reviewed accounts for Reichard and Esclara payments for Puerto Rico services. Directed R. Erekson in payment of fees.	0.40	\$104.00
07/29/21	RE	Prepare payment to Puerto Rico counsel.	0.20	\$14.00
07/30/21	JG	Revise tax returns for Zurixx LLC, Zurixx Financial LLC, and CJ Seminar LLC.	1.60	\$328.00
	JHC	Reviewed tax return revisions and followed up with J. Gifford regarding revisions and additional areas of analysis.	0.30	\$78.00
Total for professional services rendered			69.80	\$15,947.00

Expenses

<u>Date</u>	<u>Init.</u>	<u>Description</u>	
04/01/21	RE	FedEx to Receiver	\$25.18
	RE	Copying cost (5 copies at \$.15 per copy)	\$0.75
	RE	Postage	\$1.02
	JHC	Website volume usage charges.	\$308.00
	JHC	Website volume usage charges	\$66.43
04/07/21	RE	FedEx to Receiver	\$25.24
04/14/21	RE	FedEx to Receiver.	\$25.12
04/27/21	JHC	Website domain charges.	\$36.92
04/30/21	RE	Copying cost (2 copies at \$.15 per copy)	\$0.30
	RE	Postage	\$1.02
	JHC	Website volume usage charges	\$66.43
	JHC	Website volume usage charges	\$308.00
05/31/21	RE	Copying cost (4 copies at \$.15 per copy)	\$0.60
	RE	Postage	\$1.02
	RE	PACER	\$12.20
06/01/21	JHC	Monthly website usage support charges	\$308.00
	JHC	Website volume usage charges	\$66.43
06/23/21	RE	FedEx to Receiver	\$25.65

Mr. David Broadbent, Receiver

August 10, 2021

<u>Date</u>	<u>Init.</u>	<u>Description</u>	
06/29/21	RE	FedEx to Receiver	\$25.65
06/30/21	RE	Copying cost (12 copies at \$.15 per copy)	\$1.80
	RE	Postage	\$1.53
07/01/21	JHC	Website volume usage charges	\$308.00
	JHC	Website hosting	\$66.43
07/09/21	RE	FedEx to Receiver	\$25.77
07/31/21	RE	Copying cost (8 copies at \$.15 per copy)	\$1.20
	RE	Postage	\$0.51
	JHC	Website and data volume usage charges (8/1/21)	\$66.43
	JHC	Website volume usage charges (8/1/21)	\$308.00
Total expenses			\$2,083.63
Total new charges			\$18,030.63
Balance due			\$18,030.63