

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

v.

EQUITYBUILD, INC., EQUITYBUILD
FINANCE, LLC, JEROME H. COHEN, and
SHAUN D. COHEN,

Defendants.

Case No. 1:18-cv-5587

Hon. Manish S. Shah

**MORTGAGEES' RESPONSE TO RECEIVER'S EIGHTEENTH INTERIM
APPLICATION AND MOTION FOR COURT APPROVAL OF PAYMENT OF FEES
AND EXPENSES OF RECEIVER AND RECEIVER'S RETAINED PROFESSIONALS**

The Mortgagees identified on Exhibit A object to the Receiver's Eighteenth Interim Fee Application and Motion for Court Approval of Payment of Fees and Expenses of Receiver and Receiver's Retained Professionals (Dkt. 1384, the "18th Fee Petition") on the same or similar bases contained in their prior objections, which objections this Court has denied. They also object generally to the Receiver's request in his 18th Fee Petition for a super priority lien for the same reasons contained in Mortgagees' Response to Motion for Approval to Pay Certain Previously Approved Fees and Cost (Dkt. 961), and their Objections to Magistrate Judge Kim's Oral Ruling and Minute Order on Receiver's First Fee Allocation Motion (Dkt. 1389, objecting to Dkt. 1107, *see also* line-level objections at Dkt. 1210). The Court permitted a priming lien only with respect to fees incurred in "(i) the preservation, management, and liquidation of certain real estate belonging to the Receivership Estate, and (ii) the implementation and management of an orderly summary claim-priority adjudication process." (Dkt. 1030, p.2, the "Court-Approved Priming Lien Categories").

While preserving the above objections, the Mortgagees further object to the Receiver's request that fees and expenses shown on Exhibits F through I of the 18th Fee Petition (the "Fees") be paid on a first priority basis from the proceeds of the sale of certain Receivership real properties (the "Properties") (Dkt. 1332, pp. 13-15) to the extent that they are not covered by the Court-approved Priming Lien Categories. If Mortgagees' objections are not sustained in full, the Mortgagees request that the Receiver's request for a priority lien and his allocations be referred to Magistrate Judge Kim because the Mortgagees' similar objections in response to the Receiver's Second Motion for Approval of Allocations of Fees to Properties for Payment Pursuant to Receiver's Lien (Dkt. 1321) will be pending before Magistrate Judge Kim (see Dkt. 1381, objections due April 14, 2023, hearing set for June 15, 2023).

Finally, the Mortgagees request a 20% holdback of Fees requested in the Receiver's 18th Fee Petition and an additional 20% holdback on the payment of Fees that would be paid from the property-specific accounts rather than the Estate's operating account for the same reasons contained in earlier objections and which the Court consistently and expressly applied until its ruling (Dkts. 1366, 1372) on the Receiver's Seventeenth Interim Application and Motion for Court Approval of Payment of Fees and Expenses of Receiver and Receiver's Retained Professionals (Dkt. 1332, "17th Fee Petition"). As to the 17th Fee Petition, the Court stated it was continuing the holdback, and for the same reasons it did so before, but in its Order, the Court only expressly referenced one holdback instead of the two it historically implemented. The Court stated:

The 20% holdback, which this court continues, should cover the prospect of revisiting the Seventeenth Application without adding to delay or the items on Magistrate Judge Kim's plate. The court understands the Receiver's point about the discounted rates and unbilled time, but continues to believe a holdback is in the best interest of administration here. There remain issues that would be difficult to unwind once money goes out the door, and the holdback provides some hedge against that complexity down the road. For

those reasons and the ones stated in the court's orders granting the earlier fee applications, the 20% holdback continues.

Dkt. 1366 at p.2. As discussed in more detail below, the Institutional Lenders respectfully request that the Court clarify in its ruling on the 18th Fee Petition that it intends for both holdbacks to apply for the same reasons it previously imposed them.

BACKGROUND

1. The Mortgagees generally refer the Court to the Background section of their Response to Receiver's Fourteenth Interim Application and Motion for Court Approval of Payment of Fees and Expenses of Receiver and Receiver's Retained Professionals (Dkt. 1250, pp. 2-6).

2. As additional background here, on February 14, 2023 the Receiver filed his 18th Fee Petition. Dkt. 1384.

3. By order on February 15, 2023, the Court required Mortgagees to file responses or objections, if any, to the 18th Fee Application by March 1, 2023. Dkt. 1385.

4. The Court's ruling on the 17th Fee Petition was substantially the same as prior rulings except it did not refer allocation issues to Magistrate Judge Kim, instead granting the Receiver's proposed allocation, and did so over the Institutional Lenders' objection that the Receiver be paid for approved fees from the Estate's operating account instead of the property-specific accounts constituting the secured properties' sale proceeds. *See* Dkt. 1371.

5. Pursuant to the Court's Order, Dkt. 1031 at p.12, n.32, to the extent the Mortgagees are reasserting prior objections, they do so below in "summary fashion that incorporates citations (with pinpoint cites) to previous filings that have laid out the objection."

I. The Mortgagees Assert The Same Objections To The Receiver's 17th Fee Petition As They Asserted To The Receiver's Prior Fee Applications.

The Mortgagees adopt and assert their objections to the Receiver's prior fee petitions (Dkts. 1346, 1305, 1210, 1188, 1181, 1039, 1000, 960, 792, 777, 648, 617, 595, 581, 509, 438) to the Receiver's 18th Fee Petition, to preserve those objections by incorporating them by reference into this response. The Mortgagees also adopt the objections stated in the January 4, 2023 submission to chambers by Brett Natarelli noting the new availability of Estate funds in the operating account in sufficient amount to support most if not all of the Receiver's fee requests and the legal bases for why that would be more appropriate than a property surcharge (which objections the Court rejected, but characterized as "narrow and understandable," Dkt. 1371).

Therefore, all of the Receiver's requested fees should be paid from the general operating account first before any fees are allocated to a specific property. This is consistent with the purpose of the Receiver's priming lien, which was awarded when the Estate lacked sufficient funds in the general operating account (Dkt 1031, p.5-6). Now that the general operating account has sufficient funds to cover all or nearly all of the Receiver's fees, those amounts should be paid from the operating account before the any amounts are paid from the encumbered sale proceeds. The Estate's general operating account should now have in excess of \$3 million as a result of funds previously on hand (Dkt. 1384, page 28, \$1,162,254.69 on hand as of Feb. 14, 2023 and not including the recent settlement) and in excess of \$2,952,000 from the settlement with EquityBuild's accountants (Dkt. 1359) with additional settlements remaining possible due to pending actions the Receiver is pursuing for benefit of the Estate.

II. The Receiver Has Failed to Show That His Fees and Expenses in His 18th Fee Petition Fall Within the Court-Approved Priming Lien Categories.

The Receiver requests that the Fees shown on, among other exhibits, Exhibits F and G, be paid as a first lien from the proceeds of the sales of the Properties. The Receiver also attaches

summaries and compilations of the same information provided with more detail in Exhibits F and G, and an allocation summary at Exhibit J, with more detail on the general property-specific allocations at Exhibit K and detail on the property-specific allocations at Exhibits L and M. *See* Dkt. 1384, p.14 n.3. Therefore, the line-item specific objections are presented by Mortgagees only as to Exhibits F and G but also apply to the proposed allocations.¹

The Receiver's narrative in his 18th Fee Petition of the services furnished during the period covered by the 18th Fee Petition shows that several of those services are not covered by the Court-Approved Priming Lien Categories or, to the extent that they are covered, otherwise should not be paid as a priority lien, as discussed below. Although the Receiver may have invoiced the Fees in accordance with SEC billing protocols, such compliance alone does not establish that they fall within the Court-Approved Priming Lien Categories.

The Mortgagees have color highlighted sample entries on the Receiver and his attorneys' monthly invoices (Exhibits F and G to the 18th Fee Petition) to illustrate Fees that should not prime their liens, a copy of which is attached as Ex. B. The bases of these specific objections are as follows:

First, Fees that are not covered by the either of the Court-Approved Priming Lien Categories are highlighted in RED. These include:

- Fees incurred to give notice of the Receiver's appointment to individuals or entities which have been identified as potentially possessing property, books, or records of the Receivership Defendants (Dkt. 1384, p.7) for reasons stated in objections to

¹ The Receiver represents that he does not seek distribution from a priming lien as to the Asset Analysis & Recovery, Case Administration, Status Reports and Tax Issues categories. Dkt. 1353 at p.3. Accordingly, to the extent items in those categories are highlighted in red on Exhibit B, the purpose of such highlighting is to preserve Mortgagees' objections to those items being allocated in any future allocation motion.

prior fee petitions (*see, e.g.*, Dkts. 1346, 1305, 1210, 1188). As example, see Exh. B, p. 60 (“telephone conference with class counsel regarding claim data for settlement of class action and related follow-up correspondence regarding notice to claimants” which the Receiver acknowledges should be deferred rather than allocated to properties).

- Fees incurred in efforts to locate and preserve records (Dkt. 1384, p.7) for reasons stated in objections to prior fee petitions (*see, e.g.*, Dkts. 1346, 1305, 1210, 1188).
- Fees incurred for the “factual investigation” (Dkt. 1384, p. 7) to the extent reflected on Exhibits F and G (the Receiver represents he is not seeking a priming lien as to four specific lawsuits against EquityBuild professionals, *see* Dkt. 1384 at p.6) because such activities do not fall within either of the two Court-Approved Priming Lien Categories. As example, *see* Exh. B., p. 32 (“Confer with A. Watychowicz regarding responses to various subpoenas to third parties and updating spreadsheet tracking same”) which the Receiver acknowledges should be deferred rather than allocated to properties.
- Fees incurred with respect to tax issues (Dkt. 1384, pp. 7-8) have no relation to the two Court-Approved Priming Lien Categories.
- Fees incurred to calculate amounts owed to the Receiver (Dkt. 1384, p.5) or to restore funds to properties because of the Receiver’s commingling of property rents, income and expenses (see fuller discussion of objection at Dkt. 1389, pp. 9-10) have no relation to the two Court-Approved Priming Lien Categories. As example, *see* Exh. B, p. 10 (“Exchange related correspondence with J. Wine and

M. Rachlis regarding draft restoration and reimbursement motion and summary accounting information”).

- Fees incurred to address creditor inquiries or general review of claims (Dkt. 1384, pp. 9-11) fall outside the scope of the Court-Approved Priming Lien Categories. As example, see Exh. B, p.3 (“Exchange correspondence with A. Watychowicz and J. Wine regarding responses to claimant inquiries relating to claims process and timing” allocated to “all” properties). The Receiver has failed to show that they were incurred with respect to preservation, management or disposition of properties or the management of the claims adjudication process. *See also* arguments at Dkt. 1389, pp. 10-11
- Fees incurred to collect fees on FHFA properties which FHFA opposes, and related fees in preparing appellate and other filings opposing FHFA on that issue. As example, see Exh. B, p.75 (“Work on motion to dismiss appeal”) which the Receiver purports to allocate to the two FHFA properties, 1131 E 79th and 7024 Paxton.
- Entries that lack sufficient detail to show that they should be paid as a priming lien, or that allocate to inappropriate properties, should not be paid as part of the Receiver’s priming lien. As example, see Exh. B, p. 4 (“Exchange correspondence with A. Watychowicz regarding communication with representative of deceased claimant regarding claim” allocated to *all* properties despite involving, apparently, a single deceased claimant).

Second, Fees incurred to litigate Group 1 claims (Dkt. 1251, p.10) are not payable at this time through a priming lien. The Court has ruled that whether the time spent litigating the Group

1 claims could be paid from a priority lien would be determined as part of the claims adjudication process which only recently concluded. (Dkt. 1030, p. 14, n.7.) Examples are highlighted in YELLOW.

Third, the Mortgagees object to the “Distributions” category on the same grounds stated in its objections to the 17th Fee Petition (Dkt. 1346 at pp. 5-6). Examples are highlighted in ORANGE.

III. The Receiver’s Proposed Allocations Should be Referred to Magistrate Judge Kim or, in the Alternative, Mortgagees’ Objections Should be Sustained

The Court previously referred the Receiver’s Fee Allocation Motion to Magistrate Judge Kim for disposition. (Dkt. 1112). The Mortgagees filed a detailed response. (Dkt. 1210). Magistrate Judge Kim held hearings on February 8 and 10, 2023, overruling all of the objections. (Dkt. 1381). The Mortgagees request that the Court refer the Receiver’s request that the tasks shown on his exhibits be approved as a priming lien to Magistrate Judge Kim for the same reasons that the Receiver’s Fee Allocation Motion was referred to Judge Kim and to foster uniformity. Mortgagees made the same request as to the 17th Fee Petition, and this Court denied that request. Dkt. 1366, 1371. In the alternative to referral, the Mortgagees respectfully request that the Court decline to refer and instead enter an order sustaining Mortgagees’ Objections for the reasons stated in their Objections to Magistrate Judge Kim’s Oral Ruling on Receiver’s First Fee Allocation Motion (Dkt. 1389).

IV. The 18th Fee Application Should Be Subject To A 20% Holdback on all Fees and an Additional 20% Holdback on All Fees to be Surcharged to the Secured Properties.

Consistent with the Court’s order approving the Receiver’s ninth, tenth, and eleventh fee petitions (Dkt. 1031, pp. 13-14), twelfth fee petition, (Dkt. 1213, p. 9), and fee petitions thirteen through sixteen (Dkt. 1312, pp. 3-4), the Mortgagees respectfully request that the Court require any approved fees be subject to “a holdback of 20% of the fees (but not expenses) requested in the

applications, and an additional 20% holdback on any fees to be paid from the sales proceeds of encumbered real estate” as the Court previously held. Dkt. 1312, p.4 (Order on Petitions 13-16).

That Order was the last time the Court addressed the holdback issue in substantial detail. In the Court’s order overruling all objections to the 17th Fee Petition, but maintaining at least one holdback, the Court did not offer new reasoning or state that it was making a change, but instead referred back to the reasoning of its earlier rulings, suggesting it intended to maintain the holdback status quo of 20% holdback on all approved fees and additional 20% holdback as to property surcharges. Dkt. 1366 at p.2 (“For those reasons and the ones stated in the court’s orders granting the earlier fee applications, the 20% holdback continues.”).

Certain Mortgagees’ counsel, Messrs. Napoli and Natarelli, conducted a meet and confer with the Receiver’s counsel Jodi Wine on Thursday, February 23, 2023. Ms. Wine stated it is the Receiver’s position that, via Dkt. 1366, the Court imposed only one 20% holdback as to the 17th Fee Petition, and no others. Mortgagees disagree with that position for the reasons stated above and respectfully request that, if the Court approves the fees requested in the 18th Fee Application, then any approved fees should be subject to the same 20% holdback on all fees and additional 20% holdback on any fees allocated for surcharge to the property-specific accounts ordered in Dkt. 1312 as to fee petitions 13-16. In further support of this request, the Mortgagees incorporate by reference their requests for a 20% holdback contained in the Mortgagees’ objections to the Receiver’s ninth, tenth and eleventh fee applications (Dkts. 907, pp.10-12, 960, pp. 12-14, and 1000, pp. 11-13). The Receiver in reply generally incorporates his prior arguments on that topic (*see* Dkt. 1332 at p.15, Dkt. 1255 at pp. 13-15, Dkt. 1293 at 15) and Mortgagees do the same (*see* Dkt. 1250 at pp. 10-12).

CONCLUSION

Consequently, the Mortgagees request that the Court deny the Receivers 18th Fee Application on the grounds raised in their objections to the Receiver’s prior fee applications. If the Fees are approved, the Mortgagees request that only those Fees that are covered by the Court-Approved Priming Lien Categories can be paid as part of the Receiver’s priming lien and that the Court refer the determination of issue of priority and allocation to Magistrate Judge Kim or sustain Mortgagees’ Objections for the reasons detailed in Dkt. 1389 and oral arguments made on the record (*see* Dkt. 1387-1388) before Magistrate Judge Kim as to the Receiver’s First Allocation Motion (Dkt. 1107). They further request that any approved fees be subject to a 20% holdback and that any payment of approved fees from property-specific accounts be subject to an additional 20% holdback.

Dated: March 1, 2023

Respectfully submitted,

<p><u>/s/ Brett J. Natarelli</u></p> <p>Edward S. Weil (eweil@dykema.com) Michael A. Gilman (mgilman@dykema.com) Todd Gale (tgale@dykema.com) Brett J. Natarelli (bnatarelli@dykema.com) Kevin Connor (kconnor@dykema.com) Dykema Gossett PLLC 10 S. Wacker Drive, Suite 2300 Chicago, Illinois 60606 (312) 627-5675 <i>Counsel for Federal Home Loan Mortgage Corporation Wilmington Trust, National Association, as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Trust 2014-LC16, Commercial Mortgage Pass-Through Certificates, Series</i></p>	<p><u>/s/ Ronald A. Damashek</u></p> <p>Ronald Damashek (rdamashek@dickinsonwright.com) Dickinson Wright PLLC 55 West Monroe Street — Suite 1200 Chicago, Illinois 60603 Ph: (312) 377-7858 Fax: (312) 423-8160 <i>Counsel for Citibank N.A., as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Securities, Inc., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB14; Midland Loan Services, a Division of PNC Bank, National Association; Thorofare Asset Based Lending REIT Fund IV, LLC; and Liberty EBCP, LLC</i></p> <p><u>s/ Jill L. Nicholson</u></p> <p>Jill L. Nicholson (jnicholson@foley.com) Andrew T. McClain (amccain@foley.com) Foley & Lardner LLP 321 N. Clark St., Ste. 3000</p>
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<p>2014-LC16; Wilmington Trust, National Association, as Trustee for the Registered Holders of UBS Commercial Mortgage Trust 2017-C1, Commercial Mortgage Pass-Through Certificates, Series 2017-C1; Citibank N.A., as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Securities, Inc., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB48; Federal National Mortgage Association; U.S. Bank National Association, as Trustee for the registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB41; U.S. Bank National Association, as Trustee for the registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB50; U.S. Bank National Association, as Trustee for the registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB30 Sabal TL1 LLC; Midland Loan Services, a Division of PNC Bank, N.A. as servicer for Wilmington Trust, N.A., as Trustee for the Benefit of Corevest American Finance 2017-1 Trust Mortgage Pass-Through Certificates; Midland Loan Services, a Division of PNC Bank, N.A. as servicer for Wilmington Trust, N.A., as Trustee for the Registered Holders of Corevest American Finance 2017-2 Trust, Mortgage Pass-Through Certificates, Series 2017-2; BC57, LLC; UBS AG; 1111 Crest Dr., LLC, Pakravan Living Trust, Hamid Ismail, Farsaa, Inc.; Thorofare Asset Based Lending REIT Fund IV LLC</p>	<p>Chicago, IL 60654 Ph: (312) 832-4500 Fax: (312) 644-7528 Counsel for Citibank N.A., as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Securities, Inc., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB48; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB30; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB41; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB50; Wilmington Trust, National Association, as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Trust 2014-LC16, Commercial Mortgage Pass-Through Certificates, Series 2014-LC16; Federal National Mortgage Association; and Sabal TL1, LLC</p> <p><u>/s/ Timothy J. Patenode</u> Timothy J. Patenode (timothy.patenode@katten.com) Katten Muchin Rosenman LLP 525 W. Monroe Street Chicago, IL 60661-3693 Ph: (312) 902-5200 Fax: (312) 902-1061 Counsel for UBS AG</p>
<p><u>s/Jay L. Welford</u> Jay L. Welford Counsel to Liberty EBCP, LLC</p>	<p><u>s/ William J. Serritella, Jr.</u> William J. Serritella, Jr.</p>

<p>jwelford@jaffelaw.com JAFFE RAITT, HEUER & WEISS, P.C. Jay L. Welford (P34471) 27777 Franklin Road, Suite 2500 Southfield, Michigan 48034 (248) 351-3000</p> <p><u>s/ Mark S. Landman</u> milandman@lcbf.com Landman Corsi Ballaine & Ford P.C. 120 Broadway, 13th Floor New York, NY 10271 Ph: (212) 238-4800 Fax: (212) 238-4848 <i>Counsel for Freddie Mac</i></p> <p><u>/s/ Thomas B. Fullerton</u> Thomas B. Fullerton (6296539) Akerman LLP 71 S. Wacker Drive, 47th Floor Chicago, IL 60606 (312) 634-5700 thomas.fullerton@akerman.com</p> <p><u>/s/ Michael D. Napoli</u> Michael D. Napoli (TX 14803400) Akerman LLP 2001 Ross Avenue, Suite 3600 Dallas, TX 75201 (214) 720-4360 michael.napoli@akerman.com <i>Counsel for Midland Loan Services, a Division of PNC Bank, National Association</i></p>	<p>wserritella@taftlaw.com Taft Stettinius & Hollister LLP 111 East Wacker Drive, Suite 2800 Chicago, IL 60601 (312) 527-4000</p> <p><u>/s/William R. Wurm</u> William R. Wurm, #6324871 William.Wurm@stinson.com Stinson, LLP 7700 Forsyth Blvd., Suite 1100 St. Louis, MO 63105 Phone: (314) 863-0800 Fax: (314) 259-3931 <i>Attorneys for BMO Harris Bank, N.A., and Midland Loan Services, a division of PNC Bank, NA, acting under authority designated by Colony American Finance Lender, LLC, assignee Wilmington Trust, N.A. as Trustee for the benefit of registered holder of Colony American Finance 2015-1</i></p>
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CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2023, I electronically filed with CM/ECF the foregoing **MORTGAGEES' RESPONSE TO RECEIVER'S EIGHTEENTH INTERIM APPLICATION AND MOTION FOR COURT APPROVAL OF PAYMENT OF FEES AND EXPENSES OF RECEIVER AND RECEIVER'S RETAINED PROFESSIONALS** which sent electronic notification of the filing to all attorneys of record

/s/ Candace Mandel

Exhibit A

EXHIBIT A

Freddie Mac; Citibank N.A., as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Securities, Inc., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB48; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB30; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB41; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2018-SBS0; Wilmington Trust, National Association, as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Trust 2014-LC16, Commercial Mortgage Pass-Through Certificates, Series 2014-LC16; Wilmington Trust, National Association, as Trustee for the benefit of the registered holders of UBS Commercial Mortgage Trust 2017-C 1, Commercial Mortgage Pass-Through Certificates, Series 2017-C1; Federal National Mortgage Association ("Fannie Mae"); BMO Harris Bank N.A.; Midland Loan Services, a Division of PNC Bank, National Association; Midland Loan Services, a Division of PNC Bank, N.A. as servicer for Colony American Finance 2015-1; Midland Loan Services, a Division of PNC Bank, N.A. as servicer for Wilmington Trust, N.A., as Trustee for the Registered Holders of Corevest American Finance 2017-2 Trust, Mortgage Pass-Through Certificates, Series 2017-2; Midland Loan Services, a Division of PNC Bank, N.A. as servicer for Wilmington Trust, N.A., as Trustee for the Benefit of Corevest American Finance 2017-1 Trust Mortgage Pass-Through Certificates; BC57, LLC; UBS AG; Thorofare Asset Based Lending EIT Fund IV, LLC; and Liberty EBCP, LLC.; 1111 Crest Dr., LLC, Pakravan Living Trust, Hamid Esmail, and Farsaa, Inc. ; Sabal TL1, LLC.

Exhibit B

Exhibit F

Rachlis Duff & Peel, LLC

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January 13, 2023

Kevin B. Duff, Receiver
c/o Rachlis Duff & Peel, LLC
542 S. Dearborn Street, Suite 900
Chicago, IL 60605

Re: *SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen*
No. 18-cv-5587, US Dist. Ct., Northern Dist. Of Illinois, Easern Div.

Fed. I.D. No. 61-1421786
Invoice No. 6621151

Legal Fees for October 2022	\$6,084.00
Expenses Disbursed	\$0.00
Due this Invoice	\$6,084.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Business Operations</u>			
10/19/2022	KBD	0.1	Exchange correspondence with property manager regarding expense reimbursement issue (1414 E 62nd). Business Operations
SUBTOTAL:			[0.1 39.00]
<u>Claims Administration & Objections</u>			
10/3/2022	KBD	0.2	Exchange correspondence with A. Watychowicz and K. Pritchard regarding claims analysis information (all). Claims Administration & Objections
10/4/2022	KBD	0.3	Exchange correspondence with tax advisor and J. Wine regarding analysis of potential liability relating to properties in relation to potential amount available for distribution to claimants (1401 W 109th, 1422 E 68th, 2800 E 81st, 310 E 50th, 3723 W 68th, 5437 Laflin, 61 E 92nd, 6807 Indiana, 6949 Merrill, 7840 Yates, 7933 Kingston, 7953 Woodlawn, 8000 Justine, 8214 Ingleside, 8405 Marquette, 8800 Ada). Claims Administration & Objections
10/5/2022	KBD	0.6	Exchange correspondence with A. Porter regarding claim issue relating to property (4520 Drexel) (.1); attention to analysis of claim exchange related correspondence with A. Watychowicz and J. Wine (1700 Juneway) (.4); exchange correspondence with J. Wine regarding documentation relating to claim and related communications and analysis (3723 W 68th) (.1). Claims Administration & Objections
10/6/2022	KBD	0.3	Attention to claimant inquiry and communication with accounting firm representative (all). Claims Administration & Objections
10/7/2022	KBD	0.2	Exchange correspondence with J. Wine regarding communication with Judge Kim relating to settlement discussions and claims review (3723 W 68th) (.1); attention to communication with claimant regarding hearing before Judge Shah (all) (.1). Claims Administration & Objections
10/11/2022	KBD	0.2	Exchange correspondence with A. Watychowicz and J. Wine regarding responses to claimant inquiries relating to claims process and timing (all). Claims Administration & Objections
10/12/2022	KBD	0.2	Attention to settlement correspondence and related efforts and issues (3723 W 68th, 61 E 92nd, 7953 Woodlawn). Claims Administration & Objections
10/13/2022	KBD	0.9	Prepare for hearing before Judge Shah with M. Rachlis and J. Wine (all) (.8); attention to correspondence from claimant regarding hearing (all) (.1). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/14/2022	KBD	0.5	Telephone conference with SEC (all) (.4); further discussion with M. Rachlis regarding preparation for hearing before Judge Shah (all) (.1). Claims Administration & Objections
10/16/2022	KBD	2.4	Prepare for hearing before Judge Shah by reviewing claims pleadings and various other claims related items in the record (all). Claims Administration & Objections
10/17/2022	KBD	3.2	Prepare for hearing before Judge Shah (all) (1.4); confer with M. Rachlis in preparation for hearing before Judge Shah (all) (.2); attention to claimant request for information about hearing (all) (.1); appear before Judge Shah for status hearing (all) (1.0); confer with claimants' counsel , M. Rachlis, and J. Wine regarding efforts to resolve claims and communications with other claimants (all) (.1); confer with M. Rachlis and J. Wine following hearing before Judge Shah regarding claims process (all) (.1); exchange correspondence with A. Watychowicz regarding response to claimant's inquiry regarding valuation issue (all) (.1); revise communication to claimants regarding status and timing of claims process (all) (.2). Claims Administration & Objections
10/18/2022	KBD	0.2	Work on communication to claimants regarding claims process and timing (all) (.1); attention to communication from claimant regarding court communications (all) (.1). Claims Administration & Objections
10/19/2022	KBD	0.1	Exchange correspondence with A. Watychowicz and J. Wine regarding communication with claimant relating to court communications (all). Claims Administration & Objections
10/20/2022	KBD	0.1	Attention to communication from claimant and exchange related correspondence with A. Watychowicz regarding same (all). Claims Administration & Objections
10/21/2022	KBD	0.1	Attention to communication from claimant regarding claims process (all). Claims Administration & Objections
10/25/2022	KBD	0.2	Attention to communication from representative of deceased claimant and exchange related correspondence (all). Claims Administration & Objections
10/27/2022	KBD	0.2	Exchange correspondence with A. Watychowicz regarding communication with representative of deceased claimant regarding claim (all). Claims Administration & Objections
10/28/2022	KBD	0.1	Exchange correspondence with J. Wine regarding communications with Judge Kim and claimant's counsel regarding effort to resolve claimant's claim (61 E 92nd). Claims Administration & Objections
10/31/2022	KBD	0.5	Exchange correspondence with J. Wine regarding analysis and background on claim and conduct related factual research (6949 Merrill). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
SUBTOTAL:				[10.5	4,095.00]

Distributions

10/3/2022 KBD 0.2 Confer with and study correspondence from J. Wine regarding settlement discussions and potential distribution issues (3723 W 68th, 61 E 92nd).

Distributions

10/5/2022 KBD 0.2 Study draft distribution motion and exchange related correspondence with J. Wine (7933 Kingston, 8405 Marquette, 8800 Ada).

Distributions

10/28/2022 KBD 0.2 Study and revised draft motion to approve distributions for properties and exchange related correspondence with J. Wine and M. Rachlis (7933 Kingston, 8405 Marquette, 8800 Ada).

Distributions

10/31/2022 KBD 0.1 Exchange correspondence with J. Wine regarding motion to approve distributions for properties (7933 Kingston, 8405 Marquette, 8800 Ada).

Distributions

SUBTOTAL: [0.7 273.00]

Status Reports

10/11/2022 KBD 0.1 Exchange correspondence with J. Wine regarding preparation of status report.

Status Reports

10/23/2022 KBD 0.2 Review draft status report and related correspondence from J. Wine.

Status Reports

10/24/2022 KBD 1.8 Study and revise draft status report and exchange related correspondence.

Status Reports

10/25/2022 KBD 0.9 Study and revise drafts of status report and exhibits and exchange related correspondence with M. Rachlis and K. Pritchard (.8); exchange correspondence with SEC (.1).

Status Reports

10/28/2022 KBD 0.2 Exchange correspondence with J. Wine and M. Rachlis regarding revisions to status report.

Status Reports

10/30/2022 KBD 0.3 Study revised status report and exchange correspondence with J. Wine regarding changes to status report and exhibit issue.

Status Reports

10/31/2022 KBD 0.4 Exchange correspondence with J. Wine, A. Watychowicz, and K. Pritchard regarding changes to and filing of status report.

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
			Status Reports		
SUBTOTAL:				[3.9	1,521.00]

Tax Issues

10/10/2022	KBD	0.1	Exchange correspondence with tax counsel regarding analysis of potential tax liability relating to properties.		
			Tax Issues		
10/14/2022	KBD	0.1	Exchange correspondence with tax administrator and K. Pritchard regarding tax returns.		
			Tax Issues		
10/17/2022	KBD	0.1	Attention to QSF tax returns.		
			Tax Issues		
10/20/2022	KBD	0.1	Exchange correspondence with tax advisor regarding analysis of potential tax issues relating to properties (1401 W 109th, 1422 E 68th, 2800 E 81st, 310 E 50th, 3723 W 68th, 5437 Laflin, 61 E 92nd, 6807 Indiana, 6949 Merrill, 7840 Yates, 7933 Kingston, 7953 Woodlawn, 8000 Justine, 8214 Ingleside, 8405 Marquette, 8800 Ada).		
			Tax Issues		
SUBTOTAL:				[0.4	156.00]

15.6 \$6,084.00

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Duff, Kevin B.	15.60	390.00	\$6,084.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
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SUMMARY

Legal Services			\$6,084.00
Other Charges			\$0.00
TOTAL DUE			\$6,084.00

Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET
SUITE 900
CHICAGO, ILLINOIS 60605

TEL (312) 733-3950
FAX (312) 733-3952

January 13, 2023

Kevin B. Duff, Receiver
c/o Rachlis Duff & Peel, LLC
542 S. Dearborn Street, Suite 900
Chicago, IL 60605

Re: *SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen*
No. 18-cv-5587, US Dist. Ct., Northern Dist. Of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786
Invoice No. 6621152

Legal Fees for November 2022	\$11,778.00
Expenses Disbursed	\$0.00
Due this Invoice	\$11,778.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Asset Analysis & Recovery</u>			
11/2/2022	KBD	0.3	Exchange correspondence with K. Pritchard and telephone conference with bank representative regarding bank account funds . Asset Analysis & Recovery
11/21/2022	KBD	0.2	Exchange correspondence with property manager regarding former properties. Asset Analysis & Recovery
SUBTOTAL:			[0.5 195.00]
<u>Business Operations</u>			
11/8/2022	KBD	0.1	Attention restoration and reimbursement motion and payment of property expense (7635 East End). Business Operations
11/11/2022	KBD	0.3	Exchange correspondence with J. Wine regarding expense reimbursement motion and allocation of insurance premiums among properties (3d restoration) (.2); exchange further correspondence with J. Wine regarding expense issues relating to property (1102 Bingham) (.1). Business Operations
11/14/2022	KBD	0.3	Confer with J. Wine, E. Duff, and K. Pritchard regarding expense restoration motion and property accounting (3d restoration). Business Operations
11/15/2022	KBD	0.4	Review expense report analysis and related communications (7237 Bennett) (.2); telephone conference with J. Wine regarding restoration of expenses (3d restoration) (.2). Business Operations
11/17/2022	KBD	0.3	Exchange correspondence with J. Wine regarding backup for expense (1414 E 62nd). Business Operations
11/21/2022	KBD	0.2	Draft correspondence to property manager to confirm no use of net funds for other properties and exchange related correspondence with J. Wine and J. Rak regarding expense issue (1414 E 62nd). Business Operations
11/22/2022	KBD	0.2	Exchange correspondence with J. Wine regarding analysis of expense issue and communication with property manager (1414 E 62nd). Business Operations
11/23/2022	KBD	0.1	Exchange correspondence with J. Wine regarding accounting for expense issue and review of related communication for property manager (1414 E 62nd). Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/27/2022	KBD	0.2	Exchange related correspondence with J. Wine and M. Rachlis regarding draft restoration and reimbursement motion and summary accounting information (3d restoration). Business Operations
11/28/2022	KBD	1.8	Study and revise third motion for reimbursement and restoration of funds (3d Restoration) (1.4); exchange correspondence with J. Wine regarding third motion for reimbursement and restoration of funds (3d Restoration) (.2); attention to property expense issue and review related correspondence (1102 Bingham) (.2). Business Operations
11/29/2022	KBD	1.2	Attention to insurance expense for property and exchange related correspondence with E. Duff (1102 Bingham) (.2); study draft restoration and reimbursement motion and exchange related correspondence with J. Wine and M. Rachlis (3d restoration) (1.0). Business Operations
11/30/2022	KBD	0.2	Attention to recovery of gas refund and exchange related correspondence with K. Pritchard (4533 Calumet). Business Operations
SUBTOTAL:			[5.3 2,067.00]

Case Administration

11/1/2022	KBD	0.3	Exchange correspondence with A. Watychowicz regarding communication with claimants unrelated to claims (.2); exchange correspondence with K. Pritchard regarding communication from tax advisor representative (.1). Case Administration
11/4/2022	KBD	0.2	Exchange correspondence with bank representative regarding account interest. Case Administration
11/7/2022	KBD	0.4	Exchange correspondence with bank representative regarding account interest (.2); attention to wire transfer and related bank procedures (.2). Case Administration
11/8/2022	KBD	0.2	Attention to correspondence with service provider relating to invoices and exchange related correspondence with J. Wine. Case Administration
SUBTOTAL:			[1.1 429.00]

Claims Administration & Objections

11/1/2022	KBD	0.2	Exchange correspondence with J. Wine regarding claims analysis, background information, and communication with Judge Kim (6949 Merrill).
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Date	Indiv	Hours	Description
			Claims Administration & Objections
11/2/2022	KBD	0.3	Exchange correspondence with A. Watychowicz and J. Wine regarding claimant inquiry regarding claims process and distribution (all) (.2); attention to communication regarding asserted claim and communication with claimant's counsel (6949 Merrill) (.1).
			Claims Administration & Objections
11/3/2022	KBD	0.2	Study correspondence regarding claims settlement discussions, draft response to same, and exchange related correspondence with J. Wine (61 E 92nd).
			Claims Administration & Objections
11/4/2022	KBD	0.1	Attention to correspondence with J. Wine regarding communication with claimant relating to claim against property (61 E 92nd).
			Claims Administration & Objections
11/7/2022	KBD	0.1	Exchange correspondence with claimant regarding valuation of claim and exchange related correspondence with A. Watychowicz (all).
			Claims Administration & Objections
11/8/2022	KBD	0.9	Study claimant motion for adjudication of single claim property and exchange related correspondence with M. Rachlis and J. Wine (5437 Laffin) (.4); exchange further correspondence with A. Watychowicz and J. Wine regarding correspondence with claimant relating to claim valuation (all) (.1); exchange correspondence with J. Wine and A. Watychowicz regarding claim against property and supporting documents and review various related correspondence (6949 Merrill) (.4).
			Claims Administration & Objections
11/9/2022	KBD	0.2	Telephone conference with SEC (defer) (.1); review records and exchange correspondence with K. Pritchard regarding claim (1700 Juneway) (.1).
			Claims Administration & Objections
11/10/2022	KBD	0.2	Exchange correspondence with J. Wine regarding communication with claimant regarding analysis of claims (61 E 92nd).
			Claims Administration & Objections
11/11/2022	KBD	1.2	Telephone conference with J. Wine regarding restoration of expenses to property accounts and receiver's account and claims analysis issues (3d Restoration) (.6); exchange further correspondence with J. Wine regarding communication with claimant regarding analysis of claims and potential distribution and study additional related communications (61 E 92nd) (.2); exchange correspondence with J. Wine regarding potential distributions of settled claims (7933 Kingston, 8405 Marquette, 8800 Ada) (.1); exchange correspondence with J. Wine regarding analysis of claim against property (6949 Merrill) and communications relating to settlement effort (.3).
			Claims Administration & Objections
11/13/2022	KBD	0.3	Attention to communication from claimant regarding various information and assertions relating to claims (7625 East End, 7635 East End) (.2); review communication from claimant regarding claims and related analysis (3074 Cheltenham, 7625 East End) (.1).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
11/15/2022	KBD	0.4	Review records for information relating to claim and exchange related correspondence with J. Wine (6949 Merrill).
			Claims Administration & Objections
11/16/2022	KBD	0.6	Exchange correspondence with J. Wine and A. Watychowicz regarding claim , recommendation, and draft correspondence to claimant (7625 East End, 7635 East End) (.4); exchange correspondence with J. Wine and A. Watychowicz regarding claim , recommendation, and draft correspondence to claimant (3074 Cheltenham, 7625 East End) (.2).
			Claims Administration & Objections
11/17/2022	KBD	0.3	Exchange correspondence with M. Rachlis regarding claimant appeal (FHFA) (1131 E 79th, 7024 Paxton) (.1); exchange correspondence with J. Wine and A. Watychowicz regarding communication with claimant regarding claim (7625 East End, 7635 East End) (.1); exchange correspondence with J. Wine and A. Watychowicz regarding communication with claimant regarding claim (3074 Cheltenham, 7625 East End) (.1).
			Claims Administration & Objections
11/18/2022	KBD	1.9	Confer with consultant , J. Wine, A. Watychowicz, J. Rak, and K. Pritchard regarding claims analysis process and improvements (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (1.7); review correspondence from J. Wine regarding claims information and amendment of master claims reporting (7625 East End) (.2).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/18/2022	KBD	1.2	Confer with J. Wine, A. Watychowicz, and J. Rak regarding claims analysis, process issues, and data organization (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis).
			Claims Administration & Objections
11/20/2022	KBD	1.3	Study claimant motion for interlocutory order (1131 E 79th, 7024 Paxton) (1.2); review correspondence from M. Rachlis regarding claimant motion for interlocutory order and notice of appeal (1131 E 79th, 7024 Paxton) (.1).
			Claims Administration & Objections
11/21/2022	KBD	2.4	Study record regarding and analysis of procedural background, communications, and related issue with respect to properties and claimant motion to certify order for appeal (1131 E 79th, 7024 Paxton) (1.5); confer with M. Rachlis and J. Wine regarding claimant motion to certify order for appeal (1131 E 79th, 7024 Paxton) (.7); exchange correspondence with J. Wine and A. Watychowicz regarding communication with claimant regarding claims and priority (7625 East End, 7635 East End) (.1); exchange correspondence with J. Wine and A. Watychowicz regarding communication with additional claimant regarding claims and priority (3074 Cheltenham, 7625 East End) (.1).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/22/2022	KBD	0.6	Telephone conference with A. Watychowicz regarding claims administration issues (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.3); exchange correspondence with J. Wine regarding claim analysis (7750 Muskegon, 7201 Constance) (.2); exchange correspondence with J. Wine regarding response to motion for adjudication of claim (5437 Lafin) (.1).
			Claims Administration & Objections
11/23/2022	KBD	0.2	Exchange correspondence with J. Wine regarding efforts to resolve claims relating to property (3723 W 68th).
			Claims Administration & Objections
11/28/2022	KBD	2.7	Study and revise response to claimant motion for certification of order (1131 E 79th, 7024 Paxton) (2.5); exchange correspondence with A. Watychowicz regarding response to claimant regarding claim against former property (defer) (.2).
			Claims Administration & Objections
11/29/2022	KBD	1.5	Exchange correspondence with A. Watychowicz regarding claimants inquiry relating to custodial account issue (all) (.2); exchange correspondence with J. Wine regarding efforts to resolve claims relating to properties (3723 W 68th, 5437 Lafin, 61 E 92nd, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 Ada) (.2); study and revise response to motion for certification of appeal and exchange related correspondence with M. Rachlis and J. Wine (1131 E 79th, 7024 Paxton) (1.1).
			Claims Administration & Objections
11/30/2022	KBD	3.6	Telephone conference with counsel for claimant regarding claim, claims process, and various related issues (all) (.4); study and revise multiple drafts of response to claimant motion to certify issues for appeal (1131 E 79th, 7024 Paxton) (2.5); exchange various correspondence with M. Rachlis, J. Wine, and A. Watychowicz response to claimant motion to certify issues for appeal (1131 E 79th, 7024 Paxton) (.4); study and revise filing related to amended exhibits and exchange related correspondence with J. Wine and A. Watychowicz (Group 1) (.3).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
SUBTOTAL:			[20.4 7,956.00]

Distributions

11/22/2022	KBD	0.2	Exchange correspondence with J. Wine regarding distribution motions for properties and related planning (61 E 92nd, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 Ada). Distributions
11/26/2022	KBD	0.2	Study response to motion for adjudication of claims and distribution (5437 Laflin). Distributions
11/27/2022	KBD	0.2	Exchange correspondence with J. Wine and M. Rachlis regarding response to motion for adjudication of claims and distribution (5437 Laflin). Distributions
11/28/2022	KBD	0.6	Exchange correspondence with J. Wine regarding revisions to response to motion for adjudication of claim and distribution of funds relating to property (5437 Laflin). Distributions
11/29/2022	KBD	1.3	Study and revise joint motion to approve distributions (3723 W 68th, 61 E 92nd, 7953 Woodlawn) (.8); study and revise response to motion to adjudicate claim and distribution for property, revise proposed order, and exchange related correspondence with J. Wine and K. Pritchard (5437 Laflin) (.5). Distributions
11/30/2022	KBD	0.2	Review motion to adjudicate claim and distribution for property and exchange related correspondence with J. Wine and K. Pritchard (5437 Laflin). Distributions

SUBTOTAL:			[2.7 1,053.00]
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Tax Issues

11/30/2022	KBD	0.2	Attention to notice from IRS and exchange related correspondence with K. Pritchard. Tax Issues
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SUBTOTAL:			[0.2 78.00]
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30.2 \$11,778.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
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Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Duff, Kevin B.	30.20	390.00	\$11,778.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
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SUMMARY

Legal Services			\$11,778.00
Other Charges			\$0.00
TOTAL DUE			<u>\$11,778.00</u>

Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET
SUITE 900
CHICAGO, ILLINOIS 60605

TEL (312) 733-3950
FAX (312) 733-3952

January 18, 2023

Kevin B. Duff, Receiver
c/o Rachlis Duff & Peel, LLC
542 S. Dearborn Street, Suite 900
Chicago, IL 60605

Re: *SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen*
No. 18-cv-5587, US Dist. Ct., Northern Dist. Of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786
Invoice No. 6621153

Legal Fees for December 2022	\$7,995.00
Expenses Disbursed	\$0.00
Due this Invoice	\$7,995.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Business Operations</u>			
12/1/2022	KBD	0.1	Study correspondence from J. Wine regarding restoration and reimbursement of expenses (1102 Bingham, 7656 Kingston). Business Operations
12/5/2022	KBD	0.1	Exchange correspondence with E. Duff regarding property expense analysis (1102 Bingham). Business Operations
12/6/2022	KBD	0.2	Study information and correspondence regarding insurance premium allocation analysis for property (1102 Bingham). Business Operations
12/8/2022	KBD	0.8	Confer with and study correspondence from E. Duff regarding insurance reimbursement and allocation issues (1102 Bingham) (.3); further confer with E. Duff regarding insurance premium allocation issues (3d Restoration) (.5). Business Operations
12/13/2022	KBD	0.6	Confer and exchange correspondence with E. Duff and J. Wine regarding insurance premium allocations (all) (.4); study revised draft motion for reimbursement of expenses (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.2). Business Operations
12/28/2022	KBD	0.2	Telephone conference with E. Duff regarding property expense analysis (all). Business Operations
12/30/2022	KBD	0.2	Exchange correspondence with E. Duff regarding confirmation of expense analysis for properties (1422 E 68th, 2800 E 81st, 3723 W 68th, 5437 Laffin, 61 E 92nd, 6949 Merrill, 7840 Yates, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 Ada). Business Operations
SUBTOTAL:			[2.2 858.00]

Case Administration

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/1/2022	KBD	0.2	Exchange correspondence with K. Pritchard regarding bank statement information, procedures, use, and efficiencies. Case Administration
12/14/2022	KBD	0.1	Exchange correspondence with bank representative regarding interest rate. Case Administration
12/19/2022	KBD	0.1	Review correspondence from A. Watychowicz regarding receivership web site update. Case Administration
12/21/2022	KBD	0.2	Exchange correspondence with A. Watychowicz regarding web site update. Case Administration

SUBTOTAL:

[0.6 234.00]

Claims Administration & Objections

12/1/2022	KBD	0.7	Exchange correspondence and telephone conference with M. Rachlis regarding potential stay and procedural issues relating to claimant appeal (1131 E 79th, 7024 Paxton) (.4); study claimant's motion to stay its own appeal (1131 E 79th, 7024 Paxton) (.2); exchange correspondence with A. Watychowicz regarding counsel for claimant (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.1).
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Claims Administration & Objections

Date	Indiv	Hours	Description
12/1/2022	KBD	0.2	Attention to communication with claimant regarding information provided regarding distribution received on investment and claims process timing and exchange related correspondence with J. Wine and A. Watychowicz (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis). Claims Administration & Objections
12/2/2022	KBD	0.2	Work on response to claimant regarding position on claim (all). Claims Administration & Objections
12/5/2022	KBD	0.2	Exchange correspondence with M. Rachlis regarding order granting motion to stay and related issues on appeal (1131 E 79th, 7024 Paxton). Claims Administration & Objections
12/6/2022	KBD	1.1	Confer with claims consultant and J. Wine regarding claims management issues (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis). Claims Administration & Objections
12/7/2022	KBD	0.2	Study claimant reply relating to motion for certification of appeal (1131 E 79th, 7024 Paxton). Claims Administration & Objections

Date	Indiv	Hours	Description
12/8/2022	KBD	0.3	Exchange correspondence with J. Wine regarding efforts to resolve claims (3723 W 68th) (.1); study correspondence from J. Wine regarding claims management fields and reporting (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.2).
			Claims Administration & Objections
12/9/2022	KBD	0.4	Exchange correspondence with J. Wine regarding claims management fields and reporting (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis).
			Claims Administration & Objections
12/12/2022	KBD	0.3	Exchange related correspondence with J. Wine regarding resolution of claims and communication with court (1409 W 109th, 1422 E 68th, 310 E 50th, 3723 W 68th, 5437 Laflin, 61 E 92nd, 6807 Indiana, 6949 Merrill, 7760 Coles, 7933 Kingston, 7953 Woodlawn, 8000 Justine, 8214 Ingleside, 8405 Marquette, 8800 Ada) (.1); exchange correspondence with J. Wine regarding information relating to resolution for former properties (defer) (.2).
			Claims Administration & Objections
12/13/2022	KBD	0.3	Review information and correspondence relating to resolution for former properties (defer).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/14/2022	KBD	0.5	Exchange correspondence with J. Wine regarding claimant claim information (2800 E 81st, 7840 Yates) (.1); exchange correspondence with J. Wine regarding various issues relating to claims management fields and reporting (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.4).
			Claims Administration & Objections
12/15/2022	KBD	0.5	Exchange correspondence with J. Wine regarding additional comments relating to claims management fields and reporting (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.3); study correspondence from J. Wine regarding analysis of claims (2800 E 81st, 7840 Yates) (.2).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/16/2022	KBD	1.5	Confer with J. Wine and A. Watychowicz regarding claims data analysis, organization, and various related issues (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis).
			Claims Administration & Objections
12/19/2022	KBD	1.4	Telephone conference with claims support vendor regarding claims data platform design improvements and functionality (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.3); telephone conferences with J. Wine and A. Watychowicz regarding claims analysis, data management, and potential distribution planning (all) (.4); confer with J. Wine about claims analysis and settlement communications (2800 E 81st, 3723 W 68th, 7840 Yates) (.5); confer with J. Wine regarding analysis of claims against properties without institutional lender claims (1102 Bingham, 11117 Longwood, 1414 E 62nd, 2909 E 78th, 3030 E 79th, 431 E 42nd, 5955 Sacramento, 6001 Sacramento, 6437 Kenwood, 701 S 5th, 7026 Cornell, 7237 Bennett, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7834 Ellis, 7927 Essex, 8047 Manistee, 8100 Essex) (.2).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/19/2022	KBD	3.1	<p>Confer with J. Wine regarding claims analysis, data management, and potential distribution planning (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis).</p> <p>Claims Administration & Objections</p>
12/20/2022	KBD	0.1	<p>Attention to communication with claimant's custodian regarding decedent's claim (7237 Bennett).</p> <p>Claims Administration & Objections</p>
12/21/2022	KBD	0.2	<p>Exchange correspondence with J. Wine regarding communication regarding claim and decedent claimant's estate (7237 Bennett) (.1); study order denying claimant's motion to certify ruling for immediate appeal (1131 E 79th, 7024 Paxton) (.1).</p> <p>Claims Administration & Objections</p>
12/27/2022	KBD	0.1	<p>Exchange correspondence with J. Wine regarding efforts to resolve claims (1422 E 68th).</p> <p>Claims Administration & Objections</p>
12/28/2022	KBD	2	<p>Exchange correspondence with J. Wine regarding further communications regarding efforts to resolve claims (1422 E 68th, 2800 E 81st, 7840 Yates) (.2); study and revise motion to dismiss appeal (1131 E 79th, 7024 Paxton) (1.7); exchange correspondence with J. Wine and A. Watychowicz regarding update to master claims spreadsheet (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.1).</p> <p>Claims Administration & Objections</p>

Date	Indiv	Hours	Description
12/28/2022	KBD	0.1	Draft correspondence to claims vendor representative regarding claims management fields and reporting (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis)
			Claims Administration & Objections
12/29/2022	KBD	0.5	Review revised motion to dismiss appeal (1131 E 79th, 7024 Paxton) (.4); study correspondence from claims vendor representative regarding claims management platform issues (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.1).
			Claims Administration & Objections
12/29/2022	KBD	0.2	Review correspondence from claimant's custodian regarding claim, claimant's estate, and living trust issue (8100 Essex, 8326 Ellis, 7237 Bennett).
			Claims Administration & Objections
12/30/2022	KBD	0.1	Exchange correspondence with J. Wine regarding efforts to resolve claims and recent correspondence from claimants and counsel (3723 W 68th).
			Claims Administration & Objections
SUBTOTAL:			[14.2 5,538.00]

Distributions

Date	Indiv	Hours	Description
12/7/2022	KBD	0.4	Work on upcoming distributions and exchange related correspondence with J. Wine (3723 W 68th, 5437 Laflin, 61 E 92nd, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 Ada) (.3); review claimant motion for adjudication of claim (5437 Laflin) (.1). Distributions
12/8/2022	KBD	0.1	Exchange correspondence with K. Pritchard regarding distribution planning (3723 W 68th, 5437 Laflin, 61 E 92nd, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 Ada). Distributions
12/12/2022	KBD	0.2	Study draft distribution motion and exchange related correspondence with J. Wine (7933 Kingston, 8405 Marquette, 8800 Ada). Distributions
12/13/2022	KBD	0.3	Attention to motion for distribution of funds (7933 Kingston, 8405 Marquette, 8800 Ada). Distributions
12/14/2022	KBD	0.2	Exchange correspondence with J. Wine regarding distribution model and planning (defer). Distributions
12/28/2022	KBD	0.4	Review order approving distribution of proceeds from sale of property and exchange related correspondence with J. Wine and K. Pritchard (5437 Laflin). Distributions
12/29/2022	KBD	0.6	Exchange correspondence with J. Wine and K. Pritchard regarding logistics for distribution of proceeds from sale of property (5437 Laflin) (.5); exchange correspondence with bank representative regarding calculation of final interest relating to distribution (5437 Laflin) (.1). Distributions
12/30/2022	KBD	1.1	Exchange correspondence with J. Wine and K. Pritchard regarding confirmation of distribution amounts and distribution of funds (5437 Laflin) (.8); draft correspondence to claimant's counsel regarding distribution of funds (5437 Laflin) (.3). Distributions
SUBTOTAL:			[3.3 1,287.00]

Tax Issues

12/9/2022	KBD	0.1	Exchange correspondence with K. Pritchard regarding correspondence to collection firm . Tax Issues
12/19/2022	KBD	0.1	Attention to communication from and correspondence to tax collection firm . Tax Issues

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
SUBTOTAL:				[0.2	78.00]
				20.5	\$7,995.00

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Duff, Kevin B.	20.50	390.00	\$7,995.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
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SUMMARY

Legal Services			\$7,995.00
Other Charges			\$0.00
TOTAL DUE			\$7,995.00

Exhibit G

Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET
SUITE 900
CHICAGO, ILLINOIS 60605

TEL (312) 733-3950
FAX (312) 733-3952

January 13, 2023

Kevin B. Duff, Receiver
c/o Rachlis Duff & Peel, LLC
542 S. Dearborn Street, Suite 900
Chicago, IL 60605

Re: *SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen*
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786
Invoice No. 6622151

Legal Fees for October 2022	\$19,101.00
Expenses Disbursed	\$350.41
Due this Invoice	\$19,451.41

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Accounting/Auditing</u>			
10/27/2022	KMP	2.4	Review 110 monthly account statements and download to case file. Accounting/Auditing
10/28/2022	KMP	1.9	Work on integrating September monthly account statements with prior bank records. Accounting/Auditing
SUBTOTAL:			[4.3 602.00]
<u>Asset Analysis & Recovery</u>			
10/3/2022	KMP	0.2	Confer with A. Watychowicz regarding responses to various discovery subpoenas to third parties and updating spreadsheet tracking same (defer). Asset Analysis & Recovery
10/28/2022	AW	0.1	Research regarding criminal case involving potential asset recovery and related email to K. Duff . Asset Analysis & Recovery
SUBTOTAL:			[0.3 42.00]
<u>Business Operations</u>			
10/5/2022	ED	0.5	Review revised draft calculations of net amount reimbursable from property (4520 Drexel) (.3); call with accountant to discuss calculation of net amount reimbursable from property (4520 Drexel) (.2). Business Operations
10/14/2022	ED	0.3	Review and finalize report regarding calculation of net amount reimbursable (4520 Drexel). Business Operations
10/14/2022	ED	0.1	Update analysis of net amounts reimbursable from properties (3d Restoration). Business Operations
SUBTOTAL:			[0.9 351.00]
<u>Case Administration</u>			
10/17/2022	AW	0.3	Prepare update to the Receivership web page and related email to IT vendor. Case Administration
SUBTOTAL:			[0.3 42.00]

Date	Indiv	Hours	Description
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Claims Administration & Objections

10/3/2022	AW	0.6	Communicate with J. Wine regarding settlement efforts (7933 Kingston, 8405 Marquette, 8800 Ada) (.1); create a spreadsheet containing claims from former EB contractors and independent contractors and related email to K. Duff (11117 Longwood, 1700 Juneway, 400 Kilbourn, 4533 Calumet, 4930 Cornelia, 5450 Indiana, 6160 MLK, 6355 Talman, 6437 Kenwood, 7026 Cornell, 7107 Bennett, 7201 Constance, 7508 Essex, 7600 Kingston, 7625 East End, 7749 Yates, 7750 Muskegon, 7834 Ellis, 7953 Marquette, 8000 Justine, 8100 Essex) (.4); communicate with K. Duff regarding submitted claim (1422 E 68th) (.1).
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Claims Administration & Objections

10/3/2022	KMP	8.6	Review various records to compile information relating to certain claimants , prepare several spreadsheets tracking information , and related conferences with A. Watychowicz (defer).
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Claims Administration & Objections

10/4/2022	JRW	1.6	Review claims against properties, related database searches, and related analysis to K. Duff (4611 Drexel, 61 E 92nd) (1.4); correspondence regarding potential settlement of claims (3723 W 68th, 61 E 92nd, 7953 Woodlawn) (.1); exchange correspondence with K. Duff and tax advisor regarding potential tax liability impacting distribution (7933 Kingston, 8405 Marquette, 8800 Ada) (.1).
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Claims Administration & Objections

10/4/2022	MR	0.1	Attention to issues regarding settlement (61 East 92nd).
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Claims Administration & Objections

10/5/2022	AW	0.3	Research regarding claim in claims files and claims database and related email to J. Wine (1700 Juneway) (.2); communicate with K. Duff regarding emails relating to valuation questions (1700 Juneway) (.1).
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Claims Administration & Objections

10/5/2022	JRW	2.6	Database searches regarding claim (3723 W 68th) (1.6); review claim and related correspondence with K. Duff (1700 Juneway) (.7); correspondence with K. Duff and K. Pritchard regarding draft motion and updating account balances (7933 Kingston, 8405 Marquette, 8800 Ada) (.2); correspondence to claimants' counsel regarding settlement discussions (3723 W 68th, 61 E 92nd) (.1).
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Claims Administration & Objections

10/6/2022	AW	0.2	Email responses to claimants regarding status and claims process (2736 W 64th, 5001 Drexel).
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Claims Administration & Objections

10/6/2022	JRW	0.1	Review and comment on draft response to claimant (1700 Juneway).
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Claims Administration & Objections

10/7/2022	AW	0.1	Response to claimant regarding scheduled conference (2909 E 78th, 7442 Calumet, 7549 Essex, 7600 Kingston, 8047 Manistee, 8326 Ellis).
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<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
10/7/2022	MR	0.1	Attention to status on discussions relating to property (3723 W 68th).
			Claims Administration & Objections
10/10/2022	AW	0.4	Communicate with J. Rak regarding claims review (8100 Essex) (.1); review property claims and related exchange with J. Rak (8100 Essex) (.3).
			Claims Administration & Objections
10/10/2022	JR	3.8	Continue working on claims, review claims submissions for properties (2909 E 78th, 3030 E 79th, 4019 Indiana, 4520 Drexel, 5450 Indiana, 638 Avers, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee, 8100 Essex).
			Claims Administration & Objections
10/10/2022	JRW	0.1	Confer with J. Rak and A. Watychowicz regarding claims review project (3030 E 79th, 7301 Stewart, 7500 Eggleston).
			Claims Administration & Objections
10/11/2022	AW	0.5	Update to claimants' contact information and related emails (3074 Cheltenham, 5201 Washington, 6217 Dorchester, 6250 Mozart, 6356 California, 638 Avers, 7024 Paxton, 7255 Euclid, 7750 Muskegon, 7760 Coles, 8209 Ellis) (.3); draft email to claimant and related email to counsel (1131 E 79th, 2909 E 78th, 4533 Calumet, 5450 Indiana, 638 Avers, 6217 Dorchester, 6250 Mozart, 7024 Paxton, 7255 Euclid, 7549 Essex, 8047 Manistee) (.2).
			Claims Administration & Objections
10/11/2022	JR	5.5	Continue working on claims, review claims submissions for properties (2909 E 79th, 5450 Indiana, 6001 Sacramento, 6160 MLK, 638 Avers, 701 S 5th, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7748 Essex, 8047 Manistee).
			Claims Administration & Objections
10/11/2022	JRW	1	Review claims against properties and related database searches and related correspondence to K. Duff and M. Rachlis (3723 W 68th, 61 E 92nd, 7953 Woodlawn) (.7); telephone conference with Judge Kim regarding claims status (3723 W 68th, 61 E 92nd, 7953 Woodlawn) (.1); attention to claimant inquiry regarding claims process (all) (.1); settlement correspondence with Judge Kim and K. Duff (5437 Laflin) (.1).
			Claims Administration & Objections
10/11/2022	MR	0.3	Attention to emails regarding status of settlement negotiations regarding property (5437 Laflin) (.1); follow up on status regarding certain properties for resolution (3723 W 68th, 61 E 92nd, 7953 Woodlawn) (.2).
			Claims Administration & Objections
10/12/2022	JR	2.7	Continue working on claims, review claims submissions for properties (4520 Drexel, 3074 Cheltenham, 4533 Calumet, 5450 Indiana, 6160 MLK, 7109 Calumet).
			Claims Administration & Objections

Date	Indiv	Hours	Description
10/12/2022	JRW	1.1	Exchange correspondence with J. Rak regarding claim (4611 Drexel, 4520 Drexel, 5450 Indiana) (.5); review correspondence and documents from claimants' counsel regarding claims against properties (3723 W 68th, 61 E 92nd, 7953 Woodlawn) (.6). Claims Administration & Objections
10/12/2022	MR	0.3	Attention to status on settlement regarding certain properties in connection with discussions initiated by magistrate judge (3723 W 68th Place, 61 E 92nd, 7953 Woodlawn). Claims Administration & Objections
10/13/2022	AW	0.7	Attention to emails regarding potential settlement (3723 W 68th, 61 E 92nd, 7953 Woodlawn) (.1); attention to multiple emails from claimant regarding scheduled hearing and communicate with counsel regarding same (all) (.1); correspond with claimant regarding scheduled hearing (all) (.1); review claims and email exchange with J. Wine regarding update to master exhibit list (4520 Drexel) (.3); communicate with J. Wine regarding scheduled status hearing (all) (.1). Claims Administration & Objections
10/13/2022	JRW	1.4	Review correspondence from claimant regarding potential settlement (3723 E 68th) (.1); review materials from Group 1 proceedings in preparation for upcoming court hearing (Group 1) (.2); conference with K. Duff and M. Rachlis regarding upcoming hearing on pending matters (1131 E 79th, 3074 Cheltenham, 7024 Paxton, 7201 Constance, 7625 East End, 7635 East End, 7750 Muskegon) (1.1). Claims Administration & Objections
10/13/2022	MR	1.7	Prepare for meeting and related follow up with K. Duff and J. Wine (1131 E 79th, 3074 Cheltenham, 7024 Paxton, 7201 Constance, 7625 East End, 7635 East End, 7750 Muskegon) (1.6); attention to correspondence regarding property (5437 Laffin) (.1). Claims Administration & Objections
10/14/2022	AW	0.1	Communicate with J. Wine regarding scheduled status hearing (all). Claims Administration & Objections
10/14/2022	JR	2.5	Continue working on claims, review claims submissions for properties (1102 Bingham, 5450 Indiana, 7656 Kingston, 7749 Yates, 7750 Muskegon). Claims Administration & Objections
10/14/2022	JRW	2.9	Prepare amended exhibits and supplemental position statement (3074 Cheltenham, 7750 Muskegon) (1.3); telephone conference with SEC and K. Duff regarding upcoming hearing on pending motions (1131 E 79th, 3074 Cheltenham, 7024 Paxton, 7201 Constance, 7625 East End, 7635 East End, 7750 Muskegon) (.3); exchange correspondence with claimant, claimant's counsel and court regarding settlement discussions (3723 W 68th) (.1); correspondence with courtroom deputy regarding upcoming hearing (all) (.1); draft email to claimants regarding hearing (all) (.1); search EB records regarding claim and related correspondence to A. Porter regarding bank records (3723 W 68th) (.4); review claims against properties (2800 E 81st, 4755 St Lawrence, 7840 Yates) (.6). Claims Administration & Objections

Date	Indiv	Hours	Description
10/14/2022	MR	0.9	Attention to upcoming hearing (all) (.2); conferences with K. Duff and SEC regarding upcoming hearing (all) (.4); conferences with K. Duff regarding upcoming hearing (all) (.1); attention to status regarding discussion on property (6723 W 68th) (.1); attention to filing regarding late filed claim (3074 Cheltenham, 7750 Muskegon) (.1). Claims Administration & Objections
10/15/2022	AW	0.3	Email claimants dial in call to status hearing scheduled before Judge Shah (all) (.2); email claimant update regarding claims process and upcoming hearing (all) (.1). Claims Administration & Objections
10/15/2022	MR	1.2	Prepare for upcoming hearing and status (all). Claims Administration & Objections
10/16/2022	MR	1	Further preparation for upcoming hearing (all). Claims Administration & Objections
10/17/2022	AW	0.7	File amended exhibits to Receiver's submission and related email to claimants (Group 1) (.3); communicate with K. Duff and J. Wine regarding updated response regarding status to claimants (all) (.1); email claimants regarding valuation issues, scheduled hearing, and update (all) (.3). Claims Administration & Objections
10/17/2022	JR	2.9	Continue working on claims, review claims submissions for properties (1102 Bingham, 3074 Cheltenham, 4611 Drexel, 5450 Indiana, 6160 MLK, 638 Avers, 7026 Cornell, 7109 Calumet, 7201 Dorchester, 7656 Kingston, 7749 Yates, 7750 Muskegon). Claims Administration & Objections
10/17/2022	JRW	2.6	Review various Group 1 briefing in preparation for hearing (Group 1) (.5); attention to claimant inquiries regarding hearing (all) (.1); appear before Judge Shah for status hearing (all) (1.0); confer with claimants' counsel, K. Duff and M. Rachlis regarding efforts to resolve claims (all) (.1); confer with A. Watychowicz regarding hearing (all) (.1); confer with K. Duff and M. Rachlis regarding claims process (all) (.1); telephone conference with A. Porter regarding claims review issues (all) (.3); correspondence with Judge Kim regarding settlement discussions (3723 W 68th, 61 E 92nd, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 Ada) (.2); telephone conference with claimants' counsel regarding claims against property (3723 W 68th) (.2). Claims Administration & Objections
10/17/2022	MR	1.9	Further prepare for and participate in hearing, and related follow up with K. Duff and J. Wine (all). Claims Administration & Objections
10/18/2022	AW	0.4	Communicate with claimant regarding claims process and newly assigned judge (all) (.1); call with counsel regarding EquityBuild service list and related email exchange with counsel (Group 1) (.1); access and revise EquityBuild service list (Group 1) (.1); attention to filed statement and related email to counsel (Group 1) (.1). Claims Administration & Objections

Date	Indiv	Hours	Description
10/18/2022	JRW	0.4	Attention to claimant inquiries (all) (.2); correspondence to court clerk regarding provision of contact information to claimants (all) (.1); review BC57 Statement Regarding Group 1 Briefing and Issues for Determination (Group 1) (.1). Claims Administration & Objections
10/18/2022	MR	0.1	Attention to Group 1 submission (Group 1). Claims Administration & Objections
10/19/2022	AW	0.2	Communicate with counsel regarding appropriate response to claimant and related response (all) (.1); update EquityBuild service list and related email to counsel (Group 1) (.1). Claims Administration & Objections
10/20/2022	AW	0.2	Email claimants regarding status of claims process (all). Claims Administration & Objections
10/20/2022	JRW	1.1	Correspondence with claimants' counsel regarding claim against property (3723 W 68th) (.1); confer with K. Duff regarding claim against property (7635 East End) (.1); study metrics and confer with K. Duff regarding claims review process (all) (.2); conference with Judge Kim, claimant and claimants' counsel regarding potential settlement of claim (3723 W 68th) (.7). Claims Administration & Objections
10/20/2022	KMP	0.1	Attention to communication with tax administrator regarding analysis of potential tax liability for certain properties being considered for settlement in relation to potential distribution (1401 W 109th, 1422 E 68th, 2800 E 81st, 310 E 50th, 3723 W 68th, 5437 Laflin, 61 E 92nd, 6807 Indiana, 6949 Merrill, 7840 Yates, 7933 Kingston, 7953 Woodlawn, 8000 Justine, 8214 Ingleside, 8405 Marquette, 8800 Ada). Claims Administration & Objections
10/21/2022	JRW	0.1	Correspondence with claimant and court regarding settlement discussions (61 E 92nd). Claims Administration & Objections
10/25/2022	AW	0.1	Attention to email from claimant's representative and related communication with K. Duff (7237 Bennett, 7508 Essex, 8100 Essex, 8326 Ellis). Claims Administration & Objections
10/27/2022	AW	1.2	Review claim and draft email response to claimant (7237 Bennett, 7508 Essex, 8100 Essex, 8326 Ellis) (.6); review claim and related email to J. Wine (6949 Merrill) (.6). Claims Administration & Objections

Date	Indiv	Hours	Description
10/27/2022	JRW	1.9	Confer with K. Duff regarding claims review (all) (.1); review accumulated correspondence related to settlement of claims (3723 W 68th, 61 E 92nd, 6949 Merrill) (.3); title search on Cook County Recorder's site (61 E 92nd) (.2); conference call with claimant, claimants' counsel and Judge Kim regarding potential settlement of claim (61 E 92nd) (.4); correspondence with Judge Kim regarding EquityBuild assignments of mortgage interests (all) (.2); review claims against properties and related telephone conference with A. Watychowicz (2909 E 78th, 6949 Merrill, 7549 Essex, 7749 Yates, 8047 Manistee) (.4); review and revise response to claimant inquiry and related telephone conference with A. Watychowicz (2909 E 78th, 5001 Drexel, 7237 Bennett, 7508 Essex, 7549 Essex, 8047 Manistee, 8100 Essex) (.3).
Claims Administration & Objections			
10/28/2022	AW	0.9	Email claimant regarding filed claims and claims process (7237 Bennett, 7508 Essex, 8100 Essex, 8326 Ellis) (.1); detailed review of claim and related email to J. Wine (2909 E 78th, 5001 Drexel, 6949 Merrill, 7549 Essex, 8047 Manistee) (.8).
Claims Administration & Objections			
10/28/2022	JRW	0.5	Exchange correspondence and telephone conference with claimants' counsel regarding payments to claimant (61 E 92nd) (.2); correspondence to K. Duff and M. Rachlis regarding searching records (all) (.2); exchange correspondence with A. Porter regarding communications with counsel regarding settlement of state court proceeding (defer) (.1).
Claims Administration & Objections			
10/28/2022	MR	0.1	Attention to status and issues regarding discussions on property (61 E 92nd).
Claims Administration & Objections			
10/31/2022	JRW	1.4	Study claim submissions and database searches regarding claims and related analysis of documents (6949 Merrill).
Claims Administration & Objections			
10/31/2022	MR	0.4	Attention to issues on claims (6949 Merrill) (.2); attention to settlement issues on properties (7933 Kingston, 8405 Marquette, 8800 Ada) (.2).
Claims Administration & Objections			
SUBTOTAL:			[59.9 12,667.00]

Distributions

10/2/2022	MR	0.3	Follow up regarding various issues and motion regarding various properties under settlement discussion (7933 Kingston, 8405 Marquette, 8800 Ada).
Distributions			
10/4/2022	JRW	0.3	Revise draft motion to approve distributions (7933 Kingston, 8405 Marquette, 8800 Ada).
Distributions			

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/5/2022	KMP	0.3	Update property account balances for certain properties in spreadsheet prepared in connection with potential motion for distribution and related communications with J. Wine (7933 Kingston, 8405 Marquette, 8800 Ada). Distributions
10/6/2022	MR	0.1	Attention to status and revisions to motion regarding potential distributions (7933 Kingston, 8405 Marquette, 8800 Ada). Distributions
10/14/2022	KMP	0.1	Communications with K. Duff and J. Wine regarding post-distribution issues relating to certain properties (6749 Merrill, 7110 Cornell). Distributions
10/17/2022	KMP	0.4	Update spreadsheet relating to distribution of account funds for certain property accounts and forward to K. Duff (10012 LaSalle, 1017 W 102nd, 11318 Church, 1516 E 85th, 2129 W 71st, 2136 W 83rd, 3213 Throop, 406 E 87th, 417 Oglesby, 6554 Rhodes, 6759 Indiana, 6825 Indiana, 7210 Vernon, 7712 Euclid, 7922 Luella, 7925 Kingston, 8030 Marquette, 8104 Kingston, 8107 Kingston, 8346 Constance, 8403 Aberdeen, 8432 Essex, 8517 Vernon, 8529 Rhodes, 9212 Parnell, 9610 Woodlawn) (.3); .communications with bank representative regarding post-distribution issues relating to certain properties (6749 Merrill, 7110 Cornell) (.1). Distributions
10/28/2022	JRW	0.4	Update motion to approve distributions and correspond with K. Duff and M. Rachlis regarding same (7933 Kingston, 8405 Marquette, 8800 Ada). Distributions
10/28/2022	MR	0.3	Attention to draft distribution motion and issues regarding claims for properties (7933 Kingston, 8405 Marquette, 8800 Ada). Distributions
10/31/2022	JRW	0.2	Confer with K. Duff and M. Rachlis regarding revised distribution motion and related correspondence to claimants' counsel (7933 Kingston, 8405 Marquette, 8800 Ada). Distributions

SUBTOTAL:

[2.4 619.00]

Status Reports

10/11/2022	AW	0.6	Email J. Wine information regarding emails sent to claimants during third quarter of 2022. Status Reports
10/11/2022	JRW	0.5	Exchange correspondence with team regarding 3Q2022 status report (.3); begin preparing quarterly status report (.2). Status Reports
10/11/2022	KMP	0.1	Attention to communication from J. Wine regarding 3Q2022 status report checklist.

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Status Reports
10/12/2022	KMP	3.6	Begin work on financial exhibits for 3Q2022 status report.
			Status Reports
10/13/2022	KMP	5.1	Continue work on financial exhibits for 3Q2022 status report.
			Status Reports
10/14/2022	JRW	0.2	Review exhibits and correspondence regarding 3Q2022 status report.
			Status Reports
10/14/2022	KMP	4.8	Continue work on financial exhibits for 3Q2022 status report and related communications with K. Duff and J. Wine.
			Status Reports
10/21/2022	JRW	0.1	Review updated exhibit to 3Q status report.
			Status Reports
10/21/2022	KMP	0.4	Review account records and update spreadsheet tracking balances for sold property accounts for 3Q2022, and related communication with J. Wine.
			Status Reports
10/22/2022	JRW	0.4	Preparation of third quarter 2022 status report.
			Status Reports
10/24/2022	KMP	1.6	Review and comment on draft 3Q2022 status report, compile and number exhibits thereto, and related communications with EB team.
			Status Reports
10/24/2022	MR	0.5	Review and exchanges on draft status report.
			Status Reports
10/25/2022	JRW	0.2	Revision of draft status report and related correspondence with K. Duff.
			Status Reports
10/25/2022	KMP	1.8	Further review and comment on draft 3Q2022 status report, finalize report for transmittal to SEC, prepare exhibits thereto, and related communications with EB team.
			Status Reports
10/25/2022	MR	0.4	Status report review.
			Status Reports
10/26/2022	JRW	0.3	Review revised status report.
			Status Reports
10/28/2022	AW	0.1	Communicate with J. Wine regarding proposed revisions to master exhibit list for status report purposes.
			Status Reports
10/28/2022	JRW	1.5	Review redline of status report, further revise same, and related correspondence with K. Duff and M. Rachlis (1.1); correspondence to tax accountants regarding work performed during the quarter (.1); confer with A. Watychowicz regarding exhibit 5 to status report and related correspondence with K. Duff and M. Rachlis (.3).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Status Reports
10/28/2022	KMP	0.2	Attention to exchange of correspondence relating to potential edits to 3Q2022 status report.
			Status Reports
10/28/2022	MR	0.3	Review status report and related follow up with K. Duff and J. Wine.
			Status Reports
10/31/2022	AW	1.1	Email counsel regarding proposed revision to Exhibit 5 (.1); communicate with K. Pritchard regarding access to master claims list and proposed revisions (.2); update master claims list and related communications with J. Wine (.5); serve status report as per service list (.3).
			Status Reports
10/31/2022	JRW	1.2	Confer with K. Duff and A. Watychowicz regarding revisions to Exhibit 5 to status report and review and comment on revised spreadsheet (.6); correspondence to SEC regarding revisions to status report (.1); reformat exhibits 3 and 5 to status report (.4); exchange correspondence with A. Watychowicz and K. Duff regarding notice of filing (.1).
			Status Reports
10/31/2022	KMP	1.7	Edit, revise, and finalize 3Q2022 status report and exhibits, and related communications with EB team.
			Status Reports
10/31/2022	MR	0.4	Follow up regarding edits to status report.
			Status Reports

SUBTOTAL: [27.1 4,722.00]

Tax Issues

10/14/2022	KMP	0.2	Communications with K. Duff and tax administrator regarding completion of various Receivership tax returns.
			Tax Issues
10/17/2022	KMP	0.2	Attention to receipt of and download Receivership tax returns from tax administrator's portal, and related communications with K. Duff.
			Tax Issues

SUBTOTAL: [0.4 56.00]

95.6 \$19,101.00

Summary of Activity

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	
	Duff, Ellen			0.90	390.00	\$351.00
	Pritchard, Kathleen M.			33.70	140.00	\$4,718.00
	Rachlis, Michael			10.40	390.00	\$4,056.00
	Rak, Justyna			17.40	140.00	\$2,436.00
	Watychowicz, Ania			9.10	140.00	\$1,274.00
	Wine, Jodi Rosen			24.10	260.00	\$6,266.00

Other Charges

Description

Business Operations

Software license fees for October 2022 (Summit Hosting, \$206.41; Google Suite, \$144.00) 350.41

SUBTOTAL: [350.41]

Total Other Charges \$350.41

SUMMARY

Legal Services	\$19,101.00
Other Charges	\$350.41
TOTAL DUE	\$19,451.41

Rachlis Duff & Peel, LLC

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CHICAGO, ILLINOIS 60605

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FAX (312) 733-3952

January 13, 2023

Kevin B. Duff, Receiver
c/o Rachlis Duff & Peel, LLC
542 S. Dearborn Street, Suite 900
Chicago, IL 60605

Re: *SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen*
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786
Invoice No. 6622152

Legal Fees for November 2022	\$39,692.00
Expenses Disbursed	\$450.00
Due this Invoice	\$40,142.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Accounting/Auditing</u>			
11/2/2022	KMP	1.4	Review various statements and records relating to bank accounts and prepare summary for K. Duff. Accounting/Auditing
11/4/2022	KMP	0.5	Review records to compile information regarding various EB bank accounts and corresponding records, and related communications with K. Duff. Accounting/Auditing
11/10/2022	KMP	1.1	Prepare schedules of receipts and disbursements for October 2022. Accounting/Auditing
SUBTOTAL:			[3 420.00]

Business Operations

11/8/2022	JRW	0.1	Exchange correspondence regarding outstanding surveyor invoice and related motion to approve payment (7635 East End). Business Operations
11/9/2022	JRW	0.2	Confer with K. Pritchard regarding restoration issues for third restoration motion and review spreadsheets (3d Restoration). Business Operations
11/9/2022	KMP	0.3	Review wire transfer records to identify payments made to property manager for EB property, and related communication with K. Duff (1700 Juneway). Business Operations
11/10/2022	JRW	0.7	Review spreadsheets in preparation for drafting third restoration motion (1102 Bingham, 1414 E 62nd, 1700 Juneway, 2736 W 64th, 4533 Calumet, 4611 Drexel, 5618 MLK, 6217 Dorchester, 6554 Rhodes, 6825 Indiana, 7051 Bennett, 7109 Calumet, 7201 Constance, 7210 Vernon, 7635 East End, 7656 Kingston, 7748 Essex, 7749 Yates, 7834 Ellis, 8201 Kingston, 8326 Ellis). Business Operations
11/11/2022	JRW	2.5	Confer with K. Pritchard regarding accounting for expenses and related exchanges of correspondence with E. Duff and K. Duff (3d Restoration) (.8); compare spreadsheet of property expenses paid from Receiver's account to accountant's property reports (3d Restoration) (.3); telephone conference with K. Duff regarding restoration motion and related issues (3d Restoration) (.6); review and revise draft restoration motion (3d Restoration) (.8). Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/11/2022	KMP	1	Communications with K. Duff, J. Wine and E. Duff regarding certain property expense issues regarding anticipated third motion for restoration and forward related spreadsheet tracking expenses paid from Receiver's account (3d Restoration) (.3); further analysis of certain expenses associated with distributions for single family properties and related communications with J. Wine (3d Restoration) (.7).
Business Operations			
11/14/2022	ED	0.3	Discussion with K. Duff, K. Pritchard, and J. Wine regarding allocation of property expenditures (3d Restoration).
Business Operations			
11/14/2022	JRW	1.1	Communicate with K. Pritchard on expense reimbursement issues and related review of spreadsheets (3d Restoration) (.6); participate in meeting with K. Duff, E. Duff and K. Pritchard regarding property reports prepared by accountant (3d Restoration) (.4); confer with J. Rak regarding expense reports used to confirm reimbursement figures (3d Restoration) (.1).
Business Operations			
11/14/2022	KMP	1.5	Work on spreadsheet tracking expenses paid from Receiver's accounts, compare with net reimbursable income reports, and related communications with J. Wine (3d Restoration) (1.1); conference with K. Duff, J. Wine, and E. Duff regarding property expense issues relating to anticipated third motion for restoration (3d Restoration) (.4).
Business Operations			
11/15/2022	JR	1.1	Communication with K. Pritchard regarding a request for inspection information related to restoration motion, perform search for same, further communication with K. Pritchard (3d Restoration).
Business Operations			
11/15/2022	JRW	3.4	Telephone conference and email exchanges with K. Pritchard regarding analysis of expenses reimbursable from properties (3d Restoration) (1.0); telephone conference with K. Duff regarding restoration motion (3d Restoration) (.2); attention to drafting restoration motion and spreadsheets (3d Restoration) (2.2).
Business Operations			
11/15/2022	KMP	6.8	Continue work on spreadsheet tracking expenses paid from Receiver's accounts, compare with net reimbursable income reports, and related communications with J. Wine (3d Restoration) (1.3); confer with J. Wine regarding issues relating to methodology for calculating net reimbursable income and related review of various documents and spreadsheets (3d Restoration) (.6); communications with J. Rak regarding issue relating to calculations for certain expenses identified in net reimbursable income reports (3d Restoration) (.4); review schedules of receipts and disbursements in connection with preparation of exhibit for third restoration motion and update spreadsheet tracking expenses for additional EB property (3d Restoration) (4.5).

Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/16/2022	JRW	1	Confer with K. Pritchard regarding accounting report (3723 W 68th) (.2); continue working on motion to reimburse expenses paid by Receiver from property accounts (3d Restoration) (.8). Business Operations
11/16/2022	KMP	3.6	Continue work on spreadsheet tracking expenses paid from Receiver's accounts, recording information from net reimbursable income reports, confirming certain expenses through review of schedules of receipts and disbursements, and related communications with J. Wine (3d Restoration) (3.3); compile documentation for property related expense owed to property manager and related communications with K. Duff and J. Wine (1414 E 62nd) (.3). Business Operations
11/17/2022	JRW	1.9	Review correspondence regarding property manager receivable, related correspondence with K Duff and K. Prtichard, and correspondence to property manager requesting supporting materials (1414 E 62nd) (.4); continued factual research and drafting of restoration motion (3d Restoration) (1.5). Business Operations
11/17/2022	KMP	4.6	Continue work on spreadsheet tracking expenses paid from Receiver's accounts, recording information from net reimbursable income reports, confirming certain expenses through review of schedules of receipts and disbursements, and related communications with J. Wine (3d Restoration) (4.4); further communications with K. Duff and J. Wine regarding documentation for property related expense owed to property manager (1414 E 62nd) (.2). Business Operations
11/18/2022	JRW	0.7	Preparation of motion for reimbursement of expenses and related correspondence to E. Duff and K. Duff (3d Restoration). Business Operations
11/21/2022	JR	0.7	Review email from K. Duff requesting a search of former EquityBuild properties relating to potential recovery of refund, conduct search, and related follow up communication (defer). Business Operations
11/21/2022	JRW	0.5	Exchange correspondence with property manager regarding expenses owed (1414 E 62nd) (.4); exchange correspondence with property manager regarding utilities refunds and related correspondence with K. Duff regarding property addresses (defer) (.1). Business Operations
11/22/2022	JRW	6.3	Correspondence to A. Porter and J. Rak regarding restoration of funds paid at closing and related research (.4); exchange several rounds of correspondence with property manager and K. Duff regarding accounts payable balance and study spreadsheets regarding same (1414 E 62nd) (.7); confer with property manager regarding refund payment (4533 S Calumet) (.1); correspondence to E. Duff regarding reimbursement report for property (1414 E 62nd) (.1); attention to drafting third restoration motion and exhibit (3d Restoration) (5.0). Business Operations

Date	Indiv	Hours	Description
11/28/2022	ED	0.7	Call with K. Duff regarding insurance premium allocated to property (1102 Bingham) (.1); review and analysis of documents and email correspondence from accountant with respect to allocation of insurance premium amounts to properties (3d Restoration) (.6). Business Operations
11/28/2022	JR	0.4	Review email from J. Wine requesting detailed payments of City of Chicago judgments paid at closings out of closing proceeds, further research regarding same and communicate with A. Porter requesting same (2736 W 64th, 5618 MLK, 6554 Vernon, 7201 Dorchester, 7450 Luella, 7546 Saginaw, 7748 Essex). Business Operations
11/28/2022	JRW	1.2	Confer with K. Duff, M. Rachlis, and A. Watychowicz regarding third restoration motion (3d Restoration) (.7); exchange correspondence with property manager regarding accounts payable balance (1414 E 62nd) (.2); confer with J. Rak and A. Porter regarding judgments paid at closing (2736 W 64th, 5618 MLK, 6554 Vernon, 7201 Dorchester, 7450 Luella, 7546 Saginaw, 7748 Essex) (.2); confer with K. Duff and K. Pritchard regarding insurance payments (1102 Bingham) (.1). Business Operations
11/28/2022	KMP	0.7	Attention to communications with property manager regarding refunds on utility account (4533 Calumet) (.2); attention to numerous communications with property manager regarding issues relating to resolution of outstanding amount payable in connection with sold property (1414 E 62nd) (.3); communicate with J. Wine regarding insurance coverage expenses for sold property (1102 Bingham) (.2). Business Operations
11/29/2022	JR	2.9	Communication with J. Wine and A. Porter regarding City of Chicago judgments payoffs and reimbursements from property closings (2736 W 64th, 5618 MLK, 6554 Vernon, 7201 Dorchester, 7450 Luella, 7546 Saginaw, 7748 Essex) (.2); extensive analysis of settlement statements related to judgment payoffs (all) (2.7). Business Operations
11/29/2022	JRW	1.5	Exchange correspondence with K. Duff and K. Pritchard regarding insurance expense (1102 Bingham) (.1); exchange correspondence with E. Duff regarding expense reimbursement spreadsheet (3723 W 68th) (.1); revisions to third restoration motion and related correspondence with K. Duff and J. Rak (3d Restoration) (1.3). Business Operations
11/29/2022	KMP	0.2	Review email correspondence regarding insurance coverage expenses for sold property and related correspondence with K. Duff and J. Wine (1102 Bingham). Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/30/2022	ED	1.3	Email correspondence with J. Rak regarding insurance premium allocated to property (1102 Bingham) (.4); review documentation regarding property expenses paid by receiver for purposes of calculation of net reimbursable amount (1414 E 62nd) (.4); review documentation regarding premium refunds for purposes of calculation of net reimbursable amount (1414 E 62nd) (.3); email correspondence with J. Wine and accountant regarding review of documentation relating to expenses and premium refunds allocable to properties (1414 E 62nd, 3723 W 68th) (.2). Business Operations
11/30/2022	JR	3.9	Extensive analysis of settlement statements related to judgment payoffs and reimbursements to properties (all) (3.3); further communication with J. Wine regarding analysis of judgment payoffs and reimbursements to properties (3d restoration) (.5); review communication from E. Duff requesting additional information related to restoration motion and respond accordingly (1102 Bingham) (.1). Business Operations
11/30/2022	JRW	1.3	Telephone conference with property manager regarding accounts payable balance and related follow-up correspondence (1414 E 62nd) (.4); work with J. Rak on restoration to property accounts of funds paid at closing to release City of Chicago liens (2736 W 64th, 5618 MLK, 6554 Vernon, 7201 Dorchester, 7450 Luella, 7546 Saginaw, 7748 Essex) (.7); exchange correspondence with E. Duff regarding accounting reports (1414 E 62nd, 3723 W 68th) (.2). Business Operations
SUBTOTAL:			[52.4 10,599.00]

Case Administration

11/1/2022	AW	0.1	Email IT vendor regarding update to Receivership web page. Case Administration
11/8/2022	JRW	0.2	Update files with settlement correspondence. Case Administration
11/9/2022	AW	0.2	Email IT consultant regarding update to receivership webpage. Case Administration
11/18/2022	JR	0.7	Meeting with bank representative regarding updates to banking platform as it relates to bank statements Case Administration
11/18/2022	KMP	0.7	Participate in demonstration with bank representative and EB team (.5); communicate with bank representative regarding scheduling follow up demonstration regarding bank accounts reporting features (.2). Case Administration
11/22/2022	AW	0.7	Prepare update to receivership web page and related exchange with IT consultant. Case Administration

Date	Indiv	Hours	Description
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SUBTOTAL: [2.6 388.00]

Claims Administration & Objections

11/1/2022	AW	0.9	Attention to email from claimant regarding former property, related exchange with K. Duff and J. Wine, and follow up call with J. Wine (defer) (.2); draft email response to claimant regarding civil action (all) (.1); review email to Judge Kim and related call with J. Wine (6949 Merrill) (.1); attention to and respond to inquiries from claimants regarding claims process, civil action, and property sales (all) (.5).
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Claims Administration & Objections

11/1/2022	JRW	1.6	Attention to claimant inquiries (all) (.3); research docket regarding state court matter and related correspondence (defer) (.4); analysis of claims against property, related factual research, email summary to K. Duff and correspondence with A. Porter (6949 Merrill) (.6); correspondence to Judge Kim regarding claims against property (6949 Merrill) (.2); exchange correspondence with claimants' counsel regarding claims against property (6949 Merrill) (.1).
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Claims Administration & Objections

11/2/2022	AW	0.5	Communicate with counsel regarding follow up questions from claimants (all) (.1); email responses to claimants' follow up questions (all) (.4).
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Claims Administration & Objections

11/2/2022	JRW	0.2	Attention to claimant inquiries (all).
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Claims Administration & Objections

11/2/2022	MR	0.3	Follow up on status regarding claims against property (6949 Merrill).
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Claims Administration & Objections

11/3/2022	AW	0.5	Attention to emails from claimants, update contact information and confirm same with claimants (all) (.3); communicate with J. Wine regarding approved sale (defer) (.1); confer with J. Wine regarding claimant inquiry (all) (.1).
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Claims Administration & Objections

11/3/2022	JRW	0.5	Exchange correspondence with claimants' counsel regarding claim against property (61 E 92nd) (.2); exchange correspondence with M. Rachlis regarding claims against property (6949 Merrill) (.1); confer with K. Duff regarding claim against property (61 E 92nd) (.1); confer with A. Watychowicz regarding claimant inquiry (all) (.1).
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Claims Administration & Objections

11/4/2022	MR	0.3	Attention to issues regarding claimant (61 E 92nd).
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Claims Administration & Objections

11/7/2022	AW	0.3	Communicate with K. Duff and J. Wine regarding email from claimant (all) (.1); respond to claimants' emails regarding claims process and timing (all) (.2).
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Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/8/2022	AW	2	Detailed review of submitted claim (1700 Juneway, 4533 Calumet, 5450 Indiana, 6001 Sacramento, 6160 MLK, 7546 Saginaw, 7834 Ellis, 8100 Essex, 8326 Ellis) (.7); respond to claimant regarding valuation issue (all) (.1); review submitted claim and database and related email to K. Duff and J. Wine (6949 Merrill) (.8); review emails and EB records and email counsel regarding expenses (6949 Merrill) (.4).
			Claims Administration & Objections
11/8/2022	JRW	2.2	Attention to responding to claimant inquiry (all) (.1); review court docket and related telephone conference with counsel regarding disclosure of terms of settlement of state court action (defer) (.3); review motion for adjudication of single claim status and confer with K. Duff and M. Rachlis regarding same (5437 Laffin) (.4); correspondence with Judge Kim and claimants' counsel and related review and analysis of claims against property (6949 Merrill) (1.2); research and exchange correspondence with K. Duff regarding legal analysis (all) (.2).
			Claims Administration & Objections
11/8/2022	MR	0.4	Review motion on single claim issues and related follow up (5437 Laffin).
			Claims Administration & Objections
11/9/2022	JRW	0.5	Search for and review correspondence with claimant and review records regarding code violations (6949 Merrill) (.2); review materials sent by claimant (61 E 92nd) (.3).
			Claims Administration & Objections
11/9/2022	MR	0.1	Attention to issues on property relating to claims analysis (5437 Laffin).
			Claims Administration & Objections
11/10/2022	JRW	0.8	Draft correspondence to claimant regarding analysis of claim (61 E 92nd).
			Claims Administration & Objections
11/11/2022	JR	1.4	Continue working on claims, review claims submissions for properties and related communication with J. Wine (3030 E 79th, 7301 Stewart, 7500 Eggleston, 7760 Coles).
			Claims Administration & Objections
11/11/2022	JRW	2.2	Exchange correspondence with claimant , confer with K. Duff, and related correspondence to court and claimants' counsel (61 E 92nd) (.5); correspondence with Judge Kim and claimants' counsel regarding claims against property and related database searches (6949 Merrill) (.7); correspondence to court and claimants counsel regarding settlement discussions (3723 W 68th, 61 E 92nd, 7953 Woodlawn) (.2); review claim against property and other records (431 E 42nd) (.4); review claims against properties (6217 Dorchester, 6356 California, 7026 Cornell, 7600 Kingston, 8326 Ellis) (.4).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/11/2022	MR	0.4	Attention to communication regarding claim (61 E 92nd) (.2); review emails on status regarding settlement discussions on properties (3723 W 68th, 5437 Laflin, 7953 Woodlawn) (.1); review emails regarding property (61 E 92nd) (.1). Claims Administration & Objections
11/12/2022	AW	0.1	Email K. Duff and J. Wine regarding issues raised by claimants (Group 1). Claims Administration & Objections
11/14/2022	AW	2.5	Detailed review of submitted claims (6217 Dorchester, 638 Avers, 6250 Mozart, 7024 Paxton, 7255 Euclid, 8100 Essex) (2.2); communicate with claimant regarding reassigned Judge (all) (.1); review claims and service list and related email to K. Duff and J. Wine (Group 1) (.2). Claims Administration & Objections
11/14/2022	JR	4.2	Continue working on claims, review claims submissions for properties (1102 Bingham, 2909 E 78th, 3074 Cheltenham, 4019 Indiana, 4351 Calumet, 4520 Drexel, 4533 Calumet, 4611 Drexel, 5450 Indiana, 638 Avers, 7026 Cornell, 7109 Calumet, 7201 Dorchester, 7549 Essex, 7749 Yates, 7750 Muskegon, 7760 Coles, 8047 Manistee, 8100 Essex). Claims Administration & Objections
11/14/2022	JRW	0.1	Attention to claimant inquiries (3074 Cheltenham, 7625 East End, 7635 East End). Claims Administration & Objections
11/15/2022	AW	4.2	Detailed review of submitted claims (109 Laramie, 3030 E 79th, 6217 Dorchester, 6250 Mozart, 6437 Kenwood, 7024 Paxton, 7301 Stewart, 7500 Eggleston, 7508 Essex, 7749 Yates, 8100 Essex, 7927 Essex, 8201 Kingston, 8326 Ellis) (3.9); email responses to claimants regarding claims process and Receiver's recommendations (Group 1) (.1); follow up with claimant regarding alternative property addresses and recorded claim (7508 Essex) (.1); confer with J. Wine regarding claims (all) (.1). Claims Administration & Objections
11/15/2022	JR	1.8	Continue working on claims, review claims submissions for properties (4611 Drexel, 6217 Dorchester, 7237 Bennett, 7749 Yates, 7844 Ellis, 8326 Ellis). Claims Administration & Objections
11/15/2022	JRW	0.8	Telephone conference with A. Watychowicz regarding claims (all) (.1); correspondence to claimants counsel regarding updated spreadsheets (3723 W 68th, 5437 Laflin, 61 E 92nd, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 Ada) (.1); correspondence between claimant, claimants' counsel and Judge Kim regarding settlement discussions (3723 W 68th) (.1); exchange correspondence with K. Duff regarding claims (6949 Merrill) (.1); analysis of claim against property (431 E 42nd) (.4). Claims Administration & Objections
11/15/2022	MR	0.1	Attention to status on issues regarding claims against property (6949 Merrill).

Date	Indiv	Hours	Description
			Claims Administration & Objections
11/16/2022	AW	5.9	Detailed review of submitted claims (1700 Juneway, 4533 Calumet, 5001 Drexel, 6217 Dorchester, 6250 Mozart, 6437 Kenwood, 701 S 5th, 7024 Paxton, 7255 Euclid, 7508 Essex, 8100 Essex, 7927 Essex) (4.2); communicate with K. Duff and J. Wine regarding emails from claimants (all) (.1); email responses to claimants regarding claims process and Receiver's recommendations (Group 1) (.2); communicate with J. Wine regarding bank records and research for recurring charges (Group 1) (1.4).
			Claims Administration & Objections
11/16/2022	JRW	2.8	Study claimant emails and claim submissions and related analysis to and correspondence with K. Duff (3074 Cheltenham, 7625 East End, 7635 East End) (2.4); confer with A. Watychowicz regarding searching bank records (all) (.2); confer with A. Watychowicz regarding amendment of Group 1 submission (7625 East End) (.1); correspondence between claimants' counsel and Judge Kim regarding settlement discussions (3723 W 68th) (.1).
			Claims Administration & Objections
11/16/2022	MR	0.6	Conference with opposing counsel regarding appeal on claimant issues, related follow up with K. Duff, and attention to filings (1131 E 79th, 7024 Paxton).
			Claims Administration & Objections
11/17/2022	AW	0.1	Correspond with K. Duff and J. Wine regarding response to claimant (Group 1) (all).
			Claims Administration & Objections
11/17/2022	JRW	1	Review notice of appeal (1131 E 79th, 7024 Paxton) (.1); study appellate court rules and docketing from prior appeals and related analysis to K. Duff (1131 E 79th, 7024 Paxton) (.8); review appellate filings (1131 E 79th, 7024 Paxton) (.1).
			Claims Administration & Objections
11/17/2022	MR	0.4	Attention to FHFA issues, filings, and order, and related exchanges with K. Duff (1131 E 79th, 7024 Paxton).
			Claims Administration & Objections
11/18/2022	AW	1.7	Meeting with K. Duff, J. Wine, J. Rak and L. Perez regarding database capabilities (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
11/18/2022	JR	1.7	Meeting with claims consultant representative regarding updates to claims platform and access to claim submissions (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis).
			Claims Administration & Objections
11/18/2022	JR	1.2	Meet with K. Duff, J. Wine and A. Waytchowicz regarding claims analysis and procedures (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/18/2022	JRW	2	Exchange correspondence with K. Duff, J. Rak and A. Watychowicz regarding necessary amendment to position statement (Group 1) (.3); confer with vendor regarding software enhancements for claims review process (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (1.7). Claims Administration & Objections
11/18/2022	JRW	1.2	Meet separately with K. Duff, J. Rak and A. Watychowicz regarding claims process review procedures and spreadsheets (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) Claims Administration & Objections
11/19/2022	MR	2.5	Work on research and briefing issues raised by claimant (1131 E 79th, 7024 Paxton). Claims Administration & Objections
11/20/2022	MR	0.2	Attention to timing on various issues for claimant appeal (1131 E 79th, 7024 Paxton). Claims Administration & Objections
11/21/2022	AW	0.2	Communicate with J. Wine regarding amendment to exhibits submitted with Receiver's recommendation (Group 1) (.1); communicate with K. Duff and J. Wine regarding proposed response to claimant and send same (Group 1) (.1). Claims Administration & Objections
11/21/2022	JR	0.5	Review email from K. Duff requesting court Orders related to approval of public sale and confirmation of sale (1131 E 79th, 7024 Paxton).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
11/21/2022	JRW	0.9	Conference call with K. Duff and M. Rachlis regarding claimant motion for interlocutory appeal (1131 E 79th, 7024 Paxton) (.7); confer with K. Duff regarding response to claimant inquiry (7635 East End) (.1); exchange correspondence with claimants' counsel regarding potential settlement of claims (7933 Kingston, 8405 Marquette, 8800 Ada) (.1).
			Claims Administration & Objections
11/21/2022	MR	1.2	Conference regarding FHFA position and work on brief, and related communication with K. Duff (1131 E 79th, 7024 Paxton).
			Claims Administration & Objections
11/22/2022	AW	0.1	Call with K. Duff regarding upgrade to database (all).
			Claims Administration & Objections
11/22/2022	JRW	0.8	Exchange correspondence with vendor regarding spreadsheets for claims review (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.2); review memorandum in support of motion for interlocutory appeal (1131 E 79th, 7024 Paxton) (.3); correspondence with claimants' counsel and K. Duff regarding potential settlement of claims (61 E 92nd, 7953 Woodlawn) (.1); correspondence with K. Duff regarding claims (6949 Merrill) (.2).
			Claims Administration & Objections
11/22/2022	MR	1.7	Work on brief in response to motion for certification (1311 E. 79th, 7024 Paxton) (1.4); attention to motion and emails regarding properties (7933 Kingston, 8405 Marquette, 8800 Ada) (.2); attention to issue for submission regarding property (5437 Laflin) (.1).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/23/2022	JRW	1.2	Meet remotely with claims consultant representative regarding claims review protocol and spreadsheet parameters (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.8); review appellate docketing statement (1131 E 79th, 7024 Paxton) (.1); exchange correspondence regarding settlement communications (3723 W 68th) (.1); begin drafting response to motion for adjudication of single claim status (5437 Laflin) (.2).
			Claims Administration & Objections
11/23/2022	MR	3	Review docketing statement, research regarding appealability issues, and further attention to certification issues and response (1131 E 79th, 7024 Paxton).
			Claims Administration & Objections
11/24/2022	AW	1.1	Communicate with J. Wine regarding amended exhibits to Receiver's submission, revise exhibits and draft revised submission (Group 1) (.4); communicate with counsel regarding claims against former property (defer) (.1); research regarding possible settlement and communicate with J. Wine regarding subpoena to counsel (defer) (.2); draft subpoena to counsel and email J. Wine for approval (defer) (.4).
			Claims Administration & Objections
11/26/2022	JRW	1.8	Drafting of response to motion for adjudication of claims for property and exhibit to same (5437 Laflin).
			Claims Administration & Objections
11/26/2022	MR	4	Further work on draft response and research regarding certification motion (1131 E 79th, 7024 Paxton).
			Claims Administration & Objections
11/27/2022	JRW	0.4	Correspondence with claimants' counsel regarding settlement status (7953 Woodlawn) (.1); correspondence with K. Duff regarding response to motion (5437 Laflin) (.2); correspondence with A. Watychowicz regarding filing amended exhibits (Group 1) (.1).
			Claims Administration & Objections
11/27/2022	MR	3.5	Further work on draft response to certification motion (1131 E 79th, 7024 Paxton).
			Claims Administration & Objections

Date	Indiv	Hours	Description
11/28/2022	JRW	3.1	Work with A. Watychowicz on revision of exhibits and related correspondence with K. Duff (Group 1) (.4); exchange correspondence with K. Duff and M. Rachlis regarding response to motion to adjudications of claims against property and related revision of motion and exhibit (5437 Laffin) (.9); confer with A. Watychowicz regarding claims against former property and review and revise subpoena for records relating to settlements (defer) (.6); factual research regarding state court actions involving former properties (defer) (1.0); revise response to claimant inquiry regarding claim against former property (defer) (.2). Claims Administration & Objections
11/28/2022	MR	7.5	Additional work on brief and forward for proofreading and cite checking (1131 E 79th, 7024 Paxton) (6.5); further review and follow up regarding property (5437 Laffin) (.1); review various drafts of the restoration motion (3d Restoration) (.9). Claims Administration & Objections
11/29/2022	AW	0.7	Attention to voice message and emails from claimant and related email to counsel (all) (.2); complete response to claimant regarding former EB property (defer) (.1); revisions to amended exhibits and notice of filing and related email to J. Wine (Group 1) (.4). Claims Administration & Objections
11/29/2022	JRW	2.3	Review and revise response to motion for certification of appeal (1131 E 79th, 7024 Paxton) (.9); review and revise draft proposed order regarding adjudication of claims, work with K. Duff on revising response to motion and order, and related correspondence to claimants' counsel (5437 Laffin) (1.4). Claims Administration & Objections
11/29/2022	MR	4.2	Additional work and research on dismissal and docketing statement and work on motion relating to FHFA appeal (1139 E 79th, 7024 Paxton) (3.5); attention to property motion and draft order (5437 Laffin) (.2); attention to motion for restoration (3d Restoration) (.2); attention to motion regarding approval and follow up on status on properties (3723 W 68th, 61 E 92nd, 7953 Woodlawn) (.3). Claims Administration & Objections
11/30/2022	AW	1.6	Correspond with K. Duff and J. Wine regarding evaluation issue and related email to claimants (all) (.2); research and communicate with J. Wine regarding initial correspondence to investors and reporting on Receiver's efforts to notify investors about court appointment (all) (.5); additional revisions to notice of filing of exhibits and exhibits to Receiver's submission and related email to counsel (Group 1) (.5); finalize exhibits to Receiver's submission, file with the Court, and email claimants regarding same (Group 1) (.4). Claims Administration & Objections
11/30/2022	JR	3	Continue working on claims, review claims submissions for properties (3074 Cheltenham, 4533 Calumet, 4611 Drexel, 638 Avers, 7026 Cornell, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7834 Ellis). Claims Administration & Objections

Date	Indiv	Hours	Description
11/30/2022	JRW	3.8	Revise notice of amended exhibits and related communications with K. Duff and M. Rachlis (Group 1) (.5); attention to claimant inquiries (all) (.2); telephone conference with class counsel regarding claim data for settlement of class action and related follow-up correspondence regarding notice to claimants (defer) (.8); multiple rounds of review and revision of response to motion for certification of appeal (1131 E 79th, 7024 Paxton) (1.7); finalize response to motion for adjudication of claims for filing (5437 Laflin) (.6). Claims Administration & Objections
11/30/2022	KMP	0.2	Communicate with J. Rak regarding issue relating to third motion for restoration and forward copy of check for refund in connection with administrative judgment (7748 Essex). Claims Administration & Objections
11/30/2022	MR	4.5	Attention to filing of amended exhibits (Group 1) (.2); attention to issues raised by claimants obtaining money in class action litigation (defer) (.1); further work and review of brief and related exchanges, research answer and work on docketing statement, and attention to conference with claimant's counsel (1131 E 79th, 7024 Paxton) (4.0); review final of draft for response on motion regarding property (5437 Laflin) (.2). Claims Administration & Objections

SUBTOTAL: [101.5 26,559.00]

Distributions

11/3/2022	JRW	0.9	Prepare spreadsheet regarding potential distributions and related correspondence with K. Pritchard and E. Duff (3723 W 68th, 5437 Laflin, 61 E 92nd, 7953 Woodlawn). Distributions
11/3/2022	KMP	1.6	Work on spreadsheet for potential distributions relating to certain properties and related communications with J. Wine (3723 W 68th, 5437 Laflin, 61 E 92nd, 7953 Woodlawn). Distributions
11/8/2022	AW	0.1	Attention to motion to approve distribution and related email to counsel (5437 Laflin). Distributions
11/9/2022	AW	0.1	Attention to briefing schedule regarding motion to approve distribution, related email to counsel, and update docket (5437 Laflin). Distributions
11/11/2022	JRW	0.8	Prepare spreadsheet of potential distributions and related correspondence with claimants' counsel (3723 W 68th, 5437 Laflin, 61 E 92nd, 7953 Woodlawn). Distributions
11/22/2022	JRW	0.4	Revisions to proposed joint motion to approve distributions and related correspondence with claimants' counsel (7933 Kingston, 8405 Marquette, 8800 Ada).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Distributions
11/26/2022	JRW	0.7	Attention to settlement correspondence and prepare exhibit to proposed motion to approve distribution (3723 W 68th, 61 E 92nd, 7953 Woodlawn).
			Distributions
11/29/2022	JRW	0.5	Confer with K. Duff regarding draft motion to approve distribution, revise motion to incorporate comments, and related correspondence to claimants' counsel (3723 W 68th, 61 E 92nd, 7953 Woodlawn).
			Distributions
11/29/2022	KMP	1.7	Review draft response to motion regarding distribution of sale proceeds , prepare proposed order, and related communications with K. Duff and J. Wine (5437 Laffin).
			Distributions
11/30/2022	KMP	1.6	Review draft response to motion regarding distribution of sale proceeds , prepare final version with exhibits and file with the court, and related communications with K. Duff and J. Wine (5437 Laffin).
			Distributions

SUBTOTAL: [8.4 1,572.00]

Tax Issues

11/8/2022	KMP	0.3	Review notice from collection agency relating to alleged tax debt for EB entity , forward to tax accountant , and update related spreadsheet.
			Tax Issues
11/9/2022	KMP	0.1	Communicate with tax administrator regarding request for materials relating to tax analysis .
			Tax Issues
11/10/2022	KMP	0.1	Forward materials relating to tax analysis to tax administrator .
			Tax Issues
11/11/2022	KMP	0.2	Further communicate with tax administrator regarding tax preparation issues relating to tax analysis .
			Tax Issues
11/30/2022	KMP	0.4	Review Internal Revenue Service notice regarding assignment of alleged EB tax debt to collection agency and forward notice to tax accountant (.2); update tax notice status spreadsheet (.2).
			Tax Issues

SUBTOTAL: [1.1 154.00]

169 \$39,692.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
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Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Duff, Ellen	2.30	390.00	\$897.00
Pritchard, Kathleen M.	28.60	140.00	\$4,004.00
Rachlis, Michael	34.90	390.00	\$13,611.00
Rak, Justyna	23.50	140.00	\$3,290.00
Watychowicz, Ania	23.60	140.00	\$3,304.00
Wine, Jodi Rosen	56.10	260.00	\$14,586.00

Other Charges

Description

Business Operations

Software license fees for November 2022
(Summit Hosting, \$206.41; Google Suite,
\$144.00) 350.41

SUBTOTAL: [350.41]

Claims Administration & Objections

Online research for November 2022 99.59

SUBTOTAL: [99.59]

Total Other Charges \$450.00

SUMMARY

Legal Services	\$39,692.00
Other Charges	\$450.00
TOTAL DUE	\$40,142.00

Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET
SUITE 900
CHICAGO, ILLINOIS 60605

TEL (312) 733-3950
FAX (312) 733-3952

January 23, 2023

Kevin B. Duff, Receiver
c/o Rachlis Duff & Peel, LLC
542 S. Dearborn Street, Suite 900
Chicago, IL 60605

Re: *SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen*
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786
Invoice No. 6622153

Legal Fees for December 2022	\$27,760.00
Expenses Disbursed	\$406.53
Due this Invoice	\$28,166.53

Date	Indiv	Hours	Description		
<u>Accounting/Auditing</u>					
12/30/2022	KMP	0.2	Update Receiver's account ledger to reflect earned interest and recent transactions.		
			Accounting/Auditing		
SUBTOTAL:				[0.2	28.00]
<u>Asset Analysis & Recovery</u>					
12/12/2022	KMP	0.4	Review bank account statements to determine source of deposited funds , and related communication with K. Duff.		
			Asset Analysis & Recovery		
SUBTOTAL:				[0.4	56.00]
<u>Business Operations</u>					
12/1/2022	JR	1.1	Consolidate transactional documents for properties as it relates to City of Chicago judgments paid at closings and produce to J. Wine (7450 Luella, 7546 Saginaw, 7748 Essex) (.5); search related to allocation of insurance premium related to property and follow up correspondence with E. Duff regarding same (1102 Bingham) (.6)		
			Business Operations		
12/1/2022	JRW	0.4	Review and revise third restoration motion and related exchange of correspondence with K. Duff (3d Restoration) (.3); correspondence with J. Rak regarding judgments paid at closings (2736 W 64th, 5618 MLK, 6554 Vernon, 7201 Dorchester, 7450 Luella, 7546 Saginaw, 7748 Essex) (.1).		
			Business Operations		
12/1/2022	MR	0.1	Attention to emails regarding revisions and issues on third restoration motion (3d Restoration).		
			Business Operations		
12/2/2022	JRW	0.1	Exchange correspondence with E. Duff and K. Pritchard regarding property accounting reports (1102 Bingham, 1414 E 62nd, 3723 W 68th).		
			Business Operations		
12/2/2022	KMP	0.3	Communications with J. Wine regarding anticipated revisions to certain property reports regarding net reimbursable income (1102 Bingham, 1414 E 62nd, 3723 W 68th) (.1); communicate with J. Rak regarding deposit of refund from utility company to property account (4533 Calumet) (.2).		
			Business Operations		
12/5/2022	ED	0.3	Email correspondence with accountant regarding follow-up questions on calculations of Net Amounts Reimbursable from properties (3d Restoration) (.1); review and analysis of revised report calculating Net Amount Reimbursable from sold property (3d restoration) (.2).		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Business Operations
12/5/2022	JR	0.1	Communication with K. Duff and K. Pritchard regarding deposit of refund check from People's Gas related to property (4533 Calumet).
			Business Operations
12/6/2022	ED	0.6	Review and analysis of revised report calculating Net Amount Reimbursable from sold property (3d restoration) (.2); email correspondence to J. Wine and K. Duff regarding revised report calculating Net Amount Reimbursable from sold property (3d restoration) (.1); email correspondence with accountant and J. Wine regarding allocation of insurance premiums to sold property (3d restoration) (.3).
			Business Operations
12/6/2022	JRW	0.2	Exchange correspondence with E. Duff regarding amount reimbursable from property (1102 Bingham).
			Business Operations
12/7/2022	ED	0.9	Review and analysis of insurance policy documents and correspondence relating to premium costs allocable to property (3d restoration).
			Business Operations
12/7/2022	JR	2.9	Review email from E. Duff requesting property insurance premium allocations for property (1102 Bingham) (.3); exchange communication with K. Pritchard requesting financial agreement information as it relates to insurance premium allocations (1102 Bingham) (.5); review emails, policy information and property endorsement and provide E. Duff detailed documents and requested information (1102 Bingham) (2.1).
			Business Operations
12/7/2022	KMP	1.3	Research and review documents and email communications relating to insurance coverage issues in connection with net amount reimbursable for EB property and related communications with J. Rak (1102 Bingham).
			Business Operations
12/8/2022	ED	1.9	Review and analysis of insurance policy documents and correspondence relating to premium costs allocable to property (3d restoration) (.8); confer with K. Duff regarding premium costs allocable to property (1102 Bingham) (.2); confer with K. Duff regarding premium costs allocable to sold properties (3d restoration) (.3); email correspondence with accountant regarding to premium costs allocable to property (1102 Bingham) (.2); email correspondence with accountant regarding to premium costs allocable to properties for policies beginning May 2020 (3d restoration) (.4).
			Business Operations
12/8/2022	JRW	0.1	Confer with K. Duff regarding insurance allocations (1102 Bingham).
			Business Operations
12/8/2022	KMP	0.4	Additional research and review documents and email communications relating to insurance premium payment issues and related communications with E. Duff (1102 Bingham).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Business Operations
12/13/2022	ED	1.2	Prepare and send email correspondence to K. Duff and J. Wine outlining issues for discussion regarding allocation of insurance premium costs (3d restoration) (.5); call with K. Duff and J. Wine to discuss allocation of insurance premium costs (3d restoration) (.2); email correspondence to accountant regarding corrections to allocations of insurance premium costs to properties (3d restoration) (.4); call with accountant regarding calculations of premium costs allocable to properties (3d restoration) (.1).
			Business Operations
12/13/2022	JRW	3.8	Review documents and update spreadsheet regarding judgments paid at closing, related correspondence with J. Rak (2736 W 64th, 5618 MLK, 6554 Vernon, 7201 Dorchester, 7450 Luella, 7546 Saginaw, 7748 Essex) (1.4); telephone conference with K. Duff and E. Duff regarding expense reimbursement spreadsheets from accountant (3d Restoration) (.3); drafting and revision of third restoration motion and exhibit and related correspondence to K. Duff and M. Rachlis (3d Restoration) (2.1).
			Business Operations
12/13/2022	MR	0.4	Further attention to restoration motion (3d restoration).
			Business Operations
12/14/2022	JRW	0.1	Confer with A. Watychowicz and K. Pritchard regarding restoration motion (3d Restoration).
			Business Operations
12/19/2022	JRW	0.3	Study accountant's reports and exchange correspondence with E. Duff regarding net amounts reimbursable (1414 E 62nd, 6217 Dorchester).
			Business Operations
12/21/2022	JRW	0.1	Exchange correspondence with property manager regarding accounts receivable (1414 E 62nd).
			Business Operations
12/22/2022	ED	0.2	Email correspondence to accountant regarding corrections to revised reports (3d Restoration) (.1); review revised reports from accountant (3d Restoration) (.1).
			Business Operations
12/22/2022	JRW	0.3	Revise exhibit to restoration motion (3d Restoration).
			Business Operations
12/28/2022	ED	5	Review revised reports from accountant calculating net amounts reimbursable to properties (3d Restoration) (3.2); update summary analysis of amounts reimbursable from properties (3d Restoration) (1.5); email correspondence to accountant to confirm final calculations of net amounts reimbursable from properties (3d Restoration) (.3).
			Business Operations
12/29/2022	ED	2	Review and analysis of further revisions to calculations of net reimbursable amounts received from accountant (3d Restoration) (1.7); email correspondence to J. Wine and K. Duff regarding calculations of Net Amount Reimbursable from sold properties (3d Restoration) (.3).

Date	Indiv	Hours	Description
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Business Operations

12/30/2022	KMP	0.2	Attention to communications with E. Duff regarding adjusted spreadsheets reflecting net reimbursable amounts for various properties (1422 E 68th, 61 E 92nd, 6949 Merrill, 7840 Yates, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 Ada).
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Business Operations

SUBTOTAL:	[24.3	7,200.00]
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Case Administration

12/1/2022	AW	0.6	Prepare updates to webpage and related email to IT vendor (defer).
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Case Administration

12/1/2022	KMP	0.3	Communicate with K. Duff and J. Rak regarding bank's reporting capabilities in connection with generating quarterly reports and monthly bank statements, and upcoming related meeting with bank representative (.2); communicate with bank representative regarding upcoming meeting (1).
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Case Administration

12/7/2022	AW	0.2	Prepare upload to website and related email to IT vendor (defer).
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Case Administration

12/8/2022	JR	0.8	Phone call with bank representative and K. Pritchard related to banking platform and generating bank statements.
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Case Administration

12/8/2022	KMP	0.8	Participate in remote meeting with bank representative and J. Rak regarding generation of various reports from bank portal and case software program.
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Case Administration

12/13/2022	KMP	0.8	Participate in web meeting with bank representative and J. Rak regarding report generation from bank portal (.6); communicate with J. Wine and A. Watychowicz regarding formatting issues on draft motion (.2).
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Case Administration

12/13/2022	MR	0.2	Attention to production from property manager .
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Case Administration

12/19/2022	AW	0.1	Communicate with K. Duff regarding update to receivership web page (defer).
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Case Administration

12/20/2022	AW	0.3	Prepare update to receivership web page and related email to IT vendor (defer).
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Case Administration

12/21/2022	AW	0.1	Follow up correspondence with IT vendor regarding update to receivership web page (defer).
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Case Administration

Date	Indiv	Hours	Description
12/23/2022	AW	0.3	Prepare update to receivership web page and related email to IT vendor (defer) (.2); prepare service list for J. Wine (defer) (.1). Case Administration
12/30/2022	KMP	0.2	Work with bank representatives relating to access to banking portal . Case Administration

SUBTOTAL: [4.7 708.00]

Claims Administration & Objections

12/1/2022	AW	2.3	Work with J. Wine to finalize amended exhibits to Receiver's recommendation, finalize and serve on claimants (Group 1) (.5); review claim and discovery responses , draft email to claimant, and related email response (Group 1) (.6); review emails from counsel and communicate with J. Wine regarding progress on claims review (all) (.1); attention to email and voicemail from claimant's counsel , obtain contact information, and update claimant's contact information (2736 W 64th, 1102 Bingham) (.2); draft emails to claimants regarding recently filed motions, related communications with J. Wine, and serve motions on claimants (all) (.9). Claims Administration & Objections
12/1/2022	JR	1.9	Update City of Chicago claims paid out of closing proceeds for various properties related to code violations and outstanding water bills (2909 E 78th, 7109 Calumet, 7237 Bennett, 7300 St. Lawrence, 7656 Kingston, 7760 Coles, 8000 Justine) (.7); review complex proof of claims for claimant relating to confirmation of total monies received from defendants (3074 Cheltenham, 4533 Calumet, 4611 Drexel, 5450 Indiana, 6217 Dorchester, 638 Avers, 6437 Kenwood, 7026 Cornell, 7109 Calumet, 7237 Bennett, 7749 Yates, 7834 Ellis) (1.2). Claims Administration & Objections
12/1/2022	JRW	0.5	Exchange correspondence with counsel for class regarding claim forms (defer) (.2); review and revise notices to claimants (all) (.1); attention to claimant inquiry and related review of prior pleadings (all) (.2). Claims Administration & Objections
12/1/2022	MR	1	Attention to responding to issues on appeal and related communications with A. Watychowicz (1131 E 79th, 7024 Paxton). Claims Administration & Objections
12/2/2022	AW	0.2	Email response to claimants regarding claims process and reassigned Judge (all) (.1); email K. Duff information regarding properties with 5 claims or less (1401 W 109th, 1422 East 68th, 2800 E 81st, 310 E 50th, 3213 Throop, 3723 W 68th, 5437 Laffin, 61 E 92nd, 6807 Indiana, 6949 Merrill, 7840 Yates, 7933 Kingston, 7953 Woodlawn, 8000 Justine, 8214 Ingleside, 8405 Marquette, 8800 Ada) (.1). Claims Administration & Objections

Date	Indiv	Hours	Description
12/2/2022	JR	3	Continue working on claims, review claims submissions for properties (4315 Michigan, 4611 Drexel, 6217 Dorchester, 6355 Talman, 6437 Kenwood, 701 S 5th, 7051 Bennett, 7237 Bennett, 7442 Calumet, 7546 Saginaw, 7600 Kingston, 7748 Essex, 7749 Yates, 7834 Ellis, 7957 Marquette, 8100 Essex, 8326 Ellis). Claims Administration & Objections
12/2/2022	JRW	0.3	Exchange correspondence with class counsel regarding hearing (defer) (.1); correspondence with K. Duff regarding response to claimant inquiry (all) (.1); exchange correspondence with vendor regarding claims review spreadsheets (all) (.1). Claims Administration & Objections
12/2/2022	MR	0.1	Attention to status regarding litigation (defer). Claims Administration & Objections
12/5/2022	MR	2.3	Work on motion to dismiss and review order regarding same (1131 E 79th, 7024 Paxton). Claims Administration & Objections
12/6/2022	AW	0.3	Email claimants regarding Receiver's submission on Group 1 Claims (Group 1) (.2); email response to claimant regarding claims process (7026 Cornell) (.1). Claims Administration & Objections
12/6/2022	JRW	1.5	Conference call with vendor regarding claims database and reporting for claims review and distributions (all). Claims Administration & Objections
12/6/2022	MR	0.3	Attention to claimant's motion to stay and order (1131 E 79th, 7024 Paxton). Claims Administration & Objections
12/7/2022	JRW	0.2	Correspondence from claimant regarding settlement negotiations (3723 W 68th) (.1); review claimant's reply memorandum in support of motion for adjudication of single claim status (5437 Laflin) (.1). Claims Administration & Objections
12/7/2022	MR	0.1	Attention to reply on property claim adjudication motion (5437 Laflin). Claims Administration & Objections
12/8/2022	AW	0.1	Communicate with J. Wine regarding subpoenas to counsel for records relating to settlements (defer). Claims Administration & Objections
12/8/2022	JRW	1	Review and revise subpoenas (defer) (.1); confer with K. Duff regarding settlement correspondence and related review of records (3723 W 68th) (.4); review claimant's reply brief in support of motion for 1292(b) certification (1131 E 79th, 7024 Paxton) (.2); prepare list of fields for analysis of claims and potential distributions (all) (.3). Claims Administration & Objections
12/9/2022	AW	1	Finalize subpoenas for counsel regarding settlement and work with J. Wine to finalize notices to counsel (defer) (.4); prepare certified mailings of subpoenas (defer) (.4); review recommendations to claims vendor and communicate with J. Wine regarding additional suggestions to update database (all) (.2).

Date	Indiv	Hours	Description
			Claims Administration & Objections
12/9/2022	JRW	0.6	Review and revise notice letters and related correspondence with A. Watychowicz regarding subpoenas (defer) (.4); exchange correspondence with K. Duff and A. Watychowicz regarding tracking of claims and distributions and related correspondence to vendor (all) (.2).
			Claims Administration & Objections
12/12/2022	AW	0.2	Review response and documents produced pursuant to subpoena from attorney and related email to counsel (defer).
			Claims Administration & Objections
12/12/2022	JRW	1	Review settlement communications from Judge Kim, claimants' counsel and claimants (1422 E 68th, 2800 E 81st, 7840 Yates) (.2); review records and related correspondence to Judge Kim regarding status of settlement discussions (1401 W 109th, 1422 E 68th, 310 E 50th, 3723 W 68th, 5437 Laflin, 61 E 92nd, 6807 Indiana, 6949 Merrill, 7933 Kingston, 7953 Woodlawn, 8000 Justine, 8214 Ingleside, 8405 Marquette, 8800 Ada) (.7); cursory review of document production pursuant to subpoena for settlement documentation and related correspondence with K. Duff (defer) (.1).
			Claims Administration & Objections
12/13/2022	AW	0.2	Communicate with J. Wine regarding unsecured claims (defer) (.1); communicate with J. Wine regarding access to claim documents (defer) (.1).
			Claims Administration & Objections
12/13/2022	JRW	0.4	Correspondence from claimant and related communications with A. Watychowicz regarding claims not against specific properties (defer) (.1); review production pursuant to subpoena for settlement documentation and related correspondence with K. Duff (defer) (.3).
			Claims Administration & Objections
12/14/2022	AW	0.8	Attention to filed appearances and update service lists with emails of claimants' counsel (all).
			Claims Administration & Objections
12/14/2022	JRW	1.6	Review and respond to comments from K. Duff regarding claims and distribution tracking (all) (.4); review settlement correspondence, further review of claims , and analysis to K. Duff (2800 E 81st, 4755 St Lawrence, 7840 Yates) (1.2).
			Claims Administration & Objections
12/15/2022	AW	1.8	Detailed review of claims (6001 Sacramento, 7748 Essex, 8100 Essex) (1.1); update mortgagees' spreadsheet (all) (.7).
			Claims Administration & Objections
12/15/2022	JR	0.7	Review email from J. Wine requesting to review production of judgments paid from various property closings and produce documents regarding same, related communication with J. Wine (2736 W 64th, 5618 MLK, 6554 Vernon, 7201 Dorchester, 7450 Luella, 7546 Saginaw, 7748 Essex).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/15/2022	JRW	2.3	Further correspondence with K. Duff regarding claims analysis and distribution planning (all) (.5); review claims against properties and related analysis to K. Duff (2800 E 81st, 7840 Yates) (1.8). Claims Administration & Objections
12/16/2022	AW	1.7	Zoom meeting with K. Duff and J. Wine regarding claims analysis, data management, and related issues (all) (1.5); communicate with J. Wine regarding claimants' portfolios and contact information (all) (.2). Claims Administration & Objections
12/16/2022	JRW	2	Zoom meeting with K. Duff and A. Watychowicz regarding claims analysis, data management, and related issues (all) (1.5); review EB document and related correspondence with A. Watychowicz (all) (.1); attention to settlement communications (2800 E 81st, 7840 Yates) (.1); correspondence to vendor regarding additional fields for claims review and distribution database (all) (.3). Claims Administration & Objections
12/16/2022	MR	0.1	Update on status of discussions on certain properties (2800 E 81st, 7840 Yates). Claims Administration & Objections
12/19/2022	AW	1	Call with K. Duff and J Wine regarding claims (all) (.3); prepare spreadsheet with updated contact information for claimants and related email exchanges with vendor (all) (.7). Claims Administration & Objections
12/19/2022	JRW	5.5	Extended meeting with K. Duff regarding claims analysis, data management, and distribution planning (all) (3.1); telephone conferences with A. Watychowicz and K. Duff regarding claims and distributions analyses and data management issues (all) (.4); confer with K. Duff regarding status of settlement negotiations (2800 E 81st, 3723 W 68th, 7840 Yates) (.4); confer with K. Duff regarding claims against properties with no institutional debt (1102 Bingham, 11117 Longwood, 1414 E 62nd, 2909 E 78th, 3030 E 79th, 431 E 42nd, 5955 Sacramento, 6001 Sacramento, 6437 Kenwood, 701 S 5th, 7026 Cornell, 7237 Bennett, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7834 Ellis, 7927 Essex, 8047 Manistee, 8100 Essex) (.2); update list of fields for claims review database (all) (.1); telephone conference with claimant's counsel regarding email from claimant (3723 W 68th) (.1); review claims and related records regarding properties (1414 E 62nd, 6217 Dorchester) (.3); correspondence to J. Rak and A. Watychowicz regarding claims review sheet for property (6949 Merrill) (.1); attention to claims review (1700 Juneway, 4315 Michigan, 5001 Drexel, 5955 Sacramento, 6356 California, 7026 Cornell, 7957 Marquette) (.8). Claims Administration & Objections
12/20/2022	AW	6.1	Detailed review of claims (1131 E 79th, 7508 Essex, 8100 Essex) (4.9); communicate with J. Wine regarding claims review (all) (.1); update to mortgagees' spreadsheets (all) (.7); review claim and communicate with counsel regarding email from account officer (2909 E 78th, 7237 Bennett, 7549 Essex, 8047 Manistee) (.2); review spreadsheet and communicate with J. Wine regarding recorded claims (3074 Cheltenham, 6949 Merrill, 7750 Muskegon) (.2).

Date	Indiv	Hours	Description
Claims Administration & Objections			
12/20/2022	JR	3	Review email from J. Wine regarding claims for property and respond accordingly (6949 Merrill) (.2); continue working on claims, review claims submissions for properties (11117 Longwood, 2909 E 78th, 5450 Indiana, 6217 Dorchester, 7442 Calumet, 7546 Saginaw, 7549 Essex, 7748 Essex, 7927 Essex, 8047 Manistee, 816 Marquette) (2.8).
Claims Administration & Objections			
12/20/2022	JRW	5.1	Telephone conference with A. Watcyhowicz regarding claims review (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 W Juneway, 2736 W 64th, 2800 E 81st, 2909 E 78th, 3030 E 79th, 310 E 50th, 3723 W 68th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5437 Laflin, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 61 E 92nd, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 N Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7301 Stewart, 7442 Calumet, 7450 Luella, 7500 Eggleston, 7508 Essex, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7927 Essex, 7933 Kingston, 7953 Woodlawn, 7957 Marquette, 8000 Justine, 8047 Manistee, 8100 Essex, 8107 Ellis, 816 E Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis, 8405 Marquette, 8800 Ada) (.2); attention to claims review (4511 Merimac, 4611 Drexel, 638 Avers, 7255 Euclid, 7748 Essex, 7834 Ellis, 8107 Ellis) (2.9); attention to claims review (1700 Juneway, 4533 Calumet, 5450 Indiana, 6949 Merrill, 7107 Bennett, 8100 Essex, 8107 Ellis) (2.0).
Claims Administration & Objections			
12/21/2022	AW	3.2	Detailed review of claims (4533 Calumet, 5955 Sacramento, 6217 Dorchester, 6437 Kenwood, 7237 Bennett, 7546 Saginaw, 8100 Essex, 816 Marquette) (3.1); communicate with claims vendor regarding claimants' contact updates to database (all) (.1).
Claims Administration & Objections			
12/21/2022	JR	4.3	Continue working on claims, review claims submissions for properties (11117 Longwood, 2909 E 78th, 5450 Indiana, 6217 Dorchester, 7442 Calumet, 7546 Saginaw, 7549 Essex, 7748 Essex, 7927 Essex, 8047 Manistee, 816 Marquette).
Claims Administration & Objections			
12/21/2022	JRW	0.2	Attention to inquiry from claimant (all) (.1); review court order denying claimant's motion for interlocutory appeal (1131 E 79th, 7024 Paxton) (.1).
Claims Administration & Objections			
12/21/2022	MR	0.2	Attention to order denying claimant's motion for interlocutory appeal (1131 E 79th, 7024 Paxton).
Claims Administration & Objections			

Date	Indiv	Hours	Description
12/22/2022	AW	1.6	Detailed review of claims (4533 Calumet, 6217 Dorchester, 8100 Essex, 816 Marquette) (.9); communicate with IT vendor regarding web page update for claimants (defer) (.1); prepare files for update to claims database and related email to vendor (3074 Cheltenham, 6250 Mozart, 6356 California, 7750 Muskegon, 8100 Essex) (.6). Claims Administration & Objections
12/22/2022	JR	5.9	Continue working on claims, review claims submissions for properties (11117 Longwood, 2909 E 78th, 5450 Indiana, 6217 Dorchester, 7109 Calumet, 7442 Calumet, 7546 Saginaw, 7549 Essex, 7748 Essex, 7927 Essex, 8047 Manistee, 816 Marquette). Claims Administration & Objections
12/23/2022	AW	2.3	Detailed review of claims (4533 Calumet, 6217 Dorchester, 6356 California, 7201 Dorchester, 7600 Kingston, 7823 Essex, 8100 Essex). Claims Administration & Objections
12/23/2022	JR	3.9	Continue working on claims, review claims submissions for properties (11117 Longwood, 2909 E 78th, 4611 Drexel, 5450 Indiana, 6160 MLK, 6217 Dorchester, 7549 Essex, 8047 Manistee). Claims Administration & Objections
12/23/2022	JRW	0.3	Review status report filed with appellate court (1131 E 79th, 7024 Paxton) (.1); correspondence with vendor regarding claims database and related telephone conference with A. Watychowicz (all) (.2). Claims Administration & Objections
12/23/2022	MR	0.1	Attention to status report on appellate case (1131 E 79th, 7024 Paxton).. Claims Administration & Objections
12/25/2022	MR	2	Work on motion to dismiss appeal (1131 E 79th, 7024 Paxton). Claims Administration & Objections
12/27/2022	JRW	2.9	Exchange correspondence with claimants' counsel and Judge Kim regarding potential settlement of claims and scheduling of conference (1422 E 68th, 2800 E 81st, 7840 Yates) (.2); study claims and analyses in preparation for settlement conference (1422 E 68th, 2800 E 81st, 7840 Yates) (2.5); exchange correspondence with claimants' counsel and claimants regarding settlement offer (1422 E 68th) (.2). Claims Administration & Objections
12/28/2022	JRW	2.5	Further review and analysis of claims against properties in preparation for settlement conference (1422 E 68th, 2800 E 81st, 7840 Yates) (1.3); participate in settlement conference with Judge Kim, claimants' counsel and claimants (1422 E 68th, 2800 E 81st, 7840 Yates) (.7); confer with K. Duff regarding updates to master claims spreadsheet and status of work with vendor regarding development of new platform for claims review and distributions (all) (.2); correspondence to K. Duff and M. Rachlis regarding status of settlement negotiations (1422 E 68th, 2800 E 81st, 7840 Yates) (.3). Claims Administration & Objections
12/28/2022	MR	0.2	Attention to settlement discussions (1422 E 68th, 2800 E 81st, 7840 Yates) (.1); attention to order on property (5437 Lafin) (.1).

Date	Indiv	Hours	Description
Claims Administration & Objections			
12/29/2022	AW	4.4	Detailed review of claims and related email to counsel (4520 Drexel, 8100 Essex) (.9); detailed review of claims (8100 Essex) (.5); review claims and emails and communicate with claims vendor regarding possible claimant (8100 Essex) (.3); follow up with counsel regarding email from account officer (2909 E 78th, 7237 Bennett, 7549 Essex, 8047 Manistee) (.1); update claimants contact information and work with vendor on related update (2800 E 81st, 4750 Indiana, 5618 MLK, 6001 Sacramento, 6554 Vernon, 7450 Luella, 7635 East End, 7748 Essex, 7840 Yates, 8100 Essex) (.4); prepare an inventory of issues relating to claims that need to be discussed with counsel (all) (.4); review emails from claimants and prepare update relating to claimants' requests to change custodians (all) (1.8).
Claims Administration & Objections			
12/29/2022	JRW	1.4	Review and revise motion to dismiss appeal (1131 E 79th, 7024 Paxton) (1.2); correspond with claimants' counsel regarding potential settlement (3723 W 68th) (.1); confer with A. Watychowicz regarding updates to master claims spreadsheet (all) (.1).
Claims Administration & Objections			
12/29/2022	MR	2.3	Review, edit and forward drafts of motion to dismiss appeal (1131 E 79th, 7024 Paxton).
Claims Administration & Objections			
12/30/2022	AW	0.5	Communicate with J. Wine regarding issue with subpoena delivery and related correspondence with counsel and his assistant (defer) (.3); reissue subpoena for documents and serve by email as per agreement (defer) (.1); call with counsel regarding reasoning behind issuance of subpoena (defer) (.1).
Claims Administration & Objections			
12/30/2022	JRW	1	Confer with A. Watychowicz regarding outstanding subpoenas , review and revise correspondence to same, and futher confer with A. Watychowicz regarding necessary follow-up (defer) (.3); telephone conference and follow-up correspondence with claimants' counsel regarding potential settlement of claims (3723 W 68th, 61 E 91st, 7953 Woodlawn) (.2); telephone conference and follow-up correspondence with IRA representative regarding transfer of inherited assets (2909 E 78th, 7549 Essex, 8047 Manistee) (.3); review Google document regarding updates to master claims spreadsheet and related telephone conference with A. Watychowicz (all) (.2).
Claims Administration & Objections			
12/30/2022	MR	0.1	Follow exchanges on settlement regarding property (3723 W 68th).
Claims Administration & Objections			
SUBTOTAL:			[89.5 18,366.00]

Distributions

12/7/2022	AW	0.1	Attention to response to motion to approve distribution and related email to counsel (5437 Laflin).
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<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Distributions
12/7/2022	JRW	0.1	Confer with K. Duff regarding upcoming potential distributions and provide spreadsheets (3723 W 68th, 5437 Laflin, 61 E 92nd, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 Ada).
			Distributions
12/8/2022	KMP	0.3	Review bank records to provide property account balances to K. Duff in connection with upcoming potential distribution (3723 W 68th, 5437 Laflin, 61 E 92nd, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 S Ada).
			Distributions
12/12/2022	JRW	1.1	Exchange redlines of motion to approve distributions with claimants' counsel and related correspondence to settling claimants (7933 Kingston, 8405 Marquette, 8800 Ada)(.9); confer with K. Pritchard regarding distribution procedures and related correspondence with bank (all) (.2).
			Distributions
12/12/2022	KMP	0.2	Communications with J. Wine and bank representative regarding issues relating to methods for future distributions from property accounts (all).
			Distributions
12/12/2022	MR	0.2	Attention to redline of motion for distribution for properties (7933 Kingston, 8405 Marquette, 8800 Ada).
			Distributions
12/13/2022	AW	0.6	Attention to motion to approve distributions and email counsel regarding proposed revisions (7933 Kingston, 8405 Marquette, 8800 Ada) (.5); communicate with J. Wine regarding additional revisions and corrections to exhibit (7933 Kingston, 8405 Marquette, 8800 Ada) (.1).
			Distributions
12/13/2022	JRW	0.6	Email exchange with claimants regarding joint motion to approve distributions (7933 Kingston, 8405 Marquette, 8800 Ada) (.1); review redline and finalize motion to approve distributions and related telephone conference with A. Watychowicz (7933 Kingston, 8405 Marquette, 8800 Ada) (.4); exchange correspondence with claimants' counsel regarding joint motion to approve distributions (7933 Kingston, 8405 Marquette, 8800 Ada) (.1).
			Distributions
12/13/2022	MR	0.2	Attention to drafts of distribution motion and related correspondence (7933 Kingston, 8405 Marquette, 8800 Ada).
			Distributions
12/15/2022	JRW	0.1	Correspondence to claimants' counsel regarding joint motion to approve distributions (7933 Kingston, 8405 Marquette, 8800 Ada).
			Distributions
12/27/2022	JRW	0.2	Exchange correspondence with claimants counsel and E. Duff regarding revised accounting reports (1422 E 68th, 2800 E 81st, 3723 W 68th, 5437 Laflin, 61 E 92nd, 6949 Merrill, 7840 Yates, 7933 Kingston, 7953 Woodlawn, 8405 Marquette, 8800 Ada).

Date	Indiv	Hours	Description
			Distributions
12/28/2022	AW	0.1	Attention to entered orders granting distribution and related email to counsel (5437 Laflin).
			Distributions
12/28/2022	JRW	0.1	Review order approving distribution of sales proceeds and related correspondence (5437 Laflin).
			Distributions
12/29/2022	JRW	0.2	Exchange correspondence with K. Duff and claimants' counsel regarding distribution pursuant to order and related wiring instructions (5437 Laflin).
			Distributions
12/29/2022	KMP	0.6	Communicate with K. Duff and bank representatives regarding pro rata interest calculation for property distribution (5437 Laflin) (.2); prepare draft wire request forms for distribution from property account (5437 Laflin) (.4).
			Distributions
12/30/2022	JRW	0.4	Confer with K. Duff regarding necessary adjustments to distribution amount and related correspondence regarding distribution pursuant to court order (5437 Laflin).
			Distributions
12/30/2022	KMP	0.6	Revise and finalize wire request forms for distribution from property account and related communicate with K. Duff and bank representatives (5437 Laflin) (.4); effectuate transfer of funds to Receiver's account for expenses related to distribution from property account (5437 Laflin) (.2).

SUBTOTAL: [5.7 1,234.00]

Tax Issues

12/8/2022	KMP	0.2	Follow up email exchange with accountant regarding Internal Revenue Service notice in connection with alleged debt collection.
			Tax Issues
12/9/2022	AW	0.1	Review and prepare mailing for IRS.
			Tax Issues
12/9/2022	KMP	0.6	Attention to communication from tax accountant relating to tax notice from IRS, prepare draft response to IRS notice, and forward to K. Duff for review (.4); revise and finalize letter to IRS and communicate with A. Watychowicz regarding transmittal (.2).
			Tax Issues
12/12/2022	KMP	0.1	Communicate with tax accountant regarding response to tax notice from Internal Revenue Service.
			Tax Issues

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/19/2022	KMP	0.2	Communications with K. Duff and tax accountant regarding notice from collection agency relating to alleged tax debt . Tax Issues

SUBTOTAL: [1.2 168.00]

126 \$27,760.00

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Duff, Ellen	12.10	390.00	\$4,719.00
Pritchard, Kathleen M.	7.70	140.00	\$1,078.00
Rachlis, Michael	9.90	390.00	\$3,861.00
Rak, Justyna	27.60	140.00	\$3,864.00
Watychowicz, Ania	30.20	140.00	\$4,228.00
Wine, Jodi Rosen	38.50	260.00	\$10,010.00

Other Charges

Description

Business Operations

Software license fees for December 2022 (Summit Hosting, \$206.41; Google Suite, \$144.00)	350.41
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SUBTOTAL:	[350.41]
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Claims Administration & Objections

Online research for December 2022	17.68
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SUBTOTAL:	[17.68]
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Distribution

Online research for December 2022	38.44
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SUBTOTAL:	[38.44]
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Total Other Charges	\$406.53
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SUMMARY

Legal Services	\$27,760.00
Other Charges	\$406.53
TOTAL DUE	\$28,166.53