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Attorneys for Charles D. Scoville

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

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

TRAFFIC MONSOON, LLC, *et al.*,

Defendants.

MOTION FOR ATTORNEYS' FEES

Case No. 2:16-cv-00832-JNP

INTRODUCTION

Charles Scoville hereby moves the Court for an order directing the Receiver to pay attorney fees he incurred in appealing this Court's order from the assets of the Receivership Estate. Due to the difficulties Mr. Scoville has experienced, as previously documented in various filings including his Motion to Excuse Appearance of Defendant Charles Scoville at Upcoming Evidentiary Hearing and Motion to Excuse Compliance with Subpoena,¹ he has been unable to work to raise funds to pay his own attorneys' fees. Meanwhile, as the Court recognized during oral argument and in its written order granting the SEC's request for a preliminary injunction, the issues that Mr. Scoville has been litigating are important matters of first impression to the securities industry and to the Securities and Exchange Commission, which is charged with enforcing the statutes at issue in the Court's Memorandum Decision and Order Granting a Preliminary Junction and Denying Defendants' Motion to Set Aside the Receivership

¹ See Dkt. No. 138.

(Dkt. 79). The fees Mr. Scoville requests are entirely related to issues concerning the SEC's extraterritorial enforcement of the securities laws of the United States under *Morrison v. National Australia Bank Ltd.*, 561 U.S. 247 (2010).

APPLICABLE LAW

The decision to release frozen funds to pay attorney's fees "is entrusted to the discretion of the district court." *CFTC v. Am. Metals Exch. Corp.*, 991 F.2d 71, 79 (3d Cir. 1993). A number of courts, including courts in the District of Utah, have found that a court has the discretion to order that receivership assets be used to pay attorneys' fees in SEC enforcement actions, especially early in a case when issues related to the SEC's case are unsettled. *See e.g.*, *SEC v. DeYoung*, 2:14-cv-00309-RJS-DBP Dkt. Nos. 217, 147, 173 (granting fees of \$157,559.44 paid from receivership funds for litigant preparing for and participating in preliminary injunction hearing); *see also SEC v. Duclaud Gonzalez de Castilla*, 170 F. Supp. 2d 427, 430 (S.D.N.Y. 2001) ("It is well settled that this Court has authority . . . to release frozen personal assets" to pay attorney fees.); *SEC v. Dowdell*, 175 F. Supp. 2d 850, 855–56 (W.D.Va. 2001) (noting, in releasing portion of frozen funds to pay attorney fees, that "[t]his is a complex legal matter, and lawyers are essential to the presentation of issues related to it."); *SEC v. Int'l Loan Network, Inc.*, 770 F. Supp. 678, 680 (D.D.C. 1991) (mentioning that the court granted a modification of the asset freeze to permit defendants to retain counsel on their behalf). Because the creation of a receivership is an exercise of a court's equitable discretion, the court maintains discretion to modify its order and to direct the receiver to release funds to a defendant where it is equitable and appropriate to do so. *See Duclaud*, 170 F. Supp. 2d at 430. In doing so, the Court should "consider the fact the wrongdoing has not yet been proven." *F.T.C. v. Ideal Fin. Sols., Inc.*, 2:13-CV-00143-JAD-GW, 2014 WL 4541191, at *2 (D. Nev. 2014).

The *DeYoung* case cited above is an illustrative example of how these principles have been applied in this District. In that case, the defendant operated a business investing retirement funds. The SEC alleged that fraud coupled with poor investment decisions resulted in a shortfall

of \$24 million in the company's accounts. Nonetheless, the defendant sought and received payment of more than \$150,000 in attorney fees from the receivership estate which he used to litigate the case through the preliminary-injunction stage. Later in the case, the court denied subsequent motions for attorney fees because the Court found that case-determinative factual and legal issues had become settled and no longer justified payment of attorney fees.

ARGUMENT

I. THE COURT SHOULD ORDER FEES TO COMPENSATE MR. SCOVILLE'S ATTORNEYS FOR APPEALING THE ISSUES THAT THE COURT RECOGNIZED WERE UNSETTLED AND NECESSARY TO REVIEW.

In this case, the Court should order that fees incurred to appeal the Court's order granting the SEC's motion for a preliminary injunction (Dkt. 79) should be paid from Receivership funds. The reasons that such an order would be an equitable and just are as follows: (1) the *Morrison* issue—which was at the center of Defendants' opposition to the SEC's preliminary-injunction motion and Mr. Scoville's appeal—is an unsettled matter in the law, as there are no district-level or appeals-level decisions (prior to this Court's decision and the Tenth Circuit's opinion in this case) giving direction to citizens, regulators, or courts; (2) the issues Mr. Scoville is litigating are determinative of the majority of the issues in the case and a victory would result in the release of approximately 75% of the funds in the Receivership; and (3) Mr. Scoville's is unable to raise funds for his own support, much less to fund significant securities litigation.

To date, Mr. Scoville has incurred hundreds of thousands of dollars to fund his litigation. A large portion of those fees have been paid by family members and friends. However, the attorneys who were primarily responsible for preparing the briefs to the Tenth Circuit and Supreme Court have accrued unpaid fees and expenses of approximately \$270,000.² Mr. Scoville has no ability to pay these fees. If the Court does not order payment of these attorney

² See Exhibit A, invoices from Marquis Aurbach Coffing for preparing briefs in the Tenth Circuit appeal; see Exhibit B, invoices from Williams & Connolly LLP for preparing petition for writ of certiorari.

fees, his attorneys likely will never be paid for litigating the *Morrison* issue that remains undecided.

This case presents a significant issue in SEC enforcement actions: whether the amendment to the jurisdiction provisions of the Securities Act of 1933 and the Securities and Exchange Act of 1934 for SEC enforcement actions contained in Section 929P(b) of the Dodd-Frank of the Wall Street Reform and Consumer Protection Act Litigation expanded the scope of the anti-fraud provisions of those statutes. As the Court noted multiple times during argument³ and in its written order,⁴ the effect of these amendments was essentially undecided before this Court's decision. The Court recognized that further litigation would be beneficial and that payment of attorney fees would be necessary to accomplish that review.⁵ The Court recognized that its decision addressed an unsettled area of law and warranted immediate review when it certified its decision for immediate appeal. (Dkt. 79, § IV).

The importance of this issue to securities litigation has only grown since the Court's decision. The Court of Appeals principally addressed Section 929P(b) in affirming this Court's decision, thus creating a square holding on the legal question of the legal effect of that section's amendments. *SEC v. Scoville*, 913 F.3d 1204, 1215-19 (10th Cir. 2019). The matter is currently the subject of a petition for a writ of certiorari before the Supreme Court, in which *amici curiae* have filed a brief in favor of Mr. Scoville's petition. *See Scoville v. SEC*, S. Ct. No. 18-1566. After having sought extensions of its filing deadline, the SEC will be filing a brief in opposition in September.

The issue was also important to this litigation. As noted in the SEC's original pleadings and motion for preliminary injunction, more than 90% of the customers of Traffic Monsoon were

³ Tr. of Oral Argument on the Motion for a Preliminary Injunction and Motion to Set Aside the Receivership dated November 30, 2016 ("Nov. 30th Tr."), at 112:2–3 ("I think there's no controlling authority with respect to many of these issues.").

⁴ Dkt. 79 at p. 44 ("Although several district courts have noted the possibility that Section 929P9(b) may have superseded the *Morrison* test, none have actually decided the question.").

⁵ *See* Nov. 30th Tr. at 113:17–21 ("But I'm also cognizant of the fact that we can't get a meaningful discussion of the legal issues if the order that's in place prohibits the defendants from having enough assets to pay an attorney.")

outside of the United States. Even if all the claims of the “investors” in Traffic Monsoon within the United States were held in the Receivership Estate, at least 45 million dollars would be released from the Receivership Estate. Thus, this single issue surrounding *Morrison* has a dramatic effect on the funds in the Receivership and would change the need for and duties of the Receiver.

Finally, as the Court is now aware, Mr. Scoville has had numerous issues making it impossible for him to work to raise funds to defend this case. In light of those developments, there is no other route in place for the fees associated with his appeal to be paid. It is therefore likely the attorneys who prepared the appeal will never be paid without an order from this Court.

II. THE REQUESTED FEES ARE REASONABLE.

The fees sought by Mr. Scoville’s counsel are not only necessary, they are reasonable. Attached to this motion as Exhibit A and Exhibit B are redacted invoices from Mr. Scoville’s appellate counsel. The total of incurred but unpaid fees and expenses is \$270,093.22, and additional fees and expenses will be incurred for filing a reply brief in support of the petition for a writ of certiorari. The fees incurred by Marquis Aurbach Coffing, Mr. Scoville’s appellate counsel, reflect time spent on a thorough review of the District Court record, consultation with co-counsel, extensive research, consultation with Mr. Scoville on matters to be raised, replying to the SEC’s brief, preparing for oral argument (including mooted the argument), attending oral argument, and the costs incurred in assembling and serving briefs and in travelling to and attending the oral argument. The fees incurred by Williams & Connolly LLP included research of the issues to be presented in the petition, preparation of the petition, coordination with counsel, and communication with *amici curiae* and their counsel.

As the Court will recognize in reviewing the briefing before the Tenth Circuit and the petition for writ of certiorari currently before the Supreme Court, the ongoing appeal of issues raised in this Court has required hundreds of hours of work to develop and present argument addressing unsettled and complex issues of securities law and statutory interpretation.

Mr. Scoville's chosen counsel was reasonable. The attorneys primarily responsible for drafting the Tenth Circuit briefing, Micah Echols and Tom Stewart of Marquis Aurbach Coffing, are experienced attorneys who focus entirely on appellate practice. Mr. Echols has more than a decade of first-chair appellate experience in briefing and arguing issues to various courts of appeals. His expertise was crucial to the competent presentation of the issues in this case. Likewise, Mr. Stewart focuses entirely on appellate work, having authored briefs before various courts of appeals as well as arguing many cases before the Nevada Supreme Court.

Further, the attorneys at Williams & Connolly primarily responsible for drafting the petition for writ of certiorari have significant experience practicing before the appellate courts in general and the Supreme Court in particular. John Williams has argued before the Supreme Court, served as counsel for parties in other cases heard by the Court, and prepared numerous petitions for writs of certiorari. Appellate work also makes up a substantial portion of Thomas Chapman's practice, and he has been involved in the drafting of a merits brief and petitions for writs of certiorari in the Supreme Court.

To the extent the Court believes that further exploration of the reasonableness of fees is necessary, Mr. Scoville's counsel is prepared to present expert testimony from a local attorney who will opine that the amount of time spent on this matter was reasonable, that the hourly rate charged is reasonable, and that the services for which Mr. Scoville's counsel billed were necessary to this litigation.

CONCLUSION

Because this litigation centers on a previously undecided dispositive issue, which the Court recognized was unsettled and needed to be fully litigated, and because Mr. Scoville has been unable to fund a defense, the Court should order that his fees be paid from the Receivership Estate.

The fees incurred to date related to the appeal from the Court's order granting the SEC's preliminary injunction, totaling \$270,093.22, have been reasonable.

DATED: August 22, 2019

SMITH WASHBURN, LLP

 /s/ D. Loren Washburn
D. Loren Washburn
Attorneys for Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2019, the foregoing **MOTION FOR ATTORNEYS' FEES** was served on the person(s) named below via CM/ECF:

Daniel J. Wadley
Amy J. Oliver
Alison J. Okinaka
Cheryl M. Mori
SECURITIES EXCHANGE COMMISSION
351 South West Temple, Suite 6.100
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Attorneys for Securities and Exchange Commission

Peggy Hunt (Utah State Bar No. 6060)
Michael Thomson (Utah State Bar No. 9707)
John J. Wiest (Utah State Bar No. 15767)
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111 South Main Street, UT 84111-2176
Salt Lake City, UT 84111-2176
Email: hunt.peggy@dorsey.com, thomson.michael@dorsey.com
wiest.john@dorsey.com

Attorneys for Receiver Peggy Hunt

/s/ Pia Martinez

Exhibit A

**MARQUIS AURBACH
COFFING**

ATTORNEYS AT LAW

10001 PARK RUN DRIVE
LAS VEGAS, NEVADA 89145
Telephone 702-382-0711
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Traffic Monsoon, LLC
Attn: Charles David Scoville

Invoice 330069 - 354476
July 30, 2019

ID: 14779-001 - MSE

Re: Securities & Exchange Commission

For Services Rendered Through July 30, 2019

Current Fees	183,888.00
Current Disbursements	4,509.31
Total Current Charges	188,397.31

MARQUIS AURBACH COFFING P.C.

Traffic Monsoon, LLC
 Re: Securities & Exchange Commission
 I.D. 14779-001 - MSE

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Fees				
Date	Atty	Description	Hours	Amount
03/15/17	MSE	Receive telephone call from potential co-counsel regarding	0.60	225.00
03/28/17	MSE	Review and analyze preliminary injunction order.	1.00	375.00
03/29/17	LAD	Review docket and relevant documents and prepare notice of appeal to Tenth Circuit.	0.60	96.00
03/29/17	MSE	Telephone conference with client and co-counsel regarding	2.00	750.00
03/29/17	MSE	Outline list of tasks for Tenth Circuit appeal.	1.00	375.00
03/29/17	MSE	Review Tenth Circuit court rules in preparation for drafting detailed outline of Tenth Circuit appellate process and list of tasks.	3.00	1,125.00
03/30/17	MSE	Begin reviewing key documents for use in Tenth Circuit appeal.	3.00	1,125.00
03/30/17	MSE	Review District Court docket and select all necessary documents for inclusion in appendix for Tenth Circuit appeal.	1.00	375.00
03/30/17	LAD	Begin preparation of index to appellants' appendix for Tenth Circuit appeal.	1.90	304.00
03/30/17	MSE	Revise draft of notice of appeal.	0.10	37.50
03/30/17	MSE	Revise index to appellants' appendix and compare to District Court docket.	1.00	375.00
03/30/17	MSE	Review Tenth Circuit practitioner's guide and ECF guide in preparation for drafting detailed outline of Tenth Circuit appellate process and list of tasks.	3.00	1,125.00
03/30/17	MSE	Draft detailed outline and narrative of Tenth Circuit appellate process and list of tasks to be completed.	2.00	750.00
04/03/17	MSE	Telephone conference with John Durkin to	1.60	600.00
04/05/17	LAD	Review FRAP and Tenth Circuit local rules and prepare entry of appearance and certificate of interested parties.	0.50	80.00
04/06/17	MSE	Revise Tenth Circuit notice of appearance.	0.10	37.50
04/06/17	LAD	Prepare first draft of docketing statement for Tenth Circuit appeal.	2.50	400.00
04/07/17	MSE	Formulate issues on appeal and revise draft of Tenth Circuit docketing statement.	1.00	375.00
04/10/17	MSE	Exchange emails with client on	0.30	112.50
04/11/17	MSE	Telephone call with co-counsel regarding	0.40	150.00
04/14/17	MSE	Telephone conference with co-counsel	1.00	375.00
04/14/17	MSE	Separate telephone call with co-counsel regarding	0.20	75.00

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Date	Atty	Description	Hours	Amount
04/17/17	MSE	Review District Court filing of transmission of essential parts of the record to the Tenth Circuit.	0.20	75.00
04/17/17	MSE	Review docketing of Tenth Circuit appeal and exchange emails with co-counsel regarding :	0.20	75.00
04/18/17	LAD	Review 28 U.S.C. 1292 and prepare motion to confirm appellate jurisdiction.	0.80	128.00
04/18/17	MSE	Review letter from Tenth Circuit clerk docketing appeal and setting deadlines for appeal filings.	0.20	75.00
04/18/17	LAD	Add FRAP 25 certification and finalize entry of appearance and certificate of interested parties; prepare email to client regarding :	0.50	80.00
04/18/17	MSE	Review and revise updated version of Tenth Circuit notice of appearance.	0.10	37.50
04/18/17	MSE	Review and revise Tenth Circuit notice of no transcripts to be requested.	0.10	37.50
04/18/17	MSE	Review and revise Tenth Circuit motion to confirm appellate jurisdiction.	1.50	562.50
04/18/17	MSE	Perform legal research on :	1.00	375.00
04/21/17	MSE	Review SEC's notice of appearance and statement of interested parties.	0.20	75.00
04/21/17	MSE	Receive telephone call from _____ regarding _____	0.40	150.00
04/24/17	MSE	Review main deadlines in the appeal and revise email to _____	1.00	375.00
04/24/17	LAD	Draft correspondence regarding _____	0.20	32.00
04/25/17	LAD	Finalize docketing statement and notice of no transcripts.	0.30	48.00
04/25/17	MSE	Exchange several emails with _____	0.40	150.00
04/25/17	MSE	Exchange emails with _____ regarding _____	0.20	75.00
04/26/17	MSE	Review detailed responses from _____ Reply to same	1.40	525.00
04/26/17	MSE	Review Tenth Circuit minute order requesting District Court to confirm that the record is complete.	0.10	37.50
04/26/17	MSE	Review email from SEC's appellate attorney with position on proposed motion to confirm jurisdiction. Discuss same with _____	0.50	187.50
04/27/17	MSE	Review email from _____ Reply to same.	0.20	75.00
04/27/17	MSE	Review sample Tenth Circuit briefs in previous prevailing cases in preparation for drafting opening brief.	1.40	525.00
04/27/17	MSE	Exchange additional emails with co-counsel	0.20	75.00
04/27/17	MSE	Review Tenth Circuit mediation letter and draft email to _____ regarding _____	0.30	112.50
04/28/17	MSE	Make various revisions to draft of Tenth Circuit motion to confirm	1.00	375.00

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Date	Atty	Description	Hours	Amount
04/28/17	MSE	jurisdiction to explain and respond to SEC's position on jurisdiction. Review websites for in Tenth Circuit proceedings. Draft emails requesting :	2.00	750.00
05/01/17	LAD	Make final technical revisions to motion to confirm appellate jurisdiction; finalize motion with exhibits.	0.70	112.00
05/01/17	MSE	Make final edits to draft of Tenth Circuit motion to confirm jurisdiction.	0.20	75.00
05/01/17	LAD	Prepare correspondence to regarding	0.70	112.00
05/02/17	MSE	Review and revise correspondence to regarding	0.80	300.00
05/02/17	LAD	Finalize correspondence to	0.10	16.00
05/02/17	LAD	Begin preparation of appellants' appendix; review of each selected document and begin making required omissions and redactions according to FRAP 30(a) and Circuit Rules 30(D).	3.40	544.00
05/03/17	MSE	Review Tenth Circuit order denying without prejudice motion to confirm jurisdiction.	0.20	75.00
05/04/17	MSE	Review Tenth Circuit rules on jurisdictional motions and draft detailed email to :	1.00	375.00
05/04/17	MSE	Receive telephone call from to discuss	0.50	187.50
05/04/17	MSE	Review detailed response to	0.50	187.50
05/04/17	LAD	Continue preparation of appellants' appendix; continue review of each selected document and continue making required omissions and redactions according to FRAP 30(a) and Circuit Rules 30(D).	4.20	672.00
05/06/17	MSE	Review regarding	0.20	75.00
05/08/17	LAD	Continue preparation of appellants' appendix; finish review of each selected document and finish making required omissions and redactions according to FRAP 30(a) and Circuit Rules 30(D).	1.60	256.00
05/08/17	MSE	Exchange emails with on the	0.20	75.00
05/12/17	MSE	Meeting with to discuss	5.00	1,875.00
05/15/17	MSE	Confer with staff on clerk's position that deadlines for briefing have not yet started.	0.20	75.00
05/18/17	MSE	Begin reviewing documents in current appendix to omit memoranda and potentially unnecessary pages of transcripts.	1.50	562.50
05/23/17	MSE	Review emails from Receive message from Tenth Circuit clerk on lack of confirmation by District Court that record is complete. Draft status email to	1.00	375.00

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Date	Atty	Description	Hours	Amount
05/24/17	MSE	Telephone call with to discuss	1.00	375.00
05/25/17	MSE	Review minute order and letter from Tenth Circuit clerk directed to District Court clerk to confirm that the record is complete. Draft email to	0.40	150.00
05/26/17	MSE	Begin reviewing District Court record in its entirety for purposes of narrowing Tenth Circuit appendix.	1.80	675.00
05/29/17	MSE	Review District Court letter confirming that the record is complete and Tenth Circuit notice with deadline for opening brief and appendix. Draft email to	0.40	150.00
05/31/17	MSE	Receive voice messages from regarding Review relevant information and draft email to	0.50	187.50
05/31/17	MSE	Review new United States Supreme Court opinion discussing	1.50	562.50
06/01/17	MSE	Continue reviewing District Court record in its entirety for purposes of narrowing Tenth Circuit appendix.	4.70	1,762.50
06/05/17	MSE	Exchange emails with regarding	0.50	187.50
06/09/17	MSE	Review email from Reply to same.	0.40	150.00
06/09/17	MSE	Exchange additional emails with	0.30	112.50
06/12/17	MSE	Review new United States Supreme Court case law on	1.00	375.00
06/12/17	LAD	Legal research of FRAP 27 regarding requirements for a motion for extension of time; prepare motion for extension of time to file the opening brief.	1.40	224.00
06/12/17	MSE	Exchange emails with	0.30	112.50
06/12/17	MSE	Revise and finalization of Tenth Circuit motion for extension of time to file opening brief and appendix.	0.20	75.00
06/13/17	MSE	Exchange emails with opposing attorney for the SEC regarding extensions of time for Tenth Circuit briefing.	0.20	75.00
06/16/17	MSE	Review clerk's order approving extension of time to file opening brief and appendix.	0.10	37.50
07/05/17	MSE	Review new opinion discussing	1.00	375.00
07/10/17	MSE	Begin reviewing additional documents in District Court record to determine which filings should be omitted from Tenth Circuit appendix based upon appellate rules.	5.00	1,875.00
07/11/17	MSE	Emails and telephone call with regarding	1.00	375.00

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Date	Atty	Description	Hours	Amount
07/11/17	MSE	Continue reviewing additional documents in District Court record to determine which filings should be omitted from Tenth Circuit appendix based upon appellate rules.	4.00	1,500.00
07/11/17	MSE	Review case law sent by	1.50	562.50
07/12/17	MSE	Finish reviewing additional documents in District Court record to determine which filings should be omitted from Tenth Circuit appendix based upon appellate rules.	6.00	2,250.00
07/12/17	MSE	Review prior version of index to appellants' appendix for the Tenth Circuit and select various documents to be omitted based upon appellate rules.	2.00	750.00
07/13/17	LAD	Continue preparation of appellants' appendix; prepare documents for volumes 1-3 with bates numbering; revise index to include numbering for each document.	4.20	672.00
07/14/17	MSE	Review missing docket entries 49 and 50. Omit same from index to appellants' appendix.	0.30	112.50
07/14/17	LAD	Continue preparation of appellants' appendix; prepare documents for volumes 4-6 with bates numbering; revise index to include numbering for each document.	4.10	656.00
07/14/17	MSE	Review and respond to emails from co-counsel and receiver regarding potential stipulation to dismiss Traffic Monsoon.	0.20	75.00
07/17/17	LAD	Continue preparation of appellants' appendix; prepare documents for volumes 7-9 with bates numbering; revise index to include numbering for each document.	5.60	896.00
07/18/17	LAD	Continue preparation of appellants' appendix; convert documents to searchable text and add bookmarks to volumes 1-4 pursuant to Tenth Circuit CM/ECF rules.	3.60	576.00
07/19/17	LAD	Prepare second motion for extension of time to file opening brief and appendix.	0.30	48.00
07/19/17	LAD	Continue preparation of appellants' appendix; convert documents to searchable text and add bookmarks to volumes 5-9 pursuant to Tenth Circuit CM/ECF rules.	4.10	656.00
07/20/17	MSE	Review and revise cover pages for nine Tenth Circuit appendix volumes.	0.80	300.00
07/20/17	MSE	Review and revise second motion for extension of time to file opening brief and appendix.	0.50	187.50
07/20/17	MSE	Review and revise updated (with page numbers) index to appellants' appendix for Tenth Circuit appeal.	1.20	450.00
07/21/17	MSE	Prepare for and telephone conference with opposing attorney for the receiver and co-counsel to discuss issues regarding inclusion of Traffic Monsoon in Tenth Circuit appeal.	0.50	187.50
07/22/17	MSE	Lengthy telephone call with _____ to provide	2.00	750.00

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Date	Atty	Description	Hours	Amount
07/26/17	MSE	Review Tenth Circuit order approving in part second extension of time to file opening brief and appendix.	0.10	37.50
08/07/17	MSE	Review District Court pleadings for operative statutes and review same.	3.00	1,125.00
08/07/17	MSE	Begin identifying key authorities in District Court pleadings to review for argument.	3.50	1,312.50
08/08/17	MSE	Finish identifying key authorities in District Court pleadings and compile list of cases to read.	2.80	1,050.00
08/09/17	MSE	Review holdings in key cases to structure issues on appeal for Tenth Circuit opening brief.	5.00	1,875.00
08/10/17	MSE	Draft detailed outline of Tenth Circuit opening brief.	2.00	750.00
08/10/17	MSE	Review relevant statutes and relevant portions of the record and draft jurisdictional statement for Tenth Circuit opening brief.	2.50	937.50
08/11/17	MSE	Refine stated issues on appeal in Tenth Circuit brief.	0.80	300.00
08/11/17	MSE	Begin reviewing hearing transcript from day 1 of evidentiary hearing and take notes on important points, including review of exhibits mentioned.	4.50	1,687.50
08/14/17	MSE	Draft rough version of lengthy statement of the case/summary of argument section for Tenth Circuit opening brief.	6.50	2,437.50
08/14/17	MSE	Add record citations into statement of the case/summary of argument section for Tenth Circuit opening brief.	1.50	562.50
08/15/17	MSE	Review main cases for argument points and add to statement of the case/summary of argument section for Tenth Circuit opening brief.	3.00	1,125.00
08/18/17	MSE	Finish reviewing hearing transcript from day 1 of evidentiary hearing and take notes on important points, including review of exhibits mentioned.	4.00	1,500.00
08/21/17	MSE	Exchange emails with regarding	0.30	112.50
08/22/17	LAD	Status email to	0.10	16.00
08/27/17	MSE	Telephone call with to discuss	2.00	750.00
08/28/17	MSE	Begin reviewing hearing transcript from day 2 of evidentiary hearing and take notes on important points, including review of exhibits mentioned.	4.50	1,687.50
08/29/17	MSE	Finish reviewing hearing transcript from day 1 of evidentiary hearing and take notes on important points, including review of exhibits mentioned.	5.00	1,875.00
08/30/17	MSE	Email and telephone call with regarding	0.50	187.50
08/30/17	MSE	Review District Court oral argument hearing transcript, including referenced exhibits and case law.	6.00	2,250.00
08/31/17	MSE	Perform factual research on traffic exchanges online to provide background in Tenth Circuit opening brief.	3.60	1,350.00

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Date	Atty	Description	Hours	Amount
09/01/17	LAD	Prepare bound copies of appellants' appendix, volumes 1-9, for Tenth Circuit Court.	4.30	688.00
09/01/17	MSE	Draft factual and procedural background section of Tenth Circuit opening brief on background information on traffic exchanges.	2.00	750.00
09/01/17	MSE	Draft factual and procedural background section of Tenth Circuit opening brief on the SEC's complaint and ex parte orders obtained by the SEC, including review of relevant parts of the record and citations to the record.	6.20	2,325.00
09/02/17	MSE	Draft lengthy section of Tenth Circuit opening brief on evidentiary hearing and resulting orders, including review of relevant parts of the record and citations to the record.	8.00	3,000.00
09/03/17	MSE	Perform legal research on .	1.50	562.50
09/03/17	MSE	Draft standards of review section for Tenth Circuit opening brief.	0.50	187.50
09/04/17	MSE	Outline detailed legal argument section headings for first legal argument on the non-existence of a security.	1.00	375.00
09/04/17	MSE	Perform legal research on	3.20	1,200.00
09/04/17	MSE	Begin drafting first legal argument on the lack of a security, including review of relevant legal authorities and relevant portions of the record.	4.50	1,687.50
09/05/17	LAD	Prepare correspondence to Tenth Circuit Court regarding bound copy of appellants' appendix.	0.10	16.00
09/05/17	LAD	Prepare third motion for extension of time to file appellants' opening brief.	0.50	80.00
09/05/17	MSE	Continue drafting first legal argument on the lack of a security, including review of relevant legal authorities and relevant portions of the record.	3.50	1,312.50
09/06/17	MSE	Finish drafting first legal argument on the lack of a security, including review of relevant legal authorities and relevant portions of the record.	3.00	1,125.00
09/06/17	MSE	Make initial revisions to first legal argument on the lack of a security, including further review of relevant legal authorities and relevant portions of the record.	1.00	375.00
09/07/17	MSE	Review Tenth Circuit order granting request for extension. Communicate same to	0.10	37.50
09/07/17	MSE	Review Morrison opinion and extensively highlight specific language to be used in Tenth Circuit opening brief.	1.80	675.00
09/07/17	MSE	Outline specific legal argument sections to be used in second legal argument on Morrison for Tenth Circuit opening brief.	1.00	375.00
09/07/17	MSE	Perform legal research on	4.50	1,687.50
09/07/17	MSE	Begin drafting second legal argument on Morrison, including review of relevant legal authorities and relevant portions of the record.	3.00	1,125.00
09/08/17	MSE	Continue drafting second legal argument on Morrison, including review	5.30	1,987.50

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Date	Atty	Description	Hours	Amount
		of relevant legal authorities and relevant portions of the record.		
09/09/17	MSE	Continue drafting second legal argument on Morrison, including review of relevant legal authorities and relevant portions of the record.	5.80	2,175.00
09/10/17	MSE	Finish drafting second legal argument on Morrison, including review of relevant legal authorities and relevant portions of the record.	3.60	1,350.00
09/10/17	MSE	Make initial revisions to second legal argument on Morrison, including further review of relevant legal authorities and relevant portions of the record.	1.50	562.50
09/10/17	MSE	Draft detailed legal argument sections for third argument section on the non-existence of a Ponzi scheme.	1.00	375.00
09/10/17	MSE	Perform legal research on	1.80	675.00
09/10/17	MSE	Begin drafting third legal argument section on the non-existence of a Ponzi scheme, including review of relevant legal authorities and relevant portions of the record.	4.20	1,575.00
09/11/17	LAD	Prepare addendum and exhibits to opening brief.	0.70	112.00
09/11/17	MSE	Review second proposed stipulation from the receiver and forward same to co-counsel with initial impressions.	0.30	112.50
09/11/17	MSE	Finish drafting third legal argument section on the non-existence of a Ponzi scheme, including review of relevant legal authorities and relevant portions of the record.	3.50	1,312.50
09/11/17	MSE	Make initial revisions to third legal argument section on the non-existence of a Ponzi scheme, including further review of relevant legal authorities and relevant portions of the record.	1.00	375.00
09/11/17	MSE	Draft fourth legal argument section on partial release of Traffic Monsoon funds, including review of relevant legal authorities and relevant parts of the record.	2.00	750.00
09/11/17	MSE	Make initial revisions to fourth legal argument section on partial release of Traffic Monsoon funds.	0.50	187.50
09/11/17	MSE	Begin comprehensive revisions and additions to completed draft of Tenth Circuit opening brief, including confirmation of legal citations and record citations.	3.50	1,312.50
09/12/17	LAD	Make technical revisions to appellants' opening brief.	3.70	592.00
09/12/17	LAD	Mark all cited authority in appellants' opening brief and prepare table of authorities and table of contents.	3.20	512.00
09/12/17	LAD	Finalize tables, addendum, and exhibits for appellants' opening brief.	1.40	224.00
09/12/17	MSE	Finish comprehensive revisions and additions to completed draft of Tenth Circuit opening brief, including confirmation of legal citations and record citations.	4.00	1,500.00
09/12/17	MSE	Perform clean edit of Tenth Circuit opening brief to bring total word count within 13,000 word limit.	4.60	1,725.00
09/12/17	MSE	Revise and finalization of table of contents and table of authorities for Tenth Circuit opening brief.	0.90	337.50

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Date	Atty	Description	Hours	Amount
09/13/17	LAD	Prepare bound copies of appellants' opening brief for Tenth Circuit Court.	1.70	272.00
09/13/17	LAD	Revise appellants' appendix to comply with Court's notice dated September 13, 2017.	3.70	592.00
09/14/17	MSE	Review minute order from Tenth Circuit setting deadline for the SEC's answering brief.	0.10	37.50
09/15/17	MSE	Draft email to	0.30	112.50
09/21/17	MSE	Draft separate emails to regarding	0.30	112.50
09/23/17	MSE	Travel to downtown Las Vegas to meet with co-counsel to discuss	3.00	1,125.00
09/24/17	MSE	Lengthy telephone call with to review	3.00	1,125.00
10/03/17	MSE	Exchange emails with	0.40	150.00
10/10/17	MSE	Exchange emails with	0.20	75.00
10/16/17	LAD	Prepare motion for extension of time to file reply brief.	0.70	112.00
10/16/17	MSE	Initial review of the SEC's Tenth Circuit answering brief. Draft email to regarding	1.60	600.00
10/16/17	MSE	Revise motion to extend time to file Tenth Circuit reply brief.	0.20	75.00
10/17/17	MSE	Review minute order from Tenth Circuit confirming current October 30 deadline for reply brief.	0.10	37.50
10/18/17	TWS	Research	3.50	875.00
10/18/17	MSE	Receive telephone call regarding	0.50	187.50
10/18/17	MSE	Review emails from the receiver and the SEC regarding consent to allow the receiver to file an amicus brief.	0.30	112.50
10/18/17	MSE	Review results of legal research on	0.30	112.50
10/19/17	MSE	Exchange emails with opposing attorney for the SEC regarding any potential objection to extension of time to file reply brief.	0.20	75.00
10/19/17	MSE	Draft email to all counsel with Traffic Monsoon's inability to take a position on the receiver amicus brief without first seeing the brief.	0.20	75.00
10/19/17	TWS	Assess, analyze and review Tenth Circuit law regarding	1.70	425.00
10/20/17	MSE	Review Tenth Circuit minute order granting motion in part to extend deadline to file reply brief.	0.10	37.50
10/23/17	MSE	Review the receiver's motion for leave to file amicus brief and discuss	0.50	187.50

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Date	Atty	Description	Hours	Amount
		points for opposition.		
10/23/17	TWS	Assess, analyze and review receiver's motion for leave to file amicus curiae brief.	1.00	250.00
10/23/17	MSE	Review Tenth Circuit order requiring any oppositions to receiver's motion for leave to file amicus to be filed within 7 days.	0.10	37.50
10/24/17	TWS	Continue drafting opposition to motion for leave to file amicus brief.	2.70	675.00
10/25/17	TWS	Finish drafting opposition to motion for leave to file amicus brief.	3.60	900.00
10/30/17	MSE	Review time table with Tom to complete draft of Tenth Circuit reply brief.	0.30	112.50
11/01/17	TWS	Continue to thoroughly assess, analyze and review existing case record in preparation of Tenth Circuit reply brief.	2.60	650.00
11/02/17	TWS	Continue to thoroughly assess, analyze and review case record in preparation of drafting Tenth Circuit reply brief.	3.60	900.00
11/02/17	TWS	Review reply in support of amicus brief.	0.60	150.00
11/03/17	LAD	Prepare second motion for extension of time to file reply brief.	0.60	96.00
11/03/17	TWS	Thoroughly assess, analyze and review SEC briefs and related materials in preparation of drafting in Tenth Circuit reply.	4.10	1,025.00
11/03/17	TWS	Thoroughly assess, analyze and review binding Supreme Court precedent and related caselaw in preparation of drafting in Tenth Circuit reply.	4.20	1,050.00
11/06/17	MSE	Review Tenth Circuit orders granting an extension of time to file reply brief and conditionally allowing receiver amicus brief.	0.30	112.50
11/06/17	MSE	Exchange emails with	0.20	75.00
11/13/17	TWS	Strategize with MSE on	0.60	150.00
11/13/17	TWS	Begin drafting section of Tenth Circuit reply brief regarding Morrison's applicability.	3.40	850.00
11/13/17	TWS	Begin drafting section of Tenth Circuit reply brief regarding relevant sections of Securities and Exchange Act of 1934 and their inapplicability to foreign transactions.	2.80	700.00
11/13/17	MSE	Evaluate strengths and weaknesses of potential arguments for Tenth Circuit reply brief. Identify certain arguments and evidence to support arguments.	0.80	300.00
11/14/17	TWS	Begin drafting section of Tenth Circuit reply brief discussing SEC's faulty application of agency deference.	2.40	600.00
11/14/17	TWS	Continue drafting section of Tenth Circuit reply brief discussing Section 10(b)'s lack of extraterritorial application.	2.10	525.00
11/15/17	TWS	Continue drafting section of Tenth Circuit reply brief regarding SEC's improper analysis of Morrison and extraterritoriality.	2.60	650.00
11/15/17	TWS	Begin drafting section of Tenth Circuit reply brief regarding Traffic Monsoon not involving securities.	2.40	600.00
11/16/17	TWS	Continue drafting Tenth Circuit reply brief section on inapplicability of	2.50	625.00

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Date	Atty	Description	Hours	Amount
		Section 10b		
11/16/17	TWS	Begin drafting introduction to Tenth Circuit reply brief.	2.70	675.00
11/16/17	TWS	Continue drafting Tenth Circuit reply brief section on SEC's incorrect usage of Chevron deference to instant matter.	2.40	600.00
11/16/17	MSE	Review various emails addressing	0.40	150.00
11/17/17	TWS	Continue drafting section of Tenth Circuit reply brief regarding Section 10(b)'s lack of extraterritorial application.	2.40	600.00
11/17/17	TWS	Continue drafting section of Tenth Circuit reply brief regarding inapplicability of Chevron deference.	2.70	675.00
11/17/17	TWS	Continue drafting section of Tenth Circuit reply brief regarding conduct-and-effect test's prior case law being irrelevant for instant appeal.	2.10	525.00
11/17/17	TWS	Continue drafting section of Tenth Circuit reply brief regarding Traffic Monsoon not constituting a Ponzi.	1.90	475.00
11/18/17	TWS	Continue work on Tenth Circuit reply brief section regarding Section 10b's inapplicability.	4.50	1,125.00
11/18/17	TWS	Finish initial draft of Tenth Circuit reply brief's section on why AdPacks are not securities.	4.50	1,125.00
11/18/17	TWS	Begin drafting section of Tenth Circuit reply brief regarding Traffic Monsoon failing to meet elements of Ponzi scheme.	1.10	275.00
11/19/17	TWS	Continue Tenth Circuit reply brief.	3.40	850.00
11/21/17	TWS	Finalize initial draft of Tenth Circuit reply brief; send same to MSE.	3.80	950.00
11/22/17	MSE	Review and evaluate initial draft of Tenth Circuit reply brief.	1.50	562.50
11/24/17	MSE	Review record and compile list of additional factual issues to support factual assertions in Tenth Circuit reply brief.	3.50	1,312.50
11/24/17	MSE	Review legal authorities cited in Tenth Circuit reply brief and identify additional areas of research for next draft of reply brief.	2.80	1,050.00
11/24/17	MSE	Begin reviewing legal research on new areas of research for draft of Tenth Circuit reply brief.	3.40	1,275.00
11/27/17	TWS	Apply final edits to Tenth Circuit reply brief; discuss same with MSE	1.70	425.00
11/27/17	LAD	Make technical revisions to reply brief; mark all cited authority and prepare table of contents and table of authorities; finalize brief.	3.10	496.00
11/27/17	MSE	Finish reviewing legal research on new areas of research for draft of Tenth Circuit reply brief.	3.00	1,125.00
11/27/17	MSE	Draft additional factual information into draft of Tenth Circuit reply brief.	1.60	600.00
11/27/17	MSE	Draft additional information into Tenth Circuit reply brief regarding new legal research.	2.20	825.00
11/27/17	MSE	Make final revisions and edits to draft of Tenth Circuit reply brief.	1.70	637.50
11/27/17	MSE	Revise and finalization of table of contents and table of authorities for Tenth Circuit reply brief.	0.40	150.00
11/28/17	LAD	Prepare correspondence to Clerk of the Tenth Circuit regarding copies of opening brief.	0.20	32.00

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Date	Atty	Description	Hours	Amount
11/28/17	LAD	Prepare 7 bound paper copies of reply brief for Tenth Circuit.	1.30	208.00
11/29/17	MSE	Telephone call with regarding	0.50	187.50
12/08/17	TWS	Assess, analyze and review notice of change of address.	0.10	25.00
12/08/17	MSE	Review Tenth Circuit oral argument schedule for 2018; draft email to	0.20	75.00
12/11/17	MSE	Exchange emails with client on possibility of settlement of entire case.	0.20	75.00
01/11/18	TWS	Assess, analyze and review Tenth Circuit email setting argument date.	0.10	25.00
01/11/18	MSE	Review notice of oral argument setting and related documents. Exchange emails with	0.40	150.00
01/15/18	MSE	Telephone call with to discuss	1.20	450.00
01/16/18	MSE	Review acknowledgement form from Shirey to argue for the SEC in the Tenth Circuit.	0.10	37.50
01/16/18	TWS	Assess, analyze and review SEC's calendar acknowledgment form.	0.10	25.00
01/17/18	TWS	Meet with MSE regarding oral argument and preparation schedule; review email from MSE regarding the same.	0.40	100.00
01/17/18	MSE	Communicate with regarding Confirm points in lengthy email.	1.50	562.50
01/18/18	TWS	Research in preparation for oral argument/subsequent filings; email regarding	0.40	100.00
02/09/18	LAD	Begin preparation of master table of authorities for oral argument.	1.20	192.00
02/12/18	TWS	Research Tenth Circuit case law regarding discuss same with	1.80	450.00
02/12/18	TWS	Draft email to regarding	0.90	225.00
02/12/18	MSE	Review emails from Discuss points of legal research with and evaluate	1.00	375.00
02/14/18	MSE	Telephone conference with regarding Discuss same with	0.60	225.00
02/20/18	LAD	Continue preparation of master table of authorities for oral argument; continue adding summary notations for each cited authority.	1.30	208.00
02/26/18	LAD	Continue preparation of master table of authorities for oral argument; finish adding summary notations for each cited authority in opening brief.	2.20	352.00
02/26/18	LAD	Continue preparation of master table of authorities for oral argument; list out all cited authority in the answering brief and begin adding summary notations for each authority.	3.50	560.00
02/28/18	LAD	Continue preparation of master table of authorities for oral argument; continue adding summary notations for each authority in answering brief.	4.60	736.00
03/01/18	LAD	Continue preparation of master table of authorities for oral argument;	0.60	96.00

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Date	Atty	Description	Hours	Amount
		finish adding summary notations for each authority in answering brief.		
03/01/18	LAD	Continue preparation of master table of authorities for oral argument; list out all cited authority in the receiver's amicus brief and add summary notations for each authority.	0.70	112.00
03/02/18	LAD	Continue preparation of master table of authorities for oral argument; list out all cited authority in the reply brief and add summary notations for each authority.	3.20	512.00
03/05/18	LAD	Begin preparation of oral argument binder; gather and organize all cited case law.	4.10	656.00
03/05/18	LAD	Continue preparation of oral argument binder; gather and organize all cited regulatory law.	1.30	208.00
03/05/18	LAD	Continue preparation of oral argument binder; gather and organize all cited court rules.	0.30	48.00
03/05/18	LAD	Continue preparation of oral argument binder; gather and organize all cited statutory law.	1.40	224.00
03/06/18	LAD	Finish preparation of oral argument binder; gather and organize all other cited authorities and treatises.	0.50	80.00
03/06/18	LAD	Make technical revisions to master table of authorities and finalize for oral argument binder.	0.60	96.00
03/07/18	LAD	Prepare correspondence to prepare correspondence to	0.20	32.00
03/07/18	MSE	Review master table of authorities for Tenth Circuit oral argument.	1.50	562.50
03/12/18	LAD	Prepare notice of appeal from second amended order appointing receiver.	0.40	64.00
03/12/18	MSE	Review District Court's second amended order appointing receiver and calculate time to appeal from same.	0.80	300.00
03/12/18	MSE	Revise draft of District Court's second amended order appointing receiver.	0.20	75.00
03/12/18	MSE	Review Tenth Circuit argument calendar including identity of panel. Review short biographies of panel members.	0.60	225.00
03/12/18	MSE	Meeting with to discuss	0.50	187.50
03/12/18	MSE	Review key parts of the record, Tenth Circuit briefs, and key cases to prepare for meeting with	5.50	2,062.50
03/12/18	TWS	Begin preparation for moot court in Salt Lake in preparation for next week's oral argument.	1.00	250.00
03/13/18	MSE	Travel to Salt Lake City for lengthy meeting with co-counsel to discuss	12.00	4,500.00
03/13/18	TWS	Travel to and from Salt Lake for oral argument preparation with MSE and Loren Washburn; conduct oral argument prep.	12.00	3,000.00
03/14/18	MSE	Review email from receiver and documents related to sale of Manchester flat.	0.30	112.50

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Date	Atty	Description	Hours	Amount
03/14/18	MSE	Telephone call with regarding	0.20	75.00
03/16/18	MSE	Review brief filed in U.S. Supreme Court discussing	1.50	562.50
03/16/18	MSE	Review new case discussing	1.50	562.50
03/16/18	MSE	Review District Court filings from receiver to hold Charles in contempt for alleged transfer of Manchester flat.	0.60	225.00
03/19/18	MSE	Exchange emails with opposing attorney for the SEC regarding motion to supplement the record and separate motion to stay the second appeal.	0.20	75.00
03/19/18	LAD	Finalize motion to supplement the record under FRAP 10(e)(3), or alternatively, motion to take judicial notice under FRE 201(b); forward same to client with explanation of motion.	0.90	144.00
03/20/18	TWS	Travel to Denver for Tenth Circuit argument; final argument preparation with MSE and Loren Washburn.	7.00	1,750.00
03/20/18	MSE	Travel to Denver for Tenth Circuit oral argument and meet with co-counsel to discuss	7.00	2,625.00
03/21/18	TWS	Attend Tenth Circuit oral argument; debrief; travel home from Denver.	10.00	2,500.00
03/21/18	MSE	Attend Tenth Circuit oral argument, discuss and travel back to office in Las Vegas.	10.00	3,750.00
03/22/18	TWS	Assess, analyze and review order regarding oral argument.	0.10	25.00
03/26/18	LAD	Prepare docketing statement for appeal in Case No. 18-4038.	0.70	112.00
03/27/18	LAD	Prepare entry of appearance and certificate of interested parties for new appeal.	0.20	32.00
03/28/18	MSE	Draft docketing statement for new Tenth Circuit appeal.	1.00	375.00
03/28/18	LAD	Finalize entry of appearance and certificate of interested parties for second appeal.	0.10	16.00
03/28/18	LAD	Finalize docketing statement for second appeal.	0.40	64.00
03/28/18	MSE	Review and other recent authorities for possible FRAP 28(j) letter prior to decision.	1.00	375.00
03/28/18	MSE	Perform legal research on court rules and case law discussing	1.50	562.50
03/28/18	MSE	Perform legal research on discussing	2.00	750.00
04/02/18	MSE	Outline and draft Tenth Circuit motion to consolidate appeals or stay.	2.00	750.00
04/03/18	LAD	Make technical revisions to motion to consolidate appeal with Case No. 17-4059, or alternatively, motion to stay appeal pending resolution of Case No. 17-4059; finalize same.	0.40	64.00
04/03/18	MSE	Exchange emails with opposing attorney for the SEC regarding its position on consolidation or stay. Revise errata to motion regarding same.	0.60	225.00
04/03/18	LAD	Prepare errata to motion to consolidate appeal with Case No. 17-4059, or alternatively, motion for stay of appeal Pending resolution of appeal in	0.40	64.00

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Date	Atty	Description	Hours	Amount
		Case No. 17-4059.		
04/05/18	TWS	Assess, analyze and review receiver's notice of non-participation.	0.10	25.00
04/05/18	TWS	Assess, analyze and review SEC's response to motion to stay and consolidate.	0.20	50.00
04/05/18	MSE	Review the SEC's response to Traffic Monsoon's motion to consolidate appeals or stay.	0.30	112.50
04/05/18	MSE	Review the receiver's notice of non-participation in the second Tenth Circuit appeal.	0.10	37.50
04/06/18	MSE	Review Tenth Circuit order staying second appeal.	0.10	37.50
04/12/18	TWS	Assess, analyze and review motion to withdraw and order related thereto.	0.20	50.00
04/20/18	MSE	Draft detailed email	0.60	225.00
05/02/18	MSE	Telephone call to discuss	0.60	225.00
06/05/18	LAD	Prepare status report to Tenth Circuit regarding continued abatement of case pending resolution of Case No. 17-4059.	0.40	64.00
06/05/18	MSE	Revise Tenth Circuit status report and coordinate approval with co-counsel.	0.20	75.00
06/05/18	TWS	Assess, analyze and review status report filed with Tenth Circuit.	0.20	50.00
06/06/18	MSE	Review Tenth Circuit order setting schedule for status reports in second appeal.	0.10	37.50
06/20/18	MSE	Telephone call with regarding	0.40	150.00
06/21/18	MSE	Review documents in file and Tenth Circuit briefing regarding non-AdPack revenue. Draft email to regarding	1.30	487.50
06/22/18	MSE	Review new opinion from U.S. Supreme Court regarding Draft email to	0.80	300.00
06/22/18	TWS	Assess, analyze and review recent US Supreme Court case implicating	0.40	100.00
07/02/18	LAD	Prepare redacted invoice for motion on fees.	1.50	240.00
07/02/18	MSE	Review and edit redactions on copy of complete attorney fee and costs invoices.	0.80	300.00
07/17/18	MSE	Review Ninth Circuit opinion on application of	0.80	300.00
07/23/18	MSE	Review District Court motion for attorney fees and costs. Exchange emails with	0.30	112.50
07/30/18	LAD	Prepare second status report to Tenth Circuit Court pursuant to April 6, 2018 order.	0.10	16.00
07/30/18	MSE	Revise and finalization of Tenth Circuit status report for second appeal.	0.20	75.00

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Date	Atty	Description	Hours	Amount
07/31/18	TWS	Assess, analyze and review status report.	0.20	50.00
07/31/18	TWS	Assess, analyze and review order regarding future status report.	0.10	25.00
07/31/18	MSE	Review Tenth Circuit order continuing to abate second appeal from second amended receivership order.	0.10	37.50
10/01/18	MSE	Review and revise third status report for second Tenth Circuit appeal.	0.10	37.50
10/01/18	TWS	Assess, analyze and review status report and order continuing abatement of stay.	0.40	100.00
11/27/18	LAD	Prepare fourth status report pursuant to April 6, 2018 order.	0.20	32.00
11/29/18	TWS	Assess, analyze and review status report.	0.20	50.00
11/29/18	TWS	Assess, analyze and review order continuing abatement.	0.20	50.00
11/29/18	MSE	Review Tenth Circuit order continuing to abate second appeal pending the outcome of the first appeal.	0.10	37.50
01/24/19	MSE	Review Tenth Circuit's lengthy published opinion.	1.00	375.00
01/24/19	MSE	Review Tenth Circuit letter accompanying published opinion.	0.20	75.00
01/24/19	MSE	Draft lengthy email outlining	1.00	375.00
01/24/19	MSE	Exchange additional emails with regarding	0.20	75.00
01/28/19	MSE	Exchange emails with	0.40	150.00
01/29/19	LAD	Prepare fifth status report on abatement of Case No. 18-4038 to Tenth Circuit.	0.30	48.00
01/29/19	TWS	Assess, analyze and review status report.	0.20	50.00
01/29/19	MSE	Revise first draft of status report for second appeal in Tenth Circuit.	0.10	37.50
01/29/19	MSE	Telephone call with regarding	0.50	187.50
01/30/19	MSE	Additional emails and phone call regarding	0.80	300.00
01/30/19	MSE	Review file and send email to	0.30	112.50
02/04/19	TWS	Begin drafting motion to stay mandate.	1.10	275.00
02/05/19	TWS	Finish drafting motion to stay mandate; email same to Micah for review.	3.30	825.00
02/06/19	MSE	Review and begin revising draft of Tenth Circuit motion to stay mandate.	0.30	112.50
02/07/19	MSE	Exchange emails with opposing attorney for SEC regarding position on motion to stay mandate pending cert petition.	0.20	75.00
02/07/19	MSE	Review updated rules for the Tenth Circuit and the Supreme Court regarding staying mandate and grounds for certiorari.	1.30	487.50
02/07/19	MSE	Multiple phone calls with to discuss	2.00	750.00
02/07/19	MSE	Finish revising draft of Tenth Circuit motion to stay mandate.	1.00	375.00
02/08/19	MSE	Exchange emails with	0.20	75.00

MARQUIS AURBACH COFFING P.C.

Traffic Monsoon, LLC

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Date	Atty	Description	Hours	Amount
02/08/19	LAD	Finalize unopposed motion to stay mandate pending petition for a writ of certiorari.	0.10	16.00
02/12/19	TWS	Assess, analyze and review order granting in part and denying in part motion to stay mandate.	0.20	50.00
02/12/19	MSE	Review Tenth Circuit order granting motion to stay mandate.	0.20	75.00
02/14/19	MSE	Exchange emails with regarding	0.40	150.00
03/05/19	MSE	Telephone call with regarding	1.00	375.00
03/06/19	MSE	Draft email to regarding	0.20	75.00
03/07/19	MSE	Exchange emails with regarding	0.20	75.00
04/08/19	MSE	Exchange emails with	0.30	112.50
04/09/19	MSE	Exchange several emails with regarding	0.50	187.50
04/09/19	MSE	Telephone call with regarding	0.20	75.00
04/09/19	TWS	Assess, analyze and review initial draft of petition for certiorari.	1.70	425.00
04/10/19	MSE	Review draft of first application for extension of time to extend deadline to file petition for a writ of certiorari and exchange emails with regarding	0.40	150.00
04/10/19	MSE	Review FRAP rules on stay pending cert petition and exchange emails with	0.80	300.00
04/10/19	TWS	Begin drafting motion to extend stay of mandate.	2.10	525.00
04/11/19	TWS	Finish drafting motion to extend stay of mandate.	1.60	400.00
04/16/19	TWS	Finalize unopposed motion to extend stay mandate.	1.10	275.00
04/16/19	MSE	Review Supreme Court docket and revise draft Tenth Circuit motion for extension of stay of mandate.	0.30	112.50
04/16/19	TWS	Email motion to extend to co-counsel.	0.10	25.00
04/16/19	TWS	Email motion to extend to SEC's counsel.	0.10	25.00
04/17/19	TWS	Finalize motion to extend stay.	0.80	200.00
04/17/19	TWS	Email to SEC's counsel attaching new draft motion.	0.10	25.00
04/17/19	TWS	Email to regarding	0.10	25.00
04/17/19	LAD	Make technical revisions and finalize motion to extend stay of the mandate in Tenth Circuit Case No. 17-4059.	0.50	80.00
04/18/19	TWS	Assess, analyze and review order granting motion to extend stay.	0.10	25.00
04/18/19	TWS	Email order granting motion to extend stay to co-counsel.	0.10	25.00

MARQUIS AURBACH COFFING P.C.

Traffic Monsoon, LLC

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Page 19

Date	Atty	Description	Hours	Amount
04/18/19	TWS	Assess, analyze and review email from regarding	0.10	25.00
04/18/19	MSE	Review associated emails and Tenth Circuit order extending the stay of the mandate.	0.20	75.00
04/22/19	MSE	Review correspondence from Supreme Court approving extension of time to file certiorari petition.	0.20	75.00
05/08/19	MSE	Review and comment upon second United States Supreme Court application to extend time to file petition for a writ of certiorari.	0.30	112.50
05/09/19	MSE	Review emails from co-counsel notifying opposing attorneys of extension request for cert petition in Supreme Court.	0.20	75.00
05/09/19	TWS	Assess, analyze and review motion to extend time to file cert petition.	0.30	75.00
05/10/19	TWS	Begin drafting second motion to stay mandate.	1.60	400.00
05/13/19	MSE	Review Supreme Court notice granting second extension of time to file petition for a writ of certiorari.	0.20	75.00
05/13/19	MSE	Exchange email with	0.20	75.00
05/13/19	MSE	Review and approve Tenth Circuit motion to further stay the mandate in light of second extension granted by Supreme Court to file cert petition.	0.30	112.50
05/13/19	TWS	Finalize second motion to extend Tenth Circuit's stay; confer with SEC regarding the same.	0.60	150.00
05/15/19	MSE	Review Tenth Circuit order granting further extension of the stay of the mandate due to extended deadline to file cert petition. Exchange emails with	0.20	75.00
06/13/19	TWS	Assess, analyze and review draft cert petition; send email	2.50	625.00
06/18/19	MSE	Begin reviewing draft of Supreme Court petition for a writ of certiorari.	1.60	600.00
06/19/19	MSE	Finish reviewing draft of Supreme Court petition for a writ of certiorari. Draft email to	2.00	750.00
06/24/19	TWS	Draft motion to recall the mandate; confer with SEC regarding the same.	2.60	650.00
06/24/19	TWS	Draft status report regarding cert petition being filed.	0.80	200.00
06/24/19	LAD	Make revisions to unopposed motion to recall mandate to reflect filing of Supreme Court Clerk's letter regarding the filing of the petition for certiorari; prepare compliance certificate; finalize motion and exhibit.	0.40	64.00
06/24/19	MSE	Review mandate issued by Tenth Circuit.	0.10	37.50
06/24/19	MSE	Outline main points for Tenth Circuit motion to recall mandate.	0.30	112.50
06/24/19	MSE	Review and revise draft of Tenth Circuit motion to recall mandate and related status report.	0.20	75.00
06/24/19	MSE	Review correspondence from Supreme Court to Tenth Circuit indicating that cert petition was filed.	0.10	37.50
06/25/19	MSE	Review Tenth Circuit order recalling mandate in light of filing of	0.10	37.50

MARQUIS AURBACH COFFING P.C.

Traffic Monsoon, LLC

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Page 20

Date	Atty	Description	Hours	Amount
		Supreme Court petition for a writ of certiorari.		
07/18/19	MSE	Review SEC's motion for extension of time to file response to petition for a writ of certiorari, and court's approval.	0.40	150.00
07/22/19	MSE	Review email from	0.20	75.00
07/22/19	MSE	Begin reviewing amicus curiae brief filed by law professors in support of Scoville.	1.00	375.00
07/22/19	TWS	Assess, analyze and review amicus brief from securities law professors.	0.80	200.00
07/23/19	MSE	Finish reviewing amicus curiae brief filed by law professors in support of Scoville.	1.50	562.50
07/23/19	MSE	Review emails from	0.30	112.50
		Reply to same.		
07/23/19	MSE	Draft email to regarding	0.40	150.00
07/24/19	MSE	Telephone conference with regarding	0.40	150.00
07/27/19	MSE	Telephone call with regarding	0.30	112.50
Total Fees			593.20	183,888.00

Disbursements

Date	Description	Amount
	Pacer; Online Records Review	21.60
	Westlaw Research	1,342.29
09/12/17	Check Issued; Overnight delivery; Federal Express	63.55
10/13/17	Check Issued; Overnight delivery; Federal Express	64.47
12/19/17	Check Issued; Overnight delivery; Federal Express	36.35
01/31/18	Travel Expenses; R - Airfare to/from Denver for oral argument - Micah Echols and Tom Stewart	499.92
01/31/18	Travel Expenses; R - Airfare to/from Salt Lake City for oral argument preparation meeting - Micah Echols and Tom Stewart	259.92
03/31/18	Travel Expenses; R - Parking while attending oral argument in Utah	16.00
03/31/18	Travel Expenses; R - Uber fee to co-counsel's office for oral argument preparation meeting	20.15
03/31/18	Travel Expenses; R - Uber fee from co-counsel's office after oral argument preparation meeting	26.83
03/31/18	Travel Expenses; R - Parking fee while attending oral argument preparation meeting in Utah	23.00
03/31/18	Travel Expenses; R - Uber fee to oral argument in Colorado	56.00
03/31/18	Travel Expenses; R - Hotel fee while attending oral argument in Colorado	491.58
03/31/18	Travel Expenses; R - Uber to oral argument preparation meeting in Utah	20.15
07/31/18	Online Filing Fees	3.50

MARQUIS AURBACH COFFING P.C.

Traffic Monsoon, LLC		July 30, 2019 Invoice 330069 Page 21
Date	Description	Amount
	Copies	1,345.50
	Postage	10.60
	Long Distance Expense	11.90
	Scanning Charges	196.00
Total Disbursements		4,509.31

Exhibit B

LAW OFFICES
WILLIAMS & CONNOLLY LLP
725 TWELFTH STREET, N.W.
WASHINGTON, D. C. 20005-5901
(202) 434-5000
FAX (202) 434-5029

August 15, 2019

PRIVILEGED AND CONFIDENTIAL

Invoice No. 502478

Charles D. Scoville
c/o Micah S. Echols, Esq.
Marquis Aurbach Coffing
10001 Park Run Drive
Las Vegas, NV 89145

RE: Scoville v. SEC

STATEMENT

Professional Services Rendered thru July 31, 2019	\$74,291.00
TOTAL FOR PROFESSIONAL SERVICES	\$74,291.00
Out-of-Pocket Expenses	\$7,404.91
TOTAL OUT-OF-POCKET EXPENSES	\$7,404.91
SUB-TOTAL THIS STATEMENT	\$81,695.91
TOTAL DUE AS OF THIS DATE.....	\$81,695.91

CLIENT NO. 47832
 INVOICE NO. 502478
 August 15, 2019

Matter No. 47832.0001 – Scoville v. SEC

TIMEKEEPER SUMMARY

TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
John S. Williams	Partner	32.40	795.00	25,758.00
Thomas S. Chapman	Associate	75.00	565.00	42,375.00
Debbie Cackowoski	Paralegal	9.70	375.00	3,637.50
Natalie L. Yeager	Cite Checker	6.50	325.00	2,112.50
Matthew L. Foley	Researcher	1.20	340.00	408.00
		<u>124.80</u>		<u>\$74,291.00</u>

Date	Timekeeper	Narrative	Hours	Amount
04/05/19	Chapman	Researching [REDACTED] related to review of [REDACTED].	2.20	1,243.00
04/09/19	Chapman	Reviewing Tenth Circuit opinion and [REDACTED]; meeting with J. Williams; drafting motion for extension of time.	4.00	2,260.00
04/10/19	Williams	Circulating extension application; correspondence re same; call re same.	0.50	397.50
04/10/19	Chapman	Reviewing [REDACTED]; preparing extension application for filing.	2.50	1,412.50
04/11/19	Williams	Filing extension application; correspondence re same.	0.20	159.00
04/12/19	Chapman	Reviewing [REDACTED].	0.20	113.00
04/12/19	Williams	Reviewing [REDACTED].	0.20	159.00
04/14/19	Williams	Researching [REDACTED].	0.50	397.50
04/15/19	Chapman	Case discussion with J. Williams.	0.20	113.00
04/18/19	Chapman	Meeting with J. Williams on research project.	0.20	113.00
04/19/19	Williams	Meeting w/ T. Chapman.	0.20	159.00
04/19/19	Chapman	Researching [REDACTED] case law.	1.20	678.00
04/22/19	Chapman	Researching [REDACTED] case law.	2.20	1,243.00
04/23/19	Chapman	Researching [REDACTED] case law.	1.00	565.00
04/24/19	Williams	Correspondence and research re [REDACTED].	0.20	159.00
04/24/19	Chapman	Researching [REDACTED] case law.	3.50	1,977.50
04/25/19	Chapman	Researching [REDACTED] case law.	3.20	1,808.00

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 August 15, 2019

Matter No. 47832.0001 – Scoville v. SEC

Date	Timekeeper	Narrative	Hours	Amount
04/30/19	Chapman	Researching ██████████ case law.	3.00	1,695.00
04/30/19	Williams	Correspondence and research re petition and ██████████ █████████.	0.20	159.00
05/01/19	Chapman	Researching ██████████ case law; meeting with J. Williams; drafting email to co-counsel.	2.20	1,243.00
05/01/19	Williams	Meeting with T. Chapman re brief; correspondence re same.	0.20	159.00
05/08/19	Chapman	Preparing application for extension of time.	0.50	282.50
05/09/19	Williams	Finalizing supplemental application and related correspondence.	0.20	159.00
05/13/19	Williams	Correspondence re extension and preparing brief.	0.20	159.00
05/14/19	Williams	Reviewing draft and meeting with T. Chapman re same.	0.20	159.00
05/20/19	Williams	Reviewing ██████████ matter; correspondence re same.	0.20	159.00
05/21/19	Chapman	Drafting ██████████ amicus memorandum; outlining ██████████ section of cert petition.	4.00	2,260.00
05/22/19	Chapman	Drafting ██████████ amicus memorandum; outlining ██████████ section of cert petition.	0.80	452.00
05/23/19	Chapman	Researching for ██████████ section of cert petition.	0.20	113.00
05/24/19	Chapman	Drafting cert petition.	3.50	1,977.50
05/25/19	Williams	Reviewing memorandum to ██████████ seeking amicus support.	0.20	159.00
05/26/19	Williams	Revising memoranda seeking amicus support.	0.70	556.50
05/27/19	Chapman	Editing cert petition draft.	1.00	565.00
05/29/19	Chapman	Meeting with J. Williams to discuss cert petition drafting; drafting cert petition.	2.00	1,130.00
05/29/19	Williams	Revising amicus memoranda; calls re same.	1.00	795.00
05/30/19	Chapman	Drafting cert petition.	1.70	960.50
05/30/19	Williams	Call re amicus outreach.	0.50	397.50
05/31/19	Williams	Correspondence and calls re amicus matters.	0.50	397.50
06/03/19	Chapman	Drafting amicus memo for ██████████	0.50	282.50

CLIENT NO. 47832
 INVOICE NO. 502478
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Matter No. 47832.0001 – Scoville v. SEC

Date	Timekeeper	Narrative	Hours	Amount
06/03/19	Williams	Correspondence and calls re brief and amicus matters.	0.50	397.50
06/04/19	Williams	Revising cert petition.	2.20	1,749.00
06/05/19	Williams	Correspondence and calls re amicus matters.	0.50	397.50
06/06/19	Williams	Attention to amicus issues; correspondence re same; revising brief.	0.70	556.50
06/07/19	Williams	Revising brief; attention to amicus issues.	0.50	397.50
06/09/19	Chapman	Editing cert petition.	5.90	3,333.50
06/10/19	Williams	Research for cert petition.	0.50	397.50
06/11/19	Williams	Revising cert petition.	1.50	1,192.50
06/12/19	Chapman	Legal research for cert petition; preparing appendix and reviewing Supreme Court rules; discussion of cert petition with J. Williams.	2.50	1,412.50
06/12/19	Cackowoski	Per request of John Williams, worked on preparing appendix to Supreme Court submission, preparing and formatting Circuit Court opinion, email exchanges w/John and Thomas Chapman	5.20	1,950.00
06/12/19	Williams	Revising cert petition.	4.80	3,816.00
06/13/19	Cackowoski	Continue work on preparing appendix to Supreme Court submission, formatting and checking District Court opinion, other format edits for consistency, email to John Williams and Thomas Chapman forwarding final appendix	4.50	1,687.50
06/13/19	Chapman	Editing cert petition.	5.90	3,333.50
06/13/19	Williams	Revising draft; reviewing same; meeting with T. Chapman; circulating to additional counsel; attention to amicus reachout to [REDACTED] correspondence re all.	4.30	3,418.50
06/14/19	Chapman	Editing cert petition.	0.80	452.00
06/14/19	Williams	Attending to amicus issues.	0.50	397.50
06/15/19	Chapman	Editing cert petition.	1.50	847.50
06/16/19	Chapman	Editing cert petition.	0.80	452.00
06/17/19	Chapman	Editing cert petition and appendix.	3.30	1,864.50
06/18/19	Yeager	Per T. Chapman, cite checked and researched Petition for a Writ of Certiorari.	5.00	1,625.00

CLIENT NO. 47832
 INVOICE NO. 502478
 August 15, 2019

Matter No. 47832.0001 – Scoville v. SEC

Date	Timekeeper	Narrative	Hours	Amount
06/18/19	Chapman	Editing cert petition and preparing for filing.	3.30	1,864.50
06/18/19	Williams	Revising cert petition; correspondence with potential amici and co-counsel re same.	1.20	954.00
06/19/19	Chapman	Editing cert petition.	2.00	1,130.00
06/19/19	Williams	Correspondence with potential amici re cert petition; revising same and appendix; correspondence re same.	2.30	1,828.50
06/19/19	Yeager	Per T. Chapman, cite checked and researched Petition for a Writ of Certiorari.	1.00	325.00
06/20/19	Chapman	Editing cert petition and supporting documents and preparing for filing.	7.50	4,237.50
06/20/19	Williams	Revising and finalizing cert petition, appendix, certificates, etc.; circulating same; call with [REDACTED].	2.80	2,226.00
06/20/19	Yeager	Per T. Chapman, cite checked and researched Petition for a Writ of Certiorari.	0.50	162.50
06/21/19	Chapman	Finalizing and filing cert petition.	0.60	339.00
06/21/19	Williams	Correspondence re amicus outreach.	0.30	238.50
06/28/19	Williams	Reviewing [REDACTED] article; correspondence re same.	0.40	318.00
07/01/19	Williams	Calls re amicus briefing with [REDACTED] and [REDACTED] [REDACTED] correspondence re same.	0.70	556.50
07/02/19	Chapman	Research on [REDACTED].	0.30	169.50
07/02/19	Foley	For Thomas Chapman, obtained news and commentary on the [REDACTED].	1.20	408.00
07/03/19	Williams	Correspondence and calls with amici.	0.40	318.00
07/12/19	Williams	Call with [REDACTED] re amicus brief.	0.20	159.00
07/16/19	Williams	Correspondence re amicus brief and status of petition.	0.30	238.50
07/17/19	Chapman	Reviewing draft amicus brief.	0.60	339.00
07/17/19	Williams	Correspondence re scheduling issues and amicus brief.	0.20	159.00
07/18/19	Chapman	Research in support of amicus brief edits.	0.20	113.00
07/18/19	Williams	Reviewing and commenting on amicus brief; correspondence and calls re same.	1.40	1,113.00

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INVOICE NO. 502478
August 15, 2019

Matter No. 47832.0001 – Scoville v. SEC

Date	Timekeeper	Narrative	Hours	Amount
07/22/19	Williams	Correspondence re status of cert petition with team.	0.30	238.50
TOTAL PROFESSIONAL SERVICES:				\$74,291.00

CLIENT NO. 47832
 INVOICE NO. 502478
 August 15, 2019

Matter No. 47832.0001 – Scoville v. SEC

COST SUMMARY

EXPENSE DESCRIPTION	AMOUNT
Federal Express	271.65
Court Fees: Supoena Fees, Filing Fees	300.00
Messenger	109.96
Online Research	33.10
Printing	5,204.07
Westlaw	1,329.73
Printing and Copying	83.40
Color Copies	73.00

Total Disbursement Due: \$7,404.91

DESCRIPTION

04/11/2019	WILLIAMS, JOHN S.	Federal Express Noel J Francisco Esq Inv# 652387396 Tracking# 774952002727	14.16
04/11/2019	WILLIAMS, JOHN S.	Federal Express William K Shirey II Esq Inv# 652387396 Tracking# 774952016506	14.16
04/11/2019	WILLIAMS, JOHN S.	Federal Express Peggy Hunt Esq Inv# 652387396 Tracking# 774952024993	38.86
04/11/2019	W & C, WILLIAMS	Printing and Copying	43.20
04/15/2019	WILLIAMS, JOHN S.	Vendor: WASHINGTON EXPRESS LLC; Invoice#: 177069; Date: 4/15/2019; Double rush courier service on 4/11 Wex job#2930175	54.63
05/09/2019	WILLIAMS, JOHN S.	Recipient: Peggy Hunt Tracking #: 775183545900	39.13
05/09/2019	WILLIAMS, JOHN S.	Recipient: Noel J Francisco Esq Tracking #: 775183531146	15.60
05/09/2019	WILLIAMS, JOHN S.	Recipient: William K Shirey II Esq Tracking #: 775183538140	15.60
05/09/2019	W & C, WILLIAMS	Printing and Copying	36.00
05/15/2019	WILLIAMS, JOHN S.	Vendor: WASHINGTON EXPRESS LLC; Invoice#: 178090; Date: 5/15/2019 Supreme Court, 5/9/19	36.42
05/17/2019	W & C, WILLIAMS	Westlaw	58.57
06/13/2019	W & C, WILLIAMS	Westlaw	577.37
06/18/2019	CHAPMAN, THOMAS S.	VENDOR: CLERK, UP.S. SUPREME COURT; INVOICE#: 61719; DATE: 6/18/2019	300.00
06/20/2019	W & C, WILLIAMS	Printing and Copying	2.25

CLIENT NO. 47832
 INVOICE NO. 502478
 August 15, 2019

Matter No. 47832.0001 – Scoville v. SEC

DESCRIPTION

06/20/2019	W & C, WILLIAMS	Color Copies	73.00
06/21/2019	WILLIAMS, JOHN S.	Vendor: WILSON-EPES PRINTING CO., INC; Invoice#: 30973; Date: 6/21/2019	5,204.07
06/26/2019	CHAPMAN, THOMAS S.	Recipient: D LOREN WASHBURN Tracking #: 775578005239	18.89
06/26/2019	CHAPMAN, THOMAS S.	Recipient: George T Conway III Tracking #: 775578029361	14.52
06/26/2019	CHAPMAN, THOMAS S.	Recipient: MICAH ECHOLS TOM STEWART Tracking #: 775577997661	47.19
06/30/2019	CHAPMAN, THOMAS S.	Vendor: WASHINGTON EXPRESS LLC; Invoice#: 179757; Date: 6/30/2019; Courier job on 6/19/19	18.91
07/01/2019	W & C, WILLIAMS	Printing and Copying	1.95
07/01/2019	WILLIAMS, JOHN S.	Recipient: William K Shirey II Esq Tracking #: 775613865757	14.12
07/01/2019	WILLIAMS, JOHN S.	Recipient: Noel J Francisco Esq Tracking #: 775613871708	14.12
07/01/2019	WILLIAMS, JOHN S.	Recipient: Peggy Hunt Tracking #: 775613855860	25.30
07/24/2019	W & C, WILLIAMS	Pacer April - June 2019	33.10
07/24/2019	W & C, WILLIAMS	Westlaw	693.79
Total Disbursements:			\$7,404.91

LAW OFFICES
WILLIAMS & CONNOLLY LLP
725 TWELFTH STREET, N.W.
WASHINGTON, D. C. 20005-5901
(202) 434-5000
FAX (202) 434-5029

08/15/19
Invoice No. 502478
Tax ID: 52-0851221

Charles D. Scoville
c/o Micah S. Echols, Esq.
Marquis Aurbach Coffing
10001 Park Run Drive
Las Vegas, NV 89145

Matter: 47832.0001

RE: Scoville v. SEC

STATEMENT

Professional Services Rendered thru July 31, 2019	\$74,291.00
TOTAL FOR PROFESSIONAL SERVICES	\$74,291.00
Out-of-Pocket Expenses	\$7,404.91
TOTAL OUT-OF-POCKET EXPENSES	\$7,404.91
SUB-TOTAL THIS STATEMENT	\$81,695.91
TOTAL DUE AS OF THIS DATE.....	\$81,695.91

Please include this remittance with payment to Williams & Connolly LLP.

For wire transfer of funds into our account:

	<u>For Wire Transfers</u>
Beneficiary Bank:	Bank of America
ABA Routing #	026009593
Beneficiary Account:	
Account #	001918423668
Williams & Connolly LLP International Swift Code:	
Reference:(Please provide payer's name and invoice #)	
Remittance Email Address:	

<u>For ACH Transfers</u>
Bank of America
054001204
001918423668
BOFAUS3N

accountsreceivable@wc.com