

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
www.flsb.uscourts.gov

In re:

Chapter 11

1 GLOBAL CAPITAL LLC, *et al.*,¹

Case No. 18-19121-RAM

Debtors.

(Jointly Administered)

SUMMARY OF SECOND INTERIM FEE APPLICATION OF
GREENBERG TRAURIG, LLP AS COUNSEL FOR
THE LIQUIDATING TRUSTEE

1. Name of Applicant:	Greenberg Traurig, LLP
2. Role of Applicant:	Counsel for the Liquidating Trustee
3. Name of Certifying Professional:	Stephen Mendelsohn
4. Date case filed:	July 27, 2018
5. Date of Retention Order:	February 26, 2020
IF INTERIM APPLICATION, COMPLETE 6, 7 AND 8 BELOW:	
6. Period for this Application:	June 1, 2020 through November 30, 2020
7. Amount of Compensation Sought:	\$113,838.60 ²
8. Amount of Expense Reimbursement Sought:	\$3,980.95

¹The Debtors in the Chapter 11 Cases, along with the business addresses and the last four (4) digits of each Debtor's federal tax identification number, if applicable, are: 1 GC Collections, c/o Development Specialists, Inc., 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309 (9517); and 1 West Collections, c/o Development Specialists, Inc., 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309 (1711).

² This amount does not include fees in the amount of \$ \$8,499.60, still pending from the first interim fee application, for services relating to the SEC's objections to PBYA's fee application and Greenberg Traurig's fee application. Greenberg Traurig is not seeking approval and/or payment of these fees in this Application and will address same in a future Application, as appropriate.

IF FINAL APPLICATION, COMPLETE 9 AND 10 BELOW:	
9. Total Amount of Compensation Sought during case:	n/a
10. Total Amount of Expense Reimbursement Sought during case:	n/a
11. Amount of Original Retainer (s) Please disclose both Fee Retainer and Cost Retainer if such a Retainer has been received:	\$0.00
12. Current Balance of Retainer(s) remaining:	\$0.00
13. Last Post-Confirmation Quarterly Operating Report (Month/Year and ECF No.):	July 2020 - September 2020; ECF No. 2397
14. If case is Chapter 11, current funds in the Chapter 11 estate:	\$17,677,839 ³
15. If case is Chapter 7, current funds held by Chapter 7 trustee:	N/A

³ Amount as of September 30, 2020, per Liquidating Trustee's Post-Confirmation Quarterly Operating Report for the Period from July 1, 2020 Through September 30, 2020 [ECF No. 2397].

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
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In re:

Chapter 11

1 GC COLLECTIONS, *et al.*,¹

Case No. 18-19121-RAM

Debtors.

(Jointly Administered)

_____ /

**SECOND INTERIM APPLICATION OF GREENBERG TRAURIG, LLP
AS COUNSEL FOR THE LIQUIDATING TRUSTEE**

Greenberg Traurig, LLP (“**Greenberg Traurig**”), counsel to the Liquidating Trustee, applies for interim compensation for fees for services rendered and reimbursement for costs incurred in these Chapter 11 cases. This application is filed pursuant to 11 U.S.C. §§ 330 and 331, Bankruptcy Rule 2016, Local Rule 2016-1, this Court’s *Order Granting Motion of the Liquidating Trustee for Entry of an Order Modifying Procedures for Monthly, Interim, and Final Compensation and Reimbursement of Expenses of Professionals and Affirming that Such Procedures as Modified Shall Apply to Professionals Retained by the Liquidating Trustee* [ECF No. 2253], and the *First Amended Joint Plan of Liquidation* [ECF No. 805] (the “**Plan**”), and meets all of the requirements set forth in the Guidelines incorporated in Local Rule 2016-1(B)(1). The exhibits attached to this application, pursuant to the Guidelines, are:

¹ The Debtors in the Chapter 11 Cases, along with the business addresses and the last four (4) digits of each Debtor’s federal tax identification number, if applicable, are: 1 GC Collections, c/o Development Specialists, Inc., 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309 (9517); and 1 West Collections, c/o Development Specialists, Inc., 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309 (1711)

Exhibits “1-A” and “1-B”- Summary of Professional and Paraprofessional Time.

Exhibit “2” - Summary of Requested Reimbursements of Expenses.

Exhibit “3” - The applicant’s complete time records, in chronological order, by activity code category, for the time period covered by this application. The requested fees are itemized to the tenth of an hour.

Exhibit “4” – The applicant’s detailed expense records for the time period covered by this application.

Exhibit “5” – Fee Application Summary Chart

As explained more fully below, Applicant believes that the requested compensation of \$113,838.60 for the Second Interim Period (as defined below), is reasonable considering the twelve factors enumerated in Johnson v. Georgia Highway Express, Inc., 488 F.2d 714 (5th Circuit 1974), made applicable to bankruptcy proceedings by In re First Colonial Corp. of America, 544 F.2d 1291 (5th Cir. 1977), as follows:

Background

1. On July 27, 2018 (the “**Petition Date**”), 1 Global Capital LLC and 1 West Capital LLC (collectively, the “Debtors”) commenced the above-captioned bankruptcy cases (the “Chapter 11 Cases”) by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), in the United States Bankruptcy Court for the Southern District of Florida (the “Court”).

2. On July 22, 2019, the Debtors and the Official Committee of Unsecured Creditors filed the *First Amended Joint Plan of Liquidation of 1 Global Capital LLC and 1 West Capital LLC Under Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors* (as it may be further amended, supplemented or modified from time to time, the “Plan”) [ECF No. 805].²

² All capitalized terms used in the Application but not defined herein shall have the meanings set forth for such terms

3. On September 20, 2019, the Court entered the *Order Confirming First Amended Joint Plan of Liquidation of 1 Global Capital LLC and 1 West Capital LLC Under Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors* [ECF No. 1197] (the “Confirmation Order”), confirming the Plan, directing the execution of the 1 GC Collections Creditors’ Liquidating Trust Agreement (the “Liquidating Trust Agreement”), and approving the appointment of the Liquidating Trustee as the liquidating trustee of the Trust.

4. On November 21, 2019, the Effective Date of the Plan occurred. *See Notice of (A) Effective Date of Chapter 11 Plan and (B) Administrative Claims Bar Date* [ECF No. 1586].

5. Pursuant to the Liquidating Trust Agreement, the Liquidating Trustee may retain attorneys, financial advisors, accountants or other professionals and employees. Liquidating Trust Agreement ¶ 3.9. Any such retention shall be made upon application to the Court in accordance with Rule 2014 of the Federal Rules of Bankruptcy Procedure. *Id.*

6. On February 26, 2020, this Court entered an order authorizing the employment and retention of Greenberg Traurig as counsel for the Liquidating Trustee in these cases *nunc pro tunc* to the Effective Date, November 21, 2019 [ECF No. 2252].

Jurisdiction, Venue and Predicates for Relief

7. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this district pursuant to 28 U.S.C. § 1408. This matter is core within the meaning of 28 U.S.C. § 157(b)(2).

8. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

Summary of Services Rendered

9. This Application is the second interim application for compensation for services rendered and reimbursement of expenses incurred filed by Greenberg Traurig, as counsel for the Liquidating Trustee, in these cases. In connection with the professional services described below, by this Application, Greenberg Traurig seeks Court approval of compensation in the amount of \$113,838.60 and \$3,980.95 for reimbursement of expenses incurred for the period from June 1, 2019 through November 30, 2020 (the “**Second Interim Period**”).

10. A detailed recitation of each and every item of professional services that Greenberg Traurig performed during the Second Interim Period would unduly burden the Court. The following summaries are therefore intended to highlight the areas in which services were rendered throughout the Second Interim Period. As more fully described in the attached exhibits, these services included, but were not limited to, the following:

a) Asset Analysis and Recovery (801)

Second Interim Period: 2.60 hours; \$384.80 in fees

This category includes services relating to asset analysis and recovery, including but not limited to researching background for complaints and arbitrators.

b) Case Administration (804)

Second Interim Period: 4.60 hours; \$1,317.60 in fees

This category includes services relating to general case administration issues, including but not limited to communications regarding various case matters; reviewing information pertaining to fictitious name registration; analyzing plan; revising of articles of incorporation; reviewing annual reports; numerous ECF notices, docket and pleadings; preparing letters regarding agent distribution; and attendance at weekly telephonic meetings with Liquidating Trustee.

c) Litigation Matters (810)

Second Interim Period: 214.00 hours; \$99,968.80 in fees

This category includes the prosecution of cases by the Liquidating Trust against numerous merchants and guarantors for breaches of Merchant Agreements, and in one case for fraudulent transfers. Presently, some cases have been settled while others are proceeding to resolution.

d) Creditor Inquiries (832)

Second Interim Period: 13.30 hours; \$4,415.60 in fees

This category includes services relating to creditor inquiries, including but not limited to responding to creditor inquiries regarding effective date and distributions.

e) Miscellaneous Matters (843)

Second Interim Period: .20 hours; \$46.40 in fees

This category includes services relating to miscellaneous matters, including but not limited to research regarding F. Pena for preparation of complaint.

f) SEC Matters (844)

Second Interim Period: 11.30 hours; \$3,856.40 in fees

This category includes services relating to the Securities and Exchange Commission.

g) Tax Matters (845)

Second Interim Period: 4.90 hours; \$3,675.00 in fees

This category includes services relating to tax matters, including but not limited to communications regarding tax issues with making distributions to IRAs and forms 1099, drafting letter to investors requesting tax information, and researching IRA payment issues.

h) WARN Act (924)

Second Interim Period: .30 hours; \$174.00 in fees

This category includes services relating to WARN Act issues.

11. The professional services that Greenberg Traurig rendered as counsel to the Liquidating Trustee during the Second Interim Period included, but were not limited to, the following:

- a) providing legal advice with respect to the Liquidating Trustee's powers and duties as Liquidating Trustee under the terms of the Liquidating Trust;
- b) negotiating, drafting, and pursuing all documentation necessary in the administration of the Trust;
- c) preparing on behalf of the Liquidating Trustee applications, motions, answers, orders, reports, and other legal papers necessary to the administration of the Trust;
- d) appearing in Court and protecting the interests of the Liquidating Trustee before the Court;
- e) assisting with any disposition of the Trust assets, by sale or otherwise;
- f) attending meetings and negotiating with representatives of creditors, the United States Trustee, the United States Attorney's Office, the Securities and Exchange Commission and other parties-in-interest;
- g) providing legal advice regarding bankruptcy law, corporate law, corporate governance, securities, employment, transactional, tax, labor, litigation, intellectual property and other issues to the Liquidating Trustee in connection with the administration of the Trust; and
- h) taking all necessary actions, including prosecuting actions on the Liquidating Trustee's behalf, defending any action commenced against the Liquidating Trustee, and representing the Liquidating Trustee in negotiations concerning litigation in which the Liquidating Trustee is involved; and
- i) performing other legal services for, and providing other necessary legal advice to, the Liquidating Trustee, which may be necessary and proper.

Factors to be Considered

The Time and Labor Required: The detailed time records of services rendered, attached hereto as Exhibit “3”, show that the professionals and paraprofessionals of Greenberg Traurig devoted 251.20 hours of time in the representation of the Liquidating Trustee during the Second Interim Period. In circumstances where the expertise and judgment of an attorney were not required, responsibilities were delegated to paralegals. The services rendered were performed within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue or task addressed. Greenberg Traurig submits that whether viewed individually as to each of the tasks or collectively as a whole, the time expended and fees incurred during the Second Interim Period have been reasonable and efficient to accomplish the needs of these cases.

The Novelty and Difficulty of the Services Rendered: Greenberg Traurig assisted the Liquidating Trustee in addressing a number of complex legal and business issues raised during the pendency of these Chapter 11 cases, requiring in-depth knowledge of bankruptcy law, corporate law and securities law, among other areas. Such legal questions arising in the representation of the Liquidating Trustee have required the exercise of skill by experienced counsel in a variety of legal disciplines.

The Skill Requisite to Perform the Services Properly: Greenberg Traurig was able to draw upon resources within the firm to provide all of the legal services rendered to the Liquidating Trustee in the multiple areas of law recited in the preceding paragraph.

The Preclusion of Other Employment by the Professional Due to the Acceptance of the Case: Greenberg Traurig is aware of no other employment which was precluded as a result of its accepting this case, though the attorneys assigned to these cases were limited in their ability to generate other business due to their active involvement in and focus on these cases.

The Customary Fee: The rates charged by the participating attorneys and paralegals as set forth in Exhibits “1-A” and “1-B” are within the range charged by such professionals of similar skill and reputation in their respective jurisdictions and their respective fields of practice. The blended billable rate of \$453.18 per hour for the professionals and paraprofessionals working on these cases during the Second Interim Period is less than the rates customarily charged by Greenberg Traurig for similar cases. In all instances care was taken to avoid duplication of effort, and much of the work initially performed by senior attorneys was gradually delegated to more junior attorneys billing at lower hourly rates. In addition, as noted in its retention application, at the outset of its engagement, in light of the public interest surrounding these Chapter 11 Cases, Greenberg Traurig agreed with the Liquidating Trustee, solely in and for purposes of these cases, to reduce its customary hourly rates for 2018³ for all timekeepers by 20%, with a maximum hourly rate of \$750.00.

Whether the Fee is Fixed or Contingent: The Applicant’s compensation in this matter is subject to and contingent upon approval of the Court, a factor which militates in favor of a fee in the amount requested. The amount requested is consistent with the fee that the Applicant would charge its clients in other cases in which fees are payable on a monthly basis without the requirement of application to and approval by any court, except as indicated in the preceding paragraph.

Time Limitations Imposed by the Client or Other Circumstances: The immediate nature of matters involved in these cases required Greenberg Traurig’s attorneys to devote a substantial amount of their time to handle matters concerning the Chapter 11 estate. In the course of providing the services covered in this Application, Greenberg Traurig attorneys consistently

³ Greenberg Traurig will use 2018 rates for the life of this matter, and will not adjust rates based on any annual rate changes by the firm.

responded to the Debtors' needs on an expedited basis. Simply stated, these cases required Greenberg Traurig to devote substantial time on an urgent basis to a great number of issues within a highly compressed period of time.

The Experience, Reputation, and Ability of the Professional: Greenberg Traurig is an established law firm having extensive experience and knowledge in the field of debtor and creditor rights and business reorganizations under chapter 11 of the Bankruptcy Code.

The Undesirability of the Case: Greenberg Traurig did not find it undesirable to represent the Liquidating Trustee in these cases or any other reputable party in any form of bankruptcy proceeding, based upon the understanding that reasonable compensation will be awarded for fees and expenses incurred during the course of representation.

The Nature and Length of the Professional Relationship of the Client: Greenberg Traurig has not previously provided legal services to the Liquidating Trustee.

Awards in Similar Cases: The amount requested by the Applicant is reasonable in terms of awards in cases of similar magnitude and complexity. The compensation that the Applicant requests comports with the mandate of the Bankruptcy Code, which directs that services be evaluated in light of comparable services performed in non-bankruptcy cases in the community. The fees requested by the Applicant reflect an average hourly rate of approximately \$453.18 during the Second Interim Period. Considering the results obtained thus far in these cases and the complexity of the issues addressed during the period covered by this Application, this rate is appropriate.

Summary of Expenses

12. Greenberg Traurig incurred or disbursed actual and necessary costs and expenses related to these cases in the aggregate amount of \$3,980.95 during the Second Interim Period. The expenses incurred include, among other things, business meals, color copies, conference calls,

messenger services, overnight mail charges, travel related expenses, in-house and off-site photocopying charges, research charges, and filing fees. A detailed description of the necessary costs and expenses incurred by Greenberg Traurig is attached hereto as Exhibit “4”.

13. Pursuant to Local Rule 2016-1(B)(1) and the Guidelines for Fee Applications for Professionals in the Southern District of Florida in Bankruptcy Cases, Greenberg Traurig represents as follows with regard to its charges for actual and necessary costs and expenses incurred during the Interim Application Period:

a) Copy Charges were \$.15 per page, which charge is reasonable and customary in the legal industry and represents the costs of copy material, acquisition, maintenance, storage and operation of copy machines, together with a margin for recovery of related expenditures. In addition, Greenberg Traurig often utilizes outside copier services for high volume projects, and this Application seeks the recovery of those costs, if applicable:

b) Incoming facsimiles are not billed;

c) Out-going facsimiles are billed at the rate of \$1.00 per page. The cost represents operator time, maintaining several dedicated facsimile telephone lines, supplies and equipment, and includes a margin for recovery of related expenditures; and

d) Toll telephone charges are not billed.

WHEREFORE, Greenberg Traurig requests that upon due consideration of the foregoing facts and circumstances, the Court enter an Order (a) granting this Application; (b) allowing and awarding compensation of fees in the amount of \$113,838.60⁴ and reimbursement of expenses in the amount of \$3,980.95 for the Second Interim Period; (c) directing immediate payment of amounts so allowed and awarded less payments that have previously been made to Greenberg

⁴ This amount does not include fees in the amount of \$ 8,499.60, still pending from the first interim fee application, for services relating to the SEC’s objections to PBYA’s fee application and Greenberg Traurig’s fee application. Greenberg Traurig is not seeking approval and/or payment of these fees in this Application and will address same in a future Application, as appropriate.

Traurig by the Liquidating Trustee; and (d) affording such other and further relief as may be fair and reasonable under the circumstances.

Dated: December 4, 2020

GREENBERG TRAURIG, LLP

/s/ Stephen A. Mendelsohn

Stephen A. Mendelsohn

Fla. Bar No. 849324

mendelsohnm@gtlaw.com

Reginald Sainvil

Fla. Bar No. 1008135

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333 S.E. 2nd Avenue, Suite 4400

Miami, Florida 33131

Tel: 305 579-0500

Fax: 305 579-0717

Counsel for the Liquidating Trustee

Summary of Professional and Paraprofessional Time
Total per Individual for Supplemental Application Period
(EXHIBIT “1-A”)

Name	Shareholder, Associate or Para-professional	Year Licensed	Total Hours	Hourly Rate	Fee
Kenneth N. Zuckerbrot	Shareholder	1968	4.90	\$750.00	\$3,675.00
Stephen A. Mendelsohn	Shareholder	1984	121.80	\$580.00	\$70,644.00
Jed Dwyer	Shareholder	2013	.80	\$484.00	\$387.20
Stephanie Peral	Associate	2015	26.20	\$340.00	\$8,908.00
Reginald Sainvil	Associate	2015	47.60	\$332.00	\$15,803.20
Sabrina D. Niewialkouski	Associate	2016	30.30	\$332.00	\$10,059.60
Totals for Professionals			231.60		\$109,477.00
Michael A. Ambrose	Research	N/A	.40	\$120.00	\$48.00
Jennifer A. Walker	Paralegal	N/A	5.10	\$256.00	\$1,305.60
Patricia P. Lin	Paralegal	N/A	10.70	\$232.00	\$2,482.40
Juwon Adebayo	Paralegal	N/A	.80	\$176.00	\$140.80
Cynthia Lott	Paralegal	N/A	2.60	\$148.00	\$384.80
Total for Paraprofessionals			19.60		\$4,361.60
Total			251.20		\$113,838.60
Blended Average Hourly Rate				\$453.18	

**SUMMARY OF PROFESSIONAL AND PARAPROFESSIONAL TIME
BY ACTIVITY CODE CATEGORY FOR SECOND INTERIM APPLICATION PERIOD
(EXHIBIT “1-B”)**

See Attached

**Summary of Profesional and
Paraprofessional Time by
Activity Code Category
for this Time Period Only**

	Hours	Rate	Fees
Activity Code 801: Asset Analysis and Recovery			
Cynthia Lott	2.60	\$148.00	\$384.80
Totals for Activity Code 801: Asset Analysis and Recovery	2.60		\$384.80
Activity Code 804: Case Administration			
Reginald Sainvil	3.40	\$332.00	\$1,128.80
Juwon Adebayo	0.80	\$176.00	\$140.80
Michael A. Ambrose	0.40	\$120.00	\$48.00
Totals for Activity Code 804: Case Administration	4.60		\$1,317.60
Activity Code 810: Litigation Matters			
Stephen A. Mendelsohn	121.50	\$580.00	\$70,470.00
Jed Dwyer	0.70	\$484.00	\$338.80
Stephanie Peral	15.00	\$340.00	\$5,100.00
Reginald Sainvil	30.90	\$332.00	\$10,258.80
Sabrina D. Niewialkouski	30.30	\$332.00	\$10,059.60
Jennifer A. Walker	5.10	\$256.00	\$1,305.60
Patricia P. Lin	10.50	\$232.00	\$2,436.00
Totals for Activity Code 810: Litigation Matters	214.00		\$99,968.80
Activity Code 832: Creditor Inquiries			
Reginald Sainvil	13.30	\$332.00	\$4,415.60
Totals for Activity Code 832: Creditor Inquiries	13.30		\$4,415.60
Activity Code 843: Miscellaneous Matters			
Patricia P. Lin	0.20	\$232.00	\$46.40
Totals for Activity Code 843: Miscellaneous Matters	0.20		\$46.40
Activity Code 844: SEC Matters			
Jed Dwyer	0.10	\$484.00	\$48.40
Stephanie Peral	11.20	\$340.00	\$3,808.00
Totals for Activity Code 844: SEC Matters	11.30		\$3,856.40

	Hours	Rate	Fees
Activity Code 845: Tax Matters			
Kenneth N. Zuckerbrot	4.90	\$750.00	\$3,675.00
Totals for Activity Code 845: Tax Matters	4.90		\$3,675.00
Activity Code 924: WARN Act Matters			
Stephen A. Mendelsohn	0.30	\$580.00	\$174.00
Totals for Activity Code 924: WARN Act Matters	0.30		\$174.00
Total All Activity Codes			
	251.20		\$113,838.60

**SUMMARY OF EXPENSE REIMBURSEMENT
REQUESTED BY CATEGORY
EXHIBIT 2**

Category	Amount
Conference Call / CourtCall / CourtSolutions	\$52.70
Filing Fees	\$479.72
Information and Research	\$2,606.38
Outside Photocopies	\$35.00
Transcripts	\$807.15
Total	\$3,980.95

**INVOICES
EXHIBIT 3**

Invoice No.: 5432352
 File No.: 180567.010300
 Bill Date: July 16, 2020

1st Global Capital Financial Services
 1250 E. Hallandale Beach Blvd
 Suite 409
 Hallandale Beach Blvd., FL 33009

INVOICE

Re: Liquidating Trust

Legal Services through June 30, 2020:

Total Fees: \$ 28,999.00

Expenses:

Information and Research 11.15

Total Expenses: \$ 11.15

Current Invoice: \$ 29,010.15

Previous Balance (see attached statement): \$ 32,471.79

Total Amount Due: \$ 61,481.94

BIM:RLH
 Tax ID: 59-1270754

Invoice No.: 5432352
 Matter No.: 180567.010300

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Description of Professional Services Rendered:

TASK CODE: 801 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/29/20	Cynthia Lott	Retrieve Accurint and TLO background Reports on a Felix Pena (Defendant in a Lawsuit) for P. Lin.	0.30	44.40
			<hr/>	
			Total Hours:	0.30
			Total Amount:	\$ 44.40

TIMEKEEPER SUMMARY FOR TASK CODE 801,

ASSET ANALYSIS AND RECOVERY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Cynthia Lott	0.30	148.00	44.40
Totals:	0.30	148.00	\$ 44.40

Invoice No.: 5432352
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 804 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/04/20	Reginald Sainvil	Review information pertaining to fictitious name registration.	0.40	132.80
06/05/20	Reginald Sainvil	Telephone conference with investor regarding status of distributions and liquidating trustee's collection efforts.	0.40	132.80
06/09/20	Reginald Sainvil	Analyze plan provisions regarding authority of liquidating trustee and restructuring officers.	0.50	166.00
06/10/20	Reginald Sainvil	Review and revise articles of organization for 1GC and 1 West.	0.80	265.60
06/12/20	Reginald Sainvil	Analysis regarding amendments to articles of organization and related correspondence.	0.40	132.80
06/18/20	Reginald Sainvil	Analyze notice of filing and fee notice.	0.30	99.60
06/22/20	Reginald Sainvil	Review annual reports filed with division of corporations.	0.40	132.80
06/28/20	Reginald Sainvil	Correspondence regarding fees of ordinary course professional.	0.20	66.40
			<hr/>	
			Total Hours:	3.40
			Total Amount:	\$ 1,128.80

TIMEKEEPER SUMMARY FOR TASK CODE 804,

CASE ADMINISTRATION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Reginald Sainvil	3.40	332.00	1,128.80
Totals:	3.40	332.00	\$ 1,128.80

Invoice No.: 5432352
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/20	Stephen A. Mendelsohn	WALL STREET re: email request for Radium documents.	0.20	116.00
06/01/20	Stephen A. Mendelsohn	WALL STREET: review and comments as to answers to new interrogatories from Wall Street.	0.60	348.00
06/01/20	Stephen A. Mendelsohn	DART SEASONAL : emails from Jim Cassel and email to Dart's attorney as to counter demand for settlement.	0.60	348.00
06/01/20	Stephen A. Mendelsohn	GENERAL: email to Joe Luzinski as to status of open litigation for communication to SEC.	0.30	174.00
06/02/20	Stephen A. Mendelsohn	EAST COAST : re emails as to possible further amendments to settlement agreement.	0.40	232.00
06/02/20	Reginald Sainvil	[Ellwood] Analyze sale motion filed in chapter 11 of Ellwood.	0.50	166.00
06/03/20	Stephen A. Mendelsohn	EAST COAST re: emails with opposing counsel as to request to modify settlement agreement.	0.20	116.00
06/03/20	Stephen A. Mendelsohn	East Coast : Call with Jim Cassel and Joe Luzinski about East Coast's request to modify settlement agreement.	0.30	174.00
06/03/20	Stephanie Peral	Momentum: Strategise re: discovery.	0.10	34.00
06/04/20	Stephen A. Mendelsohn	EAST COAST JEWELRY re: further emails with East Coast's counsel about possible modification of settlement agreement.	0.20	116.00
06/04/20	Stephen A. Mendelsohn	WALL STREET: email with Kelly Bannan former counsel to 1st Global re: Wall Street interrogatories.	0.20	116.00
06/08/20	Stephanie Peral	Momentum: Draft, finalize, and serve responses to Wall Street's second RFP; correspondence re: same.	0.70	238.00
06/09/20	Stephen A. Mendelsohn	VERO LOGISTICS : emails with defense counsel as to possible settlement.	0.30	174.00
06/10/20	Stephen A. Mendelsohn	DART SEASONAL: emails with opposing counsel for Dart Seasonal as to settlement.	0.30	174.00
06/11/20	Stephen A. Mendelsohn	DART SEASONAL re: draft of settlement agreement.	1.20	696.00
06/11/20	Stephen A. Mendelsohn	DART SEASONAL: communications with attorney for Dart Seasonal as to settlement.	0.60	348.00
06/12/20	Stephen A. Mendelsohn	DART SEASONAL re: emails with opposing counsel as to settlement.	0.40	232.00
06/15/20	Reginald Sainvil	[Momentum] Develop outline regarding outstanding case issues.	1.00	332.00

Invoice No.: 5432352
 Matter No.: 180567.010300

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Description of Professional Services Rendered

06/16/20	Stephen A. Mendelsohn	DART SEASONAL :Draft and edits to settlement agreement.	0.30	174.00
06/18/20	Stephen A. Mendelsohn	WALL STREET re: call with Reggie Sainvil as to motion for summary judgment against Wall Street.	0.40	232.00
06/18/20	Stephen A. Mendelsohn	DART SEASONAL re; edits of settlement agreement and emails with defense counsel Lloyd Comiter.	0.50	290.00
06/18/20	Stephen A. Mendelsohn	SOFTEK re: emails with AAA as to arbitration schedule.	0.20	116.00
06/18/20	Stephen A. Mendelsohn	Draft of summary of litigation cases for DSI for possible sale of rights.	1.30	754.00
06/18/20	Stephen A. Mendelsohn	RADIUM re: call with Harris Korgolu of Shutts & Bowen attorney for Radium re: settlement offers.	0.60	348.00
06/18/20	Stephen A. Mendelsohn	RADIUM re: call with Stephanie Peral as to additional discovery.	0.30	174.00
06/18/20	Stephen A. Mendelsohn	WALL STREET re: call with Courtney Bannan former IGC counsel re: her deposition.	0.70	406.00
06/18/20	Reginald Sainvil	Strategy conference regarding Momentum adversary proceeding.	0.70	232.40
06/18/20	Reginald Sainvil	[Momentum] Develop strategy regarding preparation of summary judgment briefs and supporting affidavits.	0.50	166.00
06/19/20	Stephen A. Mendelsohn	RADIUM: Emails and call with Stephanie Peral re; extension of discovery.	0.30	174.00
06/19/20	Stephen A. Mendelsohn	RADIUM re: new settlement offer.	0.20	116.00
06/19/20	Stephanie Peral	Momentum: Send Radium production to Wall Street; work on next production to Wall Street and correspondence re: same.	0.40	136.00
06/22/20	Stephen A. Mendelsohn	RADIUM re: Call with Stephanie Peral of GT (status of discovery and documents to be produced.)	0.20	116.00
06/22/20	Stephen A. Mendelsohn	RADIUM re: draft of email as to settlement proposal from radium and call with Joe Luzinski as to demand for financial disclosures.	0.60	348.00
06/22/20	Stephanie Peral	Momentum: Communicate with S. Mendelsohn re: discovery and next steps.	0.20	68.00
06/23/20	Stephen A. Mendelsohn	EVANS re: review of Evans documents for possible case.	1.30	754.00
06/23/20	Stephanie Peral	Momentum: Finalize and send production to Wall Street.	0.20	68.00
06/24/20	Stephen A. Mendelsohn	RADIUM 2: emails and calls with attorney for radium 2 as to settlement terms.	0.30	174.00
06/24/20	Stephen A. Mendelsohn	VERO LOGISTICS re: emails with opposing counsel as to financial affidavits and other discovery delays.	0.20	116.00
06/24/20	Stephen A. Mendelsohn	CARTOON CUTS: review of client materials as to possible lawsuits.	1.10	638.00
06/25/20	Stephen A. Mendelsohn	RADIUM 2: review of draft answers to interrogatories, calls with Joe Luzinski of	1.70	986.00

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Description of Professional Services Rendered

		DSI as to answers, emails with opposing counsel as to objections and edits to proposed answers.		
06/25/20	Stephen A. Mendelsohn	Cartoon Cuts: review of possible new litigation matter, email with Joe Luzinski and call with Joe Luzinski of DSI.	2.60	1,508.00
06/25/20	Stephen A. Mendelsohn	SOFTEK: Emails with opposing counsel re: demand for arbitration.	0.20	116.00
06/25/20	Stephanie Peral	Momentum: Draft responses and objections to Wall Street's second interrogatories and correspondence re: same.	0.60	204.00
06/26/20	Stephen A. Mendelsohn	FUND 4 GROWTH re: review and analysis of potential new claims.	2.60	1,508.00
06/26/20	Stephen A. Mendelsohn	WALL STREET re: calls with Joe Luzinski, and edits to answers to interrogatories	1.40	812.00
06/26/20	Stephen A. Mendelsohn	CARTOON CUTS re: emails and calls with Joe Luzinski re: new matters against Cartoon Cuts.	0.60	348.00
06/26/20	Stephen A. Mendelsohn	VERO LOGISTICS re: email from opposing counsel as to bankruptcy filings.	0.60	348.00
06/26/20	Stephanie Peral	Momentum: Finalize and serve interrogatory responses on Wall Street.	2.00	680.00
06/26/20	Reginald Sainvil	[Momentum] Analyze language concerning DSI for purposes of responding to interrogatories.	0.50	166.00
06/28/20	Stephanie Peral	Momentum: Privilege review of documents for purposes of Radium's discovery requests.	2.90	986.00
06/29/20	Stephen A. Mendelsohn	RADIUM re: Emails with Radium's counsel as to settlement.	0.20	116.00
06/29/20	Stephen A. Mendelsohn	RADIUM re: emails with Trustee and Joe Luzinski as to counter offer to DSI.	0.20	116.00
06/29/20	Stephen A. Mendelsohn	RADIUM re: Emails with Radium's counsel as to settlement.	0.70	406.00
06/29/20	Stephen A. Mendelsohn	RADIUM re: emails with Trustee and Joe Luzinski as to counter offer to DSI.	0.30	174.00
06/29/20	Sabrina D. Niewialkouski	[Cartoon Cuts] Strategise on drafting of complaint regarding several merchant agreements guaranteed by Felix Pena; Drafted Complaint for breach of Merchant agreement against Felix Pena and 5 entities	3.30	1,095.60
06/29/20	Stephanie Peral	Momentum: Privilege review for production to Radium.	3.60	1,224.00
06/29/20	Reginald Sainvil	[Momentum] Analyze notice regarding subpoena issued to IGC.	0.20	66.40
06/29/20	Reginald Sainvil	[Momentum] Review agreed motion submitted by Junior MCA creditors.	0.30	99.60
06/30/20	Stephen A. Mendelsohn	SOFTEK re: telephone conference with AAA as to procedural issues for the arbitration venue, answer, mediation and scope of claim.	1.20	696.00
06/30/20	Stephen A. Mendelsohn	RADIUM re: settlement email to Trustee	0.30	174.00

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06/30/20	Stephen A. Mendelsohn	and options. FEE Application re: review of fee application and comments and edits.	1.60	928.00
06/30/20	Stephen A. Mendelsohn	FUND 4 Growth re: analysis of possible claims.	1.60	928.00
06/30/20	Sabrina D. Niewialkouski	[Cartoon Cuts] Reviewed, revised initial draft of Complaint	1.10	365.20
06/30/20	Reginald Sainvil	[Momentum] Analyze documents regarding the Framework Agreement.	1.90	630.80

Total Hours: 50.80

Total Amount: \$ 24,416.00

TIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	30.10	580.00	17,458.00
Sabrina D. Niewialkouski	4.40	332.00	1,460.80
Stephanie Peral	10.70	340.00	3,638.00
Reginald Sainvil	5.60	332.00	1,859.20
Totals:	50.80	480.63	\$ 24,416.00

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Description of Professional Services Rendered

TASK CODE: 832 CREDITOR INQUIRIES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/10/20	Reginald Sainvil	Telephone conference with several creditors regarding status of distributions.	0.40	132.80
06/19/20	Reginald Sainvil	Correspondence with numerous investors regarding status of distributions.	0.40	132.80
06/29/20	Reginald Sainvil	Telephone conference with creditor regarding status of distributions.	0.40	132.80
06/30/20	Reginald Sainvil	Telephone conference with investor regarding status of investigation and distributions.	0.30	99.60
			<hr/>	
			Total Hours:	1.50
			Total Amount:	\$ 498.00

TIMEKEEPER SUMMARY FOR TASK CODE 832,

CREDITOR INQUIRIES

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Reginald Sainvil	1.50	332.00	498.00
Totals:	1.50	332.00	\$ 498.00

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Description of Professional Services Rendered

TASK CODE: 843 MISCELLANEOUS MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/29/20	Patricia P. Lin	Work on obtaining an address for Felix Pena for Complaint	0.20	46.40
			<hr/>	
			Total Hours:	0.20
			Total Amount:	\$ 46.40

TIMEKEEPER SUMMARY FOR TASK CODE 843,

MISCELLANEOUS MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Patricia P. Lin	0.20	232.00	46.40
Totals:	0.20	232.00	\$ 46.40

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Description of Professional Services Rendered

TASK CODE: 844 SEC MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/20	Stephanie Peral	Correspondence re: Wall Street's request for Radium production.	0.10	34.00
06/12/20	Jed Dwyer	Telephone call with S. Peral	0.10	48.40
06/12/20	Stephanie Peral	Call with J. Dwyer re: documents mentioned by government.	0.10	34.00
06/15/20	Stephanie Peral	Draft correspondence re: document flagged by government.	0.50	170.00
06/17/20	Stephanie Peral	Momentum: Draft clawback agreement and correspondence re: same; work on production to Wall Street and correspondence re: same.	1.30	442.00
06/18/20	Stephanie Peral	Momentum: Edits to clawback agreement; work on upcoming production to Wall Street; correspondence re: same; call with Radium's counsel re: discovery.	1.00	340.00
06/30/20	Stephanie Peral	Momentum: Privilege review for production to Radium.	3.30	1,122.00
Total Hours:			6.40	
Total Amount:				\$ 2,190.40

TIMEKEEPER SUMMARY FOR TASK CODE 844,

SEC MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Jed Dwyer	0.10	484.00	48.40
Stephanie Peral	6.30	340.00	2,142.00
Totals:	6.40	342.25	\$ 2,190.40

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Description of Professional Services Rendered

TASK CODE: 845 TAX MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/05/20	Kenneth N. Zuckerbrot	Two phone calls with John Dodd re issuance of 1099s M and investors comments and framing a reply.	0.50	375.00
06/11/20	Kenneth N. Zuckerbrot	Review J. Dodd draft letter re 1099; make edits and return	0.40	300.00
			<hr/>	
			Total Hours:	0.90
			Total Amount:	\$ 675.00

TIMEKEEPER SUMMARY FOR TASK CODE 845,

TAX MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Kenneth N. Zuckerbrot	0.90	750.00	675.00
Totals:	0.90	750.00	\$ 675.00

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Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**

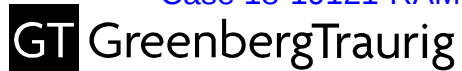
<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Jed Dwyer	0.10	484.00	48.40
Stephen A. Mendelsohn	30.10	580.00	17,458.00
Kenneth N. Zuckerbrot	0.90	750.00	675.00
Sabrina D. Niewialkouski	4.40	332.00	1,460.80
Stephanie Peral	17.00	340.00	5,780.00
Reginald Sainvil	10.50	332.00	3,486.00
Patricia P. Lin	0.20	232.00	46.40
Cynthia Lott	0.30	148.00	44.40
Totals:	63.50	456.78	\$ 28,999.00

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 Re: Liquidating Trust
 Matter No.: 180567.010300

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
02/12/20	Search Criteria: (None); Document Type: Pacer Research Charges for February 2020	\$ 0.80
02/13/20	Search Criteria: (None); Document Type: Pacer Research Charges for February 2020	\$ 0.10
02/27/20	Search Criteria: (None); Document Type: Pacer Research Charges for February 2020	\$ 0.30
02/27/20	Search Criteria: (None); Document Type: Pacer Research Charges for February 2020	\$ 0.30
02/28/20	Search Criteria: (None); Document Type: Pacer Research Charges for February 2020	\$ 1.10
03/02/20	Search Criteria: (None); Document Type: Pacer Research Charges for March 2020	\$ 0.20
03/02/20	Search Criteria: (None); Document Type: Pacer Research Charges for March 2020	\$ 0.80
03/04/20	Search Criteria: (None); Document Type: Pacer Research Charges for March 2020	\$ 0.80
03/06/20	Search Criteria: (None); Document Type: Pacer Research Charges for March 2020	\$ 0.30
03/16/20	Search Criteria: (None); Document Type: Pacer Research Charges for March 2020	\$ 1.20
03/24/20	Search Criteria: (None); Document Type: Pacer Research Charges for March 2020	\$ 1.70
06/29/20	VENDOR: Accurint-ACH / Lexis Nexis INVOICE#: 1008203-20200630 DATE: 6/30/2020 Advanced Person Search (Rollup) on Jun 29 2020 - Re: XXXXX2290,	\$ 0.47
06/29/20	VENDOR: Accurint-ACH / Lexis Nexis INVOICE#: 1008203-20200630 DATE: 6/30/2020 Criminal Search on Jun 29 2020 - Re: XXXXX2290,	\$ 0.47
06/29/20	VENDOR: Accurint-ACH / Lexis Nexis INVOICE#: 1008203-20200630 DATE: 6/30/2020 Flat Rate Comprehensive Report on Jun 29 2020 - Re: FELIX A FERNANDEZ 1943462155,	\$ 2.61
Total Expenses:		\$ 11.15



Invoice No. : 5449477
 File No. : 180567.010300
 Bill Date : August 20, 2020

1st Global Capital Financial Services
 1250 E. Hallandale Beach Blvd
 Suite 409
 Hallandale Beach Blvd., FL 33009

INVOICE

Re: Liquidating Trust

Legal Services through July 31, 2020:

Total Fees: \$ 22,238.80

Expenses:

Filing Fees	479.72
Information and Research	546.38

Total Expenses: \$ 1,026.10

Current Invoice: \$ 23,264.90

Previous Balance (see attached statement): \$ 38,272.87

Total Amount Due: \$ 61,537.77

BIM:EDL

Tax ID: 59-1270754

Invoice No.: 5449477
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Description of Professional Services Rendered:

TASK CODE: 801 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/14/20	Cynthia Lott	Retrieve background (Lexis Advance Reported Cases, AAA decisions, Bloomberg Law Labor Arbitration Decisions, and ArbCheck materials) on ten separate Arbitrators for S. Mendelsohn.	2.30	340.40
			Total Hours:	2.30
			Total Amount:	\$ 340.40

TIMEKEEPER SUMMARY FOR TASK CODE 801,

ASSET ANALYSIS AND RECOVERY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Cynthia Lott	2.30	148.00	340.40
Totals:	2.30	148.00	\$ 340.40

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Description of Professional Services Rendered

TASK CODE: 804 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/24/20	Michael A. Ambrose	Accurint search and pull for Magda C. Rodriguez for Patricia Lin	0.40	48.00
			<hr/>	
			Total Hours:	0.40
			Total Amount:	\$ 48.00

TIMEKEEPER SUMMARY FOR TASK CODE 804,

CASE ADMINISTRATION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Michael A. Ambrose	0.40	120.00	48.00
Totals:	0.40	120.00	\$ 48.00

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Description of Professional Services Rendered

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/20	Stephen A. Mendelsohn	EAST COAST: emails with opposing counsel and call wit Jim Cassel Trustee re: July payment and a further amendment to settlement agreement.	0.40	232.00
07/01/20	Stephen A. Mendelsohn	CARTOON CUTS re: review of draft complaint and edits.	0.40	232.00
07/01/20	Stephen A. Mendelsohn	DART SEASONAL re: email to opposing counsel as to status of settlement .	0.10	58.00
07/01/20	Stephen A. Mendelsohn	RADIUM 2: re: call with Jim Cassel Trustee and emails with Radium's counsel as to counter settlement offer.	0.40	232.00
07/01/20	Reginald Sainvil	[Momentum] Analyze final order regarding pretrial deadlines.	0.20	66.40
07/01/20	Reginald Sainvil	Review and revise description of debtor to be included in complaint.	0.50	166.00
07/02/20	Stephen A. Mendelsohn	RADIUM re: emails with Jim Cassel as to counter settlement offer and email to radium's counsel .	0.40	232.00
07/02/20	Stephen A. Mendelsohn	SOFTEK re: review of potential arbitrators from AAA list.	0.90	522.00
07/02/20	Stephen A. Mendelsohn	FEES: Call with SEC as to fee motion.	0.40	232.00
07/02/20	Stephen A. Mendelsohn	CARTOON CUTS re: edits to complaint.	0.50	290.00
07/02/20	Stephen A. Mendelsohn	DART SEASONAL re: email to darts counsel as to status of settlement.	0.20	116.00
07/02/20	Sabrina D. Niewialkouski	[Cartoon Cuts] Revised Complaint to reflect new footnote (that bankruptcy was confirmed for IGC)	0.20	66.40
07/02/20	Stephanie Peral	Work on upcoming production to Radium and correspondence re: same.	1.10	374.00
07/02/20	Reginald Sainvil	Analyze terms of second amendment to the East Coast Settlement Agreement.	0.40	132.80
07/03/20	Stephanie Peral	Momentum: Finalize and serve privilege log on Radium.	0.30	102.00
07/05/20	Reginald Sainvil	Draft and revise second amendment to settlement agreement for East Coast.	1.50	498.00
07/06/20	Stephen A. Mendelsohn	FUND 4 Growth re: email to Joe Luzinski as to possible case.	0.30	174.00
07/06/20	Stephen A. Mendelsohn	EAST COAST re: of draft amendments to settlement agreement and email to opposing counsel	0.20	116.00
07/06/20	Stephanie Peral	Momentum: Work on production to Radium and clawback re: same.	0.50	170.00
07/06/20	Reginald Sainvil	Review and revise second amendment to settlement agreement with East Coast.	0.40	132.80
07/07/20	Stephen A. Mendelsohn	DART SEASONAL re: emails with opposing counsel as to settlement draft.	0.30	174.00
07/08/20	Stephen A. Mendelsohn	RADIUM 2 : review of new settlement	0.30	174.00

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07/08/20	Sabrina D. Niewialkouski	proposals.		
07/08/20	Sabrina D. Niewialkouski	[Cartoon Cuts] Coordinated filing and drafting of summons and civil cover sheet	0.20	66.40
07/09/20	Stephen A. Mendelsohn	RADIUM re: call with radium's counsel Harris Koroglu as to his client's counteroffer and its proof of claim.	0.60	348.00
07/09/20	Stephen A. Mendelsohn	RADIUM: call with Jim Cassel, Joe Luzinski and John Dodd as to new radium counteroffer.	0.50	290.00
07/09/20	Stephen A. Mendelsohn	MEGA M: review of IGC documents for possible case.	0.30	174.00
07/09/20	Reginald Sainvil	Analysis regarding claims and defenses with regard to proof of claim filed by Radium in connection with Momentum adversary proceeding.	1.80	597.60
07/10/20	Stephen A. Mendelsohn	Radium re: conference call with Jim Cassel, Joe Luzinski and John Dodd re: settlement	0.40	232.00
07/10/20	Stephen A. Mendelsohn	SOFTEK re: review of proposed arbitrators.	0.50	290.00
07/10/20	Stephen A. Mendelsohn	RADIUM re: new settlement offer from Radium	0.20	116.00
07/10/20	Stephen A. Mendelsohn	RADIUM re: call with Harris Korogolu re: settlement terms.	0.40	232.00
07/13/20	Patricia P. Lin	Preparation for filing Complaint	0.20	46.40
07/13/20	Stephen A. Mendelsohn	RADIUM 2 re: emails to trustee as to tentative settlement with Radium 2.	0.30	174.00
07/13/20	Stephen A. Mendelsohn	SOFTEK: Review of research as to possible arbitrators	1.30	754.00
07/13/20	Stephen A. Mendelsohn	CARTOON CUTS re: final review and edits to complaint.	0.30	174.00
07/13/20	Sabrina D. Niewialkouski	[Cartoon Cuts] Obtained registered agent addresses for every entity to be sued and strategise over where to serve them; compiled exhibits for filing	0.90	298.80
07/14/20	Patricia P. Lin	Preparation for filing Complaint and securing a process server in Puerto Rico	2.60	603.20
07/14/20	Stephen A. Mendelsohn	DART SEASONAL re: email to Trustee as to Dart's renegeing on tentative settlement and litigation recommendations.	0.30	174.00
07/14/20	Sabrina D. Niewialkouski	[Cartoon Cuts] Redacted exhibits (SS numbers, account numbers, driver license) for filing with complaint; compiled information for civil cover sheet; reviewed and finalized summons for service with correct addresses; coordinated summons and complaint for service	1.40	464.80
07/15/20	Patricia P. Lin	Work with issued Summonses including preparation for service of process	1.10	255.20
07/15/20	Sabrina D. Niewialkouski	[Cartoon Cuts] Received, reviewed issued summons and coordinated service of same	0.30	99.60
07/16/20	Stephen A. Mendelsohn	SOFTEK: Communications with AAA and opposing counsel as to selection of arbitrator.	0.80	464.00
07/16/20	Stephanie Peral	Momentum: Analyze scheduling order and	0.20	68.00

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Description of Professional Services Rendered

		calendar deadlines.		
07/17/20	Stephen A. Mendelsohn	Radium 2: review of comments from Radium's counsel as to settlement agreement draft.	0.40	232.00
07/17/20	Stephen A. Mendelsohn	SOFTEK re: communications with opposing counsel as to selection of arbitrator and arbitration procedures.	0.80	464.00
07/21/20	Patricia P. Lin	Follow up on service of process	0.10	23.20
07/21/20	Stephen A. Mendelsohn	SOFTEK re: emails with AAA as to arbitrator conflict issues.	0.70	406.00
07/21/20	Stephen A. Mendelsohn	SOFTEK re: Review of answer and counterclaim.	1.40	812.00
07/22/20	Patricia P. Lin	Communication with process server regarding status of service on Defendants in Puerto Rico	0.10	23.20
07/22/20	Stephen A. Mendelsohn	SOFTEK re: witness list for AAA.	1.10	638.00
07/22/20	Stephen A. Mendelsohn	RADIUM re: calls with Harris Koroglu attorney for Radium as to changes to settlement agreement.	0.70	406.00
07/22/20	Sabrina D. Niewialkowski	[Cartoon Cuts] Received, reviewed updated on service in PR to defendants	0.10	33.20
07/23/20	Stephen A. Mendelsohn	RADIUM re: emails with Jim Cassel and Harris Koroglu attorney for radium as to one change to the settlement agreement.	0.20	116.00
07/23/20	Stephen A. Mendelsohn	Outline of answer to Softek arbitration counterclaim and email to Jim Cassel as to issues reflected in counterclaim.	1.60	928.00
07/23/20	Stephen A. Mendelsohn	Litigation matters: email to John Dodd summarizing cases for exemption from bulk sale	0.80	464.00
07/24/20	Patricia P. Lin	Work on service issues including searches on Felix Pena and Magda Rodriguez	1.60	371.20
07/24/20	Stephen A. Mendelsohn	CARTOON CUTS re: problems with service of process.	0.30	174.00
07/24/20	Sabrina D. Niewialkowski	[Cartoon Cuts] Received, reviewed status of service/summons on Felix Pena and Magda Rodriguez and strategise on how to instruct process server	0.80	265.60
07/27/20	Stephen A. Mendelsohn	SOFTEK re: correspondence from AAA as to arbitrator selection and procedural issues.	0.20	116.00
07/27/20	Stephen A. Mendelsohn	CARTOON CUTS re: service of process issues in Puerto Rico.	0.30	174.00
07/27/20	Stephen A. Mendelsohn	SOFTEK re: draft of letter to opposing counsel as to violation of the automatic stay.	0.20	116.00
07/27/20	Stephen A. Mendelsohn	SOFTEK re: call with Jim Cassel and John Dodd concerning counterclaims.	0.80	464.00
07/27/20	Stephen A. Mendelsohn	SOFTEK re: emails with John Dodd and discussion as to violation of automatic stay.	0.30	174.00
07/28/20	Stephen A. Mendelsohn	SOFTEK re: calls and emails with John Dodd as to letter to Softek advising of the	0.60	348.00

Invoice No.: 5449477
 Matter No.: 180567.010300

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Description of Professional Services Rendered

		violation of the automatic stay and strategy for bankruptcy court remedies.		
07/29/20	Patricia P. Lin	Follow up regarding service of process and surveillance in Puerto Rico	0.20	46.40
07/29/20	Stephen A. Mendelsohn	WALL STREET re: emails with Mendy Piekarski as to Bannan deposition (subpoena duces tecum, debtor production and privilege issues).	0.50	290.00
07/29/20	Stephen A. Mendelsohn	CARTOON CUTS re: instructions for process server concerning attempts to serve Pena and companies.	0.30	174.00
07/29/20	Stephen A. Mendelsohn	WALL STREET re: preparation for Bannan deposition and emails with Mendy Piekarski and Stephanie Peral as to documents discovery issues.	2.80	1,624.00
07/29/20	Sabrina D. Niewialkouski	[Cartoon Cuts] Strategise over time to set up surveillance for Pena and wife for process server	0.10	33.20
07/30/20	Stephen A. Mendelsohn	SOFTEK : Communication with AAA as to arbitrator conflict issues.	0.20	116.00
07/30/20	Stephen A. Mendelsohn	WALL STREET FUNDING re: emails with Mendy Piekarski attorney for Wall Street Funding as to document discovery, search terms and privilege issues.	0.90	522.00
07/30/20	Stephen A. Mendelsohn	PLATINUM: draft of settlement email to attorney for Platinum.	0.30	174.00
07/30/20	Stephanie Peral	Momentum: Correspondence re: Wall Street production.	0.20	68.00
07/31/20	Stephen A. Mendelsohn	Wall Street re: call with Mendy Piekarski attorney for Wall Street as to deposition of Courtney Bannan.	0.40	232.00
07/31/20	Stephen A. Mendelsohn	Wall Street: Preparation for Bannan deposition.	0.80	464.00
07/31/20	Stephanie Peral	Momentum: Analyze Bannan documents and prepare production re: same; correspondence re: same.	1.10	374.00

Total Hours: 45.40

Total Amount: \$ 21,280.40

Invoice No.: 5449477
Matter No.: 180567.010300

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Description of Professional Services RenderedTIMEKEEPER SUMMARY FOR TASK CODE 810.

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	27.30	580.00	15,834.00
Sabrina D. Niewialkouski	4.00	332.00	1,328.00
Stephanie Peral	3.40	340.00	1,156.00
Reginald Sainvil	4.80	332.00	1,593.60
Patricia P. Lin	5.90	232.00	1,368.80
Totals:	45.40	468.73	\$ 21,280.40

Invoice No.: 5449477
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 832 CREDITOR INQUIRIES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/20	Reginald Sainvil	Telephone conference with investor regarding future distributions and status of claims being pursued by the trust.	0.60	199.20
07/02/20	Reginald Sainvil	Correspondence with claim agent regarding status of distributions and tax-related queries from investors.	0.40	132.80
			Total Hours:	1.00
			Total Amount:	\$ 332.00

TIMEKEEPER SUMMARY FOR TASK CODE 832,

CREDITOR INQUIRIES

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Reginald Sainvil	1.00	332.00	332.00
Totals:	1.00	332.00	\$ 332.00

Invoice No.: 5449477
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 844 SEC MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/24/20	Stephanie Peral	Momentum: Correspondence with S. Mendelsohn re: status of case.	0.10	34.00
07/29/20	Stephanie Peral	Momentum: Correspondence with Wall Street re: productions.	0.60	204.00
			<hr/>	
			Total Hours:	0.70
			Total Amount:	\$ 238.00

TIMEKEEPER SUMMARY FOR TASK CODE 844,

SEC MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephanie Peral	0.70	340.00	238.00
Totals:	0.70	340.00	\$ 238.00

Invoice No.: 5449477
Matter No.: 180567.010300

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Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**

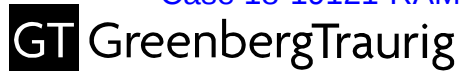
<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	27.30	580.00	15,834.00
Sabrina D. Niewialkouski	4.00	332.00	1,328.00
Stephanie Peral	4.10	340.00	1,394.00
Reginald Sainvil	5.80	332.00	1,925.60
Patricia P. Lin	5.90	232.00	1,368.80
Michael A. Ambrose	0.40	120.00	48.00
Cynthia Lott	2.30	148.00	340.40
Totals:	49.80	446.56	\$ 22,238.80

Invoice No.: 5449477
 Re: Liquidating Trust
 Matter No.: 180567.010300

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
04/06/20	Search Criteria: (None); Document Type: Pacer Research Charges for April 2020	\$	7.00
04/13/20	Search Criteria: (None); Document Type: Pacer Research Charges for April 2020	\$	1.70
07/13/20	Lexis Charges: 07/13/20 LEXIS ADVANCE Requested by LOTT, CYNTHIA Ref: 180567.010300	\$	19.80
07/14/20	Lexis Charges: 07/14/20 LEXIS ADVANCE Requested by LOTT, CYNTHIA Ref: 180567.010300	\$	514.80
07/15/20	VENDOR: Wright Express Financial Services Corpor INVOICE#: 00072820153 DATE: 7/28/2020 Complaint - Ept1110215940: 7/15/2020	\$	479.72
07/24/20	VENDOR: Accurint-ACH / Lexis Nexis INVOICE#: 1008203-20200731 DATE: 7/31/2020 Advanced Person Search (Rollup) on Jul 24 2020 - Re: MAGDA C RODRIGUEZ 00646,	\$	0.47
07/24/20	VENDOR: Accurint-ACH / Lexis Nexis INVOICE#: 1008203-20200731 DATE: 7/31/2020 Flat Rate Comprehensive Report on Jul 24 2020 - Re: MAGDA C RODRIGUEZ-RODRIGUEZ 1581749592,	\$	2.61
Total Expenses:		\$	1,026.10



Invoice No. : 5472978
 File No. : 180567.010300
 Bill Date : September 11, 2020

1st Global Capital Financial Services
 1250 E. Hallandale Beach Blvd
 Suite 409
 Hallandale Beach Blvd., FL 33009

INVOICE

Re: Liquidating Trust

Legal Services through August 31, 2020:

Total Fees: \$ 16,855.60

Expenses:

Conference Calls	2.05
Off-site Printing and Copying Charges	35.00
Transcript Charges	360.15
Information and Research	172.25

Total Expenses: \$ 569.45

Current Invoice: \$ 17,425.05

Previous Balance (see attached statement): \$ 61,537.77

Total Amount Due: \$ 78,962.82

BIM:EDL

Tax ID: 59-1270754

Invoice No.: 5472978
 Matter No.: 180567.010300

Page 1

Description of Professional Services Rendered:

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/20	Stephanie Peral	Momentum: Finalize and serve production on Wall Street.	0.10	34.00
08/01/20	Reginald Sainvil	Analyze documents regarding Global Merchant Funding and 1 Global Capital in connection with pretrial discovery and preparing for pretrial depositions relating to Momentum adversary proceeding.	3.90	1,294.80
08/03/20	Jed Dwyer	Review of issues related to specific target of litigation	0.30	145.20
08/03/20	Patricia P. Lin	Follow up with process server in Puerto Rico including work on obtaining additional information for same	0.60	139.20
08/03/20	Stephen A. Mendelsohn	CARTOON CUTS re: due diligence as to Felix Pena's criminal conviction and emails to Trustee.	0.60	348.00
08/03/20	Stephen A. Mendelsohn	SOFTEK re: emails with Nelson Robles Softek counsel re: violation of automatic stay and counterclaims.	0.30	174.00
08/03/20	Sabrina D. Niewialkouski	[Cartoon Cuts] Researched whereabouts of Felix Pena to determine if he is in custody of BOP	0.90	298.80
08/04/20	Stephen A. Mendelsohn	WALL STREET re: post Bannan deposition call with John Dodd.	0.30	174.00
08/04/20	Stephen A. Mendelsohn	WALL STREET re: post deposition of Courtney Bannan call with Wall Street attorney Mendy Piekarski.	0.40	232.00
08/04/20	Stephen A. Mendelsohn	WALL STREET FUNDING re: deposition of Courtney Bannan.	3.10	1,798.00
08/04/20	Stephen A. Mendelsohn	GENERAL LITIGATION re: usury and Merchant agreement cases discussion with John Dodd as usury defense in new cases..	0.60	348.00
08/05/20	Stephen A. Mendelsohn	SOFTEK re: call with attorneys for Softek as to automatic stay and counterclaims.	0.40	232.00
08/06/20	Stephen A. Mendelsohn	WALL STREET re: discussion with Stephanie Peral and Wall Street attorney Mendy Piekarski as to documents searches.	0.50	290.00
08/06/20	Stephen A. Mendelsohn	SOFTEK re: emails with Softek counsel as to amendment of counterclaims.	0.30	174.00
08/06/20	Stephen A. Mendelsohn	SOFTEK re: email to Trustee (counterclaims).	0.20	116.00
08/06/20	Stephen A. Mendelsohn	GENERAL re: discussion with John Dodd as to the effects of assignments of claims held by the Trustee (counterclaims).	0.50	290.00
08/06/20	Sabrina D. Niewialkouski	[Dart Seasonal Products] review and determined best strategy based on defendants' filed Motion to Strike First	2.60	863.20

Invoice No.: 5472978
 Matter No.: 180567.010300

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Description of Professional Services Rendered

Date	Attorney	Description of Professional Services Rendered	Hours	Amount
		Amended Complaint, drafted notice of withdrawing May 21, 2020 First Amended Complaint; drafted Motion for Leave to File First Amended Complaint; Drafted Proposed order on Motion for leave to file First Amended Complaint		
08/06/20	Reginald Sainvil	Analyze status of Coots' chapter 11 cases.	0.60	199.20
08/10/20	Stephen A. Mendelsohn	SOFTEK re: emails with AAA as to preliminary hearing.	0.20	116.00
08/10/20	Sabrina D. Niewialkowski	[Dart Seasonal] Coordinated filing of Notice of Withdrawal, Motion for Leave to File, and Amended Complaint	0.50	166.00
08/11/20	Sabrina D. Niewialkowski	[Dart Seasonal] Received, reviewed email re: coordinating date and time for hearing on motion for leave to amend complaint	0.10	33.20
08/12/20	Patricia P. Lin	Follow up with process server in Puerto Rico regarding service of process	0.10	23.20
08/12/20	Sabrina D. Niewialkowski	[Dart Seasonal] spoke to opposing counsel re: potential agreed order on motion for leave to amend complaint; reviewed revised notice for hearing on same and reviewed local rules for good faith conferral	0.40	132.80
08/13/20	Reginald Sainvil	Analyze documents produced in discovery in support of summary judgment to be pursued against Wall Street Funding in connection with Momentum adversary proceeding.	3.40	1,128.80
08/14/20	Stephen A. Mendelsohn	PLATINUM re: emails as to settle offer with Platinum with John Dodd and Jim Cassel.	0.20	116.00
08/17/20	Stephen A. Mendelsohn	PLATINUM re: email to attorney Mike Del Lago for Platinum re: settlement offer.	0.20	116.00
08/17/20	Stephen A. Mendelsohn	Emails with defense counsel re: arbitration procedures.	0.20	116.00
08/20/20	Sabrina D. Niewialkowski	[Cartoon Cuts] Searched civil case currently pending against Pena and wife to determine if we can locate recent address for same to serve him at	0.70	232.40
08/20/20	Sabrina D. Niewialkowski	[Dart Seasonal] called and prepared email to opposing counsel following up on whether his client will be opposing the motion for leave to amend complaint	0.20	66.40
08/21/20	Stephen A. Mendelsohn	SOFTEK re: emails with opposing counsel and AAA as to counterclaim and pre-hearing stipulation.	0.40	232.00
08/21/20	Stephen A. Mendelsohn	SOFTEK re: review of Bannan deposition and emails with John Dodd and Stephanie Peral as to future actions.	1.60	928.00
08/21/20	Sabrina D. Niewialkowski	[Dart Seasonal] Received response from opposing counsel saying he will not agree to our motion for leave to amend complaint; strategise re hearing on motion for leave on Monday; received, reviewed email from opposing counsel requesting us to prepare	1.40	464.80

Invoice No.: 5472978
 Matter No.: 180567.010300

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Description of Professional Services Rendered

		a proposed agreed order on Monday's hearing; Drafted agreed proposed order; emailed proposed order to counsel for approval; received reviewed executed agreed order from Court; coordinated filing of Amended Complaint per order on Monday; coordinated cancellation of hearing on Monday		
08/21/20	Stephanie Peral	Momentum: Analyze deposition transcript of C. Bannan.	0.60	204.00
08/23/20	Reginald Sainvil	Analyze documents produced in discovery to determine inconsistent positions of Wall Street Funding in connection with Momentum adversary proceeding.	2.70	896.40
08/24/20	Stephen A. Mendelsohn	CARTOON CUTS re: memo to Jim Cassel as to service of process and Felix Pena criminal issues.	0.30	174.00
08/24/20	Stephen A. Mendelsohn	WALL STREET re: emails with John Dodd as to Bannan deposition.	0.30	174.00
08/24/20	Stephen A. Mendelsohn	SOFTEK re: emails with opposing counsel as to pre-trial scheduling.	0.20	116.00
08/24/20	Reginald Sainvil	[Momentum] Review Ex Parte Motion Extend Pretrial Deadlines.	0.20	66.40
08/25/20	Stephen A. Mendelsohn	SOFTEK re: emails with Softek counsel as to pre trial order.	0.10	58.00
08/27/20	Stephen A. Mendelsohn	Review and comments to pre-hearing order.	0.60	348.00
08/27/20	Sabrina D. Niewialkowski	[Cartoon Cuts] Strategized on next steps for service on Felix Pena	0.10	33.20
08/28/20	Jed Dwyer	Attention to Felix Pena Fernandez issues	0.40	193.60
08/28/20	Patricia P. Lin	Follow up with server regarding service on Defendants in Puerto Rico	0.10	23.20
08/28/20	Stephen A. Mendelsohn	SOFTEK re: telephone conference with AAA arbitrator re: procedures for case and counterclaim issues.	1.30	754.00
08/31/20	Patricia P. Lin	Review previous addresses of service attempts, research additional address including communicate with process server regarding same	0.50	116.00
08/31/20	Stephen A. Mendelsohn	SOFTEK emails with AAA and opposing counsel as to scheduling order.	0.30	174.00
			<hr/>	
			Total Hours:	33.50
			Total Amount:	\$ 14,352.80

Invoice No.: 5472978
Matter No.: 180567.010300

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Description of Professional Services RenderedTIMEKEEPER SUMMARY FOR TASK CODE 810.

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Jed Dwyer	0.70	484.00	338.80
Stephen A. Mendelsohn	13.10	580.00	7,598.00
Sabrina D. Niewialkouski	6.90	332.00	2,290.80
Stephanie Peral	0.70	340.00	238.00
Reginald Sainvil	10.80	332.00	3,585.60
Patricia P. Lin	1.30	232.00	301.60
Totals:	33.50	428.44	\$ 14,352.80

Invoice No.: 5472978
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 832 CREDITOR INQUIRIES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/03/20	Reginald Sainvil	Telephone conference with creditors regarding inquires related to status of distributions.	0.70	232.40
08/13/20	Reginald Sainvil	Telephone conference with investor regarding case status and whether additional distributions will occur.	0.40	132.80
08/19/20	Reginald Sainvil	Telephone conference with creditors regarding status of distributions and likelihood of further distributions.	0.60	199.20
08/21/20	Reginald Sainvil	Correspondence with several investors regarding status of distributions.	0.70	232.40
08/24/20	Reginald Sainvil	Telephone conference with several investors regarding distributions and notice regarding W-9 form.	0.80	265.60
08/27/20	Reginald Sainvil	Telephone conference with numerous investors regarding status of chapter 11 cases and whether any distributions will be made this year.	0.80	265.60
08/27/20	Reginald Sainvil	Telephone conference with investors regarding case status and status of distributions.	0.40	132.80
			<hr/>	
			Total Hours:	4.40
			Total Amount:	\$ 1,460.80

TIMEKEEPER SUMMARY FOR TASK CODE 832,

CREDITOR INQUIRIES

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Reginald Sainvil	4.40	332.00	1,460.80
Totals:	4.40	332.00	\$ 1,460.80

Invoice No.: 5472978
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 844 SEC MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/06/20	Stephanie Peral	Momentum: Conference call with counsel for Wall Street re: discovery; correspondence re: same.	0.60	204.00
08/10/20	Stephanie Peral	Momentum: Correspondence re: Wall Street discovery and strategy re: same.	0.20	68.00
08/13/20	Stephanie Peral	Momentum: Correspondence with FTI re: Wall Street discovery.	0.30	102.00
08/17/20	Stephanie Peral	Momentum: Correspondence with counsel for Wall Street re: discovery.	0.10	34.00
08/18/20	Stephanie Peral	Momentum: Correspondence with counsel for Wall Street re: discovery and request for extension.	0.10	34.00
			<hr/>	
			Total Hours:	1.30
			Total Amount:	\$ 442.00

TIMEKEEPER SUMMARY FOR TASK CODE 844,

SEC MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephanie Peral	1.30	340.00	442.00
Totals:	1.30	340.00	\$ 442.00

Invoice No.: 5472978
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 845 TAX MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/31/20	Kenneth N. Zuckerbrot	Conference call Luzinski, Bogen, Cassel and Dodd re letters to investors and tax treatment.	0.80	600.00
			<hr/>	
			Total Hours:	0.80
			Total Amount:	\$ 600.00

TIMEKEEPER SUMMARY FOR TASK CODE 845,

TAX MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Kenneth N. Zuckerbrot	0.80	750.00	600.00
Totals:	0.80	750.00	\$ 600.00

Invoice No.: 5472978
Matter No.: 180567.010300

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Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**

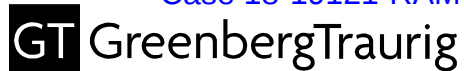
<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Jed Dwyer	0.70	484.00	338.80
Stephen A. Mendelsohn	13.10	580.00	7,598.00
Kenneth N. Zuckerbrot	0.80	750.00	600.00
Sabrina D. Niewialkowski	6.90	332.00	2,290.80
Stephanie Peral	2.00	340.00	680.00
Reginald Sainvil	15.20	332.00	5,046.40
Patricia P. Lin	1.30	232.00	301.60
Totals:	40.00	421.39	\$ 16,855.60

Invoice No.: 5472978
 Re: Liquidating Trust
 Matter No.: 180567.010300

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
03/10/20	VENDOR: TransUnion Risk and Alternative Data Sol INVOICE#: 574224-202003-1 DATE: 4/1/2020 Person: Records(1) - SSN: Searched [3][D]-[4]	\$	5.00
07/01/20	VENDOR: TransUnion Risk and Alternative Data Sol INVOICE#: 00070120196 DATE: 7/1/2020 Act. 574224. Research and Information Services. June, 2020. Requested by C. Lott for cm 180567.010300. Date: 06/29/20.	\$	30.00
08/06/20	WestlawNext Research by NIEWIALKOUSKI,SABRINA.	\$	172.25
08/09/20	VENDOR: American Teleconferencing Services Ltd INVOICE#: 3055790500-080920 DATE: 8/9/2020 Conferencing Services Invoice Date 200806 User SPM Client Code 180567 Matter Code 010300	\$	2.05
08/21/20	VENDOR: Veritext LLC (2569) INVOICE#: NY4492483 DATE: 8/21/2020 Certified transcript of Courtney Jared Bannan	\$	360.15
Total Expenses:		\$	569.45



Invoice No. : 5510031
 File No. : 180567.010300
 Bill Date : October 29, 2020

1st Global Capital Financial Services
 1250 E. Hallandale Beach Blvd
 Suite 409
 Hallandale Beach Blvd., FL 33009

INVOICE

Re: Liquidating Trust

Legal Services through September 30, 2020:

Total Fees: \$ 22,894.80

Expenses:

Professional & Legal	30.00
Information and Research	1,787.20

Total Expenses:	\$ 1,817.20
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Current Invoice:	\$ 24,712.00
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Previous Balance (see attached statement): \$ 46,323.75

Total Amount Due:	\$ 71,035.75
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BIM:JJC

Tax ID: 59-1270754

Invoice No.: 5510031
 Matter No.: 180567.010300

Page 1

Description of Professional Services Rendered:

TASK CODE: 804 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/20	Juwon Adebayo	Searched docket and pleadings for Puerto Rican case, 65th Infanteria Shopping Center.	0.80	140.80
			<hr/>	
			Total Hours:	0.80
			Total Amount:	\$ 140.80

TIMEKEEPER SUMMARY FOR TASK CODE 804,

CASE ADMINISTRATION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Juwon Adebayo	0.80	176.00	140.80
Totals:	0.80	176.00	\$ 140.80

Invoice No.: 5510031
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/02/20	Reginald Sainvil	Analyze status report regarding chapter 11 of Ellwood Medical Center.	0.40	132.80
09/03/20	Stephen A. Mendelsohn	SOFTEK re: edits to pre-hearing order.	0.20	116.00
09/04/20	Stephen A. Mendelsohn	SOFTEK re: edits to pre-trial order.	0.30	174.00
09/08/20	Stephen A. Mendelsohn	WALL STREET re: review of response to request to produce.	0.40	232.00
09/08/20	Stephen A. Mendelsohn	WALL STREET re: communications with attorney for Wall Street as to Courtney Bannan deposition and her unwillingness to cooperate and possible motion to compel.	0.20	116.00
09/09/20	Patricia P. Lin	Communication with process server regarding status of service in Puerto Rico	0.10	23.20
09/09/20	Stephen A. Mendelsohn	WALL STREET re: review . and comments to draft response to request to produce and new client documents as to Momentum bank accounts. .	0.70	406.00
09/10/20	Stephen A. Mendelsohn	SOFTEK re: further discovery strategy.	0.80	464.00
09/10/20	Stephen A. Mendelsohn	WALL STREET re: emails with Mendy Piekarski and call to Courtney Bannan re: deposition.	0.20	116.00
09/10/20	Stephen A. Mendelsohn	DART SEASONAL re: evaluation of case status and litigation strategy for judgment.	1.20	696.00
09/10/20	Stephen A. Mendelsohn	DART SEASONAL re: outline of reply to motion to dismiss amended complaint and call with associate Sabrina Niewelkouski to that motion.	0.60	348.00
09/10/20	Sabrina D. Niewialkouski	[Dart Seasonal] Received, reviewed Motion to Dismiss First Amended Complaint; strategise on filing response in opposition to Motion to Dismiss; drafted Notice of Filing Exhibit 1 to First Amended Complaint and redacted exhibit for filing	0.90	298.80
09/10/20	Sabrina D. Niewialkouski	[Felix Pena] Strategise on achieving service on Felix Pena	0.20	66.40
09/11/20	Patricia P. Lin	Communication with process server regarding service issues and publication in Puerto Rico	0.20	46.40
09/11/20	Stephen A. Mendelsohn	SOFTEK re: outline for new discovery from Softek.	1.60	928.00
09/11/20	Stephen A. Mendelsohn	CARTOON CUTS re: calls and emails with Puerto Rico counsel William Vidal as to service by substitution in Puerto Rico upon defendant Felix Pena.	1.20	696.00
09/14/20	Stephen A. Mendelsohn	CARTOON CUTS re: discussion with Sabrina Niewelkouski as to service	0.30	174.00

Invoice No.: 5510031
 Matter No.: 180567.010300

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Description of Professional Services Rendered

09/14/20	Sabrina D. Niewialkouski	problems in Puerto Rico. [Dart Seasonal] Began drafting Response in Opposition to Motion to Dismiss First Amended Complaint	3.60	1,195.20
09/14/20	Sabrina D. Niewialkouski	[Cartoon Cuts] research re: whether we can serve Felix and Magda pursuant to Puerto Rican rules of civil procedure and determining other options for service	2.90	962.80
09/15/20	Stephen A. Mendelsohn	DART SEASONAL re: comments to response to motion to dismiss.	0.40	232.00
09/15/20	Sabrina D. Niewialkouski	[Dart Seasonal] Continued drafting Response in Opposition to Motion to Dismiss	2.40	796.80
09/16/20	Patricia P. Lin	Work on gathering and review of Defendants' corporate information in an effort to obtain a better address for service of process including preparation of chart regarding same	2.60	603.20
09/16/20	Stephen A. Mendelsohn	SOFTEK re: review of new discovery demands from Softek.	1.30	754.00
09/16/20	Stephen A. Mendelsohn	DART SEASONAL re: edits and comments as to response to motion to dismiss amended complaint.	0.80	464.00
09/16/20	Sabrina D. Niewialkouski	[Dart Seasonal] Reviewed made last revision to Response in Opposition to Defendants' Motion to Dismiss	0.60	199.20
09/17/20	Patricia P. Lin	Continue work on gathering and review of Defendants' corporate information in an effort to obtain a better address for service of process including work of chart regarding same	0.40	92.80
09/17/20	Stephen A. Mendelsohn	SOFTEK re: outline of potential issues with new respondents' request for discovery.	1.30	754.00
09/17/20	Sabrina D. Niewialkouski	[Dart Seasonal] Finalized Response in Opposition to Motion to Dismiss for filing	1.20	398.40
09/17/20	Jennifer A. Walker	Cite check, shepardize, quote check and generally proof Response in Opposition to Defendants Motion to Dismiss.	1.40	358.40
09/18/20	Stephen A. Mendelsohn	WALL STREET re: refusal of witness former GC Courtney Bannan to appear at a deposition and emails with John Dodd. .	0.40	232.00
09/18/20	Stephen A. Mendelsohn	WALL STREET re: options for a motion to compel Bannan to testify at deposition.	0.60	348.00
09/21/20	Stephen A. Mendelsohn	WALL STREET re: discussion with John Dodd as to problems with Courtney Bannan deposition.	0.50	290.00
09/21/20	Stephen A. Mendelsohn	WALL STREET re: calls with Courtney Bannan former General Counsel as to her continued deposition.	0.40	232.00
09/22/20	Stephen A. Mendelsohn	WALL STREET re: call with Courtney Bannan as to her deposition.	0.50	290.00
09/22/20	Stephen A. Mendelsohn	SOFTEK re: draft of answer and	1.10	638.00

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Description of Professional Services Rendered

		affirmative defenses.		
09/22/20	Stephen A. Mendelsohn	WALL STREET re: call with Mendy Piekarski attorney for Wall Street as to Courtney Bannan deposition.	0.40	232.00
09/24/20	Stephen A. Mendelsohn	WALL STREET : Emails with Courtney Bannan and Mendy Peikarsky as to terms for Bannan's continued deposition.	0.30	174.00
09/24/20	Stephen A. Mendelsohn	General Litigation Re: telephone conference with Jim Cassel, Joe Luzinski and John Dodd as to status of litigation cases handled by GT.	0.80	464.00
09/25/20	Stephen A. Mendelsohn	EAST COAST re: review of court notice of non-prosecution, draft of notice of compliance with settlement agreement and emails with Nick Davitian counsel for East Coast.	0.60	348.00
09/25/20	Jennifer A. Walker	Research on Puerto Rico service of subpoena on Felix Pena Rodriguez and current address	1.20	307.20
09/29/20	Stephen A. Mendelsohn	WALL STREET re: preparation for continued deposition of Courtney Bannan.	1.20	696.00
09/29/20	Stephanie Peral	Momentum: Correspondence with Wall Street's counsel re: discovery and exhibits.	0.10	34.00
09/30/20	Stephen A. Mendelsohn	WALL STREET re: preparation for Courtney Bannan deposition.	0.80	464.00
09/30/20	Stephen A. Mendelsohn	WALL STREET : Attendance at Courtney Bannan deposition (former General Counsel to 1 GC).	2.20	1,276.00
09/30/20	Stephen A. Mendelsohn	WALL STREET re: call with Wall Street's counsel Mendy Pierkaski re: settlement discussions.	0.30	174.00
09/30/20	Sabrina D. Niewialkouski	[Cartoon Cuts] Continued strategy for attempting service on Felix Pena and his wife	0.20	66.40
09/30/20	Stephanie Peral	Momentum: Strategize re: next steps with S. Mendelsohn.	0.10	34.00
09/30/20	Jennifer A. Walker	Research service on Felix Pena-Rodriguez and Magda Rodriguez and contact attorney in Puerto Rico.	1.70	435.20

Total Hours: 41.80

Total Amount: \$ 18,579.20

Invoice No.: 5510031
Matter No.: 180567.010300

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Description of Professional Services RenderedTIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	21.60	580.00	12,528.00
Sabrina D. Niewialkouski	12.00	332.00	3,984.00
Stephanie Peral	0.20	340.00	68.00
Reginald Sainvil	0.40	332.00	132.80
Patricia P. Lin	3.30	232.00	765.60
Jennifer A. Walker	4.30	256.00	1,100.80
Totals:	41.80	444.48	\$ 18,579.20

Invoice No.: 5510031
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 832 CREDITOR INQUIRIES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/20	Reginald Sainvil	Telephone conference with several investors regarding status of case and likelihood of future distributions.	0.40	132.80
09/02/20	Reginald Sainvil	Correspondence with investors regarding status of distributions and return of W-9 form.	0.30	99.60
09/04/20	Reginald Sainvil	Telephone conference addressing investor questions regarding status of future distributions.	0.30	99.60
09/10/20	Reginald Sainvil	Correspondence with investors regarding status of distributions.	0.60	199.20
09/11/20	Reginald Sainvil	Telephone conference with investor regarding status of the case, collections, as well as whether any further distributions are anticipated.	0.50	166.00
09/14/20	Reginald Sainvil	Telephone conference regarding status of initial distribution in light of investor broker relationship.	0.20	66.40
09/16/20	Reginald Sainvil	Telephone conference with investor regarding status of distributions and quarterly reports.	0.40	132.80
09/21/20	Reginald Sainvil	Telephone conferences with investors regarding status of case and distributions.	0.60	199.20
09/28/20	Reginald Sainvil	Teleconference regarding status of case and distributions.	0.40	132.80
09/29/20	Reginald Sainvil	Telephone conference with investor regarding W-9 form.	0.20	66.40
Total Hours:			3.90	
Total Amount:				\$ 1,294.80

TIMEKEEPER SUMMARY FOR TASK CODE 832,

CREDITOR INQUIRIES

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Reginald Sainvil	3.90	332.00	1,294.80
Totals:	3.90	332.00	\$ 1,294.80

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Description of Professional Services Rendered

TASK CODE: 844 SEC MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/20	Stephanie Peral	Wall Street: Correspondence to Mendy re: discovery.	0.10	34.00
09/08/20	Stephanie Peral	Momentum: Draft, finalize, and serve response to Wall Street's third request for production.	0.70	238.00
09/09/20	Stephanie Peral	Momentum: Correspondence with J. Luzinski re: Wall Street's discovery request.	0.10	34.00
			<hr/>	
			Total Hours:	0.90
			Total Amount:	\$ 306.00

TIMEKEEPER SUMMARY FOR TASK CODE 844,

SEC MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephanie Peral	0.90	340.00	306.00
Totals:	0.90	340.00	\$ 306.00

Invoice No.: 5510031
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Description of Professional Services Rendered

TASK CODE: 845 TAX MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/05/20	Kenneth N. Zuckerbrot	Review Luzinski letter and FAQs (0.8).	0.80	600.00
09/08/20	Kenneth N. Zuckerbrot	Review drafts of Grantor letters (0.5); zoom conference with Luzinski, Dodd, Bogen, Cassel (1.3).	1.80	1,350.00
09/23/20	Kenneth N. Zuckerbrot	Review J. Luzinski email and reply (0.6).	0.60	450.00
Total Hours:			3.20	
Total Amount:				\$ 2,400.00

TIMEKEEPER SUMMARY FOR TASK CODE 845,

TAX MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Kenneth N. Zuckerbrot	3.20	750.00	2,400.00
Totals:	3.20	750.00	\$ 2,400.00

Invoice No.: 5510031
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 924 WARN ACT MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/30/20	Stephen A. Mendelsohn	WALL STREET re: email to John Dodd as to settlement proposals for Wall Street case.	0.30	174.00
			<hr/>	
			Total Hours:	0.30
			Total Amount:	\$ 174.00

TIMEKEEPER SUMMARY FOR TASK CODE 924,

WARN ACT MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	0.30	580.00	174.00
Totals:	0.30	580.00	\$ 174.00

Invoice No.: 5510031
Matter No.: 180567.010300

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Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**

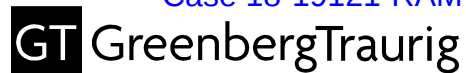
<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	21.90	580.00	12,702.00
Kenneth N. Zuckerbrot	3.20	750.00	2,400.00
Sabrina D. Niewialkouski	12.00	332.00	3,984.00
Stephanie Peral	1.10	340.00	374.00
Reginald Sainvil	4.30	332.00	1,427.60
Patricia P. Lin	3.30	232.00	765.60
Jennifer A. Walker	4.30	256.00	1,100.80
Juwon Adebayo	0.80	176.00	140.80
Totals:	50.90	449.80	\$ 22,894.80

Invoice No.: 5510031
Re: Liquidating Trust
Matter No.: 180567.010300

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
07/14/20	VENDOR: Securities Arbitration Commentator - ACH INVOICE#: 67709 DATE: 7/14/2020 AcctID: 3389. 1-Name Arbitrator Search	\$	30.00
09/14/20	WestlawNext Research by NIEWIALKOUSKI,SABRINA.	\$	1,197.50
09/15/20	Lexis Charges: 09/15/20 LEXIS ADVANCE Requested by NIEWIALKOUSKI, SABRINA Ref: 180567.010300	\$	138.60
09/15/20	WestlawNext Research by NIEWIALKOUSKI,SABRINA.	\$	451.10
Total Expenses:		\$	1,817.20



Invoice No. : 5529751
 File No. : 180567.010300
 Bill Date : November 13, 2020

1st Global Capital Financial Services
 1250 E. Hallandale Beach Blvd
 Suite 409
 Hallandale Beach Blvd., FL 33009

INVOICE

Re: Liquidating Trust

Legal Services through October 31, 2020:

Total Fees: \$ 15,944.80

Expenses:

Conference Calls	0.65
Other Charges	50.00
Transcript Charges	447.00
Information and Research	59.40

Total Expenses: \$ 557.05

Current Invoice: \$ 16,501.85

Previous Balance (see attached statement): \$ 71,035.75

Total Amount Due: \$ 87,537.60

BIM:JJC

Tax ID: 59-1270754

Invoice No.: 5529751
 Matter No.: 180567.010300

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Description of Professional Services Rendered:

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/01/20	Stephen A. Mendelsohn	WALL STREET re: follow up review after Courtney Bannan deposition as to payments from Momentum to Wall Street/King Cash.	1.10	638.00
10/02/20	Stephen A. Mendelsohn	SOFTEK re: settlement call with opposing counsel William Carvajal and Nelson Robles.	0.80	464.00
10/07/20	Stephen A. Mendelsohn	SOFTEK re: discussions with Softek's counsel as to settlement.	1.10	638.00
10/07/20	Stephen A. Mendelsohn	SOFTEK re: email to Liquidating Trustee as to settlement talks with Softek.	0.30	174.00
10/07/20	Jennifer A. Walker	Called Maria F. Velez Pastrana and spoke with her assistant regarding personal service on Felix and Magda Rodriguez. Draft and send follow-up email to Maria re same.	0.80	204.80
10/08/20	Reginald Sainvil	Prepare for and attend hearing regarding Momentum adversary proceeding.	1.30	431.60
10/09/20	Stephen A. Mendelsohn	WALL STREET: Outline of motion for summary judgment.	1.30	754.00
10/09/20	Stephen A. Mendelsohn	SOFTEK re: exchange of settlement letters and emails with Liquidating trustee.	1.20	696.00
10/12/20	Stephen A. Mendelsohn	DART SEASONAL re: preparation for hearing on motion to dismiss complaint.	1.10	638.00
10/14/20	Stephen A. Mendelsohn	DART SEASONAL re: edits and comments to opposition to motion to dismiss.	0.60	348.00
10/14/20	Sabrina D. Niewialkouski	[Dart Seasonal] Revised Response in Opposition to Motion to Dismiss in conformance with judge requirements	2.40	796.80
10/15/20	Sabrina D. Niewialkouski	[Dart Seasonal] Finalized Response in Opposition for filing	0.50	166.00
10/16/20	Sabrina D. Niewialkouski	[Dart Seasonal] Received reviewed instructions from JA re: setting hearing on Motion to Dismiss	0.10	33.20
10/20/20	Stephen A. Mendelsohn	SOFTEK re: emails with Liquidating Trustee re: settlement.	0.60	348.00
10/20/20	Stephen A. Mendelsohn	SOFTEK re: call with John Dodd re: settlement.	0.30	174.00
10/20/20	Stephen A. Mendelsohn	Review of letter from Softek's counsel re: settlement.	0.60	348.00
10/20/20	Stephen A. Mendelsohn	SOFTEK re: email with Liquidating trustee as to settlement terms	0.70	406.00
10/21/20	Stephen A. Mendelsohn	SOFTEK re: discussions with Softek's counsel as to settlement and report to Liquidating trustee as to recommendations.	2.20	1,276.00
10/22/20	Stephen A. Mendelsohn	SOFTEK re: email with William Vidal	0.50	290.00

Invoice No.: 5529751
 Matter No.: 180567.010300

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Description of Professional Services Rendered

		counsel to SOFTEK re: settlement.		
10/22/20	Stephen A. Mendelsohn	SOFTEK re: Draft of settlement agreement.	0.50	290.00
10/22/20	Stephen A. Mendelsohn	SOFTEK re: emails with John Dodd re: terms for Softek settlement.	0.20	116.00
10/23/20	Stephen A. Mendelsohn	SOFTEK re: draft of stipulation of settlement.	1.40	812.00
10/23/20	Stephen A. Mendelsohn	SOFTEK re: final negotiations with SOFTEK's counsel.	0.40	232.00
10/26/20	Stephen A. Mendelsohn	SOFTEK re: emails with Softek's counsel as to settlement terms.	0.60	348.00
10/26/20	Stephen A. Mendelsohn	SOFTEK re: edits to settlement agreement based upon John Dodd comments and questions.	0.60	348.00
10/27/20	Stephen A. Mendelsohn	SOFTEK re: call with John Dodd as to terms of settlement agreement.	0.50	290.00
10/27/20	Stephen A. Mendelsohn	SOFTEK re: call with Softek attorneys as to settlement agreement.	0.80	464.00
10/27/20	Stephen A. Mendelsohn	Wall Street: Review of order for pretrial stipulation and outline for draft stipulation.	1.20	696.00
10/28/20	Stephen A. Mendelsohn	SOFTEK re: emails with Nelson Robles and William Carvajal opposing counsel re; changes to settlement agreement.	0.40	232.00
10/28/20	Stephen A. Mendelsohn	WALL STREET re: outline of pre-trial order and email of same to Stephanie Peral.	0.70	406.00
10/29/20	Reginald Sainvil	Analyze the terms of the settlement agreement between the Trust and Softek.	0.80	265.60
10/30/20	Stephen A. Mendelsohn	SOGFTEK re: emails with Softek's counsels as to changes to settlement agreement and motion to approve settlement.	0.40	232.00
10/30/20	Stephen A. Mendelsohn	SOFTEK: review of changes from Softek's counsel to settlement agreement and motion to approve settlement.	0.50	290.00
10/30/20	Reginald Sainvil	Draft and revise motion requesting approval of settlement agreement between the Trust and Softek.	2.90	962.80

Total Hours: 29.40

Total Amount: \$ 14,808.80

Invoice No.: 5529751
Matter No.: 180567.010300

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Description of Professional Services RenderedTIMEKEEPER SUMMARY FOR TASK CODE 810.

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	20.60	580.00	11,948.00
Sabrina D. Niewialkouski	3.00	332.00	996.00
Reginald Sainvil	5.00	332.00	1,660.00
Jennifer A. Walker	0.80	256.00	204.80
Totals:	29.40	503.70	\$ 14,808.80

Invoice No.: 5529751
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 832 CREDITOR INQUIRIES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/02/20	Reginald Sainvil	Telephone conference with investor regarding status of future distributions.	0.20	66.40
10/06/20	Reginald Sainvil	Telephone conference with investor regarding status of distributions.	0.40	132.80
10/08/20	Reginald Sainvil	Teleconference with investor regarding status of distributions.	0.30	99.60
10/09/20	Reginald Sainvil	Correspondence with investors regarding status of distributions.	0.40	132.80
10/13/20	Reginald Sainvil	Telephone conference with investor regarding quarterly reports filed by the Liquidating Trustee.	0.40	132.80
10/14/20	Reginald Sainvil	Telephone conference with investors regarding status of distributions and quarterly financial reports submitted by the liquidating trustee.	0.50	166.00
10/22/20	Reginald Sainvil	Telephone conference with investor regarding status of distributions.	0.30	99.60
Total Hours:			2.50	
Total Amount:				\$ 830.00

TIMEKEEPER SUMMARY FOR TASK CODE 832.

CREDITOR INQUIRIES

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Reginald Sainvil	2.50	332.00	830.00
Totals:	2.50	332.00	\$ 830.00

Invoice No.: 5529751
 Matter No.: 180567.010300

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Description of Professional Services Rendered

TASK CODE: 844 SEC MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/14/20	Stephanie Peral	Momentum: Finalize and serve production to Wall Street.	0.30	102.00
10/28/20	Stephanie Peral	Strategize re: pre-trial stipulation.	0.40	136.00
10/29/20	Stephanie Peral	(Momentum) Strategize re: pre-trial stipulation.	0.20	68.00
			<hr/>	
			Total Hours:	0.90
			Total Amount:	\$ 306.00

TIMEKEEPER SUMMARY FOR TASK CODE 844.

SEC MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephanie Peral	0.90	340.00	306.00
Totals:	0.90	340.00	\$ 306.00

Invoice No.: 5529751
Matter No.: 180567.010300

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Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	20.60	580.00	11,948.00
Sabrina D. Niewialkouski	3.00	332.00	996.00
Stephanie Peral	0.90	340.00	306.00
Reginald Sainvil	7.50	332.00	2,490.00
Jennifer A. Walker	0.80	256.00	204.80
Totals:	32.80	486.12	\$ 15,944.80

Invoice No.: 5529751
 Re: Liquidating Trust
 Matter No.: 180567.010300

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
10/04/20	VENDOR: American Teleconferencing Services Ltd INVOICE#: 3055790500-100420 DATE: 10/4/2020 Conferencing Services Invoice Date 201002 User SPM Client Code 180567 Matter Code 010300	\$ 0.65
10/08/20	VENDOR: Gimenez, Angelina INVOICE#: 4310588610201352 DATE: 10/20/2020 Other; 10/08/20 - Telephonic Court Appearance (Reginald Sainvil); Merchant: COURTSOLUTIONS	\$ 50.00
10/14/20	Lexis Charges: 10/14/20 SEARCH Requested by MENDELSON, STEPHEN Ref: 180567.010300	\$ 59.40
10/19/20	VENDOR: Veritext LLC (2569) INVOICE#: 4588155 DATE: 10/19/2020 Job No. 4274950 09/30/20 Transcript of Courtney Jared Bannan	\$ 447.00
Total Expenses:		\$ 557.05

Invoice No. : 5540156
 File No. : 180567.010300
 Bill Date : December 2, 2020

1st Global Capital Financial Services
 1250 E. Hallandale Beach Blvd
 Suite 409
 Hallandale Beach Blvd., FL 33009

INVOICE

Re: Liquidating Trust

Legal Services through November 30, 2020:

Total Fees:	\$	6,905.60
Current Invoice:	\$	<u>6,905.60</u>
Previous Balance (see attached statement):	\$	87,537.60
Total Amount Due:	\$	<u>94,443.20</u>

BIM:JJC
 Tax ID: 59-1270754

Invoice No.: 5540156
 Matter No.: 180567.010300

Page 1

Description of Professional Services Rendered:

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/02/20	Stephen A. Mendelsohn	SOFTEK re: emails with Softek's counsel re: settlement and motion to approve agreement.	0.30	174.00
11/03/20	Stephen A. Mendelsohn	SOFTEK re: change to settlement draft.	0.30	174.00
11/03/20	Stephen A. Mendelsohn	PLATINUM re: call with Christine Medlock attorney for Platinum as to settlement.	0.50	290.00
11/04/20	Stephen A. Mendelsohn	SOFTEK re: emails with opposing counsel Nelson Robles as to one change to settlement.	0.20	116.00
11/04/20	Stephen A. Mendelsohn	PLATINUM re: further call with Platinum counsel Christine Medlock as to settlement.	0.30	174.00
11/05/20	Stephen A. Mendelsohn	Platinum re: call with counsel for Platinum as to settlement terms.	0.20	116.00
11/05/20	Stephen A. Mendelsohn	Platinum: emails with Liquidating Trustee as to settlement terms	0.30	174.00
11/06/20	Stephen A. Mendelsohn	EAST COAST JEWELRY re: emails with counsel for East Coast as to court hearing on case conference.	0.20	116.00
11/06/20	Stephen A. Mendelsohn	SOFTEK re: emails with counsel for Softek Nelson Robles re: amendment of settlement agreement.	0.20	116.00
11/09/20	Stephen A. Mendelsohn	SOFTEK re: follow-up issues for settlement re: change to section 9(a).	0.20	116.00
11/10/20	Stephen A. Mendelsohn	WALL STREET re: discussions with counsel for Wall Street as to settlement.	0.40	232.00
11/10/20	Stephen A. Mendelsohn	WALL STREET re: emails with Liquidating Trustee as to settlement negotiations.	0.50	290.00
11/10/20	Stephen A. Mendelsohn	SOFTEK re: emails with Nelson Robles attorney for Softek as to status of motion for court approval of settlement,	0.20	116.00
11/12/20	Stephen A. Mendelsohn	EAST COAST re: draft of response to order to show cause of lack of prosecution.	0.50	290.00
11/12/20	Stephen A. Mendelsohn	WALL STREET re: email to opposing counsel Mendy P. as to counter- settlement terms.	0.60	348.00
11/12/20	Reginald Sainvil	Draft and revise settlement agreement between IGC Trust and Platinum Funding.	2.20	730.40
11/13/20	Stephen A. Mendelsohn	SOFTEK re: discussion with John Dodd as to SEC potential position as to settlement.	0.20	116.00
11/13/20	Stephen A. Mendelsohn	Discussion with John Dodd as to attorney Feldman quantum meruit argument as to entitlement to legal fees.	0.40	232.00
11/13/20	Stephen A. Mendelsohn	WALL STREET re: new settlement email from Wall Street's counsel.	0.40	232.00

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Description of Professional Services Rendered

11/18/20	Stephen A. Mendelsohn	Ellwood re: notice from state court as to status hearing.	0.10	58.00
11/19/20	Stephen A. Mendelsohn	PLATINUM re: emails with counsel for Platinum as to settlement draft agreement.	0.10	58.00
11/19/20	Stephen A. Mendelsohn	WALL STREET re: counteroffer settlement email from Wall Street.	0.20	116.00
11/19/20	Stephen A. Mendelsohn	EAST COAST re: attendance at state court status conference.	0.50	290.00
11/20/20	Stephen A. Mendelsohn	WALL STREET: Discussion with opposing counsel Mendy P. as to settlement.	0.20	116.00
11/23/20	Stephen A. Mendelsohn	WALL STREET re: email to Liquidating Trustee re: new settlement offer and proposed counter offer.	0.20	116.00
11/23/20	Stephen A. Mendelsohn	WALL STREET emails with opposing counsel re: new settlement offers.	0.20	116.00
11/24/20	Stephen A. Mendelsohn	PLATINUM re: Calls with Christine Medlock counsel for Platinum as to changes to settlement agreement.	0.30	174.00
11/24/20	Stephen A. Mendelsohn	PLATINUM re: review of security agreement as to Platinum settlement.	0.20	116.00
11/24/20	Stephen A. Mendelsohn	EAST COAST re: emails with Joe Luzinski as to delinquent payments.	0.20	116.00
11/24/20	Stephen A. Mendelsohn	EAST COAST re: email to Nick Davitian counsel to East Coast as to delinquent payments.	0.20	116.00
11/30/20	Stephen A. Mendelsohn	SOFTEK re: emails with opposing counsel as to settlement payments.	0.20	116.00
11/30/20	Stephen A. Mendelsohn	PLATINUM re: emails with counsel for Platinum as to settlement payments.	0.30	174.00
11/30/20	Reginald Sainvil	Draft and revise settlement agreement regarding settlement of broker claims.	2.10	697.20

Total Hours: 13.10

Total Amount: \$ 6,531.60

TIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	8.80	580.00	5,104.00
Reginald Sainvil	4.30	332.00	1,427.60
Totals:	13.10	498.60	\$ 6,531.60

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Description of Professional Services Rendered

TASK CODE: 844 SEC MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/06/20	Stephanie Peral	Strategise re: next steps.	0.10	34.00
11/09/20	Stephanie Peral	Momentum: Correspondence re: bank statements.	0.30	102.00
11/11/20	Stephanie Peral	Momentum: Draft correspondence to client re: bank statements.	0.20	68.00
11/12/20	Stephanie Peral	Correspondence re: bank statements.	0.10	34.00
11/18/20	Stephanie Peral	Momentum: Correspondence re: discovery.	0.10	34.00
11/20/20	Stephanie Peral	Momentum: Correspondence re: discovery.	0.10	34.00
11/23/20	Stephanie Peral	Momentum: Correspondence re: discovery.	0.10	34.00
11/30/20	Stephanie Peral	Analyze upcoming pre-trial dates.	0.10	34.00

Total Hours: 1.10

Total Amount: \$ 374.00

TIMEKEEPER SUMMARY FOR TASK CODE 844,

SEC MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephanie Peral	1.10	340.00	374.00
Totals:	1.10	340.00	\$ 374.00

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Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	8.80	580.00	5,104.00
Stephanie Peral	1.10	340.00	374.00
Reginald Sainvil	4.30	332.00	1,427.60
Totals:	14.20	486.31	\$ 6,905.60