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Attorneys for Receiver for Defendants
AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS,
LLC; AEQUITAS COMMERCIAL FINANCE, LLC; AEQUITAS
CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT
MANAGEMENT, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC;
AEQUITAS HOLDINGS, LLC;
AEQUITAS COMMERCIAL FINANCE,
LLC; AEQUITAS CAPITAL
MANAGEMENT, INC.; AEQUITAS
INVESTMENT MANAGEMENT, LLC;
ROBERT J. JESENİK; BRIAN A. OLIVER;
and N. SCOTT GILLIS,

Defendants.

No. 3:16-cv-00438-JR

DECLARATION OF RONALD F.
GREENSPAN IN SUPPORT OF RECEIVER'S
REQUEST FOR APPROVAL OF TWENTY-
NINTH INTERIM FEE APPLICATION



I, Ronald F. Greenspan, the duly appointed Receiver for the Receivership Entity, declare as follows:

1. I am over 18 year of age and otherwise competent to testify.
2. I make this declaration in support of the Receiver's Request for Approval of Twenty-Ninth Interim Fee Application.
3. The June 30, 2023, Report of the Receiver [Dkt. 1029] is incorporated herein by reference in Exhibit A. Exhibit A sets forth several ways in which the report can be obtained.
4. Attached as Exhibit B is a true and accurate copy of the summary invoice for professional services rendered on behalf of the Receivership Entity, by the Receiver, for the period of April 1, 2023 through June 30, 2023. The Receiver is employed as a Senior Managing Director of FTI, which bills and collects for the Receiver's time as well as that of FTI professionals utilized by the Receiver. Also included in Exhibit B is a true and accurate copy of the summary invoice for professional services rendered on behalf of the Receivership Entity, by FTI Consulting, Inc. ("FTI"), for the period of April 1, 2023 through June 30, 2023.
5. Attached hereto as Exhibit C is a true and accurate copy of the summary invoice for professional services rendered on behalf of the Receivership Entity, by Schwabe Williamson & Wyatt ("Schwabe"), for the period of April 1, 2023 through June 30, 2023, together with the accompanying Certification.
6. I have read the entirety of the Twenty-Ninth Interim Fee Application.
7. To the best of my knowledge, information and belief formed after reasonable inquiry, the Twenty-Ninth Interim Fee Application and all fees and expenses therein are true and accurate and comply with the Billing Instructions For Receivers In Civil Actions Commenced By The U.S. Securities And Exchange Commission (the "Billing Instructions").

8. To the best of my knowledge, information and belief formed after reasonable inquiry, all fees contained in the Twenty-Ninth Interim Fee Application are consistent with the rates previously approved by the Court and the Commission Staff, and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed.

9. It is my opinion that the time spent, services performed, hourly rates charged, and expenses incurred by the Receiver and each of the professional service firms were incurred in the best interests of the Receivership Entity and were indeed essential for the Receiver to discharge the Court-ordered duties and responsibilities. With respect to each litigation matter, I certify that each action is likely to produce a net economic benefit to the estate, based on review of: (i) the legal theories upon which the action was based, including issues of standing; (ii) the likelihood of collection on any judgment which might be obtained; and, (iii) alternative methods of seeking relief, such as the retention of counsel on a contingency basis.

10. To the best of my knowledge, information and belief formed after reasonable inquiry, neither the Receiver nor any of the professional firms has included any amount for which reimbursement is sought for the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the allowable amounts set forth in the Billing Instructions).

11. To the best of my knowledge, information and belief formed after reasonable inquiry, in seeking reimbursement for a service justifiably purchased or contracted for from a third party, the Receiver requests reimbursement only for the amount billed to the Receivership by the third-party vendor and paid to such vendor.

12. To the best of my knowledge, information and belief formed after reasonable inquiry, with the exception of the Billing Instructions, the Receiver has not entered into any

agreement, written or oral, expressed or implied, with any person or entity concerning the amount of compensation to be paid from the Receivership Entity, or any sharing thereof, except that the Receiver's fees shall be paid to FTI.

13. Prior to the filing of the Receiver's Motion for Approval of the Twenty-Ninth Interim Fee Application, the detailed invoices of FTI and Schwabe were submitted to the Commission Staff for review and approval.

I declare under penalty of perjury under the laws of the state of Oregon that the foregoing statements and those contained in the attached exhibits, are true and correct to the best of my knowledge, information and belief.

Dated this 9th day of October, 2023.

/s/ Ronald Greenspan

Ronald F. Greenspan, Receiver

EXHIBIT A

RECEIVER'S REPORT DATED

June 30, 2023

The Receiver's June 30, 2023 report is nearly 200 pages in length and is not being reproduced with this filing.

The report can be found on the Court website under Docket #1029.

The report can also be found on the website established by the Receiver for this matter at www.kccllc.net, under Court docket #1029.

The report can also be obtained by email request to the Receiver's counsel, Larry Ream, at lream@schwabe.com.

EXHIBIT

B

RONALD F. GREENSPAN

COURT-APPOINTED RECEIVER FOR

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES**

(the “Receivership Entity”)

Summary of Activities for Ronald F. Greenspan (the Receiver) and FTI Consulting, Inc.

For professional services rendered and expenses incurred in connection with the Aequitas Receivership matter from April 1, 2023, through June 30, 2023 (the “Application Period”), as described below:

Business Operations

- Maintained oversight over the day-to-day operations of the Receivership Entity, the Qualified Settlement Fund, and remaining Receivership staff and contractors
- Continued bank account management duties with respect to the control of the remaining 13 bank accounts (as of June 30, 2023)
 - Addressed online banking system changes and upgrades
- Addressed various miscellaneous IT infrastructure and data management matters
- Managed daily operational matters including, but not limited to:
 - Planning Receivership operations
 - Managing daily operational and financial issues related to active portfolios of receivables and investments (collections, servicing, compliance, etc.) in which the Receivership Entity has an interest – gross cash collections from the receivables and investments were approximately \$48.6 thousand during the Application Period
 - Addressing entity registration matters
 - Working with Receivership staff and Motolease portfolio servicer (Autopay) on tax matters and portfolio wind down and data transfer preparation
 - Reviewing and addressing correspondence from employees, service providers, investors, and various other parties

- Conducting weekly status call with Receivership staff and contractors, providing updates and guidance to the employees on ongoing Receivership matters
- Reviewed and approved contractor and hourly employee time logs
- Reviewed and approved checks, purchase orders, and expense reports
- Addressed various third-party operational invoices

Cash Management

- Continued to monitor cash balances, accounts payable, and accounts receivable
- Worked closely with Receivership treasury staff and managed cash activities, including approving transactions and releasing wires, as well as coordinating banking transition following the merger between Union Bank and US Bank

Claims Administration and Objections

- The FTI Data & Analytics group performed the following tasks:
 - Reviewed and discussed outstanding items related to Motolease tax bills
 - Discussed initial plan for the fourth interim distribution
 - Performed ad hoc analyses and produced data reports per requests from counsel and third parties

Distribution Plan

- Began planning and preparation for the fourth interim distribution; provided guidance to Receivership staff on distribution preparation matters
- Reviewed drafts, discussed with counsel and provided input for the fourth interim distribution motion

Employee Retention / Matters

- Reviewed and finalized employee retention agreements

Litigation Consulting

- Reviewed latest developments and rulings related to the Aequitas criminal cases, corresponded and discussed with counsel and Receivership staff
- Finalized new net winner settlement agreement
- Reviewed, researched and prepared a court declaration in connection with two non-settling net winners

Status Reports

- Collected data and prepared analyses required for the Receiver's quarterly status report and as necessary to comply with the reporting requirements outlined in the Final Receivership Order
- Provided guidance to Receivership staff in preparation of the quarterly SFAR report and reviewed and approved the report
- Drafted the Receiver's report for 1Q-2023 and filed with the Court on May 10, 2023. The 195-page report provided a detailed overview of the Receivership Entity status and operations, including an exhibit containing an entity-level and consolidated report of cash receipts and disbursements

Tax Issues

- Worked with Receivership staff on Motolease property tax reconciliation and payment matters
- Provided guidance to Receivership staff and worked with tax counsel on Motolease / AL tax wind down matters
- Participated in discussions with Receivership tax staff and tax counsel regarding various tax planning and tax wind down matters and provided input and oversight as needed, including but not limited to local and state tax filing and general Receivership tax reporting matters

Wind-Down of Operation

- Oversaw activities related to the wind down of the Motolease portfolio including communications with counsel, Receivership staff and Autopay (portfolio servicer)
- Worked with Receivership staff and counsel on entity dissolution planning and implementation for over 20 selected Delaware legal entities

- Continued to work with Receivership staff and counsel on various Receivership wind down planning matters including tax, legal, budget, and operational wind down planning
- Conducted periodic status reviews with Receivership counsel regarding wind down planning progress

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC, AEQUITAS
CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES
(the "Receivership Entity")
Case No. 3:16-cv-00438-JR - (Receiver)

Summary of Professional Fees and Expenses for Ronald F. Greenspan
For the Period April 1, 2023 Through June 30, 2023

Professional Fees	<u>\$13,282.50</u>
Expenses	<u>\$0.00</u>
Total	<u><u>\$13,282.50</u></u>

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC, AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES
(the "Receivership Entity")**

Case No. 3:16-cv-00438-JR - (Receiver)

Summary of Professional Fees for Ronald F. Greenspan

For the Period April 1, 2023 Through June 30, 2023

Professional	Title	Rate	Hours	Total
Greenspan, Ronald	Senior Managing Director	\$825	16.1	\$13,282.50
Total Hours and Fees			16.1	\$13,282.50
<u>For Informational Purposes Only:</u>				
Total Billing Rate Discount				\$9,660.00
Additional Written Off Professional Fees			1.0	\$1,425.00
Total Discounts and Reductions			1.0	\$11,085.00

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of Professional Fees By Activity for Ronald F. Greenspan
For the Period April 1, 2023 Through June 30, 2023**

<u>Activity/Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
<u>Business Operations</u>				
Greenspan, Ronald	Senior Managing Director	\$825	0.6	\$495.00
	Activity Total		0.6	\$495.00
<u>Cash Management</u>				
Greenspan, Ronald	Senior Managing Director	\$825	0.5	\$412.50
	Activity Total		0.5	\$412.50
<u>Litigation Consulting</u>				
Greenspan, Ronald	Senior Managing Director	\$825	0.6	\$495.00
	Activity Total		0.6	\$495.00
<u>Status Reports (SEC and court)</u>				
Greenspan, Ronald	Senior Managing Director	\$825	1.5	\$1,237.50
	Activity Total		1.5	\$1,237.50
<u>Tax Issues</u>				
Greenspan, Ronald	Senior Managing Director	\$825	1.2	\$990.00
	Activity Total		1.2	\$990.00
<u>Wind-Down of Operations</u>				
Greenspan, Ronald	Senior Managing Director	\$825	11.7	\$9,652.50
	Activity Total		11.7	\$9,652.50
	TOTALS		16.1	\$13,282.50

**AQUITAS MANAGEMENT, LLC, AQUITAS HOLDINGS, LLC, AQUITAS COMMERCIAL FINANCE, LLC,
AQUITAS CAPITAL MANAGEMENT, INC., AQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of Expenses By Expense Type for Ronald F. Greenspan
For the Period April 1, 2023 Through June 30, 2023**

Expense Type	Total
	\$0.00
Total Expenses	\$0.00

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of FTI Consulting, Inc. Fees and Expenses
For the Period April 1, 2023 Through June 30, 2023**

Professional Fees	\$83,092.00
Expenses	\$0.00
Total	<u>\$83,092.00</u>

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of FTI Consulting, Inc. Professional Fees By Professional
For the Period April 1, 2023 Through June 30, 2023**

Professional	Title	Rate	Hours	Total
Foster, Charles	Managing Director	\$660	4.1	\$2,706.00
Gotguelf, Larissa	Managing Director	\$660	117.1	\$77,286.00
Chuck, Brenton	Senior Director	\$605	2.2	\$1,331.00
Chen, Yian	Director	\$570	2.7	\$1,539.00
Patel, Brinda	Senior Consultant	\$460	0.5	\$230.00
Total Hours and Fees			126.6	\$83,092.00
<u>For Informational Purposes Only:</u>				
Total Billing Rate Discount				\$40,835.00
Additional Written Off Professional Fees			29.60	\$20,304.00
Total Discounts and Reductions			29.60	\$61,139.00

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of FTI Consulting, Inc. Fees By Activity and Professional
For the April 1, 2023 Through June 30, 2023**

<u>Activity/Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
<u>Business Operations</u>				
Foster, Charles	Managing Director	\$660	4.1	\$2,706.00
Gotguelf, Larissa	Managing Director	\$660	22.1	\$14,586.00
	Activity Total		26.2	\$17,292.00
<u>Cash Management</u>				
Gotguelf, Larissa	Managing Director	\$660	7.5	\$4,950.00
	Activity Total		7.5	\$4,950.00
<u>D&A Claims Administration and Objections</u>				
Chuck, Brenton	Senior Director	\$605	2.2	\$1,331.00
Patel, Brinda	Senior Consultant	\$460	0.5	\$230.00
	Activity Total		2.7	\$1,561.00
<u>Distribution Plan</u>				
Gotguelf, Larissa	Managing Director	\$660	5.6	\$3,696.00
	Activity Total		5.6	\$3,696.00
<u>Employee Retention/Matters</u>				
Gotguelf, Larissa	Managing Director	\$660	0.7	\$462.00
	Activity Total		0.7	\$462.00
<u>Litigation Consulting</u>				
Gotguelf, Larissa	Managing Director	\$660	6.5	\$4,290.00
	Activity Total		6.5	\$4,290.00
<u>Status Reports (SEC and court)</u>				
Gotguelf, Larissa	Managing Director	\$660	7.4	\$4,884.00
	Activity Total		7.4	\$4,884.00
<u>Tax Issues</u>				
Gotguelf, Larissa	Managing Director	\$660	13.4	\$8,844.00
	Activity Total		13.4	\$8,844.00

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of FTI Consulting, Inc. Fees By Activity and Professional
For the April 1, 2023 Through June 30, 2023**

<u>Activity/Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
<u>Wind-Down of Operations</u>				
Chen, Yian	Director	\$570	2.7	\$1,539.00
Gotguelf, Larissa	Managing Director	\$660	53.9	\$35,574.00
	Activity Total		56.6	\$37,113.00
			<u>126.6</u>	<u>\$83,092.00</u>
	TOTALS		<u>126.6</u>	<u>\$83,092.00</u>

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of FTI Consulting, Inc. Expenses By Expense Type
For the Period April 1, 2023 Through June 30, 2023**

Expense Type	Total
	\$0.00
Total Expenses	\$0.00

EXHIBIT

C

Troy Greenfield, OSB #892534
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Lawrence R. Ream (Admitted Pro Hac Vice)
Email: lream@schwabe.com
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Attorneys for Receiver for Defendants AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC; AEQUITAS COMMERCIAL FINANCE, LLC; AEQUITAS CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT MANAGEMENT, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC;
AEQUITAS HOLDINGS, LLC;
AEQUITAS COMMERCIAL FINANCE,
LLC; AEQUITAS CAPITAL
MANAGEMENT, INC.; AEQUITAS
INVESTMENT MANAGEMENT, LLC;
ROBERT J. JESENİK; BRIAN A. OLIVER;
and N. SCOTT GILLIS,

Defendants.

No. 3:16-cv-00438-JR

**CERTIFICATION OF LAWRENCE R.
REAM IN SUPPORT OF RECEIVER'S
MOTION FOR APPROVAL OF TWENTY-
NINTH INTERIM FEE APPLICATION**

I, Lawrence R. Ream, certify as follows:

1. Attached is a true and accurate copy of the summary invoice for professional services rendered and expenses incurred on behalf of the Receivership Estate, by Schwabe

Williamson & Wyatt, for the period of April 1, 2023 through June 30, 2023.

2. I have reviewed the summary invoice as well as the underlying time entries and other supporting data.

3. To the best of my knowledge, information and belief formed after reasonable inquiry, the summary invoice and all fees and expenses therein are true and accurate and comply with the Billing Instructions For Receivers In Civil Actions Commenced By The U.S. Securities And Exchange Commission (the "Billing Instructions").

4. To the best of my knowledge, information and belief formed after reasonable inquiry, all fees contained in the summary invoice are consistent with the rates previously approved by the Court and the Commission Staff, and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed.

5. To the best of my knowledge, information and belief formed after reasonable inquiry, Schwabe Williamson & Wyatt has not included any amount for which reimbursement is sought for the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the allowable amounts set forth in the Billing Instructions).

6. To the best of my knowledge, information and belief formed after reasonable inquiry, in seeking reimbursement for a service justifiably purchased or contracted for from a third party, Schwabe Williamson & Wyatt requests reimbursement only for the amount billed to Schwabe Williamson & Wyatt by the third-party vendor and paid to such vendor.

Dated this 10th day of October, 2023.

/s/ Lawrence R. Ream
Lawrence R. Ream, on behalf of Schwabe
Williamson & Wyatt, P.C.

Schwabe Williamson & Wyatt

Summary of professional services rendered and expenses incurred in connection with the Aequitas Receivership matter for this Twenty-Ninth Application Period from April 1, 2023 through June 30, 2023, as summarized below.

Asset Analysis, Recovery, and Disposition

During this Twenty-Ninth Application Period, Schwabe continued to assist the Receiver in the analysis, negotiation, implementation and closing of various litigation and related recovery efforts, including the following work:

- Assist the Receiver and the Receiver's team regarding default judgment issue against a net winner defendant, including communication with the defendant and his counsel.
- Revise a net winner settlement agreement and communicate with a representative of the net winner and counsel for the net winner regarding settlement and payment terms.
- Assist the Receiver and the Receiver's team regarding a net winner's request to modify payment terms.

Continued Business Operations Issues

As the Receiver's general counsel, Schwabe consults with the Receiver, the Receiver's team and the remaining Receivership employees from time to time regarding operational issues, examples include the following work:

- Further work and communication with the Receiver and the Receiver's team regarding steps necessary to implement and complete the wind down of the Receivership.
- Correspond with the estate of Gerry Frank regarding and finalizing the transfer of the estates stock in CarePayment.
- Continued work on the notice, motion, declaration, exhibits and proposed order related to the fourth classification, allowance and distribution motion.
- Continued work and communications with the Receiver and the Receiver's team regarding Delaware Secretary of State processing requirements for the certificates of cancellation dissolving the twenty-one Delaware related legal entities and trusts.

Case Administration

As general counsel to the Receiver, Schwabe consults with the Receiver and the Receiver's team regarding the day-to-day issues that arise in the administration of this Receivership case, including the following work:

- Review and respond to third parties and the U.S. Attorneys' Office, regarding issues related to the criminal matters.
- Communicate and assist the Receiver and the Receiver's team regarding the Receiver's mandatory interim reports.

- Review and respond to inquiries from the Receiver's staff regarding the status of the various remaining entities, taxes, and related post-closing QSF issues.
- Communicate with various investors and counsel regarding the status of the Receivership, the fourth distribution motion, administrative issues, the winding up of the Receivership and transfer to the QSF.
- Communicate with the SEC Staff on numerous Receivership issues, including the status of net winner litigation, implementation and other issues related to the fourth distribution motion, final fee applications, and the termination of the Receivership and transfer of administrative matters to the QSF.
- Research and draft memorandum regarding issues that arise in the ordinary course of the Receivership.
- Prepare for and participate in regular calls with the Receiver and the Receiver's team regarding various issues and activities needed to accomplish the Receivership wind down.
- Respond to inquiries from the press.
- Continue to work with third parties accessing the Receivership's consolidated database.

Litigation

Schwabe provides litigation-related services and advice to the Receiver for matters including general litigation issues, and issues related to the assertion and the resolution of claims and disputes with investors, creditors and other interested parties, including the following work:

- File review, communication and work with the Receiver and the Receiver's team regarding service and other issues related to certain foreign defendants.
- Consult with the Receiver and the Receiver's team regarding filing dismissal motions as against certain net winner defendants.
- Communicate with and coordinate net winner payment arrangements.
- Consult with the Receiver and the Receiver's team regarding the remaining issues to resolve the outstanding claims and litigation matters prior to termination of the Receivership.

Schwabe

WILLIAMSON & WYATT®

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TAX ID# IRS-93-1130272

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS CAPITAL MANAGEMENT, INC.,
AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES (the "Receivership
Entity")

Case No. 3:16-cv-00438-JR

Summary of Professional Fees and Expenses for Schwabe, Williamson & Wyatt P.C.
For the Period April 1, 2023 through June 30, 2023

Professional Fees	\$119,054.50
Expenses	<u>\$16,507.84</u>
Total	\$135,562.34

TERMS: DUE AND PAYABLE UPON RECEIPT.

AMOUNTS UNPAID MORE THAN 30 DAYS AFTER INVOICING ARE SUBJECT TO A LATE PAYMENT CHARGE OF 9% PER ANNUM.

IOLTA PARTICIPANTS • PROCEEDS SUPPORT PUBLIC INTEREST OBJECTIVES OF THE LAW FOUNDATIONS.

ATTORNEY-CLIENT COMMUNICATION, PRIVILEGED AND CONFIDENTIAL.

Schwabe

WILLIAMSON & WYATT®

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 Mountain View, CA

TAX ID# IRS-93-1130272

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS CAPITAL MANAGEMENT, INC.,
 AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES (the "Receivership
 Entity")

Case No. 3:16-cv-00438-JR

Summary of Professional Fees by Professional for Schwabe, Williamson & Wyatt P.C.
 For the Period April 1, 2023 through June 30, 2023

Professional	Title	Hours	Rate	Amount
Bowman, Blake K	Shareholder	6.40	330.00	2,112.00
Gaylord, James "Jim" M	Associate	16.10	330.00	5,313.00
Greenfield, Troy D	Shareholder	32.10	490.00	15,729.00
Helton, Anna	Shareholder	13.60	465.00	6,324.00
Leigh, Davis B	Associate	2.70	330.00	891.00
McGraw, Holly E	Paralegal	0.50	230.00	115.00
Ream, Lawrence	Shareholder	125.80	510.00	64,158.00
Way, M John	Shareholder	52.50	465.00	24,412.50
Total Hours/Fees		249.70		119,054.50

TERMS: DUE AND PAYABLE UPON RECEIPT.

AMOUNTS UNPAID MORE THAN 30 DAYS AFTER INVOICING ARE SUBJECT TO A LATE PAYMENT CHARGE OF 9% PER ANNUM.

IOLTA PARTICIPANTS • PROCEEDS SUPPORT PUBLIC INTEREST OBJECTIVES OF THE LAW FOUNDATIONS.

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AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS CAPITAL MANAGEMENT, INC.,
 AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES (the "Receivership
 Entity")

Case No. 3:16-cv-00438-JR

Summary of Professional Fees by Task Code for Schwabe, Williamson & Wyatt P.C.
 For the Period April 1, 2023 through June 30, 2023

B101 - Asset Analysis & Recovery					
	Professional	Title	Rate	Hours	Amount
	Greenfield, Troy D	Shareholder	490.00	3.90	1,911.00
	Task Total			3.90	1,911.00

B103 – Ongoing Business Operations					
	Professional	Title	Rate	Hours	Amount
	Bowman, Blake K	Shareholder	330.00	6.40	2,112.00
	Gaylord, James "Jim" M	Associate	330.00	16.10	5,313.00
	Leigh, David B	Associate	330.00	0.50	165.00
	McGraw, Holly E	Paralegal	230.00	0.50	115.00
	Ream, Lawrence R	Shareholder	510.00	28.10	14,331.00
	Task Total			51.60	22,036.00

B105 – Case Administration					
	Professional	Title	Rate	Hours	Amount
	Greenfield, Troy D	Shareholder	490.00	22.50	11,025.00
	Leigh, Davis B	Associate	330.00	2.20	726.00
	Ream, Lawrence R	Shareholder	510.00	93.90	47,889.00
	Task Total			118.60	59,640.00

B108 – Receiver Plan & Analysis Issues					
	Professional	Title	Rate	Hours	Amount
	Way, M John	Shareholder	465.00	52.50	24,412.50
	Task Total			52.50	24,412.50

TERMS: DUE AND PAYABLE UPON RECEIPT.

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Summary of Professional Fees by Task for Schwabe, Williamson & Wyatt P.C.
 For the Period April 1, 2023 through June 30, 2023

B109 - Litigation					
	Professional	Title	Rate	Hours	Amount
	Greenfield, Troy D	Shareholder	490.00	5.70	2,793.00
	Helton, Anna	Shareholder	465.00	13.60	6,324.00
	Ream, Lawrence R	Shareholder	510.00	3.80	1,938.00
	Task Total			23.10	11,055.00
	Grand Total			249.70	119,054.50

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS CAPITAL MANAGEMENT, INC.,
 AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES (the “Receivership
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Summary of Expenses for Schwabe, Williamson & Wyatt P.C.
 For the Period April 1, 2023 through June 30, 2023

Expense Type	Quantity	Rate	Amount
Court Access Fee	1	12.80	12.80
Filing Fees	2		16,192.75
Online Research	3		302.29
Total Expenses			16,507.84

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