

HOLLAND & HART LLP  
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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><b>RECEIVER’S EIGHTH APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE RECEIVER AND RETAINED PROFESSIONALS</b></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 Eighth Application for Compensation and Reimbursement of Expenses for the Receiver and Retained Professionals (the “Eighth Application”). The Receiver requests an Order approving payment of fees and expenses incurred from December 1, 2021, through July 31, 2022 (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 Eighth 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 Eighth 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: 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; negotiate tolling agreements with respect to various parties; significant settlement negotiations with various parties; analyze impact of stipulated judgment entered and strategy with respect to various claims; participate in litigation with landlord in Puerto Rico in the District Court and the Tenth Circuit, including contempt proceedings; 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. The landlord in Puerto Rico has appealed this Court's orders three times, which unfortunately has required the Receiver's attention, but the Receiver has prevailed on two of those appeals thus far, and he anticipates prevailing on the third.

6. The Receiver has recovered approximately \$185,000 in funds since the filing of the Seventh Application on December 23, 2021, which amount includes settlements of potential claw-back claims and brings the total recovered so far to approximately \$308,950. As reported in previous applications, through settlement, the Receiver also resolved potential claims against \$4,025,511.92 that the Receiver held in segregated accounts, making those funds available as part of the receivership estate.

7. The Court approved the following amounts for previous fee applications:

<b><u>Receiver (David Broadbent, Holland &amp; Hart)</u></b>	Total Payments
First Fee Application	\$ 31,590.50

Second Fee Application	\$ 37,575.90
Third Fee Application	\$ 25,854.20
Fourth Fee Application	\$ 32,435.00
Fifth Fee Application	\$ 22,606.50
Sixth Fee Application	\$ 8,786.35
Seventh Fee Application	<u>\$ 16,008.30</u>
Total Receiver Fees and Costs	\$174,856.75

**Holland & Hart**

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	\$370,969.81
Sixth Fee Application	\$188,650.85
Seventh Fee Application	<u>\$215,042.61</u>
Total Receiver's Counsel Fees and Costs	\$1,473,468.00

**Rocky Mountain Advisory, Accountants**

First Fee Application	\$ 15,214.62
Second Fee Application	\$ 15,292.97
Third Fee Application	\$ 16,173.51
Fourth Fee Application	\$ 15,366.42
Fifth Fee Application	\$ 22,148.36
Sixth Fee Applications	\$ 18,030.63
Seventh Fee Application	<u>\$ 22,099.82</u>
Total Accountant to Receiver Fees and Costs	\$ 124,326.33

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"):

	<b><u>Fees Requested</u></b>	<b><u>Expense Reimbursement Requested</u></b>	<b><u>Total</u></b>
Receiver	\$14,539.05	\$0.00	\$14,539.05
H&H	\$175,763.10	\$2,037.09	\$177,800.19
RMA	\$13,605.00	\$4,484.39	\$18,089.39
<b>Total</b>	<b>\$203,907.15</b>	<b>\$6,521.48</b>	<b>\$210,428.63</b>

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 Receiver and H&H raised their rates in January pursuant to their ordinary practices and the rates established by their law firm for their services. The increase in the rates is approximately 10%, but the Receiver and H&H continue to apply the discount of approximately 10% they applied to previous invoices. With this application, the Receiver requests the Court approve these modest rate increases.

11. 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.

12. 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. A proposed form of order is attached hereto as **Exhibit D**.

RESPECTFULLY SUBMITTED this 12th day of August, 2022.

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.
- D - Proposed Order.

18877265\_v1

# **EXHIBIT “A”**





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

**August 9, 2022**

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:	1979765 3761125 107333 DKBroadbent
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**Regarding: Matter No. 0001 - Receiver Services**

**Invoice Summary**

<b>Current fees</b>	<b>\$14,539.05</b>
<b>Current charges this invoice</b>	<b>\$14,539.05</b>

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

UMB Bank, N.A.  
 1670 Broadway, Denver, CO 80202  
 ABA# 101000695  
 Holland & Hart Operating Account  
 Acct # 6971172602  
 Swift Code UMKCUS44  
 Please include invoice #1979765 on payment.

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979765 3761125
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For professional services rendered through July 31, 2022

**Itemized Fees**

<b>Description of Work</b>	<b>Date</b>	<b>Tkpr</b>	<b>Hours</b>
Review email and respond; review amended stipulated preliminary injunction;	12/02/21	DKB	0.30
Review order regarding contempt; review report on fees claimed; conference with DSByers;	12/08/21	DKB	0.10
Review and evaluate email correspondence; conference with Robert Wing regarding settlement; conference with DSByers;	12/14/21	DKB	0.40
Conference with FTC attorneys, Robert Wing and DSByers; review proposed settlement agreement; review and evaluate email correspondence from Mr. Pahnke and respond;	12/15/21	DKB	1.30
Conference with FTC attorneys; conference with CATabot and DSByers;	12/21/21	DKB	0.80
Conference with DSByers regarding motion to permit filings to preserve claims; review proposed motion;	01/04/22	DKB	0.20
Review and respond to emails regarding Puerto Rico claims, review email from Mr. Loughridge and respond;	01/12/22	DKB	0.20
Conference with Robert Wing, review account and expense information	01/27/22	DKB	0.30
Conference with Mr. Meert; review and evaluate email correspondence from Mr. Curtis, review expense summary and estimations, conference with DSByers;	02/01/22	DKB	0.50
Conference with Robert Wing; review damage issues; review and evaluate email correspondence with Mr. Curtis;	02/02/22	DKB	0.30
Review proposed response in Efron litigation;	02/07/22	DKB	0.20
Conference with Ahmed Kahn, claimant;	02/10/22	DKB	0.20
Review motion and settlement agreement; review research on voidable transfers and insolvency issues; conference with Mr. Curtis;	02/14/22	DKB	1.60
Review settlement agreement and court order; conference	02/15/22	DKB	0.20

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1979765
	H&H Ref. No.	3761125

with Robert Wing and DSByers;

Emails to consumers to respond to their questions; review and judgment regarding effect on receivership matters;	02/17/22	DKB	0.30
Review and respond to emails from consumers; conference with Mr. Curtis regarding insolvency issues;	02/18/22	DKB	0.40
Conference with DSByers; conference with FTC, DSByers and Utah Division of Consumer Protection issues;	02/24/22	DKB	0.80
Conference with Robert Wing; review litigation options;	02/28/22	DKB	0.20
Review 10th Circuit order dismissing Efron appeal; review Judge Nuffer's order on fraudulent transfer and unjust enrichment; conference with DSByers regarding supplemental authority;	03/01/22	DKB	0.70
Conference with DSByers; review judgment and court order dismissing ancillary cases;	03/02/22	DKB	0.60
Conference with David and Judith NuHavun;; conference with Spencer Topham;	03/03/22	DKB	0.30
Review status of appeal, motion to lift stay;	03/04/22	DKB	0.40
Review and evaluate email correspondence and respond;	03/08/22	DKB	0.20
Review and edit 10th Circuit brief;	03/14/22	DKB	0.80
Conference with CATalbot; conference with Robert Wing;	03/16/22	DKB	0.30
Conference with DSByers regarding dismissal of California litigation and settlement offers; conference with Robert Wing;	03/24/22	DKB	0.30
Conference with CATalbot and DSByers; conference with NSnyder; conference with Robert Wing;	04/07/22	DKB	1.60
Review litigation case status; conference with DSByers and CATalbot;	04/08/22	DKB	1.60
Review Efron memorandum decision and judgment and determine next steps;	04/15/22	DKB	0.30
Josh Doan and Robert Wing;	04/25/22	DKB	0.20

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979765 3761125	
Telephone conference with Robert Wing; follow-up with DSByers;	04/26/22	DKB	0.20
Review outstanding cases and claim, DSByers and CATalbot,	04/27/22	DKB	0.70
Conference with Jordan Cameron, conference with Mr. Castleberry;	05/02/22	DKB	1.20
Conference with DSByers; review and execute tolling agreements;	05/04/22	DKB	0.40
Review and execute tolling agreements; conferences with DSByers;	05/05/22	DKB	0.20
Review and sign tolling agreements; conference with DSByers;	05/06/22	DKB	0.20
Review Puerto Rico action filings; DSByers;	05/20/22	DKB	0.20
Conference with CATalbot; conference with Mr. Wing; review receiver response to Efron motion for stay;	05/25/22	DKB	0.40
Review third party confidential settlement offer; conference with DSByers;	06/01/22	DKB	0.20
Analyze receivership claims and finances, conference with Mr. Doan; conference with DSByers;	06/02/22	DKB	0.40
Conference with Robert Wing, Mr. Doan and Roberto Angujizola; conference with DSByers regarding potential settlement;	06/06/22	DKB	0.60
Review settlement negotiations, review proposed settlement agreement; conference with DSByers;	06/09/22	DKB	0.40
Conference with DSByers regarding ██████████ settlement options;	06/13/22	DKB	0.10
DSByers; conference with Mr. ██████████, review state of Utah tax claim;	06/17/22	DKB	0.20
Review and evaluate email correspondence regarding tax claim, email to Robert Wing and Mr. Doan;	06/20/22	DKB	0.30
Review 10th Circuit judgment, initiate, review and evaluate email correspondence regarding possible settlement;	06/30/22	DKB	0.10
Conference with David Castleberry; and DSByers;	07/07/22	DKB	0.20

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979765 3761125
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Conference with Liz Elboom of the California Employment Development Department; provide requested information;	07/11/22	DKB	0.40
Conference with Robert Wing;	07/12/22	DKB	0.20
Conference with ██████████, attorney for ██████████, and conference with DSByers, regarding settlement discussions;	07/15/22	DKB	0.40
Conference with DSByers regarding settlement discussions;	07/27/22	DKB	0.30

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**Total Current Fees:                   \$14,539.05**

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Tkpr ID</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
DKBroadbent (2021)	5140	544.50	2.90	1,579.05
DKBroadbent (2022)	5140	648.00	20.00	12,960.00
			<b>22.90</b>	<b>\$14,539.05</b>



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

**August 9, 2022**

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:	1979765 3761125 107333 DKBroadbent
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**Regarding: Matter No. 0001 - Receiver Services**

**Invoice Summary**

<b>Current fees</b>	<b>\$14,539.05</b>
<b>Current charges this invoice</b>	<b>\$14,539.05</b>

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

**Due On Receipt**

Please return this page with your remittance.

# **EXHIBIT “B”**



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

**August 9, 2022**

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:	1979766 3761132 107333 DKBroadbent
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**Regarding: Matter No. 0002 - Zurixx Monitor - Attorneys**

**Invoice Summary**

<b>Current fees</b>	<b>\$93,615.60</b>
<b>Current disbursements</b>	<b>\$2,037.09</b>
<b>Current charges this invoice</b>	<b>\$95,652.69</b>

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

UMB Bank, N.A.  
 1670 Broadway, Denver, CO 80202  
 ABA# 101000695  
 Holland & Hart Operating Account  
 Acct # 6971172602  
 Swift Code UMKCUS44  
 Please include invoice #1979766 on payment.



IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
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For professional services rendered through July 31, 2022

**Itemized Fees**

<b>Description of Work</b>	<b>Date</b>	<b>Tkpr</b>	<b>Hours</b>
Review revised injunction; email with DKBroadbent and DSByers regarding same and regarding changes in status	12/02/21	CAT	0.40
Review amended PI order;	12/02/21	DSB	0.30
Address questions regarding appeal (Efron)	12/03/21	CAT	0.20
Conference with Mr. Cantarero regarding various tasks related to preserving electronic information; deposition notices for Mr. Davis and Mr. Shemin; work on fee application related to contempt rulings against Mr. Efron;	12/03/21	DSB	1.40
Review disclosure statement (Efron); email with team regarding same; telephone conference with DSByers regarding contempt issues	12/06/21	CAT	0.60
Work on fee application related to contempt orders against Mr. Efron and exhibits; attention to obtaining deposition transcripts; docketing statement filed by Mr. Efron at the 10th Cir.;	12/06/21	DSB	4.20
Review court order and Docketing statement and emails regarding same	12/06/21	MLQ	0.20
Conferences with DSByers; address deposition transcripts; review incoming emails to Receivership;	12/06/21	BBL	0.50
Work on motion for attorneys fees related to contempt orders against Mr. Efron and exhibits to the same; correspondence with Mr. Doan regarding requested information for settlement conference; work to pull information;	12/07/21	DSB	4.80
Finalize and file fee application related to contempt orders entered against Mr. Efron; work on related exhibits; correspondence with Receiver and CATalbot regarding draft of the same; work to gather information for parties' settlement conference and correspondence with Receiver and Mr. Anguizola regarding the same; conference with Mr. Curtis regarding the same;	12/08/21	DSB	2.60

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
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Work on arranging equipment auction; work on fee application; work with Mr. Curtis to pull requested information for settlement conference;	12/09/21	DSB	1.60
Work to pull information regarding status of receivership assets and fees requested by parties for settlement conference and conferences and correspondence with Mr. Anguizola and Mr. Curtis regarding the same;	12/10/21	DSB	1.50
Conference with team regarding settlement and receivership issues;	12/15/21	CAT	1.20
Conference with counsel for plaintiffs regarding potential settlement and receiver duties going forward; review stipulation filed by the parties to stay the case pending approval from commissions of settlement; correspondence with counsel for defendants regarding possible settlement; correspondence and conference with Mr. Wing regarding case law related to claims; correspondence with Ms. Pavely regarding Hansen class action lawsuit; review draft of agreement;	12/15/21	DSB	4.60
Review order staying case; analyze status of tolling claims and tolling agreements; correspondence with counsel for tolling parties regarding the same and possible settlements;	12/16/21	DSB	3.60
Correspondence with Mr. Curtis regarding receivership accounts and receipts; correspondence with auctioneer regarding equipment auction; work on fee application; correspondence with tolling parties regarding extensions of agreements and possible settlement;	12/17/21	DSB	4.60
Conference with DKBroadbent and DSByers regarding status and strategy;	12/21/21	CAT	0.70
Work on application for professional fees and correspondence with plaintiffs regarding the same;	12/22/21	DSB	0.40
Email with team regarding contempt issues; review documents regarding same;	12/23/21	CAT	0.50
Correspondence with counsel in New Jersey regarding class action and stay by Utah Court; review correspondence to New Jersey federal court regarding status of stay; correspondence with Mr. [REDACTED] regarding auction of equipment; finalize and file application for professional fees;	12/23/21	DSB	1.60

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
Review prior filings and draft Request to Submit	12/23/21	MLQ 0.70
Finalize and file request to submit; email with team regarding status;	12/27/21	CAT 0.20
Update Zurixx.com website with current pleadings;	12/27/21	BBL 0.30
Correspondence regarding auction of equipment and forward proceeds to Mr. Curtis for deposit;	12/28/21	DSB 0.30
Prepare and submit status report (Washington Court of Appeals);	12/29/21	CAT 0.20
Correspondence with Mr. Cantarero regarding status of servers;	12/29/21	DSB 0.20
Correspondence regarding monthly receiver reporting to the parties;	12/29/21	DSB 0.20
Correspondence with Mr. Cantarero regarding server maintenance;	12/31/21	DSB 0.30
Review appellate filings and order;	01/03/22	CAT 0.60
Review motion to extend time filed by EFrom at 10th Cir. and order denying the same; correspondence with team regarding the same; correspondence with Mr. Cantarero regarding needed updates to servers;	01/03/22	DSB 0.80
Review and edit filings; email with team regarding same;	01/04/22	CAT 0.30
Attention to service of account statements and correspondence with Mr. Curtis and BBLarsen regarding the same;	01/04/22	DSB 0.30
Correspondence with client regarding request from media on comment on case;	01/05/22	DSB 0.30
Emails regarding telephone call regarding Old Home Love case status; telephone call regarding case status	01/05/22	MLQ 0.30
Attention to preservation of assets and correspondence with BBLarsen regarding the same;	01/06/22	DSB 0.20
Review mail received in Receivership PO Box; address domain renewal invoice; conferences with DSByers regarding same;	01/06/22	BBL 0.30

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
Review order granting motion for attorneys fees related to Efron dispute; correspondence with team regarding strategy for collection; attention to fee application; attention to service of account statements and correspondence with Mr. Curtis and team regarding the same;	01/07/22	DSB 1.20
Conferences with DSByers and Mr. Curtis regarding monthly bank account statements;	01/07/22	BBL 0.20
Review and address correspondence;	01/08/22	CAT 0.20
Conference with MLQuist regarding contempt order and appellate issues;	01/10/22	CAT 0.30
Analyze appellate briefing deadlines and correspondence with CATalbot and MLQuist regarding the same; attention to service of bank statements;	01/10/22	DSB 0.60
Research reducing order to judgment for collection purposes; draft Request for Entry of Judgment	01/10/22	MLQ 1.20
Confirm counsel of record; distribute bank statements for November and December 2021 to same;	01/10/22	BBL 0.30
Correspondence with counsel for Efron regarding request for extension; correspondence with team regarding strategy to resolve dispute; correspondence regarding payment of vendor;	01/11/22	DSB 0.40
Review and edit request for entry of judgment; email with MLQuist and DSByers regarding same; telephone conference with DSByers regarding appellate motion; telephone conference with MLQuist regarding same; review appellate order;	01/12/22	CAT 1.10
Motion at 10th Cir. for extension and correspondence with team regarding the same; review order granting motion; analyze strategy for requesting entry of judgment and correspondence with team regarding the same;	01/12/22	DSB 1.20
Emails with team regarding appeal; emails with team regarding judgment in contempt proceeding	01/12/22	MLQ 0.30
Conference with Mr. Cantarero regarding server updates and status; correspondence regarding payment of vendors;	01/13/22	DSB 0.40
Correspondence with Mr. Cantarero regarding maintaining servers and needed updates;	01/14/22	DSB 0.30

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132	
Telephone call with DSByers regarding expiration of tolling agreement and drafting of Complaint; emails regarding tolling agreement; review Complaint	01/14/22	MLQ	0.40
Analyze strategy for requesting entry of judgment against Efron and correspondence with team regarding the same; attention to payment of professionals;	01/19/22	DSB	0.60
Emails regarding Request for Entry of Judgment; finalize Request for Entry of Judgment and prepare for filing	01/19/22	MLQ	0.30
Conferences with Mr. Cantarero regarding updates and maintenance of servers; attention to payment of vendors;	01/20/22	DSB	1.20
Draft Proposed Order for Entry of Judgment	01/24/22	MLQ	0.70
Review and analyze Efron filing; email with team regarding same;	01/26/22	CAT	1.10
Review filing from Efron seeking stay pending appeal; correspondence with team regarding the same;	01/26/22	DSB	0.80
Review motion to stay judgment; research rules relating to motions to stay judgment; emails regarding same	01/26/22	MLQ	0.90
Review and analyze motion to stay; correspondence with Mr. Hinkley regarding claims process;	01/27/22	DSB	0.80
Telephone conference with Receiver regarding various issues;	01/28/22	DSB	0.20
Conference with MLQuist regarding opposition to motion;	01/31/22	CAT	0.20
Correspondence with potential claimants regarding status of claims procedures;	01/31/22	DSB	0.30
Draft Opposition Memo to Motion to Stay Judgment	01/31/22	MLQ	4.30
Analyze projections of costs for receivership including IT issues and conference with Mr. Cantarero regarding the same; correspondence with Receiver regarding the same;	02/01/22	DSB	0.80
Draft Opposition to Motion for Stay	02/01/22	MLQ	2.80
Review filings in CA court; emails regarding same	02/01/22	MLQ	0.60
Review and edit draft opposition to motion to stay; email with MLQuist and DKBroadbent regarding same;	02/02/22	CAT	0.80

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
Finish drafting and revise Opposition to Motion for Stay; emails to team regarding motion; revise motion	02/02/22	MLQ 3.20
Revise Opposition to motion for stay; emails with team regarding filing	02/04/22	MLQ 0.50
Attention to opposition to Efron's motion to stay;	02/07/22	DSB 0.30
Review and analyze appellants' opening brief; email with team regarding same;	02/09/22	CAT 1.40
Review appellate filings from Efron and notice from 10th Cir. Regarding deficiencies;	02/09/22	DSB 0.60
Review appellate court filing on sanctions issue	02/09/22	MLQ 1.20
Review Efron filings with 10th Cir. on appeal;	02/10/22	DSB 0.60
Review motion for entry of judgment; correspondence with Receiver regarding the same;	02/14/22	DSB 0.30
Review Stipulated Order for Permanent Injunction and Monetary Judgment and effects on Receivership	02/14/22	MLQ 0.20
Review entry of judgment in underlying case; attention to service of bank statements pursuant to appointment order and correspondence with BBLarsen and Mr. Curtis regarding the same;	02/15/22	DSB 0.20
Review court order; meeting with CATalbot regarding strategy forward	02/15/22	MLQ 0.30
Forward January Receiver bank statement to counsel of record pursuant to the Court's order;	02/15/22	BBL 0.20
Correspondence with team regarding strategy with respect to pending motions, appeal and judgment against Efron given entry of judgment; work on update to website regarding information on judgment; correspondence with various claimants and consumers regarding impact of judgment;	02/17/22	DSB 1.50
Correspondence and conference with consumers regarding settlement and FTC instruction on claims;	02/18/22	DSB 0.30
Email with potential claimants regarding claims issues;	02/21/22	CAT 0.30
Correspondence with consumers and trade creditors	02/21/22	DSB 2.00

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1979766
	H&H Ref. No.	3761132

regarding potential claims process; work with LKelly on updates to website; correspondence with Receiver and CATalbot regarding claims and items to address with plaintiffs counsel;;

Update pleadings on Zurrix website;	02/21/22	BBL	0.40
Correspondence with counsel for plaintiffs in underlying action to schedule call to discuss post settlement/judgment receivership planning; conference with Receiver regarding the same;	02/22/22	DSB	0.60
Research CA federal court case for any obligations on Receiver's part; review Appellant Appendix in 10th Circuit on Contempt Order; draft Opposition to Appellant's Brief	02/24/22	MLQ	3.10
Research and draft Opposition to appeal of contempt order	02/25/22	MLQ	3.60
Draft Opposition to contempt appeal	02/28/22	MLQ	0.90
Review 10th Circuit ruling; email with team regarding same; review RaPower decision; email with team regarding same;	03/01/22	CAT	1.50
Review and analyze 10th Cir. dismissal of appeal; conferences with MLQuist and CATalbot regarding the same and strategy for entry of judgment; analyze status of lawsuit against Global Learning and conference with MLQuist regarding the same;	03/01/22	DSB	0.80
Review 10th Circuit opinion from first appeal of contempt order; conference with DSBoyle regarding case status and strategy forward; research appellate opposition to second contempt order; research case in CA court	03/01/22	MLQ	3.20
Email with consumers regarding claims issues;	03/02/22	CAT	0.20
Emails regarding lifting stay to ancillary cases	03/02/22	MLQ	0.20
Conference with potential buyer for assets;	03/04/22	DSB	1.20
Draft Appellee Brief to second contempt order appeal; draft Request to Submit Motion for Stay	03/06/22	MLQ	7.40
Analyze strategy with respect to Efron dispute and correspondence with MLQuist regarding request to submit	03/07/22	DSB	0.40

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1979766
	H&H Ref. No.	3761132

and status of appellate brief;

Finalize Request to Submit for filing; emails with DSBByers regarding status of cases	03/07/22	MLQ	0.20
Conferences with TLNeve regarding Zurixx receivership email monitoring and consumer contact tracking;	03/07/22	BBL	0.20
Review and edit draft answer brief;	03/09/22	CAT	1.50
Analyze status of purported claims filed against receivership entities and status conference and correspondence with MLQuist regarding the same; work with team on 10th Cir. appellate brief;	03/09/22	DSB	1.20
Continue drafting Answer Brief to second contempt motion appeal	03/09/22	MLQ	7.30
Attention to maintenance of receivership servers and correspondence with Receiver, and Messrs Curtis and Cantarero regarding the same; review and edit appellate brief for Efron appeal and correspondence with MLQuist and CATalbot regarding the same;	03/10/22	DSB	2.00
Organize Supplemental Appendix; review revisions to draft Answer Brief	03/10/22	MLQ	1.00
Conferences with MLQuist; gather documents for supplemental appendix to appellate record; draft supplemental appendix index;	03/10/22	BBL	1.30
Analyze non-consumer claims and correspondence with Mr. Curtis regarding the same; correspondence with consumers regarding claims with FTC;	03/11/22	DSB	0.60
Organize supplemental appendix; revise brief; cite check brief	03/11/22	MLQ	4.80
Conferences with MLQuist; prepare Supplemental Appendix documents and update index; prepare index for filing;	03/11/22	BBL	2.00
Research case law for brief; review/cite check brief	03/13/22	MLQ	2.40
Revise and edit draft appellate brief; email with team regarding same; conference with MLQuist regarding same;	03/14/22	CAT	1.30
Attention to 10th Cir. Brief and conference with team	03/14/22	DSB	0.90



IRS EMPLOYER NO. 84-0382505

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	H&H Ref. No.	3761132

regarding the same; communications with consumers regarding settlement; analyze claims; correspondence regarding claims against receivership entities;

Meeting with CATalbot regarding fees on appeal; final review of brief with revisions; add revisions from DKBroadbent; finalize for filing; finalize Appendices for filing	03/14/22	MLQ	3.40
Address consumer/vendor spreadsheet;	03/14/22	BBL	0.20
Coordinate revisions to Appendix	03/15/22	MLQ	0.60
Conferences with MLQuist and VSGarrett; update and revise Index of appellate supplemental appendix; reprocess documents and prepare for filing;	03/15/22	BBL	3.40
Review and finalize appellate briefing;	03/16/22	CAT	0.30
Conference with potential purchaser regarding purchase of assets; conference with Receiver regarding the same;	03/16/22	DSB	1.00
Organize revised Appendix; revise page numbers in brief and final review for filing	03/16/22	MLQ	1.60
Finalize appendix documents for filing; conferences with MLQuist regarding same;	03/16/22	BBL	1.60
Review and finalize printing of brief and appendix	03/17/22	MLQ	0.30
Telephone conference with counsel regarding ongoing California litigation issues; conference with DSByers regarding same;	03/18/22	CAT	0.60
Analyze claims by nonconsumer claimants and conference with Mr. Curtis regarding the same; review and analyze information received from Mr. Curtis; conference with CATalbot regarding strategy with respect to multiple pending lawsuits in violation of the stay; analyze declaration filed in such action and begin letter in response to the same;	03/18/22	DSB	2.30
Review letter to court with printed filing copies; finalize and send to court	03/18/22	MLQ	0.20
Conference with DSByers regarding California litigation; review correspondence regarding same; email with California counsel regarding dismissal and hearing issues;	03/21/22	CAT	0.80

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
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Revise and edit letter to counsel regarding stay; telephone conference with DSByers regarding same;	03/21/22	CAT	0.30
Review orders in receivership action and draft letter regarding stay and need to dismiss action to Mr. Mayer, counsel for plaintiff in action pending in California; conference with CATalbot regarding the same; correspondence with Mr. Kennedy regarding the same; follow up correspondence with Mr. Mayer regarding the same;	03/21/22	DSB	2.20
Conference with Mr. Mayer regarding the need to correct declaration regarding stay and to dismiss action; correspondence with Mr. Kennedy regarding dismissal of other California action;	03/22/22	DSB	0.60
Correspondence with Mr. Mayer regarding the scope of the stay and analyze the orders regarding the same; correspondence with CATalbot and the Receiver regarding the same;	03/23/22	DSB	0.50
Conferences with DHPeterson regarding vendor claims; conference with TLNeve regarding additional to vendor claim tracking log;	03/23/22	BBL	0.20
Letter to Washington Court of Appeals regarding case status; telephone conference with DSByers regarding same and regarding California litigation;	03/24/22	CAT	0.30
Conference with Receiver regarding status of various pending cases filed in other jurisdictions and strategy for staying the same; review filing for update to Washington court; correspondence and conferences with Messrs Mayer and Kennedy regarding action pending in California and need for them to be dismissed;	03/24/22	DSB	2.40
Correspondence with Messrs Mayer and Kennedy regarding dismissal of California action; correspondence with Mr. Cantarero regarding upkeep of servers;	03/25/22	DSB	1.00
Correspondence with Mr. Kennedy regarding California disputes; correspondence with employee regarding claims process;	03/28/22	DSB	0.60
Conference and correspondence with counsel for plaintiffs in Hansen class action lawsuit regarding status of case and stay; correspondence with Mr. Kennedy regarding dismissal of California actions; correspondence from nonconsumer	03/31/22	DSB	0.80

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

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claimants regarding procedures for claims;

Correspondence regarding Hansen Class Action; analyze nonconsumer claims and strategy with respect to the same;	04/01/22	DSB	0.80
Address claims process inquiries;	04/05/22	CAT	0.60
Correspondence with team regarding strategy for appeal with Efron;	04/07/22	DSB	0.30
Review and analyze decision; email with team regarding same; address issues regarding stayed litigation;	04/12/22	CAT	0.70
Review judgment entered against Efron and correspondence with team regarding the same; work on application for professional fees;	04/12/22	DSB	1.30
Review Court Order on Motion for Stay and Motion for Separate Judgment; emails to team regarding supplementing 10th Circuit record	04/12/22	MLQ	0.30
Address appeals issues, including email with MLQuist regarding supplemental authorities;	04/13/22	CAT	0.40
Correspondence with non-consumer claimants regarding claims analyze strategy for supplementing record on appeal for Efron dispute and correspondence with team regarding the same;	04/13/22	DSB	0.80
Draft Supplemental Authority Letter	04/14/22	MLQ	0.40
Draft Supplemental Letter to 10th Circuit	04/15/22	MLQ	1.40
Revise and edit draft notice of supplemental authority; email with team regarding same;	04/18/22	CAT	0.50
Review and analyze supplemental letter related to Efron dispute; correspondence regarding strategy for collection on Efron judgment; communications with consumers regarding claims process; analyze website information and conference with CATalbot regarding the same; correspondence with Mr. Curtis regarding tax issues;	04/18/22	DSB	1.70
Finalize Supplemental Letter to 10th Circuit	04/18/22	MLQ	0.70
Conferences with CATalbot and DSByers regarding claims link;	04/18/22	BBL	0.10

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
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Respond to consumer inquiries; conference with DSByers regarding same;	04/19/22	CAT	0.50
Correspondence regarding collection on judgment against Efron;	04/19/22	DSB	0.20
Conference with potential buyer for assets;	04/21/22	DSB	1.00
Analyze strategy with respect to appeal of Efron matter and correspondence with CATalbot and MLQuist regarding the same; correspondence with assets purchaser regarding possible transaction with the receiver;	04/22/22	DSB	1.60
Mandate issued from 10th Cir. regarding appeal in Efron matter;	04/25/22	DSB	0.20
Update pleadings on Zurixx website;	04/25/22	BBL	0.20
Emails with DSByers regarding Young employment agreement; review files for Young employment agreement	04/26/22	MLQ	0.30
Address status and strategy of claims, including conference with DSByers and DKBroadbent;	04/27/22	CAT	1.00
Conferences with TNeve regarding emails to Receivership for logging; communications with certain individuals regarding updated contact information;	05/02/22	BBL	0.30
Conference with DSByers regarding status and strategy;	05/03/22	CAT	0.30
Work on fee application; conference with Receiver regarding status of various tasks;	05/05/22	DSB	0.60
Correspondence with Mr. Curtis regarding financial information for receivership estate; work on fee application;	05/11/22	DSB	0.60
Review and analyze appellate filings; email with team regarding same;	05/13/22	CAT	0.90
Review amended notice of appeal from Efron and motion to stay pending appeal,; correspondence with team regarding the same;	05/13/22	DSB	1.10
Review Motion for Stay; review amended notice of appeal; review rules related to vexatious litigant; email to CATalbot and DSByers regarding strategy;	05/13/22	MLQ	0.60
Conference with MLQuist regarding response to motion to stay, including review of prior appellate issues;	05/17/22	CAT	0.40

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
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Analyze issues regarding latest appeal with Mr. Efron and correspondence with CATalbot and MLQuist regarding the same; work on fee application and conference with Mr. Curtis regarding the same;	05/17/22	DSB	2.10
Review new appeal for grounds to dismiss; draft Opposition to Motion for Stay;	05/17/22	MLQ	4.80
Research and draft Opposition to Motion for Stay;	05/18/22	MLQ	5.50
Research, draft and revise Opposition to Motion for Stay;	05/19/22	MLQ	5.80
Review and edit response to motion to stay; conference with DKBroadbent and MLQuist regarding same;	05/20/22	CAT	1.10
Review response to motion for stay pending appeal, and correspondence with team regarding deadline for filing;	05/20/22	DSB	0.40
Telephone call with client; research bonding requirements in appellate court;	05/20/22	MLQ	1.10
Revise and edit draft response to motion to stay; conference with DKBroadbent regarding same;	05/23/22	CAT	2.40
Review and edit response to motion for stay pending appeal and correspondence with MLQuist regarding the same;	05/23/22	DSB	0.80
Revise Opposition to Motion to Stay;	05/23/22	MLQ	2.60
Review pending email correspondence to Receivership; communications with individuals requesting updated contact information;	05/23/22	BBL	0.30
Work on motion to approve distribution; correspondence with Receiver regarding fee application; correspondence with Mr. Castleberry regarding case;	05/25/22	DSB	1.60
Appearance in 10th Cir. appeal with Efron; correspondence with Utah State Tax Commission regarding claim and correspondence with Receiver regarding the same; work on motion for distribution and fee application and correspondence with Receiver regarding the same; conference with Mr. Castleberry regarding cases;	05/26/22	DSB	2.40
Draft notices of appearance for third appeal; review docket and timeline;	05/26/22	MLQ	0.70

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
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Update pleadings on Zurixx website;	05/26/22	BBL	0.30
Attention to filings for the Efron appeal; correspondence with CATalbot and MLQuist regarding the same; finalize draft of fee application and correspondence with Messrs Doan and Wing regarding the same;	05/27/22	DSB	0.50
Review filings in third appeal;	05/27/22	MLQ	0.40
Filings in 10th Cir. Appeal regarding record for appeal; conference with Mr. Cantarero regarding status of services and strategy for upkeep of information; correspondence with Mr. Castleberry regarding status of cases;	05/31/22	DSB	1.20
Conference with Receiver regarding motions including motion to distribute; correspondence with Mr. Hinkley regarding Utah State tax claim; work on motion to distribute and motion to lift stay;	06/02/22	DSB	4.30
Work on motion to approve distribution; analyze administrative costs of estate going forward; conferences with Receiver regarding the same;	06/03/22	DSB	2.00
Conference with counsel for Plaintiffs in main action; follow up conference with Receiver regarding the same; conference with Mr. Cantarero regarding needed upgrades to servers and obtaining estimate of costs moving forward; correspondence with Receiver regarding possible employee claims; correspondence with Mr. Curtis regarding the same;	06/06/22	DSB	2.10
Analyze potential claims against estate; correspondence with Receiver regarding the same; conference and correspondence with Mr. Curtis regarding the same;	06/07/22	DSB	1.20
Correspondence with Mr. Cantarero regarding server updates;	06/10/22	DSB	0.20
Correspondence with Mr. Cantarero regarding status of server updates and maintenance;	06/11/22	DSB	0.20
Email with customers to respond to questions regarding claims process;	06/14/22	CAT	0.20
Correspondence with Mr. Cantarero regarding needed upgrades to servers;	06/14/22	DSB	0.30
Conference with Mr. Cantarero regarding maintenance and preservation of electronic information;	06/15/22	DSB	0.30

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
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Review information regarding tax claim and correspondence with Receiver regarding the same;	06/16/22	DSB	0.30
Correspondence from Mr. Curtis on tax claim by State of Utah; correspondence with Receiver and Plaintiffs' counsel regarding the same;	06/20/22	DSB	0.40
Correspondence with Mr. Cantarero regarding server maintenance and upgrades;	06/22/22	DSB	0.30
Correspondence regarding tax returns; conference with Mr. Curtis regarding various matters;	06/28/22	DSB	0.60
Review and analyze ruling; email with team regarding same;	06/29/22	CAT	0.50
Review dismissal of one of Efron's appeals and correspondence with team regarding the same; correspondence with Ms. Cohen regarding filing of status report in lawsuit regarding continuation of stay;	06/29/22	DSB	0.50
Email with counsel (Efron) regarding extension; review and analyze motion to stay; conference with SMPerkins regarding same;	06/30/22	CAT	1.50
Attention to motion filed by Efron to stay contempt proceedings pending appeal; conference with CATalbot and Receiver regarding strategy with respect to attempting to resolve dispute; correspondence with Efron's counsel regarding request for extension; conference with Receiver regarding fee application and follow up with Plaintiffs' counsel regarding the same;	06/30/22	DSB	0.80
Analysis of motion to stay; email with SMPerkins regarding same;	07/01/22	CAT	0.60
Correspondence with CATalbot and SMPerkins regarding briefing on motion to stay pending appeal;	07/01/22	DSB	0.30
Review Pleadings; Draft response to Motion to Stay;	07/01/22	SMP	0.40
Review and analyze motion for stay; conference with DSByers and SMPerkins regarding same;	07/05/22	CAT	0.50
Conference with Receiver regarding various tasks and status and strategy with respect to the same;	07/05/22	DSB	0.80
Draft Response to Motion to Stay Appending Appeal;	07/05/22	SMP	1.60

IRS EMPLOYER NO. 84-0382505

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107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979766 3761132
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Draft Response to Motion to Stay;	07/06/22	SMP	2.60
Review and edit draft opposition to motion to stay; email with team regarding same;	07/07/22	CAT	1.00
Correspondence regarding briefing on motion to stay pending appeal; review draft brief;	07/07/22	DSB	0.70
Draft Response to Motion to Stay;	07/07/22	SMP	1.10
Revise and edit draft opposition to motion to stay; email with team regarding same;	07/08/22	CAT	3.30
Correspondence with team regarding response to motion for stay pending appeal;	07/08/22	DSB	0.40
Draft Response to Motion to Stay;	07/08/22	SMP	3.50
Email with team regarding arguments in response to motion to stay;	07/09/22	CAT	0.30
Revise Response to Motion for Stay in Third Appeal	07/09/22	MLQ	2.40
Revise, finalize, and file response to motion to stay; email with SMPerkins and MLQuist regarding same;	07/11/22	CAT	1.70
Finalize Response to Motion to Stay;	07/11/22	SMP	1.50
Revise Opposition to Motion to Stay; finalize for filing	07/11/22	MLQ	0.70
Address inquiries regarding receivership;	07/12/22	CAT	0.60
Review and analyze order regarding Efron motion to stay; email with team regarding same;	07/13/22	CAT	0.30
Attention to sharing information with Mr. Cameron;	07/15/22	DSB	0.30
Analyze order denying stay pending appeal in Efron matter and conference regarding collection on judgment;	07/19/22	DSB	0.50
<b>Total Current Fees:</b>			<b>\$93,615.60</b>

**Timekeeper Summary**



IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1979766
	H&H Ref. No.	3761132

<b>Timekeeper</b>	<b>Tkpr ID</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
BBLarsen (2021)	2172	279.00	.80	223.20
BBLarsen (2022)	2172	301.50	11.50	3,467.25
DSByers (2021)	5654	418.50	32.20	13,475.70
DSByers (2022)	5654	441.00	71.00	31,311.00
CATalbot (2021)	5657	427.50	4.00	\$1732.50
CATalbot (2022)	5657	460.00	31.50	14,589.30
MLQuist (2021)	6209	265.50	.90	238.95
MLQuist (2022)	6209	297.00	85.10	\$25,274.70
SMPerkins (2022)	6302	270.00	10.70	2,889.00
			<b>248.60</b>	<b>\$93,615.60</b>

**Disbursements**

<b>Description of Disbursements</b>	<b>Date</b>	<b>Amount</b>
Trial Transcripts: VENDOR: For The Record, Inc.; INVOICE#: 20213058; [REDACTED]	11/09/21	1,011.77
Trial Transcripts: VENDOR: Advanced Reporting Solutions; INVOICE#: 319216; Electronic Transcripts	12/01/21	516.35
Outside Fees: VENDOR: Advanced Reporting Solutions; INVOICE#: 319233; Electronic Transcript - 9:00am - 11:42am	12/02/21	437.85
Outside Fees: VENDOR: L.A. Superior Court; INVOICE#: 1220301J1801; DATE: 3/1/2022 - Court Fees	03/01/22	22.60
United Parcel Service: COM. NEXT DAY AIR, Clerk of the Court, U.S. Court of Appeals 10th, DENVER, CO, 1Z59E98W0198276053	03/18/22	48.52
	<b>Total Current Disbursements:</b>	<b>\$2,037.09</b>



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

**August 9, 2022**

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:	1979766 3761132 107333 DKBroadbent
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**Regarding: Matter No. 0002 - Zurixx Monitor - Attorneys**

**Invoice Summary**

<b>Current fees</b>	<b>\$93,615.60</b>
<b>Current disbursements</b>	<b>\$2,037.09</b>
<b>Current charges this invoice</b>	<b>\$95,652.69</b>

Thank you for your prompt payment. Questions regarding this invoice should be directed to the attorney responsible for your account, or Carla Norton, Senior 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 9, 2022**

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:	1979767 3761442 107333 DKBroadbent
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**Regarding: Matter No. 0003 - Third-Party Claw Back**

**Invoice Summary**

<b>Current fees</b>	<b>\$82,147.50</b>
<b>Current charges this invoice</b>	<b>\$82,147.50</b>

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

UMB Bank, N.A.  
1670 Broadway, Denver, CO 80202  
ABA# 101000695  
Holland & Hart Operating Account  
Acct # 6971172602  
Swift Code UMKCUS44  
Please include invoice #1979767 on payment.

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979767 3761442
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For professional services rendered through July 31, 2022

**Itemized Fees**

<b>Description of Work</b>	<b>Date</b>	<b>Tkpr</b>	<b>Hours</b>
Address questions regarding settlement;	12/03/21	CAT	0.20
Correspondence with tolling party regarding possible settlement; conference with BBLarsen regarding status of tolling agreements and deadlines;	12/07/21	DSB	0.40
Correspondence with tolling parties regarding potential settlements; conference with Receiver regarding the same;	12/08/21	DSB	0.60
Review information forwarded from tolling party regarding potential resolution of dispute; Analyze status of tolling agreements and conference with BBLarsen regarding the same;	12/10/21	DSB	3.20
Conferences with DSByers; update chart of current tolling agreements with deadlines; forward to DSByers;	12/10/21	BBL	0.50
Analyze status of tolling agreements and conference with BBLarsen regarding the same; correspondence with Receiver regarding status and call with plaintiffs' counsel;	12/14/21	DSB	0.60
Conferences with DSByers and CATalbot; update tolling agreement chart;	12/14/21	BBL	0.30
Correspondence with counsel for tolling parties regarding possible settlement;	12/20/21	DSB	0.30
Correspondence and conference with CATalbot and Receiver regarding strategy of claw back claims going forward;	12/21/21	DSB	0.60
Conference with counsel for tolling party regarding settlement discussions;	12/23/21	DSB	0.30
Conference with client regarding need for motion for leave to file claims to preserve them notwithstanding stay issued by court to file new actions; prepare and file motion; review order granting the same and analyze claims that may need filing absent agreement to extend tolling agreements;	01/04/22	DSB	3.80
Conference with tolling parties regarding potential settlement and extending tolling agreements;	01/07/22	DSB	1.20

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979767 3761442
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Correspondence with tolling parties regarding settlement negotiations; review media articles regarding Old Home Love;	01/10/22	DSB	0.80
Conference with tolling parties regarding possible settlement and extensions of tolling period; conference with BBLarsen regarding the same;	01/11/22	DSB	0.60
Conference with DSByers regarding tolling agreement;	01/11/22	BBL	0.20
Negotiations with counsel for tolling parties regarding possible settlement and extension of tolling agreements;	01/13/22	DSB	0.80
Negotiations with tolling parties regarding possible settlement and regarding extending tolling agreements; correspondence with Receiver regarding the same;	01/14/22	DSB	2.00
Correspondence with tolling parties regarding settlement and extensions of tolling agreements; correspondence with Receiver regarding the same;	01/17/22	DSB	0.50
Correspondence with tolling parties regarding extension of tolling agreements; review order granting fee application;	01/18/22	DSB	1.20
Address Second Amended Tolling Agreement; update tolling agreement tracking sheet; conference with DSByers regarding same;	01/18/22	BBL	0.30
Negotiations with tolling parties regarding possible settlement and extensions of tolling agreements;	02/02/22	DSB	1.20
Negotiations with tolling parties regarding settlement and extending tolling agreements;	02/03/22	DSB	0.60
Work on extending tolling agreements and conferences with counsel and Receiver regarding the same;	02/04/22	DSB	2.40
Conferences with DSByers regarding amended tolling agreements;	02/04/22	BBL	0.20
Correspondence with tolling party regarding extension of tolling agreement and settlement negotiations;	02/09/22	DSB	0.60
Review status of tolling agreements and correspondence with parties regarding needed extensions and possible settlement; analyze factual bases for claims against various tolling parties; correspondence with Receiver regarding strategy of claw back claims;	02/10/22	DSB	2.30

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979767 3761442
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Research factual information regarding claims against various tolling parties; correspondence with Mr. Curtis regarding the same; obtain extension of tolling agreement from tolling parties;	02/16/22	DSB	2.20
Analyze factual evidence related to claims against various tolling parties and correspondence with Mr. Curtis regarding the same; analyze impact of judgment entered in main case on ancillary and tolled claims;	02/17/22	DSB	3.00
Analyze impact of judgment on third party claims; correspondence with Receiver regarding the same; obtain extensions on tolling agreements from several parties;	02/18/22	DSB	2.30
Analyze status and strategy for claw-back claims including tolled claims moving forward post judgment in underlying matter; analyze documents related to specific tolled claims; correspondence with tolling parties' counsel regarding settlement;	02/22/22	DSB	3.40
Analyze overall strategy for liquidation of receivership assets particularly claw-back claims; conference with Receiver regarding the same;	02/23/22	DSB	2.00
Conference with counsel for plaintiffs in main case and Receiver regarding strategy for liquidation of the receivership estate; conference with DKBroadbent regarding the same and various tasks; work on motion to lift stay of ancillary cases;	02/24/22	DSB	2.30
Correspondence with counsel for Young regarding status of case; analyze strategy for pending ancillary cases and tolled claims; correspondence and conferences with counsel for various tolling parties regarding settlement and tolling agreements;	02/25/22	DSB	2.20
Analyze strategy for cases moving forward and work on motion to lift stay; conferences with various tolling parties regarding potential settlement; arrange conference with Mr. Pack;	02/28/22	DSB	2.20
Work on motion to lift stay of ancillary cases; analyze decision from Judge Nuffer and conference with Receiver regarding the same; conferences with counsel for various tolling parties regarding settlement negotiations; telephone conference with Mr. Pack regarding Young matter, moving forward with the same, and potential settlement negotiations;	03/01/22	DSB	4.00

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979767 3761442
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conference with Receiver regarding various related issues;

Review and analyze case law and impact on pending and tolled claims; analyze strategy with respect to the same and potential settlement; conferences with team regarding strategy with respect to pending cases; meeting with Receiver regarding status of multiple tasks and issues;	03/02/22	DSB	4.60
Conferences and correspondence with counsel for defendants in various ancillary actions regarding coordination for resuming litigation and possible settlement; analyze procedural status of each of the ancillary actions;	03/07/22	DSB	2.60
Review case law related to ancillary action claims; correspondence and conferences with various parties' counsel regarding status of pending ancillary actions and tolling agreements and regarding possible settlement of claims;	03/08/22	DSB	2.20
Correspondence and conferences with various counsel for defendants in filed ancillary matters and for tolling parties regarding coordination of matters going forward, settlement discussions, and extending of tolling agreements;	03/09/22	DSB	1.60
Analyze status of pending ancillary actions; correspondence with various counsel for defendants in actions regarding stipulations for proceeding with cases and regarding possible settlement; conference with Receiver regarding status of the same;	03/10/22	DSB	4.00
Coordinate call with Mr. Pack regarding possible settlement;	03/17/22	DSB	0.20
Settlement discussions with counsel for multiple parties in filed actions and tolling disputes;	03/18/22	DSB	0.80
Correspondence with counsel for multiple parties regarding settlement of pending and tolling disputes;	03/21/22	DSB	1.30
Settlement communications in multiple filed claw back actions;	03/22/22	DSB	0.50
Review and analyze correspondence regarding settlement in tolling matter and conference with Receiver regarding the same; analyze multiple factual assertions in the same;	03/24/22	DSB	1.80
Draft amendment to tolling agreement and correspondence with counsel for tolling party regarding the same and settlement of dispute; review signed amendment; Analyze	03/29/22	DSB	1.80

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979767 3761442
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status of claw back claims and negotiations for settlement;  
follow up with multiple parties regarding the same;

Correspondence with Receiver regarding status of various matters and tolling agreements and arrange for signature of amendment;	03/30/22	DSB	0.60
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Settlement negotiations with tolling parties and regarding extending tolling agreements;	03/31/22	DSB	0.60
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Correspondence with multiple parties' counsel regarding potential settlement of disputes;	04/01/22	DSB	1.30
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Correspondence with Mr. ██████ regarding employment agreement;	04/05/22	DSB	0.10
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Correspondence with opposing counsel in ██████ matter regarding request for documents; review documents related to inquiry;	04/06/22	DSB	0.60
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Correspondence with multiple counsel in filed actions regarding possible settlement; conferences with Receiver and CATalbot regarding strategy for claw back actions and tolled claims;	04/07/22	DSB	1.40
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Correspondence with multiple counsel for claw back and tolling parties regarding settlement;	04/12/22	DSB	1.20
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Review and analyze correspondence from tolling party regarding merits of claim and work on response; conference with Receiver regarding strategy with respect to claw back claims;	04/15/22	DSB	2.30
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Correspondence with multiple counsel for tolling parties regarding possible settlement and exchange of information;	04/18/22	DSB	0.40
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Correspondence with tolling parties regarding possible settlement and status of case;	04/22/22	DSB	1.30
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Analyze settlement communication from tolling party and work on response; conference with Mr. Curtis regarding the same; analyze strategy with respect to settlement on multiple claw back claims; work on amending tolling agreements related to disputes; correspondence with counsel for tolling parties regarding tolling agreements and possible settlement;	04/25/22	DSB	3.60
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Analyze settlement strategy for multiple claims and correspondence with multiple counsel regarding the same and extending tolling agreements; work on draft amendments	04/26/22	DSB	6.80
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IRS EMPLOYER NO. 84-0382505

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107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1979767
	H&H Ref. No.	3761442

to tolling agreements; correspondence with Mr. Curtis regarding transfers related to various parties and conference with potential witnesses regarding the same; analyze documents related to filed claims and correspondence with MLQuist regarding the same;

Analyze strategy with respect to settlement with multiple parties; correspondence with multiple counsel regarding settlement and need to extend tolling agreements; work on draft amendments to tolling agreements; conference with Receiver regarding status and strategy of matters;	04/27/22	DSB	5.20
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Analyze strategy for settlement and with respect to tolling agreements; work on drafting amendments to tolling agreements; correspondence with multiple parties regarding settlement and extending tolling periods; correspondence with Mr. Curtis regarding analysis with respect to multiple transfers; work on responding to correspondence regarding settlement;	04/28/22	DSB	3.40
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Correspondence with multiple tolling parties regarding possible settlement discussions and extending tolling agreement;	04/29/22	DSB	1.00
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Work on obtaining extensions of tolling agreements and negotiations with multiple parties regarding possible settlement;	05/01/22	DSB	0.80
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Work on obtaining extensions of tolling agreements;	05/02/22	DSB	0.80
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Work with multiple tolling parties on amendments to tolling agreements and on settlement negotiations; draft correspondence related to the same and conferences with Receiver regarding the same;	05/03/22	DSB	3.60
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Continue effort to finalize amendments to tolling agreements; multiple conferences with counsel for various parties regarding possible settlement; conference with Receiver regarding the same and various other issues;	05/04/22	DSB	4.60
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Continue effort obtain extensions on tolling agreements and negotiate settlements;	05/05/22	DSB	3.30
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Conferences with DSByers regarding extension of certain Tolling Agreements;	05/05/22	BBL	0.20
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Finalize multiple tolling agreements and settlement negotiations with multiple parties; conference with Receiver	05/06/22	DSB	3.40
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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.	1979767 3761442
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regarding the same;

Revise Complaint	05/06/22	MLQ	2.30
Conferences with DSByers regarding Tolling Agreements; confirm receipt of Tolling Agreements;	05/06/22	BBL	0.30
Conference with tolling party regarding settlement proposal and regarding status of case;	05/10/22	DSB	0.40
Review and analyze status and strategy for filed and tolled claims;	05/11/22	DSB	0.80
Conferences with DSByers regarding filed third-party claims;	05/11/22	BBL	0.20
Correspondence with counsel for tolling party regarding extension of tolling agreement and possible settlement;	05/12/22	DSB	0.20
Negotiate amendment to tolling agreement with tolling party; also negotiate regarding settlement of dispute;	05/13/22	DSB	1.00
Settlement negotiations with multiple tolling parties; conference with Receiver regarding strategy with respect to the same;	05/17/22	DSB	1.00
Gather information regarding case and communications counsel regarding the same; negotiations with multiple tolling parties regarding possible settlement; of claims;	05/24/22	DSB	2.00
Settlement negotiations with multiple tolling parties;	05/25/22	DSB	1.80
Conferences with DSByers and CATalbot; gather and forward third-party claw back pleadings to Mr. Castleberry;	05/26/22	BBL	0.30
Conference with client regarding settlement negotiations; negotiations with tolling party regarding settlement; analyze status of tolling expirations and correspondence with BBLarsen regarding the same;	05/27/22	DSB	1.30
Conferences with DSByers regarding expiration of tolling agreement;	05/27/22	BBL	0.20
Conference with Receiver regarding settlement negotiations; negotiations with tolling party regarding the same;	05/31/22	DSB	0.80
Conferences with DSByers and Ms. Jones regarding tolling agreements;	05/31/22	BBL	0.30

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979767 3761442
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Negotiate settlement with tolling party and review correspondence from counsel regarding the same; conference with Receiver regarding the same; analyze status of tolling agreements and correspondence with BBLarsen regarding the same;	06/01/22	DSB	1.30
Conferences with DSByers regarding tolling agreement;	06/01/22	BBL	0.10
Conference and correspondence with counsel for tolling party regarding settlement negotiations; conference with Receiver regarding the same;	06/02/22	DSB	0.60
Work on settlement negotiations with various parties; work to amend tolling agreements;	06/03/22	DSB	2.20
Revise Complaint against ██████████	06/03/22	MLQ	1.20
Conferences with DSByers regarding amendment to Tolling Agreement;	06/03/22	BBL	0.20
Negotiations of settlement with tolling party; correspondence with Receiver regarding the same;	06/08/22	DSB	0.60
Work on settlement agreement with tolling party and conference with Receiver regarding the same; correspondence with multiple tolling parties' counsel regarding possible settlement;	06/09/22	DSB	4.30
Work on settlement agreement with tolling party and conference with Receiver regarding the same; correspondence with opposing counsel regarding the same and forward draft agreement for review; follow up with multiple other tolling parties regarding settlement negotiations;	06/10/22	DSB	2.60
Correspondence with counsel for tolling party regarding settlement agreement and forward draft for review; correspondence with Receiver regarding merits of various claims and status of settlement discussions;	06/13/22	DSB	1.00
Negotiations with tolling parties regarding settlement; conference with Mr. ██████████ regarding possible settlement and correspondence with Receiver regarding the same;	06/14/22	DSB	1.20
Correspondence with tolling party regarding settlement agreement; correspondence with Mr. ██████████ regarding possible settlement of claims;	06/15/22	DSB	0.80

IRS EMPLOYER NO. 84-0382505

**Holland & Hart LLP**

107333 Broadbent, David, as Receiver for Zurixx	Invoice No. H&H Ref. No.	1979767 3761442
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Review and analyze proposed edits to settlement agreement and correspondence with Receiver regarding the same; follow-up regarding settlement negotiations with multiple parties;	06/16/22	DSB	2.00
Negotiations for settlement with tolling party and finalize agreement; draft amendment to tolling agreement and conferences with counsel regarding the same; correspondence and conferences with Receiver regarding the same;	06/17/22	DSB	2.00
Conferences with DSByers regarding amendment of Tolling Agreement;	06/17/22	BBL	0.20
Conferences with DSByers regarding settlement;	06/21/22	BBL	0.10
Finalize settlement with tolling party and correspondence with counsel for tolling party and Receiver regarding the same;	06/22/22	DSB	0.80
Confirm payment on settlement and conference with Mr. Curtis and opposing counsel regarding the same;	06/27/22	DSB	0.30
Settlement negotiations with multiple tolling parties, as well as defendants in filed actions; work on amending tolling agreements to preserve claims;	07/01/22	DSB	3.40
Correspondence with tolling party regarding receipt of settlement funds; settlement conferences with multiple other tolling parties;	07/07/22	DSB	2.40
Conference with client regarding efforts related to managing claims; correspondence with counsel regarding the same; correspondence and conferences with tolling parties regarding settlements;	07/08/22	DSB	0.50
(COMBINE WITH OTHER ENTRY)	07/08/22	DSB	1.50
Conferences with DSByers and CATalbot; forward third-party pleadings to Mr. Cameron;	07/18/22	BBL	0.20
Conference with Receiver regarding settlement negotiations and strategy for various claims; correspondence with multiple tolling parties regarding settlement negotiations;	07/19/22	DSB	1.80
Work on amendments to tolling agreements; discussions with various tolling parties regarding possible settlement; conference with opposing counsel in filed disputes regarding	07/21/22	DSB	3.30

IRS EMPLOYER NO. 84-0382505

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107333 Broadbent, David, as Receiver for Zurixx	Invoice No.	1979767
	H&H Ref. No.	3761442

settlement negotiations; correspondence with Receiver regarding the same;

Conferences with multiple parties regarding settlement negotiations and potentially extending tolling agreements; correspondence with Receiver regarding the same;	07/22/22	DSB	4.70
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Work on amendments for multiple tolling agreements and analyzing claims and possible settlement; correspondence and conferences with multiple counsel for tolling parties regarding the same; correspondence with Receiver regarding the status of various discussions and strategy with respect to the same;	07/25/22	DSB	4.20
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Correspondence with multiple counsel regarding possible settlement and amending tolling agreements;	07/26/22	DSB	0.60
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Analyze and review various tolling agreements and terms thereof and conference with BBLarsen regarding the same; multiple negotiations with multiple tolling parties regarding settlement and extensions of tolling agreements;	07/27/22	DSB	4.60
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Conferences with DSByers; review original Tolling Agreements for provisions regarding Receiver's agreement not to sue during tolled period; report findings to DSByers;	07/27/22	BBL	0.40
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Multiple emails and conferences with multiple tolling parties regarding extension of tolling agreements and negotiations for settlement; draft amendments to tolling agreements and forward to respective counsel;	07/28/22	DSB	6.30
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Work on settlement negotiations with multiple parties; work on drafting amendments to tolling agreements and correspondence with counsel for multiple tolling parties;	07/29/22	DSB	3.60
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**Total Current Fees: \$82,147.50**

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Tkpr ID</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
BBLarsen (2021)	2172	279.00	.80	223.20
BBLarsen (2022)	2172	301.50	3.40	1025.10
DSByers (2021)	5654	418.50	6.00	2,511.00
DSByers (2022)	5654	441.00	175.20	77,263.20
CATalbot (2022)	5657	427.50	0.20	85.50
MLQuist (2022)	6209	297.00	3.50	1,039.50
			<b>189.10</b>	<b>\$82,147.50</b>



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

**August 9, 2022**

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:	1979767 3761442 107333 DKBroadbent
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**Regarding: Matter No. 0003 - Third-Party Claw Back**

**Invoice Summary**

<b>Current fees</b>	<b>\$82,147.50</b>
<b>Current charges this invoice</b>	<b>\$82,147.50</b>

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

**Due On Receipt**

Please return this page with your remittance.

# **EXHIBIT “C”**

**Rocky Mountain Advisory LLC**  
 15 West South Temple, Suite 500  
 Salt Lake City, UT 84101  
 (801) 428-1600



August 10, 2022

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

**Invoice Number: 15881**  
 Invoice Period: 11-30-2021 - 07-31-2022

Payment Terms: Net 15

**RE: Zurixx**

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

**Time Details**

<b>Date</b>	<b>Staff Member</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
12-06-2021	HD	Research and compile invoices requested by counsel.	0.60	117.00
12-06-2021	JHC	Reviewed and sent Puerto Rico law firm invoices to D. Byers for claim filing. Prepared summary of Puerto Rico law firm payments and provided to D. Byers.	0.50	130.00
12-08-2021	RE	Prepare payment to vendor and professional and document for file.	0.30	21.00
12-09-2021	JHC	Analyzed chargebacks from merchant banks and prepared allocation to real estate telesales based on relative sales history. Prepared report on chargebacks and provided to D. Byers.	1.60	416.00
12-10-2021	JHC	Communications with M. Magistro regarding merchant banks and use with certain sales channels or lines of service. Call with D. Byers. Reviewed and provided invoice for fee application. Updated bank and asset balances for receivership and provided to D. Byers.	1.50	390.00
12-14-2021	RE	Prepare check for vendor payment and document.	0.10	7.00
12-16-2021	JHC	Call with D. Byers regarding settlement and related issues. Email communications with counsel regarding needed financial information. Prepared financial reports and data needed by receiver and FTC and provided the same. Prepared estimates of operating expenses and costs going forward.	2.20	572.00
01-03-2022	RE	Prepare vendor payment and document for the file.	0.10	7.00
01-03-2022	JHC	Compiled, accounted for and documented payments for website usage charges and domain renewal. Email communications with counsel regarding the same.	0.60	156.00
01-04-2022	JG	Request Form 2 or cash ledger for 1099 filing requirements.	0.10	21.50
01-04-2022	JHC	Prepared export of data for all transactions from 2021 for	1.40	364.00



<b>Date</b>	<b>Staff Member</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		preparation of forms 1099 and discussed with J. Gifford. Retrieved, redacted and submitted November bank statements to counsel for distribution to defendants in case.		
01-06-2022	JHC	Searched for bank records information to provide to counsel. Reviewed docket regarding recent filings.	0.30	78.00
01-07-2022	HD	Review cash disbursement ledger for 1099 data.	0.50	97.50
01-07-2022	JHC	Retrieved, reviewed and redacted bank statement for December 2021; provided bank statement to counsel for distribution to Defendants.	0.40	104.00
01-10-2022	RE	Deposit auction proceeds and document.	0.10	7.00
01-11-2022	RE	Prepare check to vendor and document.	0.10	7.00
01-11-2022	JG	Review IRS Forms 1099.	0.40	86.00
01-11-2022	HD	Reach out to vendors requiring a 1099 and obtain their W-9.	0.20	39.00
01-19-2022	RE	Prepare checks for Receiver and professionals for payment of 7th interim fee application. Document for file.	0.50	35.00
01-21-2022	SO	Clean up ledger data for 2021 tax year and begin trial balance calculations.	2.00	250.00
01-25-2022	SO	Continue tax year 2021 and enter data into CCH system.	1.00	125.00
01-26-2022	HD	Began preparation of 2021 tax return.	1.10	214.50
01-31-2022	JG	E-file IRS Forms 1099.	0.10	21.50
02-14-2022	JHC	Call with D. Broadbent regarding solvency analysis and Zurixx status with respect to stipulated order. Reviewed stipulated order for permanent injunction and monetary judgment. Analyzed solvency of Zurixx and related issues. Reviewed guidance and case law on solvency issues.	1.20	312.00
02-15-2022	JHC	Retrieved bank statements for January, redacted account information and provided to counsel for distribution to defendants. Transferred Zurixx files to new network. Email communications with D. Broadbent to arrange discussion of recovery litigation.	0.90	234.00
02-15-2022	RE	Prepare checks for Receiver's signature and document for file.	0.30	21.00
02-17-2022	JHC	Analyzed documents for litigation recovery matter and responded to counsel. Analyzed solvency of Zurixx entities and discussed with M. Connors.	1.70	442.00
02-17-2022	HD	Continue preparation of the 2021 Federal and State tax return for Zurixx LLC.	1.20	234.00
02-17-2022	MHC	Consult regarding valuation matters.	0.40	106.00
02-18-2022	GAM	Review Order regarding judgment on company and owners. Discuss judgment and insolvency issues with staff.	0.40	146.00
02-18-2022	HD	Complete 2021 Federal and State tax return for Zurixx LLC and send to J. Gifford for review.	1.40	273.00
02-18-2022	JHC	Call with G. Miller regarding solvency analysis and components of the same. Call with D. Broadbent regarding solvency analysis. Reviewed and analyzed components of solvency.	0.90	234.00
02-18-2022	RE	Prepare check to professional for tax services, document for file, and communications with Receiver.	0.30	21.00
03-04-2022	JG	Discuss 2021 tax preparation with J. Curtis.	0.40	86.00
03-04-2022	JHC	Email communications with J. Carlson regarding tax returns. Discussed tax return with J. Gifford. Reviewed	0.60	156.00

<b>Date</b>	<b>Staff Member</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		2020 tax return.		
03-08-2022	RE	Prepare two vendor payments for Receiver signature and communications with Receiver regarding same.	0.20	14.00
03-11-2022	JHC	Searched for information on payments to employees at inception of case and amounts due for period prior to receivership. Provided data to D. Byers. Inquired with D. Easter and M. Magistro regarding amounts owed to employees and contractors prior to receivership. Email communications with D. Byers.	1.20	312.00
03-18-2022	JHC	Reviewed D. Easter file of unpaid employee wages and submitted to D. Byers.	0.40	104.00
04-11-2022	SO	Deliver checks to Receiver.	0.80	100.00
04-18-2022	JHC	Call with J. Carlson regarding Zurixx tax returns, stipulation and permanent injunction. Meeting with J. Gifford on tax issues and tax preparation for 2021 tax year. Email to Receiver and D. Byers regarding tax issues and questions.	0.80	208.00
04-22-2022	JG	Review M. Magistro email regarding tax returns.	0.50	107.50
04-25-2022	JHC	Call with D. Byers regarding avoidance action issues and response to the same. Analyzed Zurixx entity revenue and transactions to respond to assertions by avoidance action defendant. Searched for information on payments and responded to D. Byers.	1.90	494.00
04-26-2022	JG	Call with M. Magistro and J. Curtis.	0.70	150.50
04-26-2022	JHC	Virtual meeting with M. Magistro, D. Byers and J. Gifford on certain Zurixx entity transactions and tax return issues.	0.90	234.00
04-28-2022	JHC	Analyzed certain Zurixx entity revenue and expenses relative to events in San Mateo and New Jersey. Reviewed and refined expenses and revenues and calculated net loss from events for response to avoidance action defendant. Email communications with D. Byers regarding the same.	2.70	702.00
05-04-2022	JHC	Reviewed invoice for the five months ended April 30, 2022 and provided revisions and corrections to R. Erekson. Reviewed expenses and recategorization of website expenses and provided update to R. Erekson. Finalized invoice and submitted to D. Byers. Prepared summary of services rendered and updated D. Byers on continuing hosting and website expenses.	0.90	234.00
05-11-2022	JHC	Reviewed and determined amounts recovered for fee application narrative and provided information to D. Byers.	0.30	78.00
05-17-2022	JHC	Revised time descriptions in invoice and submitted to D. Byers for fee applications.	0.40	104.00
05-25-2022	JG	Review 2021 Zurixx LLC tax returns.	3.10	666.50
05-26-2022	JG	Review prior year Zurixx capital contribution allocations.	0.30	64.50
06-03-2022	JG	Discuss 2021 tax return with H. Denison.	0.20	43.00
06-03-2022	HD	Made updates to return after J. Gifford's review. Researched K-2 and K-3 filing requirements.	3.20	624.00
06-06-2022	JHC	Email communications with D. Byers on listing of employee wage claims and revisions to the same. Reviewed file to make updates and determine necessary changes.	0.60	156.00
06-07-2022	HD	Research tax filing requirements for schedules K-2 and K-3.	0.40	78.00
06-07-2022	JHC	Prepared unpaid wage summary for ordinary employees, eliminating sales commissions and independent contractors, and sent to D. Byers for possible motion.	1.80	468.00

Date	Staff Member	Description	Hours	Amount
		Analyzed historical pay for certain individuals in order to remove sales commissions and independent contractors payments from analysis.		
06-08-2022	HD	Finished preparing 2021 Federal and State Tax Return.	1.10	214.50
06-08-2022	RE	Prepare check for vendor and document for file.	0.10	7.00
06-14-2022	RE	Prepare check for vendor and document for file.	0.10	7.00
06-17-2022	JG	Review options for payment of UT withholding tax on Brand Managements 2018 tax return.	0.60	129.00
06-17-2022	JHC	Generated and submitted wire instructions to D. Byers for settlement payments. Drafted email to D. Broadbent on state tax claim.	0.70	182.00
06-20-2022	JHC	Reviewed 2021 tax return with J. Gifford and instructed him on sending draft to parties. Responded to D. Broadbent inquiry regarding State of Utah tax claim for 2018 Brand Management Holdings taxes.	0.60	156.00
06-20-2022	JG	Review with J. Curtis and email draft to parties.	1.20	258.00
06-21-2022	HD	Updated 2021 Federal and State tax returns for Zurixx, LLC. Prepared 2021 Federal and State tax returns for Zurixx Financial, LLC. Prepared 2021 Federal and State tax returns for CJ Seminar, LLC.	2.90	565.50
06-21-2022	JG	Review Zurixx Financial and CJ Seminar.	0.60	129.00
06-21-2022	JHC	Prepared form W-9 for providing to settling party and provided to D. Byers.	0.40	104.00
06-21-2022	RE	Prepare check for storage fees for six months, communicate with receiver and document for file.	0.20	14.00
06-24-2022	HD	Made updates to 2021 Federal and State Tax Returns for Zurixx LLC and CJ Seminar LLC post manager review.	1.90	370.50
06-28-2022	JG	Review and revise CJ Seminar and Zurixx LLC tax returns.	2.30	494.50
06-28-2022	JHC	Calls with J. Carlson on tax issues. Meeting with J. Gifford on tax return and related issues. Email D. Byers regarding case issues.	0.60	156.00
07-25-2022	JHC	Analyzed data and searched for payments to potential clawback defendant. Prepared detailed report of payments to clawback defendant and sent to D. Byers as requested.	1.30	338.00
07-28-2022	RE	Prepare vendor check, send to receiver and document for file.	0.10	7.00
			<b>Total</b>	<b>13,605.00</b>

### Time Summary

Staff Member	Hours	Rate	Amount
Gil A. Miller	0.40	365.00	146.00
Heather Denison	14.50	195.00	2,827.50
John H. Curtis	29.30	260.00	7,618.00
Josh Gifford	10.50	215.00	2,257.50
Matt H. Connors	0.40	265.00	106.00
Raani Erekson	2.50	70.00	175.00
Saria Ott	3.80	125.00	475.00
<b>Total</b>			<b>13,605.00</b>

### Expense Summary

<b>Expense</b>	<b>Amount</b>
Copies	2.40
PACER	48.20
Postage	6.93
Supplies - Tax Forms	23.52
Website Domain Renewal	1,312.91
Website Hosting Expenses	3,090.43
<b>Total Expenses</b>	<b>4,484.39</b>
<b>Total for this Invoice</b>	<b>18,089.39</b>
<b>Previous Invoice Balance</b>	<b>22,099.82</b>
Payment - Check number 10343 on 01-24-2022	(22,099.82)
<b>Total Amount to Pay as of 08-10-2022</b>	<b>18,089.39</b>

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

August 10, 2022

**Rocky Mountain Advisory LLC**  
 15 West South Temple, Suite 500  
 Salt Lake City, UT 84101

**Invoice Number: 15881**  
 Invoice Period: 11-30-2021 - 07-31-2022

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**REMITTANCE COPY**

**RE: Zurixx**

<b>Fees</b>	13,605.00
<b>Expenses</b>	4,484.39
<b>Total for this Invoice</b>	18,089.39
<b>Previous Invoice Balance</b>	22,099.82
Payment - Check number 10343 on 01-24-2022	(22,099.82)
<b>Total Amount to Pay as of 08-10-2022</b>	<b>18,089.39</b>

<b>Project</b>	<b>Balance Due</b>
Zurixx	18,089.39
<b>Total Amount to Pay</b>	<b>18,089.39</b>

**Open Invoices and Credits**

<b>Date</b>	<b>Transaction</b>	<b>Project</b>	<b>Amount</b>	<b>Applied</b>	<b>Balance</b>
08-10-2022	Invoice 15881	Zurixx	18,089.39		18,089.39
				<b>Balance</b>	<b>18,089.39</b>

# **EXHIBIT ‘D’**

HOLLAND & HART LLP  
Doyle S. Byers, #11440  
Cory A. Talbot, #11477  
Engels J. Tejada, #11427  
Michelle L. Quist, #13559  
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Salt Lake City, Utah 84101  
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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><b>ORDER APPROVING RECEIVER’S EIGHTH APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE RECEIVER AND RETAINED PROFESSIONALS</b></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”), filed his Eighth Application for Compensation and Reimbursement of Expenses for the Receiver and Retained Professionals (Dkt. No. \_\_\_; the “Motion”) on August 12, 2022.

Having considered the Motion, and good cause appearing, the Court HEREBY ORDERS as follows:

1. The Motion is GRANTED and APPROVED; and

2. The Receiver is authorized to pay the amounts incurred as outlined in the Motion from the assets in his possession or control as Receiver of the Receivership Entities.<sup>1</sup>

DATED this \_\_\_\_\_ day of August, 2022.

BY THE COURT:

\_\_\_\_\_  
Honorable Dale A. Kimball  
U.S. District Court Judge

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\_\_\_\_\_  
<sup>1</sup> The term “Receivership Entities” is defined in this Court’s Stipulated Preliminary Injunction entered on November 1, 2019 (Dkt. No. 54).