

**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

**OBJECTING INSTITUTIONAL LENDERS' RESPONSE TO RECEIVER'S 20TH
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 (the "Objecting Institutional Lenders") object to the Receiver's 20th Interim Fee Application and Motion for Court Approval of Payment of Fees and Expenses of Receiver and Receiver's Retained Professionals (Dkt. 1517, the "20th Fee Petition" regarding the "Fees") on the same or similar bases contained in their prior objections, which objections this Court has denied.

The Objecting Institutional Lenders highlight for the Court's attention that the Receiver's fees are increasing in recent quarters rather than decreasing. The Receiver seeks \$182,547.79 for this latest 20th Fee Petition, an amount that has been increasing with each petition since the 16th Fee Petition which was for only \$70,079. The 19th and 20th Fee Petitions, respectively, each seek about *double* what was sought in each of the 16th and 17th Fee Petitions, respectively, as reflected by the table below.

Fee Petition	Amount	Dates	Source
20th Fee Petition	\$182,547.79	Apr. 1, 2023 through June 30, 2023	Dkt. 1517-1, Exh. I at p.8, PageID 102978
19th Fee Petition	\$137,383.12	Jan. 1, 2023 through March 31, 2023	Dkt. 1478-1, Exh. I at p.7, PageID 99656
18th Fee Petition	\$90,913.38	Oct. 1, 2022 through Dec. 31, 2022	Dkt. 1384-1, Exh. J. at p. 8, PageID 81741
17th Fee Petition	\$87,217.78	July 1, 2022 through Sept. 30, 2022	Dkt. 1332, Exh. K at p.8, PageID 79091
16th Fee Petition	\$70,079.63	April 1, 2022 through June 30, 2022	Dkt. 1293, Exh. K at p.6, PageID 71067

The Objecting Institutional Lenders also object generally to the Receiver’s request in his 20th Fee Petition for a super-priority lien for the same reasons contained in their Response to Motion for Approval to Pay Certain Previously Approved Fees and Cost (Dkt. 961), 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), and their Objections to Magistrate Judge Kim’s Recommendation on Receiver’s Second Motion for Approval of Fee Allocations for Interim Payment Pursuant to Receiver’s Lien (“Objections to RF2A”) (Dkt. 1501, objecting to Dkt. 1491 Recommendation and Dkt. 1321 Motion), all such objections the Court has overruled except where the Receiver has agreed an error was made (*see, e.g.*, Dkt. 1450).

BACKGROUND

1. The Objecting Institutional Lenders 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 August 14, 2023 the Receiver filed his 20th Fee Petition. Dkt. 1517.

3. Pursuant to the Court's Order, Dkt. 1031 at p.12, n.32, because the Objecting Institutional Lenders are reasserting prior allocation objections of the same category as they previously did, they do so below in "summary fashion that incorporates citations (with pinpoint cites) to previous filings that have laid out the objection." The Objecting Institutional Lenders are not asserting any objections which are categorically new, but some of the entries present different contexts to similar issues from prior petitions.

I. The Objecting Institutional Lenders Assert The Same Objections To The Receiver's 20th Fee Petition As They Asserted To The Receiver's Prior Fee Applications.

The Objecting Institutional Lenders adopt and assert their objections to the Receiver's prior fee petitions (Dkts. 1486, 1394, 1346, 1305, 1210, 1188, 1181, 1039, 1000, 960, 792, 777, 648, 617, 595, 581, 509, 438) as to the Receiver's 20th Fee Petition, to preserve those objections by incorporating them by reference into this response. The Objecting Institutional Lenders 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 against the segregated sales proceeds (which objections the Court rejected, but characterized as "narrow and understandable," Dkt. 1371). The Objecting Institutional Lenders also adopt the arguments presented in their Objections to Magistrate Judge Kim's Oral Ruling and Minute Order on Receiver's First Fee Allocation Motion, see Dkt. 1389,

and their Objections to the RF2A (Dkt. 1501) and Objections to RF2A (Dkt. 1501, objecting to Dkt. 1491 Recommendation and Dkt. 1321 Motion).

The Estate's general operating account has \$2,285,029.56 in available funds as of June 30, 2023 (Dkt. 1516 at p.25, PageID 102677), resulting from various distributions associated with prior fee orders. The Estate's general operating account therefore has more than sufficient funding to bear the 20th Fee Petition amounts the Receiver seeks to allocate as a priming lien surcharge on the property sales proceeds totaling \$182,547.79. Dkt. 1517-1, Exh. I at p.8, PageID 102978. The District Court has repeatedly overruled objections arguing that the source of funds to pay the Receiver should, in substantial part, come from the operating account estate funds rather than the segregated property accounts. Dkts. 1371, 1366, 1452, Dkt. 1481 at 9 ("[T]hey argue that the allocated fees should be paid from the Receiver's account and not from the property accounts. But this argument also simply retreads old ground. As the Objectors concede, this is a previously overruled objection.")

II. Color-Coded Categorical Objections.

The Receiver requests that \$182,547.79 of the Fees reflected on, among other exhibits, Exhibits F and G to Dkt. 1517, 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 I, with more detail on the general and property-specific allocations at Exhibits K and L. Therefore, the line-item specific objections are presented only as to Exhibits F and G also apply to the proposed allocations. As before, the Objecting Institutional Lenders are not challenging the reasonableness of any time spent, nor that the Receiver should be compensated, rather they argue and preserve for appeal their argument that the source of funds should be the estate's general operating account as to the subjects of the objections.

The Objecting Institutional Lenders have color highlighted sample entries on the Receiver and his attorneys' monthly invoices (Exhibits F and G to the 20th Fee Petition) to illustrate Fees that should not prime the victorious secured creditors' liens, a copy of which is attached as Exhibit B. The bases of these specific objections are as follows:

First, Fees that the Objecting Institutional Lenders contend should be paid from estate operating funds rather than segregated property sale proceeds, but which objections the Court has previously overruled and where the issues are substantially the same as previously overruled objections even if arising in somewhat different contexts, are highlighted in **RED**. These include:

- Fees marked “defer” which typically relate to the Receiver’s pursuit of EquityBuild assets against third parties. These are marked red to preserve the objection for appeal if and when the Receiver purports to allocate them to a property.
- Entries which are billed to all or substantially all properties but can only relate to one or a smaller subset of properties. As example, see PageID 102908, a 1.1 entry on 4/21\2023 to “Review claimants’ submissions and correspondence” and send an internal email, billed to “set73”. But most claimants did not make “submissions” in advance of the 4/26/2023 hearing, and many claimants have never participated in discovery or other processes so as to generate any “correspondence,” so it is inappropriate to charge all of the properties for what must have been a more limited subset of “submissions and correspondence” reviewed. The Receiver also billed .1 to all of the properties (set73) to communicate with a single claimant.
- Entries which are billed to all of a group even though the charge does not appear to relate to all of that group equally. As example, see PageID 102924, .4 entry on 5/3/23 to “email communications with counsel regarding confidentiality order and

related email to claimant” charged to all Group 2 properties. This entry appears to relate to a particular claimant who had questions or concerns about the confidentiality order and the Receiver’s correspondence with that claimant about it. That should be billed if at all to that claimant’s property rather than the whole of Group 2. Similarly, on 5/30-31 and on 6/1, 6/2, 6/5-6/7, 6/9, and 6/12-6/13 there are entries totaling 14.50 hours for “Record responses to discovery and email confirmations to claimants (Group 2).” Presumably, those responses relate to less than all 5 Group 2 properties because very little was produced by claimants on Property 101 while production was more voluminous on other Group 2 properties, yet they were allocated equally to all.

- In other instances, the Receiver’s fees have been allocated based solely on the number of properties involved even though the work with respect to those properties would not have been equal. For example, on 4/23/23, JRW’s 1.7 hour time entry (PageID 102909) for “review of deeds, mortgages and releases” was divided between the three properties involved even though the effect of the release is only at issue as to one of the properties, 6160 MLK.
- Entries which are unreasonably vague, such as “attention to claim” billed to one particular property for .8 on 6/14/2023 (PageID 102953).
- The Court has overruled objections similar to those above in all prior fee petitions and associated objections. *See, e.g.*, Dkt. 1353 at pp.8-9 (and citations therein); Dkt. 1181 at pp. 9-14.

Second, Fees incurred to general review of claims without any apparent tie-in to adjudication efforts or even to activities presently occurring in the case should be charged to the

estate's operating account because no benefit to the victorious secured creditor can be shown at this time. Such entries are highlighted in **YELLOW**. Such entries are fairly voluminous, often vague, and are generally associated with properties for which the adjudication process has not even started. For example, on PageID 102912, there are two large entries, 4/27/23 for 6.8 hours, and 4/28/23 for 6 hours, to "Continue working on claims, review claims submissions for properties" with many of the addresses falling in Groups 4-8. The Objecting Institutional Lenders incorporate by reference their detailed descriptions of this objection category at Dkt. 1443 pp. 10-11; Dkt. 1389 (legal argument at pp. 1-8, specifics on this category at pp. 10-11); and Dkt. 1210 at p.14. The Court overruled these objections and broadened the "implementation and management of an orderly summary claim-priority adjudication process" priming lien category (Dkt. 1030 at p.2) to include "giving notice to interested parties, locating and preserving records, and handling creditor inquiries" and general claim review in preparation for adjudication (Dkt. 1366 at 2) in granting the Receiver's 17th Fee Petition. The Court also overruled this objection category when granting the First Fee Allocation Motion (Dkt. 1450) and has overruled all similar objections the Institutional Lenders have made since.

Third, Fees incurred to litigate Group 1 claims 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 is on appeal and thus ongoing. (Dkt. 1030, p. 14, n.7.). Such entries are highlighted in **ORANGE**. The Court has repeatedly overruled objections on this basis. *See, e.g.*, Dkt. 1504. However, in this quarter, most of the Fees expended in this regard were to oppose BC57's Motion to Stay, which was granted over the Receiver's and the claimants' objections, and should therefore not be permitted a priming lien. The relevant Group 1 claimants had independent counsel, Mr. Stein, who

opposed the stay, Dkt. 1473, rendering the legal fees incurred by the Receiver to also oppose the stay superfluous. As example, see PageID 102888, 1.7 entry regarding the opposition to the Motion to Stay on 5/15/23. The Receiver also spent time assigning distributions which were stayed and did not happen which should not be billed to the properties at this time. As example, see PageID 102879, 4\7\23 entry for .5 for an internal conference regarding “Group 1 claims” including the “proposed distribution order.”

Fourth, the Objecting Institutional Lenders object to Fees associated with tasks the Receiver would have needed to undertake even in the absence of issues of secured priority such as preparing status reports, effectuating service, or performing accounting functions. While the Objecting Institutional Lenders do not dispute that the Receiver should be paid for this work, paying fees for such tasks out of segregated sales proceeds to the detriment of the victorious secured creditor violates the general rule that the estate’s operating account should bear the expense absent special benefit to the victorious secured creditor. These entries are highlighted in **BLUE**. For example, on 4/27/23, PageID 102911 the Receiver’s attorneys billed .7 to tasks associated regarding updating claimant contact information reference materials. No particular properties should be billed for such tasks because the Receiver would have needed to maintain an index of claimant contact information and deal with claimants regardless of whether they are secured or not, and regardless of whether secured claimants existed or not. The Court has previously overruled all such “general receivership” objections. *See* Dkt. 1481, Exh. A (Transcript of 4/26/2023 hearing at pp. 22-23); Dkt. 1481 at pp. 12-13 (Receiver summary of Court’s prior ruling on similar issues but involving different fee entries). The Court also overruled similar objections made in the 17th -19th Fee Petitions (Dkts. 1366, 1452, 1504).

Fifth, the Objecting Institutional Lenders object to Fees related to Group 2 and Group 3 as premature because it is too early to determine if the Receiver will have conferred a benefit on the properties sufficient to obtain a priming lien until after the adjudication process plays out. These entries are highlighted in **GREEN**. As example, see PageID 102895, 3.2 entry on 6/1/23 for various activities regarding the Group 2 and Group 3 adjudications. In addition, the Receiver allocated its supplemental discovery work related to Group 2 across all 5 properties, even though there is no evidence that such work will benefit the creditor that the Court ultimately determines has the first priority lien. For example, on 6/27/23, PageID 102961-102962, a total of 22.9 hours were allocated for the Receiver's "additional discovery requests" and subpoenas that were directed to the institutional lenders and the title insurance companies that closed their loans. Such discovery has no benefit to the institutional lenders, as it is directed at investigating in order to contest their claims, and should not be allocated to their collateral unless and until the Court determines that another lien claimant has priority. Respectfully, the Receiver should not be undertaking such discovery at all, much less charging it to the properties, where the individual investors are represented by counsel (such as Capital Investors, LLC (6951 S. Merrill Fund I LLC) which asserts a \$1,550,000 secured claim against the 6949 Merrill Property), and especially where the institutional lender, Thorofare Asset Based Lending REIT Fund IV, LLC, recorded a first-in-time purchase money mortgage against the property, such that there are no alleged fraudulent payoff statements or releases involved. The Court has rejected similar arguments about Group 1 Fees generally. *See, e.g.*, Dkts. 1350, 1353 at pp.9- 10 (and citations therein), 1366, 1371. The Objecting Institutional Lenders also argued for deferring allocation of Group 2 fees until after adjudication in the 19th Fee Petition (Dkt. 1486 at p.7), and the Court overruled that objection (Dkt. 1504).

III. The 20th 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), and the reasons advanced in the Motion for Reconsideration, Dkt. 1471, which the Court denied, the Objecting Institutional Lenders 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 prior to the 17th Fee Petition. Dkt. 1312, p.4 (Order on Petitions 13-16). The Court has since then rejected in favor of a 20% holdback on all fees only without an additional 20% holdback on the payment of Fees that would be paid from the property-specific accounts. Dkts. 1483, 1504, 1510, 1511. While the Court has required only a 20% holdback since the 17th Petition, see Dkt. 1468, the Objecting Institutional Lenders continue to assert that an additional holdback of 20% of Fees to be allocated against the properties' segregated sales proceeds will ensure there are sufficient untapped funds to unwind any errors. Such errors might include Objecting Institutional Lenders objections to fee petitions being sustained on final appeal at the conclusion of the Receivership, but the anticipated process of reconciling the Receiver's continued "restorations" and ongoing account maneuvers at the end of the case may also benefit from an additional holdback. The Objecting Institutional Lenders also made this argument in the 19th Fee Petition (Dkt. 1486 at p.8), and the Court rejected the argument in favor of a sole 20% holdback on all Fees (Dkt. 1504).

CONCLUSION

Consequently, the Objecting Institutional Lenders request that the Court deny the Receivers 20th Fee Application on the grounds raised herein and in their objections to the

Receiver’s prior fee applications. If the Fees are approved, the Objecting Institutional Lenders argue that the objected-to Fees should be paid from the estate’s operating funds rather than the segregated property sales proceeds. The Objecting Institutional Lenders 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, which this Court has recently repeatedly rejected.

Dated: September 5, 2023

Respectfully submitted,

<p><u>/s/ Brett J. Natarelli</u></p> <p>Edward S. Weil (eweil@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 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.</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/ Andrew T. McClain</u> Jill L. Nicholson (jnicholson@foley.com) Andrew T. McClain (amcclain@foley.com) Foley & Lardner LLP 321 N. Clark St., Ste. 3000 Chicago, IL 60654 Ph: (312) 832-4500 Fax: (312) 644-7528 <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-SB48; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase</i></p>
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<p><i>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</i></p>	<p><i>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</i></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 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> mlandman@lcbf.com Landman Corsi Ballaine & Ford P.C.</p>	<p><u>s/ William J. Serritella, Jr.</u> William J. Serritella, Jr. wserritella@taftlaw.com Taft Stettinius & Hollister LLP 111 East Wacker Drive, Suite 2800 Chicago, IL 60601 (312) 527-4000</p>

<p>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><u>/s/ Bradley S. Anderson</u> Bradley S. Anderson, MO #53569 1201 Walnut Street, Ste. 2900 Kansas City, MO 64106-2150 Telephone: (816) 691-3119 Facsimile: (816) 412-1000 bradley.anderson@stinson.com <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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Exhibit 1

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 F

Rachlis Duff & Peel, LLC

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CHICAGO, ILLINOIS 60605

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

July 19, 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. 6621157

Legal Fees for April 2023	\$9,828.00
Expenses Disbursed	<u>\$0.00</u>
Due this Invoice	\$9,828.00

Date	Indiv	Hours	Description
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Asset Analysis & Recovery

4/3/2023	KBD	0.3	Exchange correspondence with government representatives regarding potential restitution in connection with separate criminal proceeding and exchange related correspondence with A. Watychowicz (defer). Asset Analysis & Recovery
4/5/2023	KBD	0.3	Exchange correspondence with authorities in third party criminal proceeding regarding victim notification forms and prepare same (defer). Asset Analysis & Recovery
4/6/2023	KBD	0.1	Exchange correspondence with A. Watychowicz regarding documents related to criminal proceeding (defer).. Asset Analysis & Recovery
4/13/2023	KBD	0.2	Attention to investigation of potential asset . Asset Analysis & Recovery
4/14/2023	KBD	0.2	Exchange correspondence with government representative regarding victim restitution information (.1); exchange correspondence with domain vendor regarding potential asset (.1). Asset Analysis & Recovery
4/17/2023	KBD	0.3	Work on response to victim notification letter . Asset Analysis & Recovery
4/19/2023	KBD	0.7	Work on declaration of victim losses and draft correspondence to government representatives . Asset Analysis & Recovery

SUBTOTAL: [2.1 819.00]

Business Operations

4/13/2023	KBD	0.2	Exchange correspondence with K. Pritchard and J. Wine regarding utility payment issue (4611 Drexel). Business Operations
4/18/2023	KBD	0.1	Exchange correspondence with property manager regarding utility refund checks (7109 Calumet). Business Operations
4/19/2023	KBD	0.3	Attention to returned checks and exchange related correspondence with K. Pritchard (1401 W 109th, 6217 Dorchester, 7201 Constance). Business Operations
4/29/2023	KBD	0.1	Exchange correspondence with J. Wine regarding utility refund checks from property manager (7109 Calumet). Business Operations

Date	Indiv	Hours	Description
SUBTOTAL:			[0.7 273.00]

Case Administration

4/18/2023	KBD	0.6	Confer with J. Wine and K. Pritchard regarding property bank accounts and tracking holdbacks. Case Administration
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SUBTOTAL:			[0.6 234.00]
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Claims Administration & Objections

4/3/2023	KBD	0.3	Exchange correspondence with J. Wine regarding recipient subpoena noncompliance and motion to compel production of information (defer (.1); study correspondence from J. Wine regarding analysis of claims in connection with distribution order (Group 1) (.2).
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Claims Administration & Objections

4/4/2023	KBD	0.3	Exchange correspondence with J. Wine regarding produced information regarding to third party litigation and study same (defer).
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Claims Administration & Objections

4/5/2023	KBD	0.4	Confer and exchange correspondence with J. Wine regarding motion to compel third party to produce information and cooperate relating to former property (defer).
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Claims Administration & Objections

4/7/2023	KBD	0.2	Confer with M. Rachlis and J. Wine regarding analysis of claims issues for prospective claims review (set59).
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Claims Administration & Objections

4/10/2023	KBD	0.2	Study correspondence from and telephone conference with J. Wine regarding analysis of claims and related issue (set59).
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Claims Administration & Objections

4/11/2023	KBD	0.2	Study notes about claims platform (set59).
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Claims Administration & Objections

4/12/2023	KBD	1.8	Analysis of claim (6217 Dorchester) (.5); confer with J. Wine regarding analysis of claim (6217 Dorchester) (.6); review motion for adjudication of claims (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.3); confer with J. Wine regarding motion for adjudication of claims and motion to strike as premature (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.2); study analysis of claim (7051 Bennett) (.2).
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Claims Administration & Objections

4/13/2023	KBD	0.6	Telephone conference with SEC (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.4); exchange correspondence with M. Rachlis and J. Wine approach to addressing motion to adjudicate claims (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.2).
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<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
4/14/2023	KBD	0.6	Confer with J. Wine regarding claims process and claims database (set59).
			Claims Administration & Objections
4/17/2023	KBD	0.5	Exchange correspondence with J. Wine and A. Watychowicz regarding analysis of claim and related communication from claimant (7625 East End) (.3); exchange correspondence with J. Wine regarding offer to claimant regarding properties (1131 E 79th, 7024 Paxton) (.1); exchange correspondence with J. Wine regarding planning for claims approach on properties and preparing for hearing before Judge Shah (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.1).
			Claims Administration & Objections
4/19/2023	KBD	0.9	Prepare for hearing before Judge Shah and exchange related correspondence with J. Wine and A. Watychowicz (set73).
			Claims Administration & Objections
4/20/2023	KBD	1.4	Confer with J. Wine regarding claims process and preparation for hearing before Judge Shah, including sequence of groups (set68) (.7); confer with J. Wine regarding claims and preparation for hearing before Judge Shah (Group 1) (.3); review prior correspondence with and regarding claimants and claims (Group 1) (.4).
			Claims Administration & Objections
4/21/2023	KBD	1.1	Draft and revise order setting proposed schedule for claims groups and exchange related correspondence with M. Rachlis and J. Wine (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.9); review claimant submissions relating to hearing before Judge Shah (Group 1) (.2).
			Claims Administration & Objections
4/24/2023	KBD	2.1	Confer with J. Wine and M. Rachlis regarding hearing before Judge Shah (set73) (1.5); telephone conference with SEC (set68) (.4); draft correspondence to M. Rachlis and J. Wine regarding planning for claims groups and process (set 68) (.2).
			Claims Administration & Objections
4/25/2023	KBD	3.9	Confer with J. Wine and M. Rachlis regarding hearing before Judge Shah (set73) (3.0); confer with SEC (set73) (.9).
			Claims Administration & Objections
4/26/2023	KBD	3.7	Prepare for hearing before Judge Shah on claims process (set73) (1.8); confer with M. Rachlis and J. Wine regarding claims process planning and hearing before Judge Shah (set73) (.2); exchange correspondence with J. Wine and M. Rachlis regarding claimant's counsel's communication regarding prospective claims process issues (set68)(.1); appear for hearing before Judge Shah (set73) (1.2); confer post-hearing with claimants and counsel regarding claims process considerations and planning (.4) (set68).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/27/2023	KBD	0.8	Exchange correspondence with A. Watychowicz and J. Wine regarding communication with claimant related to hearing before Judge Shah and distribution timing and related issues (Group 1) (.3); prepare spreadsheet regarding potential funds available for claims, investigation of records relating to same, and exchange related correspondence with J. Wine (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.5). Claims Administration & Objections

SUBTOTAL: [19 7,410.00]

Distributions

4/7/2023	KBD	0.5	Confer and exchange correspondence with M. Rachlis and J. Wine regarding analysis of claims issues regarding Group 1 claims, communications with claimants , and proposed distribution order (Group 1). Distributions
4/12/2023	KBD	0.1	Attention to returned check and claimant change of address (8326 Ellis). Distributions
4/18/2023	KBD	0.2	Attention to returned checks and communications with bank and distribution recipients (3723 W 68th). Distributions
4/21/2023	KBD	0.1	Exchange correspondence with K. Pritchard regarding returned checks and communications with bank (1401 W 109th, 6217 Dorchester, 7201 Constance). Distributions
4/28/2023	KBD	0.2	Study correspondence from J. Wine regarding claimant plan for motion to stay distribution (Group 1) (.1); review correspondence from J. Wine regarding communication with claimant's counsel regarding analysis of claim (1422 E 68th) (.1). Distributions

SUBTOTAL: [1.1 429.00]

Status Reports

4/13/2023	KBD	0.2	Exchange correspondence with J. Wine and K. Pritchard regarding gathering information for preparation of status report and related timing considerations. Status Reports
4/20/2023	KBD	0.9	Study and revise draft status report and exchange related correspondence (.7); draft correspondence to bank representative regarding update for status report (.2). Status Reports

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/21/2023	KBD	0.3	Revise draft status report and exchange related correspondence with J. Wine. Status Reports
4/27/2023	KBD	0.1	Attention to status report and preparation for submission to the Court. Status Reports
4/28/2023	KBD	0.2	Exchange correspondence with J. Wine regarding revision to status report. Status Reports

SUBTOTAL:			[1.7	663.00]
			25.2	\$9,828.00

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Duff, Kevin B.	25.20	390.00	\$9,828.00

SUMMARY

Legal Services	\$9,828.00
Other Charges	\$0.00
TOTAL DUE	<hr/> \$9,828.00 <hr/> <hr/>

Rachlis Duff & Peel, LLC

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July 19, 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. 6621158

Legal Fees for May 2023	\$12,012.00
Expenses Disbursed	<u>\$0.00</u>
Due this Invoice	\$12,012.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
<u>Asset Analysis & Recovery</u>					
5/3/2023	KBD	0.4	Evaluate potential asset and related communications to ascertain value and cost-benefit analysis. Asset Analysis & Recovery		
SUBTOTAL:				[0.4	156.00]

<u>Case Administration</u>					
5/2/2023	KBD	1.1	Study memorandum regarding claims platform and related telephone conference with J. Wine and exchange related correspondence (1.0); exchange correspondence with J. Wine regarding accounts and funds relating to property and communication with claimant's counsel (1131 E 79th) (.1). Case Administration		
5/3/2023	KBD	0.3	Telephone conference with claims vendor representative regarding claims data platform. Case Administration		
5/4/2023	KBD	1.4	Confer with bank representative and K. Pritchard regarding account management issues (.3); confer with J. Wine regarding claims vendor data platform improvements (set68) (1.1). Case Administration		
5/5/2023	KBD	1.2	Confer with J. Wine regarding claims platform improvements (.6); confer with claims vendor and J. Wine regarding platform functionality and improvements (.6). Case Administration		
5/15/2023	KBD	0.3	Confer with claims vendor representatives and J. Wine regarding improvements to claims data database and platform. Case Administration		
5/16/2023	KBD	0.2	Attention to opening new accounts. Case Administration		
5/22/2023	KBD	0.2	Confer with claims vendor regarding improvements to claims database and reporting platform. Case Administration		
SUBTOTAL:				[4.7	1,833.00]

Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
5/1/2023	KBD	0.9	Confer with J. Wine, M. Rachlis, and claimants' counsel regarding potential improvements to claims process (1131 E 79th, 1401 W 109th, 1422 E 68th, 1700 Juneway, 2736 W 64th, 2800 E 81st, 310 E 50th, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 Avers, 6554 Vernon, 6807 Indiana, 6949 Merrill, 7024 Paxton, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7255 Euclid, 7300 St Lawrence, 7442 Calumet, 7450 Luella, 7508 Essex, 7546 Saginaw, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7840 Yates, 7957 Marquette, 8000 Justine, 8107 Ellis, 816 Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis, 9212 Parnell, 9610 Woodlawn).
			Claims Administration & Objections
5/2/2023	KBD	0.8	Study communications regarding Group 1 claimants and exchange related correspondence with A. Watychowicz and J. Wine (Group 1) (.2); work on schedules for Groups 2 and 3 and exchange related correspondence with J. Wine and M. Rachlis (Group 2, Group 3) (.5); exchange correspondence with J. Wine regarding claimant's agreement to confidentiality order for claims materials (1700 Juneway) (.1).
			Claims Administration & Objections
5/3/2023	KBD	0.6	Telephone conferences with J. Wine regarding claims data platform (set68) (.2); exchange correspondence with J. Wine regarding confidentiality order enforcement and claims process and revised draft related correspondence to claimant (1700 Juneway) (.3); exchange correspondence with A. Watychowicz regarding communication with claimant relating to claims process and beneficiary issue (7300 St Lawrence, 7760 Coles, 7927 Essex) (.1).
			Claims Administration & Objections
5/4/2023	KBD	0.4	Confer with J. Wine regarding communications with claimants' counsel regarding properties in groups and claims process approach and strategy (set68) (.2); draft correspondence to J. Wine regarding lack of response from claimant regarding offer to discuss property and claims related issues (1131 E 79th, 7024 Paxton) (.1); attention to claimant communication regarding opt-in for confidentiality order (1700 Juneway) (.1).
			Claims Administration & Objections
5/5/2023	KBD	2.1	Exchange correspondence with A. Watychowicz, M. Rachlis, and J. Wine regarding framing reports, claims management, and service for Groups 2 and 3 (Group 2, Group 3) (.1); confer with J. Wine regarding claims management, potential additional claim, and service for Groups 2 and 3 (Group 2, Group 3) (.1); study and revise framing report for Group 2 (Group 2) (.3); telephone conference with J. Wine regarding framing report for Group 2 (Group 2) (.1); study and revise framing report for Group 3 (Group 3) (.3); telephone conference with J. Wine regarding framing report for Group 3 (Group 3) (.1); exchange and study various additional correspondence with J. Wine, M. Rachlis, and A. Watychowicz regarding framing reports and related review of revisions to framing reports (Group 2, Group 3) (1.1).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
5/6/2023	KBD	0.3	Study revised framing report and exchange related correspondence with J. Wine and M. Rachlis (Group 3).
			Claims Administration & Objections
5/8/2023	KBD	0.8	Consider service issues related to framing reports and exchange related correspondence with M. Rachlis, J. Wine, and A. Watychowicz (Group 2, Group 3) (.4); attention to correspondence from claimant in response to service of framing report and exchange related correspondence (Group 2) (.1); exchange correspondence with J. Wine regarding claimant's withdrawal of claim (5450 Indiana, 7927 Essex) (.1); study correspondence from J. Wine regarding communication with claimant regarding potential resolution of claims (1131 E 79th, 7024 Paxton) (.1); attention to communication from claimant and A. Watychowicz regarding claim (5450 Indiana) (.1).
			Claims Administration & Objections
5/9/2023	KBD	0.5	Attention to communication from claimants regarding framing report and procedure for claims process (Group 3) (.2); attention to communication with claimant regarding claimant identity and beneficiary inquiry (7300 St Lawrence, 7760 Coles, 7927 Essex) (.1); review correspondence from A. Watychowicz regarding claim and related documentation (7844 Ellis) (.1); attention to communication with unsecured claimant (defer) (.1).
			Claims Administration & Objections
5/10/2023	KBD	0.3	Revise draft response to claimant regarding withdrawal of claims (defer) (.2); revise draft response to counsel for claimant regarding claims and amounts claimed (Group 2) (.1).
			Claims Administration & Objections
5/11/2023	KBD	1.4	Exchange correspondence with J. Wine and A. Watychowicz regarding response to unsecured claimants regarding schedule for claims resolution (defer) (.2); further address communication with claimant regarding claimant identity and beneficiary inquiry (7300 St Lawrence, 7760 Coles, 7927 Essex) (.1); revise response to claimant regarding withdrawal of claim and exchange additional related correspondence (5450 Indiana, 7927 Essex) (.2); telephone conference with claimant regarding claims, groupings, and schedule and exchange related correspondence with A. Watychowicz (Group 3) (.4); exchange correspondence with claimant regarding claim information and procedure (Group 3) (.2); attention to funding of accounts for properties and exchange related correspondence with J. Wine and K. Pritchard (2909 E 78th, 3030 E 79th, 7300 Stewart, 7500 Eggleston, 7549 Essex) (.3).
			Claims Administration & Objections
5/12/2023	KBD	0.3	Exchange correspondence with J. Wine regarding response to claimant regarding communication with court (1422 E 68th) (.1); exchange correspondence with A. Watychowicz regarding claims and disputed claims process (1131 E 79th, 7749 Yates) (.1); exchange correspondence with A. Watychowicz and J. Wine regarding claimant's beneficiary and related communication (5450 Indiana, 7953 Marquette) (.1).

Date	Indiv	Hours	Description
			Claims Administration & Objections
5/15/2023	KBD	0.2	Confer with J. Wine regarding review of Group 3 claims (Group 3) (.1); review correspondence regarding efforts to resolve disputed claims and related communication with court (1422 E 68th) (.1).
			Claims Administration & Objections
5/16/2023	KBD	0.5	Confer with J. Wine regarding efforts to resolve disputed claims (1422 E 68th) (.1); attention to communications with claimant groups (Group 2, Group 3) (.2); draft correspondence to claimant regarding prospect of claims process (Group 3) (.1); attention to correspondence from claimant and confirmation of receipt of claim (Group 2) (.1).
			Claims Administration & Objections
5/17/2023	KBD	0.6	Exchange correspondence with A. Watychowicz regarding claimant withdrawal of claim (5450 Indiana, 7927 Essex) (.1); attention to communications to claims groups participants and exchange related correspondence (Group 2, Group 3) (.2); attention to communication from claimant related to class action (defer) (.1); exchange correspondence with claimant regarding Group 2 discovery requests (Group 2) (.2).
			Claims Administration & Objections
5/18/2023	KBD	0.5	Attention to communications from claimants' counsel and J. Wine and M. Rachlis regarding claims groupings and procedure for claims process (set68) (.3); attention to funding of accounts and exchange related correspondence with K. Pritchard (2909 E 78th, 3030 E 79th, 7300 Stewart, 7500 Eggleston, 7549 Essex) (.2).
			Claims Administration & Objections
5/22/2023	KBD	1.7	Confer with M. Rachlis and J. Wine regarding claims process groupings, schedule, and upcoming related court filing on claims groups (set56) (.5); attention to communicating with claimants regarding efficient and proper use of claims group emails (Group 2, Group 3) (.4); exchange correspondence with J. Wine regarding efforts to resolved claims and related communications (310 E 50th) (.1); confer with and exchange correspondence with J. Wine and A. Watychowicz regarding communications with counsel for claimants regarding certain properties (1131 E 79th, 310 E 50th, 4520 Drexel, 5001 Drexel, 7300 St Lawrence) (.7).
			Claims Administration & Objections
5/23/2023	KBD	2.9	Telephone conference with A. Watychowicz regarding communications with Group 3 claimants (Group 3) (.1); confer with J. Wine regarding analysis of Group 3 claims (Group 3) (1.0); confer with M. Rachlis and J. Wine regarding claims process planning and groupings (set68) (1.3); attention to numerous claimant communications regarding Group 2 claims procedures (Group 2) (.2); exchange correspondence with A. Watychowicz regarding communication with claimant representative regarding estate issue (6250 Mozart, 7508 Essex, 7748 Essex) (.1); exchange correspondence with J. Wine and M. Rachlis regarding Group 1 claims analysis and new information about fund issue (Group 1) (.2).

Claims Administration & Objections

Date	Indiv	Hours	Description
5/24/2023	KBD	1.4	Attention to communications with claimants relating to claims process (Group 2) (.2); exchange correspondence with A. Watychowicz, J. Wine and claims vendor representative regarding addressing duplicate claims (set68) (.2); study correspondence from J. Wine regarding communication with claimants' counsel regarding claims groupings (set68) (.2); prepare for hearing before Judge Shah in respect to claims process, claims grouping, and schedule and draft related correspondence to M. Rachlis and J. Wine (set68) (.8).
			Claims Administration & Objections
5/25/2023	KBD	0.4	Exchange correspondence with A. Watychowicz and J. Wine regarding communication with claimant relating to claims group discovery (Group 2) (.1); appear for hearing before Judge Shah regarding claims process and future process efficiencies (set68) (.1); draft correspondence to J. Wine and M. Rachlis regarding prospective claims process improvements (set68) (.2).
			Claims Administration & Objections
5/30/2023	KBD	0.7	Attention to claimant communications, responses to same, and exchange related correspondence with A. Watychowicz (Group 2) (.3); attention to correspondence from claimant relating to claims group discovery and exchange related correspondence with A. Watychowicz (Group 2) (.1); exchange correspondence with A. Watychowicz regarding communication with claimant regarding class action (defer) (.1); attention to request from claimant's counsel regarding claims files and exchange related correspondence (5450 Indiana, 7749 Yates) (.2).
			Claims Administration & Objections
5/31/2023	KBD	0.2	Exchange correspondence with A. Watychowicz regarding communication with claimant's counsel regarding claims files (5450 Indiana, 7749 Yates).
			Claims Administration & Objections

SUBTOTAL: [17.5 6,825.00]

Distributions

5/2/2023	KBD	0.2	Attention to motion to stay distributions, communications with claimant's counsel, and exchange related correspondence with J. Wine and M. Rachlis (Group 1).
			Distributions
5/6/2023	KBD	0.1	Study correspondence from claimant regarding distribution timing and related procedural issues (Group 1).
			Distributions
5/8/2023	KBD	0.4	Revise correspondence to claimant regarding distribution timing and related procedural issues and exchange related correspondence with J. Wine and A. Watychowicz (Group 1) (.3); exchange correspondence with J. Wine regarding communication from claimant regarding claim and transfer of interest (Group 1) (.1).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
Distributions			
5/9/2023	KBD	1	Telephone conference with SEC (Group 1) (.2); study draft response to motion to stay distribution (Group 1) (.3); confer with M. Rachlis and J. Wine regarding motion to stay (Group 1) (.2); confer with J. Rak regarding legal research relating to motion to stay (Group 1) (.1); legal research relating to motion to stay (Group 1) (.2).
Distributions			
5/10/2023	KBD	0.6	Attention to correspondence from claimant and counsel for claimant regarding motion to stay and related procedures (Group 1) (.2); study draft response to motion to stay distribution and related correspondence from M. Rachlis (Group 1) (.4).
Distributions			
5/11/2023	KBD	3	Draft correspondence to counsel for claimant regarding motion to stay distribution (Group 1) (.1); work on response to motion to stay and exchange related correspondence and exchange related correspondence with A. Watychowicz (Group 1) (2.9).
Distributions			
5/12/2023	KBD	0.4	Telephone conference with SEC (.3); exchange correspondence with A. Watychowicz regarding response to claimant relating to motion to stay (Group 1) (.1).
Distributions			
5/15/2023	KBD	1.7	Revise response to claimant motion to stay and exchange related correspondence with M. Rachlis, A. Watychowicz and J. Wine (Group 1) (1.4); study claimants' response to motion to stay (Group 1) (.3).
Distributions			
5/17/2023	KBD	0.2	Attention to communication with claimants regarding distribution timing and motion to stay (Group 1) (.1); review correspondence from claimant regarding hearing on motion to stay and exchange related correspondence (Group 1) (.1).
Distributions			
5/22/2023	KBD	0.4	Study claimant reply in support of motion to stay distribution.
Distributions			

SUBTOTAL: [8 3,120.00]

Status Reports

5/24/2023	KBD	0.2	Study account balance information.
Status Reports			

SUBTOTAL: [0.2 78.00]

30.8 \$12,012.00

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Duff, Kevin B.	30.80	390.00	\$12,012.00

SUMMARY

Legal Services	\$12,012.00
Other Charges	\$0.00
TOTAL DUE	\$12,012.00

Rachlis Duff & Peel, LLC

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July 19, 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. 6621159

Legal Fees for June 2023	\$13,377.00
Expenses Disbursed	<u>\$0.00</u>
Due this Invoice	\$13,377.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Case Administration</u>			
6/7/2023	KBD	0.2	Exchange correspondence with bank representative and K. Pritchard regarding banking matter. Case Administration
6/22/2023	KBD	0.3	Exchange correspondence with bank representative and K. Pritchard and J. Wine regarding interest issue. Case Administration
6/23/2023	KBD	0.4	Attention to execution of bank account records and exchange related correspondence with bank representative and K. Pritchard. Case Administration
6/30/2023	KBD	0.4	Exchange correspondence with M. Rachlis and J. Wine regarding rescheduled hearing before Judge Shah and potential motion to reschedule. Case Administration
SUBTOTAL:			[1.3 507.00]

Claims Administration & Objections

6/5/2023	KBD	1.2	Confer with M. Rachlis and J. Wine regarding claims process grouping, timing, and various related issues and exchange related correspondence (set56) (1.0); study correspondence from J. Wine regarding claims against property (7237 Bennett) (.2). Claims Administration & Objections
6/6/2023	KBD	0.6	Confer with J. Wine and claims vendor representatives regarding claims platform data, functionality, and reports (set68) (.3); exchange correspondence with J. Wine regarding communication with claimant's counsel regarding potential resolution of claims against properties (1131 E 79th, 7024 Paxton) (.2); exchange correspondence with A. Watychowicz regarding communications issue with claimants (Group 2) (.1). Claims Administration & Objections
6/7/2023	KBD	0.4	Attention to communication with claimants regarding group communications and compliance with confidentiality order (Group 2) (.3); review correspondence and analysis regarding claim (4533 Calumet) (.1). Claims Administration & Objections
6/8/2023	KBD	0.5	Telephone conference with J. Wine regarding claims analysis and process issues (set 68) (.2); attention to claims process groupings and exchange related correspondence (set56) (.2); exchange correspondence with J. Wine regarding potential discovery (Group 2, Group 3) (.1). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/9/2023	KBD	2.2	Confer with J. Wine and M. Rachlis regarding claims process, property groupings, and upcoming filing (set56) (1.3); confer with M. Rachlis and J. Wine regarding Group 2 discovery issues and planning (Group 2) (.5); attention to response to claimant regarding determination of claim amounts (Group 2) (.1); study draft proposed revised claims groupings (set56) (.3). Claims Administration & Objections
6/11/2023	KBD	0.2	Study and revise draft proposed revised claims groupings (set56). Claims Administration & Objections
6/12/2023	KBD	2.4	Telephone conference with E. Duff regarding analysis of claim (6160 MLK) (.1); study revised proposed claims process groupings and exchange related correspondence with J. Wine and M. Rachlis (set56) (.2); telephone conference with J. Wine and M. Rachlis regarding claims process grouping proposal (set56) (.5); attention to claimant's counsel's request for records (Group 2) (.2); exchange further correspondence with J. Wine and M. Rachlis regarding claims process grouping proposal (set56) (1.4). Claims Administration & Objections
6/13/2023	KBD	1.8	Telephone conference with M. Rachlis, J. Wine and SEC (set 56) (.3); confer with M. Rachlis and J. Wine regarding claims process groupings and timing (set 56) (.2); study and revise draft submission on claims process groupings and timing (set 56) (.5); exchange correspondence with J. Wine and M. Rachlis regarding proposed claims groupings (set56) (.8). Claims Administration & Objections
6/14/2023	KBD	2.3	Study draft submission for proposed groupings and schedule and exchange related correspondence with J. Wine and M. Rachlis (set56) (.3); confer with M. Rachlis and J. Wine regarding claims groupings, draft submission on proposed adjusted claims groupings and timing, and various related issues (set 56) (.6); study documentation submitted by claimant regarding claim against property and exchange related correspondence (6160 MLK) (.4); exchange correspondence with M. Rachlis and J. Wine regarding claims process improvements (set56) (.3); study claimant appellate brief (Group 1) (.3); study correspondence from claimant's counsel regarding comments on proposed groupings and exchange related correspondence (set56) (.4). Claims Administration & Objections
6/15/2023	KBD	2.3	Review appellate brief (Group 1) (.4); confer with M. Rachlis and J. Wine regarding appeal (Group 1) (.4); confer with M. Rachlis and J. Wine regarding hearing before Judge Shah (set56) (.3); confer with M. Rachlis and J. Wine regarding discovery and Group 2 claims planning issues (Group 2) (.2); draft correspondence to A. Watychowicz regarding records relating to claim (6160 MLK) (.3); revise submission regarding claims process, remaining claims groups, and exchange related correspondence (set56) (.5); attention to communication with claimant regarding class action (defer) (.1); exchange correspondence regarding appeal (Group 1) (.1). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/16/2023	KBD	0.9	Attention to communication regarding Group 2 claimants and claims (Group 2) (.1); exchange correspondence with J. Wine regarding appeal schedule and review related correspondence (Group 1) (.2); attention to communication with claimant regarding claims process and schedule (Group 3) (.1); review correspondence regarding claimant request for proposal and related correspondence (1131 E 79th, 7024 Paxton) (.1); study draft claims analysis chart and review related correspondence from J. Wine (Group 3) (.4). Claims Administration & Objections
6/17/2023	KBD	0.4	Study correspondence regarding draft claims analysis chart and further review same (Group 3). Claims Administration & Objections
6/18/2023	KBD	0.1	Exchange correspondence regarding draft claims analysis chart (Group 3). Claims Administration & Objections
6/19/2023	KBD	2.1	Confer with M. Rachlis and J. Wine regarding Group 3 claims analysis (Group 3) (.8); confer with M. Rachlis and J. Wine regarding Group 2 claims analysis (Group 2) (.2); exchange correspondence with J. Wine regarding Group 3 documentation and claims analysis issues (Group 3) (.3); exchange correspondence with J. Wine regarding claims related discovery (6160 MLK) (.2); attention to communication with claimants regarding discovery issues (Group 2) (.1); draft correspondence to M. Rachlis and J. Wine regarding potential resolution of claims (1131 E 79th, 7024 Paxton) (.5). Claims Administration & Objections
6/20/2023	KBD	4.2	Study claims analysis regarding CCF1 claims and exchange related correspondence (3030 E 79th, 7301 Stewart, 7500 Eggleston) (1.3); study draft framework for narrative on Group 3 claims submission (Group 3) (1.2); study property reports and related correspondence from M. Rachlis (1700 Juneway) (.1); review correspondence from A. Watychowicz and J. Wine regarding communication with Group 3 claimants (Group 3) (.2); review communication with Group 2 claimants and exchange related correspondence with A. Watychowicz and J. Wine (Group 2) (.2); exchange various correspondence regarding analysis of claims for Group 3 (Group 3) (.9); study revised narrative for Group 3 submission (Group 3) (.3). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/21/2023	KBD	3.2	Confer with J. Wine regarding submission on Group 3 claims (Group 3) (.2); study claims analysis regarding certain Group 3 claims and exchange related correspondence (2909 E 78th, 7549 Essex, 7927 Essex, 8047 Manistee) (1.5); attention to communication from claimant regarding claim and discovery (6160 MLK) (.2); attention to communication from claimants regarding production of documentation (Group 2) (.1); study and revise submission on Group 3 claims (Group 3) (.6); exchange correspondence regarding claimant documentation access and security (Group 2) (.2); draft correspondence to claimant regarding claims and further group timing and exchange related correspondence with A. Watychowicz and J. Wine (109 Laramie, 6250 Mozart) (.3); attention to production issue from claimant (6160 MLK) (.1).
			Claims Administration & Objections
6/22/2023	KBD	5.6	Study amicus brief for appeal (Group 1) (.4); confer with J. Wine regarding claims analysis and various related issues (Group 3) (1.4); additional review, revisions, and correspondence regarding Group 3 claims submission (Group 3) (3.8).
			Claims Administration & Objections
6/23/2023	KBD	0.4	Telephone conference with SEC (Group 1) (.2); attention to motion for extension of time on appeal (Group 2) (.1); exchange correspondence with M. Rachlis regarding funds in escrow (6949 Merrill) (.1).
			Claims Administration & Objections
6/26/2023	KBD	1	Exchange correspondence regarding claimant communication and amendment of distribution spreadsheet (Group 3) (.4); review order regarding jurisdictional statement and exchange related correspondence (Group 1) (.1); exchange correspondence with J. Wine and M. Rachlis regarding claims and discovery (5450 Indiana, 7749 Yates) (.5).
			Claims Administration & Objections
6/27/2023	KBD	0.1	Exchange correspondence with M. Rachlis and J. Wine regarding potential source of claims information (Group 2).
			Claims Administration & Objections
6/28/2023	KBD	0.3	Study and revise responses to claimant inquiry regarding various Group 2 issues (Group 2).
			Claims Administration & Objections
6/29/2023	KBD	0.2	Exchange correspondence with J. Wine and M. Rachlis regarding discovery issues and communications with claimants' counsel (Group 2).
			Claims Administration & Objections
6/30/2023	KBD	0.3	Exchange correspondence with A. Watychowicz and J. Wine regarding communication with claimant regarding claim, claims submission, and potential distribution amounts (Group 3).
			Claims Administration & Objections

SUBTOTAL:

[32.7 12,753.00]

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

6/6/2023	KBD	0.1	Exchange correspondence with J. Wine regarding claims and distribution issue (Group 1).
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Distributions

6/7/2023	KBD	0.1	Attention to amended distribution order and exchange related correspondence (3074 Cheltenham).
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Distributions

SUBTOTAL:			[0.2 78.00]
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Status Reports

6/8/2023	KBD	0.1	Draft correspondence to K. Pritchard and J. Wine regarding status report planning.
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Status Reports

SUBTOTAL:			[0.1 39.00]
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34.3	\$13,377.00
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Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Duff, Kevin B.	34.30	390.00	\$13,377.00

SUMMARY

Legal Services	\$13,377.00
Other Charges	\$0.00
TOTAL DUE	\$13,377.00

Exhibit G

Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET
SUITE 900
CHICAGO, ILLINOIS 60605

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

July 19, 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. 6622157

Legal Fees for April 2023	\$46,581.00
Expenses Disbursed	<u>\$144.00</u>
Due this Invoice	\$46,725.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Asset Analysis & Recovery</u>			
4/3/2023	AW	0.2	Research and correspond with K. Duff regarding victim notification letter (defer). Asset Analysis & Recovery
4/5/2023	AW	0.3	Review and communicate with K. Duff regarding case files and prior production of documents (defer). Asset Analysis & Recovery
4/6/2023	AW	0.2	Research and email communication with K. Duff regarding prior communications with vendor (defer). Asset Analysis & Recovery
4/6/2023	JRW	0.1	Confer with K. Duff regarding release of domain names (defer). Asset Analysis & Recovery
4/7/2023	AW	0.6	Research regarding EB loss and related email to K. Duff (defer). Asset Analysis & Recovery
4/17/2023	AW	0.1	Review document production and related correspondence with K. Duff (defer). Asset Analysis & Recovery

SUBTOTAL: [1.5 222.00]

<u>Business Operations</u>			
4/12/2023	KMP	0.2	Communicate with payee to request updated address for delivery of check for payment of expense ordered to be paid in connection with third motion for restoration, and related communications with K. Duff and bank representative (8326 Ellis). Business Operations
4/13/2023	JRW	0.4	Follow up with utility regarding overdue invoice (4611 Drexel). Business Operations
4/13/2023	KMP	0.2	Attention to notice from collection agency regarding check remitted for utility bill in connection with third restoration motion (4611 Drexel). Business Operations
4/17/2023	KMP	0.2	Communicate with J. Wine to confirm details of certain payment to vendor in connection with third restoration motion (1414 E 62nd). Business Operations
4/18/2023	JRW	0.4	Confer with collections agency regarding payments to utility and related summary to team (1401 W 109th, 4611 Drexel). Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/18/2023	KMP	0.4	Communicate with K. Duff and J. Wine regarding checks relating to certain payments to vendors in connection with third restoration motion (1401 W 109th, 4611 S Drexel, 6217 Dorchester, 7201 Constance, 7656 Kingston) (.3); further communication with J. Wine and vendor in connection with details of payment issued to vendor in connection with third restoration motion (1414 E 62nd) (.1).
			Business Operations
4/19/2023	JRW	0.1	Confer with K. Duff and K. Pritchard regarding utility payment checks (1409 W 109th, 6217 Dorchester, 7201 Constance).
			Business Operations
4/19/2023	KMP	0.3	Further communicate with K. Duff and J. Wine regarding returned checks relating to certain payments to vendor in connection with third restoration motion and review related records (1401 W 109th, 4611 S Drexel, 6217 Dorchester, 7201 Constance).
			Business Operations
4/20/2023	KMP	0.2	Prepare correspondence to bank representatives regarding checks relating to certain payments to vendor in connection with third restoration motion and related communication with K. Duff (1401 W 109th, 4611 S Drexel, 6217 Dorchester, 7201 Constance).
			Business Operations
4/21/2023	KMP	0.2	Telephone conference with bank representative regarding checks relating to certain payments to vendor in connection with third restoration motion and related communications with K. Duff and J. Wine (1401 W 109th, 4611 S Drexel, 6217 Dorchester, 7201 Constance).
			Business Operations
4/25/2023	AW	0.3	Attention to correspondence regarding utilities and related communication with K. Pritchard (defer) (.1); communicate with J. Wine regarding signed contracts (defer) (.2).
			Business Operations
4/25/2023	KMP	0.2	Review notices from collection agency relating to amounts disbursed to utility company in connection with third restoration motion (4611 Drexel, 7201 Constance).
			Business Operations

SUBTOTAL: [3.1 542.00]

Case Administration

4/3/2023	AW	0.1	Attention to filed motion to compel discovery and docket presentment of motion. Case Administration
4/5/2023	JRW	0.1	Exchange correspondence with claims vendor regarding status of claims review platform. Case Administration

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/6/2023	JRW	1.1	Attention to testing of new claims review platform, prepare list of issues regarding same, and related correspondence with vendor . Case Administration
4/7/2023	JRW	1.4	Meet with claims vendor regarding issues identified in claims review platform (.6); prepare memorandum regarding issues identified in claims review platform (.8). Case Administration
4/10/2023	JRW	0.7	Continued testing and analysis of claims review platform. Case Administration
4/11/2023	JR	0.8	Exchange communication with J. Wine regarding claims platform and the process of updating claimant information in same. Case Administration
4/11/2023	JRW	2.2	Work with K. Duff regarding training on new claims review platform (1.3); confer with J. Rak regarding claims review issues and review platform (.8); correspondence to team regarding claims review platform (.1). Case Administration
4/12/2023	JR	0.4	Further communication with J. Wine regarding claims portal. Case Administration
4/13/2023	JR	0.7	Communication with J. Wine regarding claims portal and suggested updates to same. Case Administration
4/13/2023	JRW	0.7	Meet with J. Rak regarding claim review platform and procedures. Case Administration
4/14/2023	AW	0.1	Attention to order updating hearing schedule and related docket update (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee). Case Administration
4/14/2023	JRW	2.7	Prepare memorandum regarding bugs and enhancements to claims review platform and related correspondence with claims vendor (1.5); confer with K. Duff regarding claims process and claims database (.6); meeting with claims database vendor regarding database performance issues (.6). Case Administration
4/17/2023	JRW	0.5	Exchange correspondence with property manager and K. Pritchard regarding refund check (.2); exchange several correspondence with claims review database vendor and provide spreadsheets to same (.3). Case Administration
4/18/2023	JRW	0.3	Conference with K. Duff and K. Pritchard regarding segregated bank accounts . Case Administration
4/21/2023	JRW	0.3	Exchange correspondence with K. Pritchard and K. Duff regarding cashier's checks (.2); exchange correspondence with claims vendor regarding claims review platform (.1).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Case Administration
4/27/2023	AW	0.4	Prepare update to receivership web page and related communication with IT vendor (defer).
			Case Administration
4/28/2023	AW	0.1	Communicate with J. Wine regarding counsel service list.
			Case Administration
4/29/2023	JRW	0.2	Follow-up with claims vendor regarding open issues.
			Case Administration
SUBTOTAL:			[12.8 3,016.00]

Claims Administration & Objections

4/3/2023	AW	0.2	Attention to email and follow up request from claimant regarding submitted claims and responses to same (set73).
			Claims Administration & Objections
4/3/2023	JR	6.5	Continue working on claims, review claims submissions for properties (2909 E 78th, 4108 Monticello, 4520 Drexel, 4611 Drexel, 638 Avers, 6801 East End, 7255 Euclid, 7549 Essex, 7600 Kingston, 7635 East End, 7546 Saginaw, 7748 Essex, 7749 Yates, 7834 Ellis, 7957 Marquette, 8047 Manistee, 8326 Ellis, SSDF1, SSDF4, SSDF8, Portfolio Mezzanine Lender, LLC).
			Claims Administration & Objections
4/3/2023	JRW	0.8	Exchange correspondence with plaintiff's counsel in state foreclosure action , related review of settlement agreement and communications with K. Duff and M. Rachlis (defer).
			Claims Administration & Objections
4/3/2023	MR	0.2	Attention to issues on state foreclosure action and settlement (defer).
			Claims Administration & Objections
4/4/2023	AW	0.1	Communicate with J. Wine regarding request from claimant (set73).
			Claims Administration & Objections
4/4/2023	JR	5.8	Continue working on claims, review claims submissions for properties (1131 E 79th, 2909 E 78th, 4317 Michigan, 4520 Drexel, 6801 East End, 7024 Paxton, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7748 Essex, 7749 Yates, 8047 Manistee, 8326 Ellis, SSDF4).
			Claims Administration & Objections
4/4/2023	JRW	0.7	Attention to responding to claimant inquiry (set73) (.1); continued correspondence and telephone conferences with counsel in state court action regarding production in response to subpoena and related review of documents (defer) (.6).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/5/2023	JRW	2	Multiple correspondence and telephone conferences with various counsel in state court action regarding response to subpoena, motion to compel, and related review of additional document production (defer) (1.6); confer with K. Duff regarding motion to compel documents relating to former property (defer) (.3); correspondence to Judge Shah's clerk regarding withdrawal of motion to compel (defer) (.1).
			Claims Administration & Objections
4/5/2023	MR	0.2	Attention to withdrawal of motion to compel (defer).
			Claims Administration & Objections
4/6/2023	JRW	3.1	Update claims review notes for claimant (3074 Cheltenham, 4533 Calumet, 4611 Drexel, 5450 Indiana, 6217 Dorchester, 638 Avers, 6437 Kenwood, 701 S 5th, 7026 Cornell, 7201 Dorchester, 7237 Bennett, 7749 Yates, 7834 Ellis, 7957 Marquette, 8326 Ellis, SSDF1) (1.6); detailed review of claims (400 S Kilbourn Avenue, 6355-59 S Talman Avenue, 6558 S Vernon Avenue, 701 S 5th, 7051 Bennett, 7109 Calumet, 7616 Phillips, 7953 Marquette, SSDF4) (1.5).
			Claims Administration & Objections
4/7/2023	AW	0.9	Work with J. Wine on revisions to second amended proposed order approving distribution, file notice, and email claimants regarding same (Group 1).
			Claims Administration & Objections
4/7/2023	JRW	2.5	Detailed review of claims (4315 Michigan, 7748 Essex, 7749 Yates) (.9); detailed review of claims (7749 Yates) (.3); detailed review of claims (6217 Dorchester, 6355 Talman, 6437 Kenwood, 701 S 5th, 7749 Yates) (1.3).
			Claims Administration & Objections
4/7/2023	MR	0.2	Confer with K. Duff and J. Wine regarding analysis of claims issues for prospective claims review (set59).
			Claims Administration & Objections
4/10/2023	AW	0.8	Response to email inquiries from claimants regarding claims process (set68) (.2); communicate with claimant's counsel regarding class action (defer) (.1); follow up with J. Wine regarding second amended order regarding distribution (Group 1) (.1); review total amounts claimed against properties and related email to J. Wine (1131 E 79th, 2909 E 78th, 7549 Essex, 8047 Manistee) (.4).
			Claims Administration & Objections
4/10/2023	JRW	5.2	Confer with A. Watychowicz regarding proposed order and related correspondence to court (Group 1) (.3); detailed review of claims and related database searches (400 Kilbourn, 4315 Michigan, 4611 Drexel, 7450 Luella, 7748 Essex, 7749 Yates) (2.6); detailed review of claims (2909 E 78th, 3030 E 79th, 6217 Dorchester, 6437 Kenwood, 7237 Bennett, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (1.7); detailed review of claim (7749 Yates) (.3); telephone conference and related correspondence with K. Duff regarding claims analysis issues (set59) (.3).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/10/2023	KMP	0.2	Attention to voicemail message from claimant regarding submission of claim and forward to J. Wine and A. Watychowicz (set 73). Claims Administration & Objections
4/11/2023	JR	3.7	Review email communication from J. Wine related to property EBF mortgage information and respond accordingly (6217 Dorchester) (.2); continue working on claims, review claims submissions for properties (4317 Michigan, 7024 Paxton, 7546 Saginaw, 7600 Kingston, 7834 Ellis, 7748 Essex, 7749 Yates, 8326 Ellis) (3.5). Claims Administration & Objections
4/11/2023	JRW	3.7	Detailed review of claims (11117 Longwood, 4533 Calumet, 7109 Calumet, 7237 Bennett, 7749 Yates) (.5); confer with A. Watychowicz regarding claimant inquiry (set73) (.1); detailed review of claims (1131 E 79th, 7749 Yates) (.6); detailed review of claims (7656 Kingston, 7749 Yates) (.9); correspondence to K. Duff regarding claims review procedures (set59) (.3); detailed review of claims and related database research (1700 Juneway, 4611 Drexel, 7749 Yates, SSDF1, SSDF4) (1.3). Claims Administration & Objections
4/12/2023	AW	0.2	Response to claimant's email regarding class action (defer) (.1); attention to motion filed by claimant and related email to counsel (Group 3) (.1). Claims Administration & Objections
4/12/2023	JR	6.9	Continue working on claims, review claims submissions for properties (11117 Longwood, 2909 E 78th, 3030 E 79th, 4317 Michigan, 7024 Paxton, 7301 Stewart, 7500 Eggleston, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7834 Ellis, 7748 Essex, 7749 Yates, 7927 Essex, 8047 Manistee, 8326 Ellis, SSDF4). Claims Administration & Objections
4/12/2023	JRW	4.4	Detailed review of claim submission , conduct database searches and review documents (638 Avers, 6356 California, 6437 Kenwood, 7051 Bennett, 7237 Bennett, 7748 Essex, 7749 Yates, 7834 Ellis) (2.7); telephone conference with J. Rak regarding claim review issues (set59) (.2); conference with K. Duff regarding analysis of claim (6217 Dorchester) (.6); review claimants' motion to adjudicate interest in properties, confer with and compile materials for K. Duff, and begin drafting motion to strike same (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.9). Claims Administration & Objections
4/12/2023	MR	0.3	Attention to motion to adjudicate claims (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee). Claims Administration & Objections
4/13/2023	AW	0.1	Response to claimant's email regarding scheduled hearing before Judge Shah (set73). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/13/2023	JR	6	Continue working on claims, review claims submissions for properties (11117 Longwood, 2909 E 78th, 3030 E 79th, 4317 Michigan, 638 Avers, 7024 Paxton, 7255 Euclid, 7301 Stewart, 7500 Eggleston, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7834 Ellis, 7748 Essex, 7749 Yates, 7927 Essex, 8047 Manistee, 8326 Ellis, SSDF4, SSDF8).
			Claims Administration & Objections
4/13/2023	JRW	4.7	Attention to claimant inquiry (set73) (.1); revise draft motion to strike motion for adjudication of claims , review court order rescheduling hearing and related correspondence with K. Duff (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.3); correspond with J. Rak regarding claim (4533 Calumet, 4611 Drexel, 5450 Indiana, 6250 Mozart, 6355 Talman, 6437 Kenwood, 701 S 5th, 7026 Cornell, 7051 Bennett, 7237 Bennett, 7546 Saginaw, 7600 Kingston, 7748 Essex, 8326 Ellis, SSDF4) (.1); detailed review of claims and related database searches (6001 Sacramento, 638 Avers, 7024 Paxton, 7546 Saginaw, 7749 Yates) (2.1); database research regarding rollovers to equity fund (defer) (.7); detailed review of claims and related database searches (7546 Saginaw, 7748 Essex, 7749 Yates) (1.4).
			Claims Administration & Objections
4/13/2023	MR	0.3	Attention to email from claimant (set73) (.1); attention to exchange regarding motion to adjudicate and court order on schedule (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.2).
			Claims Administration & Objections
4/14/2023	AW	0.2	Communicate with claims vendor regarding new claim (7834 Ellis) (.1); update claimant's contact information (310 E 50th, 6801 East End, 7237 Bennett, 8209 Ellis, 8214 Ingleside) (.1).
			Claims Administration & Objections
4/14/2023	JR	5.5	Continue working on claims, review claims submissions for properties (638 Avers, 7255 Euclid, 7749 Yates, SSDF8).
			Claims Administration & Objections
4/14/2023	JRW	1.8	Work with J. Rak regarding claims review (set59) (.5); attention to claim review (638 Avers, 6356 California, 6437 Kenwood, 7051 Bennett, 7237 Bennett, 7748 Essex, 7749 Yates, 7834 Ellis) (.9); attention to review of claim (7749 Yates) (.4).
			Claims Administration & Objections

Date	Indiv	Hours	Description
4/17/2023	AW	1.4	<p>Communication with claimant regarding clarification of his claim (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.1); communicate with J. Wine and later claimant regarding Receiver's revised recommendation (Group 1) (.1); draft email response to claimant regarding Receiver's review of claim and recommendation (Group 1) (.1); attention to filing from claimant, review email exchanges with the Receiver, summarize issue with emails from claimant, and related communications to K. Duff and J. Wine (400 Kilbourn, 526 W 78th, 6356 California, 6558 Vernon, 6801 East End, 701 S 5th, 7051 Bennett, 7442 Calumet, 7546 Saginaw, 7616 Phillips, 7625 East End, 7635 East End, 7656 Kingston, SSDF4) (.6); communicate with K. Duff regarding claimants' notices (set73) (.1); review claimant's claims and confirm with database records (6356 California, 638 Avers, 6437 Kenwood, 7051 Bennett, 7237 Bennett, 7748 Essex, 7749 Yates, 7750 Muskegon, 7834 Ellis) (.1); review emails with claimant and confirm Receiver's recommendation (Group 1) (.2); email J. Wine regarding correction to claim (4533 Calumet, 4611 Drexel, SSDF4) (.1).</p> <p>Claims Administration & Objections</p>
4/17/2023	JR	5.6	<p>Continue working on claims, review claims submissions for properties (109 Laramie, 4511 Merrimac, 4533 Calumet, 4611 Drexel, 5955 Sacramento, 6001 Sacramento, 6250 Mozart, 6437 Kenwood, 6801 East End, 701 S 5th, 7024 Paxton, 7508 Essex, 7749 Yates, SSDF4, SSDF8) (5.5); review email communication with J. Wine and respond accordingly regarding claims status and progress (set68) (.1).</p> <p>Claims Administration & Objections</p>
4/17/2023	JRW	6.6	<p>Review letter to court from claimant and related research regarding legacy fund and correspondence with K. Duff and A. Watychowicz (7625 East End, SSDF4) (1.4); detailed review of claim submissions (1700 Juneway, 400 Kilbourn, 4611 Drexel, 6217 Dorchester, 7107 Bennett, 7749 Yates, 8107 Ellis) (2.3); study claim submission and update claim review notes (4533 Calumet, 4611 Drexel, 5450 Indiana, 6250 Mozart, 6355 Talman, 6437 Kenwood, 701 S 5th, 7026 Cornell, 7051 Bennett, 7237 Bennett, 7546 Saginaw, 7600 Kingston, 7748 Essex, 8326 Ellis, SSDF4) (2.6); draft and revise responses to claimant inquiries (Group1) (.3).</p> <p>Claims Administration & Objections</p>
4/17/2023	MR	0.2	<p>Attention to claimant's letter (7625 East End, SSDF4).</p> <p>Claims Administration & Objections</p>
4/18/2023	AW	0.1	<p>Response to claimant regarding update to claims (4533 Calumet, 4611 Drexel).</p> <p>Claims Administration & Objections</p>
4/18/2023	JR	5.5	<p>Continue working on claims, review claims submissions for properties (109 Laramie, 1131 E 79th, 5955 Sacramento, 6217 Dorchester, 6437 Kenwood, 701 S 5th, 7024 Paxton, 7026 Cornell, 7546 Saginaw, 7237 Bennett, 7834 Ellis, SSDF4).</p> <p>Claims Administration & Objections</p>
4/18/2023	JRW	0.3	<p>Research on Cook County Recorder's site regarding recorded EBF mortgages (11117 Longwood, 6437 Kenwood, 7927 Essex).</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
4/19/2023	AW	0.1	Email claimant information regarding class action (defer).
			Claims Administration & Objections
4/19/2023	JR	6.8	Continue working on claims, review claims submissions for properties (1131 E 79th, 2909 E 78th, 4520 Drexel, 6250 Mozart, 638 Avers, 6801 East End, 7255 Euclid, 7546 Saginaw, 7549 Essex, 7600 Kingston, 7748 Essex, 7749 Yates, 7834 Ellis, 7957 Marquette, 8047 Manistee, 8326 Ellis, SSDF1, SSDF4, SSDF8, Portfolio Mezzanine Lender, LLC).
			Claims Administration & Objections
4/19/2023	JRW	0.2	Confer with K. Duff in preparation for upcoming status hearing and prepare meeting agenda (set73).
			Claims Administration & Objections
4/20/2023	AW	0.4	Communicate with claimant regarding proposed grouping of properties and update to his contact information (set73) (.1); communicate with K. Duff and J. Wine regarding filing from claimants (set73) (.1); research and communicate with K. Duff regarding filed appearances regarding claimants seeking to be heard at hearing (set73) (.2).
			Claims Administration & Objections
4/20/2023	JR	4.5	Continue working on claims, review claims submissions for properties (7024 Paxton, 7051 Bennett, 7546 Saginaw, 7750 Muskegon, 7834 Ellis, 8326 Ellis).
			Claims Administration & Objections
4/20/2023	JRW	2.2	Study claimant submission and related review of deeds, mortgages and releases in Cook County Recorder title histories (5450 Indiana, 7749 Yates) (.8); meet with K. Duff regarding preparation for hearing and schedule and strategy for claims process groups (set68) (.7); confer with K. Duff regarding claimant submissions for upcoming hearing (Group1) (.3); review email correspondence and other materials in preparation for hearing (set73) (.4).
			Claims Administration & Objections
4/21/2023	AW	1.2	Review claimants' submissions and correspondence and related email to K. Duff and J. Wine (set73) (1.1); communicate with J. Wine regarding request from claimant (set73) (.1).
			Claims Administration & Objections
4/21/2023	JR	4.5	Continue working on claims, review claims submissions for properties (11117 Longwood, 2909 E 78th, 4317 Michigan, 5001 Drexel, 6217 Dorchester, 6437 Kenwood, 701 S 5th, 7255 Euclid, 7549 Essex, 8047 Manistee, 8326 Ellis).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/21/2023	JRW	1.1	Review proposed schedule for claim groups 2 and 3, related correspondence and revisions to same (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.4); review claims and prior claim review notes (6949 Merrill) (.5); review position statements of claimants (Group 1) (.2).
			Claims Administration & Objections
4/21/2023	MR	0.2	Attention to correspondence regarding upcoming hearing, groups and schedule (Group 2, Group 3).
			Claims Administration & Objections
4/23/2023	JRW	1.7	Review claims against Group 2 properties and related review of deeds, mortgages and releases in Cook County Recorder title histories (1700 Juneway, 6160 MLK, 6949 Merrill).
			Claims Administration & Objections
4/24/2023	AW	0.2	Communicate with J. Rak regarding claims files and access to same (5955 Sacramento, 6001 Sacramento).
			Claims Administration & Objections
4/24/2023	JR	5.5	Continue working on claims, review claims submissions for properties (1117 Longwood, 2736 W 64th, 3030 E 79th, 3915 Kimball, 5001 Drexel, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6217 Dorchester, 6437 Kenwood, 7051 Bennett, 7301 Stewart, 7442 Calumet, 7500 Eggleston, 7600 Kingston, 7701 Essex, 7957 Marquette, SSDF6).
			Claims Administration & Objections
4/24/2023	JRW	10.2	Attention to claimant inquiry (set73) (.2); meet with K. Duff and M. Rachlis to prepare for upcoming hearing (set73) (1.5); continued review of Group 2 institutional lender claims (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (1.0); telephone conference with claimant regarding claims process and upcoming hearing (set73) (.5); continued preparation for hearing (set73) (1.1); telephone conference with claimants' counsel regarding potential settlement discussions (1131 E 79th, 7024 Paxton) (.1); exchange correspondence with claimants' counsel regarding claimants' letters to the court and related communications with K. Duff (Group 1) (.2); review and revise proposed scheduling order for groups 2 and 3 (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.6); detailed review of claim (7024 Paxton, 7834 Ellis) (.5); detailed review of claims (2909 E 78th, 7024 Paxton, 7201 Dorchester, 7508 Essex, 7549 Essex, 8047 Manistee) (1.1); detailed review of claims (3030 E 79th, 4533 Calumet, 638 Avers, 7024 Paxton, 7026 Cornell, 7301 Stewart, 7500 Eggleston) (1.2); review claim review notes and conduct database searches regarding claims (2909 E 78th, 4611 Drexel, 5450 Indiana, 6160 MLK, 6217 Dorchester, 701 S 5th, 7024 Paxton, 7549 Essex, 8047 Manistee) (2.2).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/24/2023	MR	2.2	Meeting on upcoming hearing with K. Duff and J. Wine (set73) (1.5); further preparation and review regarding planning on claims group and process and upcoming hearing (set68) (.7). Claims Administration & Objections
4/25/2023	AW	0.3	Follow up communication with J. Rak regarding claims files and access to same (5955 Sacramento, 6001 Sacramento) (.2); communicate with J. Wine regarding update to claims (4533 Calumet, 4611 Drexel) (.1). Claims Administration & Objections
4/25/2023	JR	4.5	Continue working on claims, review claims submissions for properties (11117 Longwood, 1131 E 79th, 5955 Sacramento, 6355 Talman, 7442 Calumet, 7600 Kingston, 8326 Ellis, SSDF4). Claims Administration & Objections
4/25/2023	JRW	6.6	Strategy meeting with K. Duff and M. Rachlis regarding claims process, groupings, and treatment of various factual patterns, in preparation for upcoming hearing (set73) (3.0); conference call with SEC, K. Duff and M. Rachlis regarding claims process (set73) (.9); study January 2020 memorandum regarding claims process (set68) (.2); confer with A. Watychowicz regarding claim (4533 Calumet, 4611 Drexel, SSDF4) (.1); review claims and claim review notes regarding property (7927 Essex) (.4); study claim and related EquityBuild documents (2909 E 78th, 4611 Drexel, 5450 Indiana, 6160 MLK, 6217 Dorchester, 701 S 5th, 7024 Paxton, 7549 Essex, 8047 Manistee) (.4); confer with A. Watychowicz regarding framing report and email distribution list for Groups 2 and 3, update proposed order, and related correspondence with K. Duff and M. Rachlis (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.6); study claimant submissions and draft outline of potential response to same (Group 1) (1.0). Claims Administration & Objections
4/25/2023	MR	5.5	Participate in meetings with K. Duff and J. Wine regarding claims process and related issues for hearing (set73) (3.0); participate in meeting with J. Wine, K. Duff and SEC regarding claims process, claim groups and hearing (set73) (.9); further preparation for upcoming hearing (set73) (.7); attention to Group 1 issues (Group 1) (.4); attention to issues regarding claim groupings (set68) (.5). Claims Administration & Objections
4/26/2023	AEP	0.4	Teleconference with J. Wine regarding existence of releases recorded by EquityBuild Finance, reasons for non-existence of assignments of partial interests in mortgages, and variations among CASAs (set59). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/26/2023	AW	4.3	<p>Confer with J. Wine regarding and start working on draft exhibits to framing report (Group 2, Group 3) (3.8); communicate with J. Wine regarding update to claims (4533 Calumet, 4611 Drexel) (.2); attention to requests from claimants to update their contact information and related communication with claims vendor (set73) (.2); communicate with J. Wine regarding beneficiary issue (7300 Lawrence, 7760 Coles, 7927 Essex) (.1).</p> <p>Claims Administration & Objections</p>
4/26/2023	JR	6.5	<p>Continue working on claims, review claims submissions for properties (4317 Michigan, 4533 Calumet, 5955 Sacramento, 6355 Talman, 7026 Cornell, 7442 Calumet, 7656 Kingston, 8326 Ellis).</p> <p>Claims Administration & Objections</p>
4/26/2023	JRW	4	<p>Attention to claimant inquiries (set73) (.6); review motion for adjudication of claims in preparation for hearing (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.2); appearance in court for status hearing and rulings (set73) (1.2); conferences with counsel and claimants regarding claims process and planning for same (set68) (.4); exchange correspondence with claimants' counsel regarding potential settlement and review notes regarding analysis of claims (1422 E 68th) (.3); telephone conference with A. Porter regarding analysis of EquityBuild documents and impact on claims (set59) (.5); exchange correspondence with counsel for claimants regarding potential streamlining of claims process (set68) (.1); revise proposed orders regarding group 2 and 3 claims processes and related correspondence with claimants' counsel (set68) (.4); exchange correspondence with claims vendor regarding updates to claimant information in review portal, generation of reports, and open issues (set59) (.3).</p> <p>Claims Administration & Objections</p>
4/26/2023	MR	3.5	<p>Further prepare for hearing on claims process, groupings, and related issues (set73) (1.5); conferences with K. Duff and J. Wine regarding upcoming hearing (set73) (.2); participate in status hearing (set73) (1.2); conference and discussions with K. Duff and J. Wine and others regarding prospective claims process (set68) (.4); various follow up regarding prospective claims process (set68) (.2).</p> <p>Claims Administration & Objections</p>
4/27/2023	AW	4.9	<p>Follow up call with J. Wine regarding framing report and complete draft exhibits (Group 2, Group 3) (3.9); communicate with K. Duff regarding distribution (Group 1) (.1); communicate with vendor regarding updates to claimants' contact information (set73) (.1); communicate with J. Wine regarding updates to claimants' contact information requests sent to vendor (2909 E 78th, 3030 E 79th, 5201 Washington, 6160 MLK, 7301 Stewart, 7549 Essex, 7500 Eggleston, 7834 Ellis, 8047 Manistee) (.6); follow up communications with J. Wine regarding beneficiary issue (7300 Lawrence, 7760 Coles, 7927 Essex) (.1); email J. Wine regarding correction to claims (4533 Calumet, 4611 Drexel) (.1).</p> <p>Claims Administration & Objections</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/27/2023	JR	6.8	Continue working on claims, review claims submissions for properties (109 N Laramie, 2909 E 78th, 4317 Michigan, 4533 Calumet, 5955 Sacramento, 6001 Sacramento, 6355 Talman, 7026 Cornell, 7107 Bennett, 7442 Calumet, 7549 Essex, 7656 Kingston, 8047 Manistee, 8326 Ellis, SSDF4). Claims Administration & Objections
4/27/2023	JRW	0.5	Confer with A. Watychowicz regarding framing reports for groups 2 and 3 (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.1); exchange correspondence with claims vendor regarding claims portal (set59) (.1); telephone conference with claimants' counsel regarding potential settlement (1422 E 68th) (.2); confer with A. Watychowicz regarding response to claimant inquiry (set73) (.1). Claims Administration & Objections
4/27/2023	KMP	0.3	Review information regarding deposits of sales proceeds for certain properties and related communications with J. Wine (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee). Claims Administration & Objections
4/28/2023	JR	6	Continue working on claims, review claims submissions for properties (109 N Laramie, 3637 Richmond, 6001 Sacramento, 7026 Cornell, 7107 Bennett, 7200 Stony Island, 7834 Ellis, 8326 Ellis, SSDF4). Claims Administration & Objections
4/28/2023	JRW	0.6	Draft correspondence to claimant regarding settlement discussions (1422 E 68th) (.2); confer with M. Rachlis regarding treatment of recoveries from related matters (set68) (.1); correspondence with claimants' counsel regarding claims and claims process (1422 E 68th, 3074 Cheltenham, 6949 Merrill, 7201 Constance, 7625 East End, 7635 East End, 7750 Muskegon) (.3). Claims Administration & Objections
4/29/2023	JRW	0.3	Review portal and correspond with claims vendor regarding revision to claim information (2909 E 78th, 7549 Essex, 7834 Ellis, 8047 Manistee). Claims Administration & Objections

SUBTOTAL: [182.9 36,490.00]

Distributions

4/2/2023	MR	0.5	Attention to proposed claims distribution plan and related follow up (Group 1). Distributions
4/3/2023	JRW	0.1	Exchange correspondence with M. Rachlis regarding further review of claims for distribution order (Group 1). Distributions

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/3/2023	MR	0.1	Exchange correspondence with J. Wine regarding distribution plan (Group 1). Distributions
4/6/2023	JRW	0.1	Exchange correspondence regarding amended distribution order (Group 1). Distributions
4/6/2023	MR	0.1	Further attention to correspondence on amended distribution order (Group 1). Distributions
4/7/2023	JRW	1.5	Conference with K. Duff and M. Rachlis regarding analysis of claims for proposed distribution order (Group 1) (.5); draft notice and work with A. Watychowicz to finalize and file second amended distribution order and exhibits (Group 1) (1.0). Distributions
4/7/2023	MR	0.6	Confer with K. Duff and J. Wine regarding analysis of claims issues regarding Group 1 claims, communications with claimants , and proposed distribution order (Group 1) (.3); review and comment on proposed distribution order and related follow up and review of exhibits (Group 1) (.3). Distributions
4/18/2023	KMP	0.6	Confer with K. Duff and J. Wine, and communicate with bank representatives regarding status of check request and interest accumulation issues in connection with property distributions, and related review of records (3723 W 68th, 61 E 92nd, 7953 Woodlawn). Distributions
4/19/2023	KMP	0.2	Further communicate with bank representatives regarding status of check request and interest accumulation issues in connection with property distributions (3723 W 68th, 61 E 92nd, 7953 Woodlawn). Distributions
4/27/2023	JRW	0.2	Exchange correspondence with K. Duff and A. Watychowicz regarding response to claimant inquiries regarding Group 1 distributions (Group1). Distributions

SUBTOTAL: [4 1,113.00]

Status Reports

4/11/2023	AW	0.2	Review past status reports and communicate with J. Wine regarding claims lists. Status Reports
4/13/2023	JRW	0.4	Exchange various correspondence with team regarding status report for first quarter 2023. Status Reports

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/13/2023	KMP	1.9	Begin work on financial exhibits for 1Q2023 status report and related communications with K. Duff and J. Wine. Status Reports
4/14/2023	KMP	2.4	Continue working on financial exhibits for 1Q2023 status report. Status Reports
4/17/2023	AW	0.3	Review Receiver's and claims' email accounts and communicate with J. Wine regarding communications with claimants. Status Reports
4/17/2023	KMP	5.6	Continue working on financial exhibits for 1Q2023 status report and related communication with J. Wine. Status Reports
4/18/2023	JRW	2.3	Preparation of status report for first quarter 2023. Status Reports
4/18/2023	KMP	2.5	Continue working on financial exhibits for 1Q2023 status report and forward to J. Wine for review (2.1); confer with K. Duff and J. Wine regarding certain issues relating to property account balances spreadsheet (.4). Status Reports
4/19/2023	JRW	3.1	Attention to preparation of first quarter 2023 status report. Status Reports
4/20/2023	JRW	1.6	Continued drafting and revision of first quarter status report. Status Reports
4/20/2023	KMP	2.6	Review and redline draft 1Q2023 status report and related communications with K. Duff and J. Wine (.8); update spreadsheets and calculate unpaid fees for reporting in 1Q2023 status report and related communications with J. Wine (1.8). Status Reports
4/21/2023	JRW	1	Work with K. Pritchard on calculations for status report and related review and revision of spreadsheets and analysis to K. Duff (.7); final revisions and correspondence to SEC regarding status report (.3). Status Reports
4/21/2023	KMP	1.1	Confer with J. Wine update regarding calculation of unpaid fees for reporting in 1Q2023 status report and revise related spreadsheets (.8); prepare pdf copies of exhibits to status report and forward to J. Wine (.3). Status Reports
4/27/2023	AW	0.1	Communicate with K. Pritchard regarding exhibits to status report. Status Reports
4/27/2023	JRW	0.3	Further revision of first quarter 2023 status report. Status Reports
4/27/2023	KMP	0.4	Review revised draft status report (.3); communicate with A. Watychowicz regarding certain exhibits to status report (.1). Status Reports

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
4/28/2023	AW	1.1	Prepare two versions of exhibit to status report and related communication with K. Pritchard. Status Reports
4/28/2023	JRW	0.3	Revise first quarter status report and finalize for filing. Status Reports
4/28/2023	KMP	1.1	Review, revise, finalize and file 1Q2023 status report and exhibits, and related communications with EB team (1.0); communicate with J. Wine and A. Watychowicz regarding certain exhibits to status report (.1). Status Reports
4/28/2023	MR	0.4	Review and follow up on status report. Status Reports

SUBTOTAL: [28.7 5,198.00]

233 \$46,581.00

<u>Other Charges</u>	<u>Description</u>		
	Google suite for April 2023	144.00	

SUBTOTAL:		[144.00]	

Total Other Charges		\$144.00	

<u>Summary of Activity</u>			
	<u>Hours</u>	<u>Rate</u>	
Pritchard, Kathleen M.	20.80	140.00	\$2,912.00
Rachlis, Michael	14.50	390.00	\$5,655.00
Rak, Justyna	92.50	140.00	\$12,950.00
Watychowicz, Ania	19.50	140.00	\$2,730.00
Wine, Jodi Rosen	85.30	260.00	\$22,178.00
Porter, Andrew E	0.40	390.00	\$156.00

SUMMARY

Legal Services	\$46,581.00
Other Charges	\$144.00
TOTAL DUE	\$46,725.00

Rachlis Duff & Peel, LLC

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CHICAGO, ILLINOIS 60605

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

July 19, 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. 6622158

Legal Fees for May 2023	\$50,155.00
Expenses Disbursed	<u>\$191.71</u>
Due this Invoice	\$50,346.71

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Accounting/Auditing</u>			
5/3/2023	JRW	0.1	Confer with K. Pritchard regarding transferring money to consolidate property accounts. Accounting/Auditing
5/3/2023	KMP	0.3	Communications with K. Duff, J. Wine, and bank representative regarding merging duplicate accounts and other account management issues, and review related account records. Accounting/Auditing
5/4/2023	KMP	1	Participate in web conference with K. Duff and bank representative regarding account management issues (.4); effectuate transfer of funds to merge duplicate property accounts and related communications with K. Duff and J. Wine (.3); update ledgers for Receiver's accounts to reflect recent transactions (.2); communicate with K. Duff regarding increase to interest rate on Receiver's accounts (.1). Accounting/Auditing
5/9/2023	KMP	0.3	Attention to communication with bank representative regarding confirmation of interest rate increase for Receiver's accounts (.1); prepare deposit of utility refund to property account (.2). Accounting/Auditing
5/12/2023	KMP	0.3	Update spreadsheet for Receiver's accounts to reflect recent transactions. Accounting/Auditing
SUBTOTAL:			[2 292.00]

<u>Business Operations</u>			
5/5/2023	JRW	0.1	Email to claimants' counsel regarding consolidation of property accounts (1131 E 79th). Business Operations
5/9/2023	KMP	0.2	Confer with K. Duff and J. Wine regarding status of communications with utility company relating to checks disbursed from third restoration for utility payments (1401 W 109th, 6217 Dorchester, 7201 Constance). Business Operations
5/10/2023	KMP	0.2	Communicate with property manager regarding refund checks for property utilities (7109 Calumet). Business Operations
5/11/2023	KMP	0.6	Review spreadsheet relating to restoration of funds to certain properties, and related communications with K. Duff and J. Wine (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex). Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
5/12/2023	JRW	0.4	Telephone conference with People's Gas regarding payment of outstanding balances and related correspondence to K. Pritchard (1401 W 109th, 6217 Dorchester, 7201 Constance). Business Operations
5/12/2023	KMP	0.3	Communicate with J. Wine regarding confirmation of mailing address for delivery of checks to utility company in connection with third restoration and prepare transmittal of checks (1401 W 109th, 6217 Dorchester, 7201 Constance). Business Operations

SUBTOTAL: [1.8 312.00]

Case Administration

5/1/2023	AW	0.1	Review receivership webpage and request update. Case Administration
5/1/2023	JRW	0.5	Study exported report from claims review portal and related communications with claims vendor (set68). Case Administration
5/2/2023	JRW	2	Confer with K. Duff regarding claims review portal, update list of outstanding issues, and related correspondence to claims vendor (set68) (.9); meet with claims vendor regarding reports and platform (set68) (.8); review and respond to correspondence regarding prioritization of issues regarding claims portal (set68) (.3). Case Administration
5/3/2023	AW	0.3	Request update to Receivership web page (.1); attention to entered orders, related emails to counsel, and docket update (.2). Case Administration
5/3/2023	JRW	1.3	Exchange correspondence with claims vendor regarding mapping of data to portal and update on pending items and requests for information (set68). Case Administration
5/4/2023	JRW	0.3	Exchange correspondence with claims vendor regarding fields in claims review platform (set68). Case Administration
5/5/2023	JRW	0.8	Conference with claims vendor regarding demonstration of search function (.2); meet with claims vendor and K. Duff regarding updates on claims review portal (set68) (.6). Case Administration
5/8/2023	AW	0.2	Request update to receivership webpage. Case Administration
5/9/2023	JRW	1.7	Conference call with claims vendor and J. Rak regarding portal enhancement and status of updates (.4); work with J. Rak and claims vendor on claims portal design elements (1.3). Case Administration

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
5/10/2023	AW	0.5	Prepare update to receivership webpage and related email to IT vendor (.3); communicate with clerk regarding docketing error (.2). Case Administration
5/10/2023	JRW	0.9	Respond to further questions from claims vendor regarding portal requirements and review related revisions (set68). Case Administration
5/11/2023	AW	0.1	Attention to notice of correction and corrected filing and related email to counsel. Case Administration
5/11/2023	KMP	0.2	Confer with J. Rak regarding communications relating to opening of property account. Case Administration
5/12/2023	AW	0.1	Follow up with IT vendor regarding updates to webpage. Case Administration
5/12/2023	JRW	0.2	Telephone and email communications regarding claims portal (set68). Case Administration
5/15/2023	JRW	0.2	Confer with K. Duff regarding claims portal and related scheduling of tutorial on reporting. Case Administration
5/15/2023	JRW	0.3	Conference call with vendor and K. Duff regarding claim review portal (set68). Case Administration
5/16/2023	AW	0.3	Request update to receivership webpage. Case Administration
5/16/2023	JRW	1.5	Exchange multiple correspondence with claims vendor regarding claims review portal (set68) (.4); attend training session on reporting functionality of claims review portal (set68) (.6); conference with claims vendor , A. Watychowicz and J. Rak regarding claims portal issues (.5). Case Administration
5/17/2023	AW	0.3	Docket deadlines related to approved groups. Case Administration
5/22/2023	JR	1.6	Communication with J. Wine regarding review and testing of the claims portal as it relates to generating reports (.1); review report tutorial recording, practice test and generate various reports on the claims reporting portal (1.5). Case Administration
5/22/2023	JRW	0.2	Conference call with claims vendor regarding claims review portal development update (set68). Case Administration
5/23/2023	JR	1.5	Review and further test reporting platform and generate report, communication with J. Wine generating and producing reports for review.

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Case Administration
5/24/2023	JR	6.1	Review email from J. Wine associated with claims report that was generated from claims platform, provide information to specific questions and issues associated with same (1.5); further review bank's reporting portal and identify issues associated with the platform, further related communications with J. Wine (1.7); phone meeting with bank representative identifying previous concerns and new issues, discussing timelines for resolution (1.2); additional communication with J. Wine related to generating reports from claims platform and resolving various issues (.6); review email from J. Wine and bank representative relating to proof of claim data that will be imported into claims platform, related review, and further communicate with J. Wine and bank representative identifying issue (1.1).
			Case Administration
5/24/2023	JRW	1.2	work with J. Rak, K. Duff, A. Watychowicz and vendor regarding issues related to claim review portal and reporting (set68) (1.1); communicate with K. Pritchard regarding returned checks (.1).
			Case Administration
5/25/2023	AW	0.1	Attention to entered order regarding extension to submission about revised proposed grouping of properties, email counsel re same and update docket.
			Case Administration
5/26/2023	JR	1	Review email from bank representative related to claim portal updates, review implemented updates and respond accordingly (.5); exchange communication with bank representative requesting various updates to the claims portal (.5).
			Case Administration
5/29/2023	JR	1.6	Communication with J. Wine regarding request to review and test the claims portal as it relates to generating reports (.1); review report tutorial recording, practice test and generate various reports on the reporting portal (1.5).
			Case Administration
5/31/2023	AW	0.6	Prepare update to receivership webpage and related email to IT vendor.
			Case Administration

SUBTOTAL: [25.7 4,930.00]

Claims Administration & Objections

5/1/2023	AW	0.4	Confer with M. Rachlis regarding class action (defer) (.1); review files and communications with J. Wine regarding inquiries from claimants (set73) (.3).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
5/1/2023	JR	2.7	Continue working on claims, review claims submissions for properties (109 Laramie, 11117 Longwood, 6001 Sacramento, 6217 Dorchester, 7026 Cornell, 7834 Ellis, 8326 Ellis) (2.2); communication with J. Wine regarding finalizing various property claims for funds as they relate to the lender statements of account, review same and further communicate with J. Wine (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee) (.5)
5/1/2023	JRW	1.4	<p>Claims Administration & Objections</p> <p>Attention to claimant inquiries (set73) (.2); exchange correspondence with vendor regarding property grouping (2909 E 78th, 7549 Essex, 8047 Manistee) (.1); telephone conference with claimants' counsel, K. Duff and M. Rachlis regarding claims process and future groups (1131 E 79th, 1401 W 109th, 1422 E 68th, 1700 Juneway, 2736 W 64th, 2800 E 81st, 310 E 50th, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 Avers, 6554 Vernon, 6807 Indiana, 6949 Merrill, 7024 Paxton, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7255 Euclid, 7300 St Lawrence, 7442 Calumet, 7450 Luella, 7508 Essex, 7546 Saginaw, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7840 Yates, 7957 Marquette, 8000 Justine, 8107 Ellis, 816 Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis, 9212 Parnell, 9610 Woodlawn) (.7); exchange correspondence with claimants' counsel regarding property account balance (1131 E 79th) (.2); confer with J. Rak regarding claims review (1414 E 62nd, 1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6217 Dorchester, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.2).</p>
5/1/2023	MR	1	<p>Claims Administration & Objections</p> <p>Attention to issues on groupings and related conferences with claimant's counsel, J. Wine and K. Duff (set68) (.9); conference with A. Watychowicz regarding class action (defer) (.1).</p> <p>Claims Administration & Objections</p>
5/2/2023	AW	0.2	<p>Communicate with K. Duff and J. Wine regarding received communications (Group 1) (.1); response to claimant's inquiry regarding class action (defer) (.1).</p> <p>Claims Administration & Objections</p>
5/2/2023	JR	6.3	<p>Continue working on claims, review claims submissions for properties (109 Laramie, 11117 Longwood, 4533 Calumet, 6356 California, 7026 Cornell, 7201 Dorchester, 7927 Essex).</p> <p>Claims Administration & Objections</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
5/2/2023	JRW	1.4	Correspondence with claimant and claimants' counsel regarding withdrawal of claim (1422 E 68th) (.1); confer with J. Rak regarding claim and update master spreadsheet (7026 Cornell) (.1); telephone conference with claimants' counsel regarding claims against particular property and Group 2 claims process (6949 Merrill) (.3); drafting, revision, and communications with K. Duff and M. Rachlis regarding schedules for claim groups 2 and 3 (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.8); exchange correspondence with K. Duff regarding claimant opting out of confidentiality order (1700 Juneway) (.1).
			Claims Administration & Objections
5/2/2023	MR	0.4	Attention to orders and schedule for draft of claims process (Group 2, Group 3).
			Claims Administration & Objections
5/3/2023	AW	2.7	Response to claimant and update to claimant's contact information (7051 Bennett, 7107 Bennett) (.2); response to claimants' inquiries regarding claims process, beneficiary issues, update to claims (set73) (.7); response to follow up email from claimant regarding receiver's recommendation (Group 1) (.1); email communications with counsel regarding confidentiality order and related email to claimant (Group 2) (.4); communicate with counsel regarding submitted acknowledgement forms (Group 1) (.1); work with J. Wine on update to standard response to claimants (set73) (.1); review claim forms and related email communication with J. Wine (4520 Drexel, 7237 Bennett, 7508 Essex, 7927 Essex, 8100 Essex, 8326 Ellis) (1.1).
			Claims Administration & Objections
5/3/2023	JR	7	Continue working on claims, review claims submissions for properties (11117 Longwood, 4533 Calumet, 6356 California, 7026 Cornell, 7201 Dorchester, 7237 Bennett, 7508 Essex, 7834 Ellis, SSD4) (6.8); communication with J. Wine regarding assistance with claims review relating to funds (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.2).
			Claims Administration & Objections

Date	Indiv	Hours	Description
5/3/2023	JRW	6.1	Work with A. Watychowicz on framing report and distribution lists for Groups 2 and 3 and related correspondence with claimants' counsel (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.2); separate telephone conferences with A. Watychowicz, K. Duff and J. Rak regarding updating claims review portal (set68) (.6); work with K. Duff, M. Rachlis and A. Watychowicz regarding correspondence to claimant opting out of confidentiality order (1700 Juneway) (.4); attention to review of claims for Group 3 position statement (3030 E 79th, 7301 Stewart, 7500 Eggleston) (2.5); attention to responding to claimant inquiries, prepare template for responding to inquiries regarding Group 1 distribution, and related telephone conference with A. Watychowicz (set73) (.6); factual research regarding claims (2736 W 64th, 4315 Michigan, 6355 Talman, 6356 California, 7051 Bennett, 7201 Dorchester, 7442 Calumet, 7508 Essex, 7546 Saginaw, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7957 Marquette, 816 Marquette, 8201 Kingston, 8326 Ellis) (.2); detailed review of claims (3030 E 79th, 4533 Calumet, 6250 Mozart, 7301 Stewart, 7500 Eggleston) (.9); detailed review of claims (3030 E 79th, 4533 Calumet, 6250 Mozart, 7201 Dorchester, 7301 Stewart, 7500 Eggleston, 816 Marquette, 8201 Kingston, 8326 Ellis) (.7).

Claims Administration & Objections

5/3/2023	MR	0.4	Attention to claimant's issues regarding confidentiality (1700 Juneway).
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Claims Administration & Objections

5/4/2023	AW	1.1	Review claim and communications with claimant's counsel and related email to J. Wine (3030 E 79th, 4520 Drexel, 7301 Stewart, 7500 Eggleston, SSDF2) (.2); update service list as per claimant's agreement to abide to confidentiality order (Group 2) (.2); communicate with counsel regarding follow up from claimant (7300 St Lawrence, 7760 Coles, 7927 Essex) (.1); review claims list and email submissions and communicate with J. Wine regarding necessary update (11117 Longwood, 3030 E 79th, 3915 Kimball, 4019 Indiana, 4108 Monticello, 4109 Kimball, 4351 Calumet, 5001 Drexel, 7301 Stewart, 7500 Eggleston, 9531 Fairfield, SSDF4) (.6).
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Claims Administration & Objections

5/4/2023	JR	4.2	Continue working on claims, review claims submissions for properties (109 Laramie, 11117 Longwood, 7237 Bennett, 7546 Saginaw).
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Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
5/4/2023	JRW	5.6	Telephone conference with claimants' counsel regarding Group 2 schedule (6949 Merrill) (.1); review claims (1131 E 79th, 4520 Drexel, SSDF1) (.8); study claims (1131 E 79th) (1.0); telephone conference with claimants' counsel regarding Group 2 framing report (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (.1); conference call with claimants' counsel regarding property's inclusion in Group 2 (6160 MLK) (.2); work with A. Watychowicz and K. Duff on framing reports for Groups 2 and 3 (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.4); attention to claims review and related correspondence with claimants' counsel (11117 Longwood, 3030 E 79th, 3915 Kimball, 4019 Indiana, 4108 Monticello, 4109 Kimball, 4351 Calumet, 5001 Drexel, 7301 Stewart, 7500 Eggleston, 9531 Fairfield, SSDF4) (1.5); confer with K. Duff regarding upcoming property groupings (set68) (.4); conference with K. Duff regarding outstanding issues relating to claim review portal (set68) (1.1).
			Claims Administration & Objections
5/5/2023	AW	5.6	Draft a framing report and email J. Wine with request for feedback (Group 2) (.4); work with J. Wine on revisions to framing reports and updates to claims lists and email lists (Group 2, Group 3) (4.3); finalize, file with the Court, and serve framing report on claimants (Group 2, Group 3) (.6); call with J. Wine regarding claims process (set73) (.3).
			Claims Administration & Objections
5/5/2023	JR	5.5	Continue working on claims, review claims submissions for properties (11117 Longwood, 2909 E 78th, 4611 Drexel, 7107 Bennett, 7549 Essex, 7834 Ellis, 8047 Manistee).
			Claims Administration & Objections
5/5/2023	JRW	5.3	Continued preparation of framing reports and proposed schedules for groups 2 and 3, and various related discussions with K. Duff and A. Watychowicz (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (2.7); confer with K. Duff regarding claims portal requirements and upcoming conference call with claims vendor (set68) (.4); review diagram regarding tracking of distributions and update notes regarding portal functionality (set68) (.9); continue reviewing claims against properties and related correspondence with claimants' counsel (11117 Longwood, 3030 E 79th, 3915 Kimball, 4019 Indiana, 4108 Monticello, 4109 Kimball, 4351 Calumet, 5001 Drexel, 7301 Stewart, 7500 Eggleston, 9531 Fairfield, SSDF4) (1.3).
			Claims Administration & Objections
5/5/2023	KMP	0.3	Review and comment on Group 2 framing report (Group 2).
			Claims Administration & Objections
5/5/2023	MR	1.4	Attention to framing report issues (Group 2, Group 3).
			Claims Administration & Objections

Date	Indiv	Hours	Description
5/8/2023	AW	6.3	<p>Communicate with K. Duff and J. Wine regarding response to inquiry regarding appeal and related email to claimant (Group 1) (.2); response to email from claimant regarding framing report (Group 2) (.1); attention to communications with claimants and work to update email service list (Group 2, Group 3) (3.7); attention to email from claimant and update claims list (5450 Indiana, 6250 Mozart, 6355 Talman, 6437 Kenwood, 701 S 5th, 7026 Cornell, 7051 Bennett, 7237 Bennett, 7546 Saginaw, 7600 Kingston, 7748 Essex, 8326 Ellis, SSDF4) (.2); communicate with counsel regarding email to all claimants regarding framing reports and finalize project (Group 2, Group 3) (.7); communicate with counsel regarding Receiver's recommendation (Group 1) (.1); attention to emails from counsel for claimants and update contact information (Group 2) (.2); attention to newly filed appeal and docketing statement, related email to counsel, and updates to docket (Group 1) (.2); review prior communications with claimant regarding abandonment of claims and related exchange with counsel (5450 Indiana, 7927 Essex) (.2); review claims and submit recommendation to K. Duff and J. Wine (5450 Indiana, Group 3, SSDF4) (.7).</p> <p>Claims Administration & Objections</p>
5/8/2023	JR	7.3	<p>Continue working on claims, review claims submissions for properties (2909 E 78th, 3030 E 79th, 4930 Cornelia, 11117 Longwood, 4611 Drexel, 701 S 5th, 7301 Steward, 7500 Eggleston, 7549 Essex, 7600 Kingston, 7823 Essex, 7834 Ellis, 8047 Manistee).</p> <p>Claims Administration & Objections</p>
5/8/2023	JRW	2.3	<p>Work with A. Watychowicz regarding strategy for addressing bounced emails and related correspondence with counsel for City of Chicago and claimant (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.5); attention to inquiries from claimants (set73) (.7); exchange correspondence regarding service of framing reports and related revision of cover emails to claimants (set68) (.4); exchange various correspondence with claims vendor and J. Rak regarding migration of search functionality to claims review portal (set68) (.2); review claim and confer with J. Rak regarding analysis of same (4611 Drexel) (.3); exchange correspondence with counsel for claimant regarding potential settlement discussions and related communications with K. Duff and M. Rachlis regarding strategy (1131 E 79th, 7024 Paxton) (.2).</p> <p>Claims Administration & Objections</p>
5/8/2023	KMP	0.2	<p>Confer with A. Watychowicz regarding correspondence to claimants relating to Groups 2 and 3 framing reports (Group 2, Group 3).</p> <p>Claims Administration & Objections</p>
5/8/2023	MR	0.5	<p>Attention to various orders on appeal issues (Group 1) (.3); attention to follow up issues regarding Group 2 and Group 3 framing report (Group 2, Group 3) (.2).</p> <p>Claims Administration & Objections</p>

Date	Indiv	Hours	Description
5/9/2023	AW	1.7	<p>Communicate with claimants regarding documents, claims, and proposed grouping of properties (4533 Calumet, 5450 Indiana, 7300 St Lawrence, 7760 Coles, 7927 Essex, 7953 Marquette) (.4); email exchanges with claimants to update email service list (Group 2, Group 3) (.2); respond to claimant regarding Receiver's recommendation (Group 1) (.1); follow up email to claimant regarding update to claims list (5450 Indiana, 6250 Mozart, 6355 Talman, 6437 Kenwood, 701 S 5th, 7026 Cornell, 7051 Bennett, 7237 Bennett, 7546 Saginaw, 7600 Kingston, 7748 Essex, 8326 Ellis, SSDF4) (.1); review claims and submit draft emails to K. Duff and J. Wine (7844 Ellis, SSDF4, SSDF6) (.3); communicate with counsel regarding his client's claims (11117 Longwood, 3915 Kimball, 4108 Monticello, 4019 Indiana, 4109 Kimball, 4351 Calumet, 5001 Drexel, 9531 Fairfield, SSDF4) (.2); prepare and communicate with counsel for claimants regarding current list of claims (set73) (.3); review claim and communicate with claimant's counsel regarding status (5201 Washington) (.1).</p> <p>Claims Administration & Objections</p>
5/9/2023	JR	1.8	<p>Continue working on claims, review claims submissions for properties (4930 Cornelia, 701 S 5th, 2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7600 Kingston, 7823 Essex, 8047 Manistee).</p> <p>Claims Administration & Objections</p>
5/9/2023	JRW	0.3	<p>Attention to claimant inquiries (set73) (.2); confer with A. Watychowicz and J. Rak regarding changes to master spreadsheet (4611 Drexel, 7834 Ellis) (.1).</p> <p>Claims Administration & Objections</p>
5/10/2023	AW	3.6	<p>Further follow up with claimant regarding claimant issues (7300 St Lawrence, 7760 Coles, 7927 Essex) (.1); communicate with claimant regarding claim and related email to J. Wine regarding claims portal update (5450 Indiana) (.2); email exchange with claimant to update email service list (Group 2) (.1); communicate with claimant regarding grouping of properties (8100 Essex) (.1); communicate with counsel regarding claimant's abandonment request (5450 Indiana, 7927 Essex) (.1); draft email to claimant regarding appeal issues and related exchange with counsel (Group 1) (.1); update claimant's counsel information (Group 2) (.1); detailed review of claim, extensive research regarding loaned amounts, draft email to counsel for approval, and related email exchanges (6160 MLK) (2.2); attention to email from claimant regarding update to custodian name and related email exchange with J. Wine (7748 Essex) (.1); review claims portal, communicate with J. Wine regarding required updates, and related communications with claims vendor (set73) (.2); finalize draft orders setting scheduled for approved groups and related email to counsel (Group 2, Group 3) (.3).</p> <p>Claims Administration & Objections</p>

Date	Indiv	Hours	Description
5/10/2023	JR	5.6	Continue working on claims, review claims submissions for properties (109 Laramie, 4109 Kimball, 4930 Cornelia, 701 S 5th, 2909 E 78th, 3030 E 79th, 4533 Calumet, 6160 MLK, 6217 Dorchester, 6355 Talman, 6548 Campbell, 6801 East End, 7026 Cornell, 7301 Stewart, 7450 Luella, 7500 Eggleston, 7549 Essex, 7600 Kingston, 7823 Essex, 8047 Manistee, SSDF1, SSDF4).
			Claims Administration & Objections
5/10/2023	JRW	1.9	Correspondence regarding claim and confer with A. Watychowicz and vendors regarding required updates to master spreadsheet (5450 Indiana) (.3); correspondence with J. Rak regarding analysis of claim (7026 Cornell, SSDF4) (.3); correspondence to court regarding proposed orders commencing Group 2 and Group 3 proceedings (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.2); review claims and revise correspondence to claimants' counsel (6160 MLK) (.6); attention to responding to claimant inquiries (set 73) (.5).
			Claims Administration & Objections
5/11/2023	AW	1.8	Communicate with claimants regarding upcoming discovery, clarification of claims, and email issues (Group 2) (.3); respond to claimant regarding fund investment (SSDF4) (.1); follow up with K. Duff and J. Wine regarding claimant beneficiary questions (7300 St Lawrence, 7760 Coles, 7927 Essex) (.1); follow up with J. Wine regarding claimants and proposed responses (set73) (.1); communicate with J. Wine regarding set up of claims in portal (5450 Indiana) (.1); request update to claims portal (5450 Indiana) (.2); research and communicate with K. Duff regarding emails from claimants (Group 1) (.9).
			Claims Administration & Objections
5/11/2023	JR	4.3	Continue working on claims, review claims submissions for properties (2909 E 78th, 3030 E 79th, 4109 Kimball, 7026 Cornell, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee) (2.6); review email from J. Wine relating to an update from claimant and work on update (7748 Essex) (.9); review email from K. Duff requesting information related to orders approving the sale of group 1 properties (3074 Cheltenham, 7625 East End, 7635 East End, 7201 Constance, 7750 Muskegon) (.3); further communication with K. Duff regarding research for information related to property bank account (7748 Essex) (.5).
			Claims Administration & Objections
5/11/2023	JRW	4.8	Attention to claimant inquiries (set73) (.8); review orders, prepare spreadsheet regarding transfer of funds to segregated property accounts, and related analysis to K. Duff and K. Pritchard (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex) (.8); continued review of claims against properties (11117 Longwood, 3030 E 79th, 3915 Kimball, 4019 Indiana, 4108 Monticello, 4109 Kimball, 4351 Calumet, 5001 Drexel, 7301 Stewart, 7500 Eggleston, 9531 Fairfield, SSDF4) (2.5); review claims, update claims review sheet, and related correspondence with J. Rak (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.7).
			Claims Administration & Objections

Date	Indiv	Hours	Description
5/12/2023	AW	2.9	<p>Correspond with claimant regarding abandonment of claim (5450 Indiana, 7927 Essex) (.1); correspond with claimant regarding fund investment (SSDF4) (.1); communications with K. Duff regarding draft response, email response to claimant regarding approved distribution and appeal issues, and work on response to follow-up question (Group 1) (.2); draft email response to claimant regarding claims process (1131 E 79th, 7749 Yates) (.1); clarification email regarding claims process (Group 2, Group 3) (.3); update email addresses for claimants (Group 3) (.2); review prior communications with claimant, and related email to J. Wine (Group 1) (.4); further review and research regarding trust agreement and related email to J. Wine (1102 Bingham, 3074 Cheltenham, 4611 Drexel, 4528 Michigan, 7237 Bennett, 7255 Euclid, 7750 Muskegon) (.2); communicate with K. Duff regarding emails from claimants (Group 1) (.1); attention to documents from claimant's beneficiary and related communication with counsel (5450 Indiana, 7953 Marquette) (.1); detailed review of claim and correspond with J. Wine regarding recommendation to update claim (7834 Ellis, SSDF6) (1.1).</p> <p>Claims Administration & Objections</p>
5/12/2023	JR	6.1	<p>Continue working on claims, review claims submissions for properties (2909 E 78th, 4109 Kimball, 7026 Cornell, 7549 Essex, 8047 Manistee) (2.6); exchange communication with J. Wine regarding review of various claims for final recommendation related to distributions for an EquityBuild fund and update same (3030 E 79th, 7301 Stewart, 7500 Eggleston) (3.5).</p> <p>Claims Administration & Objections</p>
5/12/2023	JRW	4.1	<p>Review settlement correspondence and related email exchange with claimant (1422 E 68th) (.3); meet with J. Rak regarding Group 3 position statement (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee) (.5); study claim review notes in preparation for drafting position statement (2909 E 78th, 7549 Essex, 8047 Manistee) (2.0); attention to claimant inquiries (.2); telephone conference with claimant's representative regarding claims (1102 Bingham, 3074 Cheltenham, 4825 Michigan, 4611 Drexel, 7237 Bennett, 7255 Euclid, 7750 Muskegon) (.4); review export report regarding successors and trustees identified in POCs (defer) (.7).</p> <p>Claims Administration & Objections</p>
5/12/2023	MR	0.1	<p>Attention to correspondence regarding property 107 (1422 E 68th).</p> <p>Claims Administration & Objections</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
5/15/2023	AW	2.5	Email claimant regarding update to claims (7748 Essex) (.1); update claimants' contact information and related confirming emails (6160 MLK, 8100 Essex) (.2); review claim entry and follow up with claims vendor (5450 Indiana) (.1); attention to documents from claimant's beneficiary and update to claims (Group 2) (.1); follow up with J. Wine regarding submission of proposed orders (Group 2, Group 3) (.1); review claims portal and confirm requested updates were completed (set73) (.2); draft email response to claimant and related communication with counsel (6250 Mozart) (.1); attention to duplicative claims and related communications with J. Wine (1700 Juneway, 5450 Indiana, 7237 Bennett, 7508 Essex, 7748 Essex, 7749 Yates, 7750 Muskegon, 7927 Essex) (.7); prepare a claims list with duplicative claims and related email to J. Wine, and reformat for submission purposes (1700 Juneway, 5450 Indiana, 7237 Bennett, 7508 Essex, 7748 Essex, 7749 Yates, 7750 Muskegon, 7927 Essex) (.9).
			Claims Administration & Objections
5/15/2023	JR	6.5	Review various claims for final recommendation related to distributions for EquityBuild funds (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7927 Essex, 7549 Essex, 8047 Manistee).
			Claims Administration & Objections
5/15/2023	JRW	1.1	Confer with A. Watychowicz and claims vendor regarding updates to portal (set68) (.2); review correspondence between claimant's counsel and Judge Kim regarding settlement discussions (1422 E 68th) (.1); confer with J. Rak regarding claims analysis (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.2); attention to claim review (7748 Essex) (.2); confer with A. Watychowicz regarding instances with more than one claim with same claim number (7748 Essex) (.4).
			Claims Administration & Objections
5/15/2023	KMP	0.3	Review bank records and provide current property account balances for Group 1 properties to K. Duff (Group 1) (.2); confer with A. Watychowicz regarding voicemail message from claimant (defer) (.1).
			Claims Administration & Objections
5/15/2023	MR	0.5	Attention to orders regarding Group 2 properties (Group 2) (.1); attention to filing regarding Group 3 properties (Group 3) (.4).
			Claims Administration & Objections
5/16/2023	AW	3.4	Follow-up email to claimant regarding approved distribution and appeal issues (Group 1) (.1); work with counsel on emails to claimants from approved groups and standard discovery requests (Group 2, Group 3) (2.4); email claimants regarding entered summary proceedings and instructions on how to proceed (Group 2, Group 3) (.3); confirm claimants' emails are on the email list and communicate with claimants regarding prior communications and email issues (Group 3) (.4); further reformatting of duplicative claims list and related email to J. Wine (1700 Juneway, 5450 Indiana, 7237 Bennett, 7508 Essex, 7748 Essex, 7749 Yates, 7750 Muskegon, 7927 Essex) (.2).

Date	Indiv	Hours	Description
			Claims Administration & Objections
5/16/2023	JR	3.5	Review various claims for final recommendation related to distributions for EquityBuild fund (7927 Essex).
			Claims Administration & Objections
5/16/2023	JRW	2.7	Attention to service email for Group 2 and 3 orders (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.6); review and revise standard discovery requests for Groups 2 and 3 (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.3); telephone conference with claimant regarding class action matter (defer) (.1); attention to renumbering claims (1700 Juneway, 5450 Indiana, 7237 Bennett, 7508 Essex, 7748 Essex, 7749 Yates, 7750 Muskegon, 7927 Essex) (.4); review records and exchange correspondence with K. Duff regarding analysis of claims against property (1422 E 68th) (.5); review claims analysis and related correspondence with J. Rak (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.8).
			Claims Administration & Objections
5/16/2023	KMP	0.3	Communications with K. Duff, J. Wine, and bank representatives regarding establishment of new property accounts (7500 Eggleston, 7549 Essex).
			Claims Administration & Objections
5/16/2023	MR	0.5	Attention to issues on opening accounts for Group 3 properties and communications regarding initiation of group (Group 3) (.3); attention to Group 2 claims communications (Group 2) (.2).
			Claims Administration & Objections
5/16/2023	SZ	0.3	Attention to receipt of claimants' power of attorney (5450 Indiana, 7953 Marquette).
			Claims Administration & Objections
5/17/2023	AW	0.7	Respond to claimant regarding unsecured claim (7616 Phillips) (.1); update emails service lists (Group 2, Group 3) (.1); confirm removal of emails from service list (5450 Indiana, 7927 Essex) (.1); email claimant regarding class action (defer) (.1); email claimant regarding approved distribution and appeal issues (Group 1) (.1); draft email to claimant and related communication with counsel (Group 1) (.1); communicate with counsel regarding claimants' requests for transcript (Group 1) (.1).
			Claims Administration & Objections
5/17/2023	JR	6.2	Review email from J. Wine requesting updates to claim rollover information and returns on investments, analyze claims and further communication with J. Wine regarding related production (3030 E 79th, 7301 Stewart, 7500 Eggleston) (3.9); review various claims for final recommendation related to distributions for EquityBuild fund (7927 Essex) (1.5); continue working on claims, review claims submissions for properties (2909 E 78th, 4611 Drexel, 7026 Cornell, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee) (.8).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
5/17/2023	JRW	0.1	Attention to claimant inquiries (Group 2).
			Claims Administration & Objections
5/17/2023	KMP	0.4	Further communications with K. Duff, J. Wine, and bank representatives regarding establishment of new property accounts (7500 Eggleston, 7549 Essex) (.2); communicate with K. Duff and J. Wine regarding confirmation of funds to be transferred to unfunded accounts (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex) (.2).
			Claims Administration & Objections
5/17/2023	MR	0.1	Update on efforts to resolve claims regarding property 107 (1422 E 68th).
			Claims Administration & Objections
5/18/2023	AW	0.5	Email claimants regarding transcript of April 26, 2023 proceedings (Group 1) (.2); start creation of email distribution group (Group 2) (.3).
			Claims Administration & Objections
5/18/2023	JR	6.6	Continue working on claims, review claims submissions for properties (2909 E 78th, 4611 Drexel, 6217 Dorchester, 7026 Cornell, 7500 Eggleston, 7549 Essex, 7546 Saginaw, 7927 Essex, 8047 Manistee).
			Claims Administration & Objections
5/18/2023	JRW	1.3	Review and revise spreadsheet calculating net transfers to property accounts, related exchange of correspondence with K. Pritchard, and research regarding first and second restoration motions (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex) (.8); exchange correspondence with counsel for claimants regarding proposed adjustment to claims Group 2 and related conference with K. Duff (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (.4); attention to claimant inquiry regarding standard discovery (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (.1).
			Claims Administration & Objections
5/18/2023	KMP	0.5	Further communications with K. Duff and J. Wine regarding confirmation of funds to be transferred to unfunded accounts, review related orders and spreadsheets, and effectuate transfers from Receiver's account (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex).
			Claims Administration & Objections
5/18/2023	MR	0.2	Attention to email regarding Group 2 issues and participants (Group 2).
			Claims Administration & Objections
5/19/2023	AW	0.3	Continue creation of email distribution group (Group 2).
			Claims Administration & Objections
5/19/2023	JR	4.6	Continue working on claims, review claims submissions for properties (6217 Dorchester, 7026 Cornell).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
5/20/2023	AW	0.5	Continue creation of email distribution groups (Group 2, Group 3) (.3); review emails in EquityBuild email account and related communication with K. Duff and J. Wine (Group 2, Group 3) (.2). Claims Administration & Objections
5/22/2023	AW	0.6	Complete creation of email distribution group (Group 3) (.3); communicate with J. Wine regarding receiver's recommendation (Group 1) (.1); communicate with J. Wine regarding tracking of discovery responses and groups setup (Group 2) (.2). Claims Administration & Objections
5/22/2023	JR	4.5	Continue working on claims, review claims submissions for properties (4317 Michigan, 5201 Washington, 7237 Bennett, 7255 Euclid, SSDF6). Claims Administration & Objections
5/22/2023	JRW	7	Exchange correspondence with claimants' counsel regarding proposed changes to property grouping (1131 E 79th, 310 E 50th, 4520 Drexel, 5001 Drexel, 6160 MLK, 7300 St. Lawrence) (.2); review Group 2 claimant emails and discovery responses and draft message regarding discovery obligations and proper use of email distribution list (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (2.1); meet with K. Duff and M. Rachlis regarding properties identified by claimants for adjustments to claims process (1131 E 79th, 310 E 50th, 4520 Drexel, 5001 Drexel, 6160 MLK, 7300 St. Lawrence) (.5); meet with K. Duff and M. Rachlis regarding claims process (set68) (.5); attention to claimant inquiry and related research (defer) (.4); telephone conference with claimants' counsel regarding client's claim against property and related email (310 E 50th) (.3); research regarding claims against properties and prepare analysis of same (1131 E 79th, 4520 Drexel, 5001 Drexel, 7300 St. Lawrence) (1.1); confer with J. Rak regarding claims report generation (set68) (.2); detailed review of claims (3030 E 79th, 4019 Indiana, 5001 Drexel, 7301 Stewart, 7500 Eggleston, SSDF4) (1.6); exchange correspondence with claims vendor regarding issue involving report generation (set68) (.1). Claims Administration & Objections
5/22/2023	MR	1.7	Attention to communications from Group 2 and Group 3 regarding discovery and follow up on related response (Group 2, Group 3) (.3); meeting with K. Duff and J. Wine regarding properties identified by lenders for potential adjustments claims process and review various related documents and emails (1131 E 79th, 310 E 50th, 4520 Drexel, 5001 Drexel, 6160 MLK, 7300 St. Lawrence) (.8); conferences with K. Duff and J. Wine regarding claims process moving forward (set 68) (.5); attention to claimant inquiry (defer) (.1). Claims Administration & Objections

Date	Indiv	Hours	Description
5/23/2023	AW	5.5	<p>Email claimant regarding transcript of April 26, 2023 proceedings (Group 1) (.1); record responses to discovery and email confirmations to claimants (Group 2) (2.4); respond to claimants regarding discovery requests inquiries, group email issues, access to documents (Group 2) (2.1); email claimant regarding required documents from beneficiaries and attention to received documents (6250 Mozart, 7508 Essex, 7748 Essex) (.2); communicate with claimants regarding group settings and Receiver's upcoming submission (Group 3) (.2); communicate with J. Rak regarding claimant's statement regarding claim (6160 MLK) (.1); prepare update email to claimants and related communications with counsel (Group 2) (.2); communicate with counsel regarding question from claimant regarding potential payout and tax benefits (Group 2) (.2).</p>
5/23/2023	JRW	8	<p>Claims Administration & Objections</p> <p>Research regarding SSDF6 fund , related telephone conference with A. Watychowicz and K. Duff and prepare related memorandum (defer) (1.8); attention to claimant inquiries and related telephone conference with A. Watychowicz (set68) (.3); meet with K. Duff regarding Group 3 claims (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee) (1.0); confer with J. Rak regarding claims reports and related review of sample report (set68) (.3); continue working on Receiver's recommendation regarding claims (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.7); begin working on recommendation regarding claims (2909 E 78th, 7549 Essex, 8047 Manistee) (.5); update property groupings sheet (set68) (1.0); conference call with K. Duff and M. Rachlis regarding planning for claims groups and efforts to streamline claims process (set68) (1.3); review chain of title and recorded documents (7109 Calumet, 4611 Drexel, 6217 S Dorchester) (1.1).</p>
5/23/2023	MR	1.8	<p>Claims Administration & Objections</p> <p>Conferences with K. Duff and J. Wine regarding claims process and attention to various related documents (set68) (1.6); attention to issues on Group 1 claims and distributions (Group 1) (.2).</p> <p>Claims Administration & Objections</p>

Date	Indiv	Hours	Description
5/24/2023	AW	2.5	<p>Record responses to discovery and email confirmation to claimant (Group 2) (.2); respond to claimants regarding discovery requests inquiries (Group 2) (.8); respond to claimant regarding class action (defer) (.1); communicate with J. Wine regarding claims process (Group 2) (.3); communicate with J. Wine regarding trust agreement from claimant (1102 Bingham, 3074 Cheltenham, 4611 Drexel, 4528 Michigan, 7237 Bennett, 7255 Euclid, 7750 Muskegon) (.1); email claims vendor regarding duplicative claims in portal and follow up email exchanges regarding claims numbers (1700 Juneway, 5450 Indiana, 7237 Bennett, 7508 Essex, 7748 Essex, 7749 Yates, 7750 Muskegon, 7927 Essex) (.3); follow up with claims vendor regarding addition of claim to portal (11117 Longwood, 3030 E 79th, 3915 Kimball, 4019 Indiana, 4108 Monticello, 4109 Kimball, 4351 Calumet, 5001 Drexel, 7301 Stewart, 7500 Eggleston, 9531 Fairfield, SSDF4) (.1); review of claim, email J. Wine recommendation, and request further review from J. Rak (5450 Indiana, 6160 MLK, SSDF4) (.6).</p>
5/24/2023	JRW	5.9	<p>Claims Administration & Objections</p> <p>Attention to responding to claimant inquiries (set73) (.8); conference call with counsel for claimants regarding claims process and property groupings and prepare summary of discussion and related issues (1131 E 79th, 310 E 50th, 4520 Drexel, 5001 Drexel, 6160 MLK, 7024 Paxton, 7300 St. Lawrence) (.7); review claim against properties and related correspondence with A. Watychowicz and J. Rak (11117 Longwood, 2909 E 78th, 6250 Mozart, 7549 Essex, 8047 Manistee, SSDF4) (.1); confer with K. Duff and A. Watychowicz regarding claimant distribution lists and claimant correspondence regarding privacy concerns (1700 Juneway, 2909 E 78th, 3030 E 79th, 5450 Indiana, 6160 MLK, 6949 Merrill, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 7927 Essex, 8047 Manistee) (.2); analyze facts related to timing and sequence of asset conveyance, execution of mortgages and liens recorded against properties in relation to potential adjustment of property groupings and related preparation of memorandum and revised spreadsheet (set56) (2.9); conference with K. Duff and M. Rachlis regarding property groupings (set59) (.5); prepare summary of issues relating to Receiver's recommendation on Group 3 claims and related correspondence to A. Watychowicz (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee) (.7).</p>
5/24/2023	MR	1.5	<p>Claims Administration & Objections</p> <p>Conferences with K. Duff and J. Wine regarding upcoming filing and issues (set68) (.5); review materials in regards to upcoming submissions (set 68) (1.0).</p> <p>Claims Administration & Objections</p>

Date	Indiv	Hours	Description
5/25/2023	AW	2.9	Record responses to discovery and email confirmations to claimants (Group 2) (.5); communicate with claimant regarding group settings and Receiver's upcoming submission (Group 3) (.1); communicate with counsel regarding and respond to claimant regarding discovery requests inquiries and confidentiality issues (Group 2) (.2); update claim with documents from claimant's beneficiary and communicate regarding same with J. Wine and J. Rak (6160 MLK) (.3); review claims recommendations and email J. Wine comments regarding same (3030 E 79th, 7301 Stewart, 7500 Eggleston) (1.8).
			Claims Administration & Objections
5/25/2023	JR	1.1	Review email from A. Watychowicz regarding review of claims previously submitted for claimant for multiple properties (11117 Longwood, 2909 E 78th, 5450 Indiana, 6160 MLK, 6250 Mozart, 6355 Talman, 7549 Essex, 8047 Manistee, SSDF4).
			Claims Administration & Objections
5/25/2023	MR	0.4	Further review and attention to issues on claims process and request extension for submission (set 68).
			Claims Administration & Objections
5/26/2023	AW	0.4	Communicate with J. Wine regarding withdrawals issue and related research (3030 E 79th, 7301 Stewart, 7500 Eggleston).
			Claims Administration & Objections
5/26/2023	JR	4.2	Review email from J. Wine requesting review of claim submission (11117 Longwood, 2909 E 78th, 7549 Essex, 8047 Manistee).
			Claims Administration & Objections
5/29/2023	JR	4.5	Continue working on claims, review claims submissions for properties (4317 Michigan, 5201 Washington, 7237 Bennett, 7255 Euclid, SSDF6).
			Claims Administration & Objections
5/30/2023	AW	2.9	Record responses to discovery and email confirmations to claimants (Group 2) (1.6); respond to claimants regarding email group setup, clarification on received discovery responses, service of framing report (Group 2) (.4); communicate with claimant regarding group settings and Receiver's upcoming submission (Group 3) (.1); draft email and email response to claimant regarding class action (defer) (.2); research claims , communicate with K. Duff and later claimant's counsel regarding access to claims files (5450 Indiana, 7749 Yates) (.3); work with K. Duff on response to claimant's demand (5450 Indiana, 6160 MLK) (.3).
			Claims Administration & Objections
5/30/2023	JR	4.5	Continue working on claims, review claims submissions for properties (4611 Drexel, 701 S 5th, 7237 Bennett, 7834 Ellis).
			Claims Administration & Objections
5/30/2023	SZ	0.3	Attention to affidavit received from claimant (3074 Cheltenham, 6160 MLK, 7834 Ellis, 701 S 5th).
			Claims Administration & Objections

Date	Indiv	Hours	Description
5/31/2023	AW	1	Record responses to discovery and email confirmations to claimants (Group 2) (.7); follow up with claimant's counsel regarding access to claims (5450 Indiana, 7749 Yates) (.1); response to claimant's demand (5450 Indiana, 6160 MLK) (.1); attention to draft correspondence to K. Duff regarding requested claims files (5450 Indiana, 7749 Yates) (.1).
			Claims Administration & Objections
5/31/2023	JR	2.7	Continue working on claims, review claims submissions for properties (7237 Bennett) (2.5); review mailed claims submission as it relates to claim related questions, related correspondence with A. Watychowicz, forward electronic copy and file (2909 E 78th, 3030 E 79th, 6217 Dorchester, 6437 Kenwood, 7301 Stewart, 7237 Bennett, 7500 Eggleston, 7549 Essex, 7749 Yates, 8047 Manistee) (.2).
			Claims Administration & Objections

SUBTOTAL: [222.1 40,817.00]

Distributions

5/2/2023	JRW	0.3	Review draft motion to stay and related correspondence with K. Duff and M. Rachlis (Group 1).
			Distributions
5/2/2023	MR	0.4	Attention to stay issues on distribution (Group 1).
			Distributions
5/3/2023	JRW	0.3	Review motion to stay and compare to prior version and related correspondence with counsel for claimant (Group 1) (.2); confer with A. Watychowicz regarding Group 1 distribution order (Group 1) (.1).
			Distributions
5/3/2023	MR	0.1	Attention to orders regarding Group 1 distribution. (Group 1).
			Distributions
5/5/2023	AW	0.1	Attention to filed notice of appeal and motion to stay and related email to counsel (Group 1).
			Distributions
5/5/2023	MR	0.2	Further attention to stay filing (Group 1).
			Distributions
5/9/2023	JR	0.5	Exchange communication with K. Duff regarding research relating to motion to stay (Group 1).
			Distributions
5/10/2023	MR	1	Attention to motion to stay pending appeal (Group 1).
			Distributions
5/11/2023	JRW	0.2	Review draft response to motion to stay (Group 1).
			Distributions
5/11/2023	MR	0.3	Further attention to response on stay motion (Group 1).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Distributions
5/12/2023	JRW	1	Review redlines, further revise response to motion to stay, and related correspondence (Group 1) (.9); review response to motion to stay (Group1) (.1).
			Distributions
5/12/2023	MR	1.7	Further attention to response on stay motion and review related SEC submission (Group 1).
			Distributions
5/15/2023	AW	0.8	Revisions to Receiver's response to motion to stay, finalize and file with the Court (Group 1).
			Distributions
5/15/2023	JRW	1.5	Review multiple redlines and further revisions to response to motion to stay (Group 1).
			Distributions
5/15/2023	MR	2.6	Further review and work on response regarding stay issues and review of other related submissions (Group 1).
			Distributions
5/17/2023	AW	0.3	Email Receiver's response to motion to stay to claimants (Group 1).
			Distributions
5/22/2023	MR	0.3	Review reply on motion to stay (Group 1).
			Distributions
5/24/2023	JRW	0.3	Revise distribution schedule for Group 1 properties (3074 Cheltenham, 7201 Constance, 7625 East End, 7635 East End, 7750 Muskegon, SSDF6).
			Distributions

SUBTOTAL: [11.9 3,748.00]

Status Reports

5/1/2023	AW	0.1	Communicate with claimant regarding status report . Status Reports
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SUBTOTAL: [0.1 14.00]

Tax Issues

5/25/2023	KMP	0.3	Compile balance schedules for Receiver's and property accounts through March 31, 2023 and forward to tax administrator . Tax Issues
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SUBTOTAL: [0.3 42.00]

263.9 \$50,155.00

<u>Other Charges</u>	<u>Description</u>	
	Online research for May 2023	47.71
	Google suite for May 2023	144.00
		[191.71]
		\$191.71
SUBTOTAL:		
Total Other Charges		\$191.71

<u>Summary of Activity</u>			
	<u>Hours</u>	<u>Rate</u>	
Pritchard, Kathleen M.	5.70	140.00	\$798.00
Rachlis, Michael	17.10	390.00	\$6,669.00
Rak, Justyna	112.00	140.00	\$15,680.00
Watychowicz, Ania	53.90	140.00	\$7,546.00
Wine, Jodi Rosen	74.60	260.00	\$19,396.00
Stoja Zjalic	0.60	110.00	\$66.00

SUMMARY

Legal Services	\$50,155.00
Other Charges	\$191.71
TOTAL DUE	<hr/> \$50,346.71 <hr/> <hr/>

Rachlis Duff & Peel, LLC

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SUITE 900
CHICAGO, ILLINOIS 60605

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

August 2, 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. 6622159

Legal Fees for June 2023

\$83,301.00

Expenses Disbursed

\$221.65

Due this Invoice

\$83,522.65

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Accounting/Auditing</u>			
6/5/2023	KMP	0.9	Review status of resolution of returned check for utility payment relating to third restoration motion and research back-up documentation (4711 Drexel). Accounting/Auditing
6/6/2023	KMP	0.4	Communicate with K. Duff and J. Wine regarding issues relating to returned checks issued to collection agencies for payment of utility bills and related review of documents (4611 Drexel, 7201 Constance). Accounting/Auditing
6/7/2023	KMP	0.4	Communicate with K. Duff and bank representatives regarding return and reissuance of check for payment of utility bill, and prepare transmittal of unusable check to bank (4611 Drexel). Accounting/Auditing
6/12/2023	KMP	0.3	Prepare revised check request for payment to utility company in connection with third motion for restoration and related communications with K. Duff (4611 Drexel) (.2); exchange email correspondence with bank representative regarding reconciliation of account data (.1). Accounting/Auditing
6/13/2023	KMP	0.3	Further revise check request for payment to utility company in connection with third motion for restoration and related communications with K. Duff and bank representative (4611 Drexel). Accounting/Auditing
6/14/2023	KMP	0.3	Further revise check request for payment to utility company in connection with third motion for restoration and related communications with K. Duff and bank representative (4611 Drexel). Accounting/Auditing
6/15/2023	KMP	2.3	Communicate with K. Duff and bank representative regarding check request for payment to utility company in connection with third motion for restoration (4611 Drexel) (.3); review and download May account statements for Receiver's accounts and related communications with J. Rak (.4); work on reconciliation of Receiver's accounts, including verifying numerous transfers and payments made (1.4); work with S. Zjalic on preparation and transmittal of deposit to Receiver's account (.2). Accounting/Auditing
6/15/2023	SZ	0.4	Attention to insurance policy premium refund and deposit of the same to Axos. Accounting/Auditing
6/19/2023	KMP	1.4	Communicate with bank representative regarding discrepancy in interest reporting for certain property accounts and resolution of same (.2); prepare schedules of receipts and disbursements for April and June 2023 for Receiver's accounts (1.2). Accounting/Auditing

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/22/2023	KMP	0.3	Several exchanges with bank representative regarding interest accounting issue for certain property accounts, and related communications with K. Duff and J. Wine. Accounting/Auditing
6/23/2023	KMP	0.3	Attention to further exchanges with bank representative regarding interest accounting issue for certain property accounts, and related communications with K. Duff. Accounting/Auditing
SUBTOTAL:			[7.3 1,010.00]

Case Administration

6/5/2023	JRW	0.8	Begin reviewing tutorial and testing reporting functionality of claims review platform. Case Administration
6/6/2023	JRW	0.3	Conference call with claims vendor regarding updates on platform development. Case Administration
6/7/2023	JRW	2.3	Continued review of tutorial regarding reporting functionality of claims portal and related testing and report generation and telephone conferences with J. Rak and claims vendor . Case Administration
6/8/2023	JR	0.6	Exchange communication with J. Wine related to claims platform issues related to uploading files, communication with bank representative informing of same issues and requesting to resolve (set68). Case Administration
6/8/2023	JRW	0.1	Confer with J. Rak regarding documents uploaded to claims portal. Case Administration
6/9/2023	AW	0.3	Review receivership web page and email exchanges regarding update to postings. Case Administration
6/12/2023	AW	0.2	Attention to extension of deadline relating to revised proposed grouping of properties and update docket (.1); request further update to receivership web page (.1). Case Administration
6/12/2023	JRW	0.5	Exchange correspondence with claims vendor regarding database issue and related discussions with A. Watychowicz. Case Administration
6/12/2023	SZ	0.2	Email exchange with E. Duff regarding records for institutional lenders. Case Administration
6/13/2023	JRW	1	Prepare test reports from claims review portal.

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Case Administration
6/15/2023	AW	0.1	Attention to schedule entered by 7th Circuit and update docket.
			Case Administration
6/15/2023	JRW	0.2	Correspondence to B. Hines regarding status of upgrades to claims review portal.
			Case Administration
6/16/2023	AW	0.1	Communicate with claimant regarding email settings (Group 2).
			Case Administration
6/21/2023	AW	0.4	Prepare update to receivership web page and related email to IT consultant.
			Case Administration
6/22/2023	AW	0.1	Follow up with vendor regarding requested update to web page.
			Case Administration
6/23/2023	JRW	0.3	Exchange correspondence with claims vendor regarding database update and related review of ticketed items.
			Case Administration
6/26/2023	AW	0.2	Prepare update to web page.
			Case Administration
6/26/2023	JRW	0.5	Confer with J. Rak and claims vendor regarding portal updates (.1); confer with A. Watychowicz and J. Rak regarding list of unidentified class action claims and related review of document (.2); exchange correspondence regarding service issue (.1); confer with vendor regarding Excel issue (.1).
			Case Administration
6/29/2023	AW	0.2	Follow up on request to update web page and add additional pleadings to post.
			Case Administration
6/29/2023	JRW	1.3	Review portal alterations and update checklist.
			Case Administration
6/30/2023	JRW	0.6	Exchange correspondence with claims vendor regarding database updates (.2); research regarding bank records and related communications with A. Watychowicz (.4).
			Case Administration
SUBTOTAL:			[10.3 2,384.00]

Claims Administration & Objections

6/1/2023	AW	0.3	Record responses to discovery and email confirmations to claimants (Group 2) (.2); follow up with J. Wine regarding claims review (7844 Ellis, SSDF6) (.1).
			Claims Administration & Objections

Date	Indiv	Hours	Description
6/1/2023	JR	6.3	Continue working on claims, review claims submissions for properties (6217 Dorchester, 7237 Bennett, 7255 Euclid, 7834 Ellis, 8326 Ellis) (5.8); exchange communication with J. Wine and A. Watychowicz related to possible duplicate claims that were submitted after completing an extensive review of same (7237 Bennett) (.5).
			Claims Administration & Objections
6/2/2023	AW	0.5	Record responses to discovery and email confirmations to claimants (Group 2) (.4); email claimant regarding class action (defer) (.1).
			Claims Administration & Objections
6/2/2023	JR	2.6	Continue working on claims, review claims submissions for properties (4108 Monticello, 4528 Michigan, 6217 Dorchester, 6250 Mozart, 638 Avers, 7237 Bennett, 7255 Euclid, 7834 Ellis, 8326 Ellis).
			Claims Administration & Objections
6/2/2023	MR	0.1	Attention to issues regarding groupings of remaining properties (set56).
			Claims Administration & Objections
6/5/2023	AW	2.2	Email claimant regarding class action (defer) (.1); record responses to discovery and email confirmations to claimants (Group 2) (.4); prepare files for transfer and related communication with claimant's counsel (5450 Indiana, 7749 Yates) (.3); review proposed groupings and related email to J. Wine (set68) (1.2); communicate with J. Wine regarding review of claims records (Group 3) (.1); communicate with J. Wine regarding response to claimant (Group 3) (.1).
			Claims Administration & Objections
6/5/2023	JR	0.8	Continue working on claims, review claims submissions for properties (6250 Mozart, 7834 Ellis).
			Claims Administration & Objections
6/5/2023	JRW	4.7	Analysis of claims against property and related correspondence with J. Rak and K. Duff (7237 Bennett) (.6); confer with K. Duff and M. Rachlis regarding claims process and possible adjustments to same (set56) (.9); exchange correspondence with counsel for claimants regarding claims process (set56) (.2); confer with A. Watychowicz regarding property groupings and submission and related review of updated spreadsheet (set56) (.3); detailed review of claims against properties (3030 E 79th, 4533 Calumet, 6250 Mozart, 7301 Stewart, 7500 Eggleston) (.6); review updates to portal and revised status report on pending issues, and related correspondence with claims vendor (set68) (1.4); correspondence with A. Watychowicz regarding documents related to interest payments contained in database (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee) (.2); conduct database searches and send informal discovery request to claimant (3030 E 79th, 4533 Calumet, 7301 Stewart, 7500 Eggleston) (.5).
			Claims Administration & Objections

Date	Indiv	Hours	Description
6/5/2023	MR	0.9	Conferences with J. Wine and K. Duff regarding various issues relating to claimant and procedures and attention to various related exchanges (set56). Claims Administration & Objections
6/6/2023	AW	1.8	Record responses to discovery and email confirmations to claimants (Group 2) (1.4); review claims and communicate with claimant regarding proposed grouping of properties (4315 Michigan, 7748 Essex, 7749 Yates) (.2); communicate with counsel and claimant regarding communication issue and attention to solution (Group 2) (.2). Claims Administration & Objections
6/6/2023	JR	6.3	Communication with the team at bank related to claims portal, updates and status of future updates (set68) (.5); continue working on claims, review claims submissions for properties (11117 Longwood, 2909 E 78th, 6250 Mozart, 701 S 5th, 7237 Bennett, 7442 Calumet, 7549 Essex, 7749 Yates, 7834 Ellis, 8047 Manistee, SSDF4) (5.8). Claims Administration & Objections
6/6/2023	JRW	4.2	Study claims, related database research, and correspondence with A. Watychowicz regarding adjustments to master spreadsheet (3030 E 79th, 4520 Drexel, 7024 Paxton, 7026 Cornell, 7301 Stewart, 7500 Eggleston, 7546 Saginaw, 7749 Yates, SSDF1) (2.3); exchange correspondence with claimants' counsel and confer with K. Duff regarding related issues (1131 E 79th, 7024 Paxton) (.2); confer with K. Duff regarding fund (defer) (.1); exchange correspondence with K. Duff and A. Watychowicz regarding messages sent via email distribution list (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (.1); study title histories and documentation relating to properties (1131 E 79th, 4520 Drexel, 5001 Drexel, 7024 Paxton) (.5); attention to property grouping analysis (set56) (.8); review claim and related correspondence with J. Rak (7549 Essex, 2909 E 78th, 8047 Manistee) (.2). Claims Administration & Objections
6/6/2023	MR	0.2	Various emails regarding claims against fund (SSDF6). Claims Administration & Objections
6/6/2023	SZ	0.2	Attention to claimant's payment demand letters and related email exchange with the Receiver and A. Watychowicz (2909 E 78th, 4611 Drexel, 5450 Indiana, 6160 MLK, 6217 Dorchester, 701 S 5th, 7024 Paxton, 7549 Essex, 8047 Manistee). Claims Administration & Objections
6/7/2023	AW	1.7	Record responses to discovery and email confirmations to claimants (Group 2) (.8); communicate with counsel and respond to claimant regarding his revised and current claims (Group 3) (.1); communicate with claimants regarding Group 2 email settings (Group 2) (.1); research email list and confirm with claimants regarding communication issue (Group 2) (.5); update emailing list and related email to claimant (Group 2) (.1); communicate with claimant regarding proposed grouping of properties (11117 Longwood, 8326 Ellis) (.1).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
6/7/2023	JR	2.7	Update claim information as it relates to various claimants and properties, review claims submissions for properties (11117 Longwood, 2909 E 78th, 6250 Mozart, 701 S 5th, 7237 Bennett, 7442 Calumet, 7549 Essex, 7749 Yates, 7834 Ellis, 8047 Manistee, SSDF4) (.2); conduct further research for claim with conflicting claim information, communicate with J. Wine regarding same , continue working on claims, review claims submissions for properties (3030 E 79th, 7500 Eggleston, 7301 Stewart, 7546 Saginaw) (2.5).
			Claims Administration & Objections
6/7/2023	JRW	2.9	Correspondence with claimant regarding informal discovery request and related research and updating of records (3030 E 79th, 4533 Calumet, 7301 Stewart, 7500 Eggleston) (.4); detailed review of claims (2736 W 64th, 3030 E 79th, 3074 Cheltenham, 4533 Calumet, 5201 Washington, 6217 Dorchester, 6250 Mozart, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7301 Stewart, 7500 Eggleston, 7656 Kingston, 7748 Essex, 7750 Muskegon, 816 Marquette, 8201 Kingston, 8326 Ellis) (1.5); attention to claimant inquiries regarding Group 2 discovery and communications (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (.3); correspondence with K. Duff and claimants' counsel regarding potential settlement discussions (1131 E 79th, 7024 Paxton) (.1); confer with J. Rak regarding claims analysis (3030 E 79th, 7301 Stewart, 7500 Eggleston, 7546 Saginaw) (.3); correspondence to J. Rak regarding claims (11117 Longwood, 4108 Monticello, 7749 Yates) (.3).
			Claims Administration & Objections
6/8/2023	AW	1.3	Review proposed groupings of properties and communicate with J. Wine regarding same (set68) (.7); update resolved claims spreadsheet and related email to J. Wine (3723 W 68th, 61 E 92nd, 7953 Woodlawn) (.3); review claims and communicate with J. Wine regarding proposed update to claims list (11117 Longwood, 2909 E 78th, 5450 Indiana, 6160 MLK, 6250 Mozart, 7549 Essex, 8047 Manistee, SSDF4) (.3).
			Claims Administration & Objections
6/8/2023	JR	3.2	Continue working on claims, review claims submissions for properties (2909 E 78th, 3030 E 79th, 7051 Bennett, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7749 Yates, 8047 Manistee, SSDF8, Portfolio Mezzanine Lender, LLC) (2.5); communication with J. Wine relating to complex claim submission and analysis of same (7051 Bennet, Portfolio Mezzanine Lender, LLC, SSDF8) (.2); review email from J. Wine related to final review of claims and produce requested information related to claims for property (7749 Yates) (.5).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/8/2023	JRW	5.3	Prepare for and participate in conference with claimants' counsel regarding claims process for future groups and prepare summary of same (set56) (.8); exchange correspondence with J. Rak regarding continued work pursuant to claims process (set68) (.3); continued factual research regarding properties and related analysis of future property groups (set56) (1.9); confer with A. Watychowicz regarding claims against remaining properties (set56) (.1); telephone conference with K. Duff regarding submission on future claims groups (set56) (.4); detailed review of claims (11117 Longwood, 6250 Mozart, 6355 Talman, 7237 Bennett, SSDF2, SSDF4) (.5); detailed review of claims (5001 Drexel, SSDF2) (.7); update claim review notes (7237 Bennett) (.6).
			Claims Administration & Objections
6/8/2023	MR	0.3	Attention to issues for remaining groupings and issues raised by institutional lender claimants (set56).
			Claims Administration & Objections
6/9/2023	AW	3.4	Record responses to discovery and email confirmations to claimants (Group 2) (1.5); update email service list as per claimant's request (Group 2) (.1); email claimants' discovery requests and instructions on submission (Group 2) (.1); follow up with claimant regarding class action (defer) (.1); communicate with counsel and later with claimant regarding details of claim (Group 2) (.2); review claims against funds, organize mortgagees' spreadsheets, and related email to J. Wine (8100 Essex, SSDF2, SSDF4, SSDF6) (1.4).
			Claims Administration & Objections
6/9/2023	JR	3.1	Continue working on claims, review claims submissions for properties (2909 E 78th, 3030 E 79th, 701 S 5th, 7051 Bennett, 7301 Stewart, 7442 Calumet, 7500 Eggleston, 7549 Essex, 7749 Yates, 7834 Ellis, 8047 Manistee, SSDF8, Portfolio Mezzanine Lender, LLC) (2.5); update claim notes for claimant (7024 Paxton, 7026 Cornell, 7749 Yates, SSDF1) (.5); exchange communication with A. Watychowicz regarding creation of EBF mortgage spreadsheet as it relates to claims, produce same and further communication with A. Watychowicz (SSDF2) (.1).
			Claims Administration & Objections
6/9/2023	JRW	7	Confer with A. Porter regarding liens against property (7024 Paxton) (.3); confer with A. Watychowicz regarding claims (SSDF2) (.1); conference with K. Duff and M. Rachlis regarding potential adjustments to claims process and property groupings (set56) (1.4); conference with K. Duff and M. Rachlis regarding Group 2 discovery (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (.5); draft response to claimant inquiries regarding Group 2 discovery (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (.4); correspondence with K. Duff and M. Rachlis regarding claims against properties (1700 Juneway, 6160 MLK) (.2); work on preparation of submission regarding revised property groupings (set56) (1.8); continued analysis of claims in Group 3 (2909 E 78th, 7549 Essex, 8047 Manistee) (2.3).
			Claims Administration & Objections

Date	Indiv	Hours	Description
6/9/2023	MR	2.1	Review draft and conferences with J. Wine and K. Duff regarding groupings issues for submission (set56) (1.4); conferences with J. Wine and K. Duff regarding discovery (Group 2) (.5); attention to and conferences with K. Duff and J. Wine regarding claims (1700 Juneway, 6160 MLK) (.2). Claims Administration & Objections
6/11/2023	MR	0.6	Attention to proposed groupings of properties and follow up regarding same (set56). Claims Administration & Objections
6/12/2023	AW	3.9	Record responses to discovery and email confirmations to claimants (Group 2) (1.6); prepare and provide upload link for claimant's voluminous submission (Group 2) (.1); email claimant regarding class action (defer) (.1); communicate with claimant regarding details of his claim and claims process (5001 Drexel) (.1); review proposed groupings and communicate with J. Wine regarding sole claim (431 E 42nd) (.1); research emails and database regarding former EB employees who submitted claims and related emails with K. Pritchard and J. Wine (Group 2, Group 3) (1.3); research regarding received interest and related email to J. Wine (Group 3) (.4); follow up with counsel regarding request from claimant's counsel (Group 2) (.1); communicate with K. Pritchard regarding submitted claims (6437 Kenwood, 7749 Yates) (.1). Claims Administration & Objections
6/12/2023	ED	3.8	Review documents and email correspondence regarding financing history and claims of claimants (6160 MLK) (1.9); review documents and email correspondence regarding financing history and claims (6160 MLK) (1.9). Claims Administration & Objections
6/12/2023	JRW	7	Confer with A. Watychowicz regarding discovery (Group 2) (.2); work on submission regarding future property groupings and schedule and related exchanges of redlines and correspondence (set56) (2.3); attention to review of claim and related communications with A. Watychowicz (431 E 42nd) (.2); exchange correspondence with claimants' counsel regarding proposed schedule for future groups (set56) (.2); conference with K. Duff and M. Rachlis regarding proposed property groups and schedule (set56) (.9); confer with A. Watychowicz regarding informal discovery request (Group 3) (.1); confer with K. Duff, M. Rachlis and A. Watychowicz regarding claimant's request for documents (5450 Indiana, 7749 Yates) (.2); confer with A. Watychowicz regarding research into distributions to claimants (Group 3) (.3); confer with counsel for claimants regarding document productions (Group 2) (.1); correspondence to SEC regarding claims process schedule and groupings (set56) (.1); work on Receiver's recommendation regarding Group 3 claims (2909 E 78th, 7549 Essex, 8047 Manistee) (2.4). Claims Administration & Objections
6/12/2023	KMP	0.4	Research regarding claimant and related communications with A. Watychowicz (6437 Kenwood, 7749 Yates). Claims Administration & Objections

Date	Indiv	Hours	Description
6/12/2023	MR	5.9	Work on various drafts of claims submissions and groupings and exchanges regarding same with K. Duff and J. Wine (set56) (3.5); conferences regarding property groupings (set56) (.9); attention to issues regarding production and requests from claimant (5450 Indiana, 7749 Yates) (.1); conferences with K. Duff and J. Wine regarding production (5450 Indiana, 7749 Yates) (.2); review claims (1700 Juneway) (1.2). Claims Administration & Objections
6/13/2023	AW	6.3	Record responses to discovery and email confirmations to claimants (Group 2) (4.8); work with counsel on and communicate with claimant's counsel regarding access to emails (Group 2) (.2); update contact information for claimant's counsel (Group 2) (.1); email claimants' discovery requests and instructions on submission (Group 2) (.1); communicate with claimant regarding setting on his email that prevents communications from group email and provide upload link for voluminous files (Group 2) (.2); search database regarding interest return (Group 3) (.5); communicate with J. Wine regarding providing access for Group 2 claimants to standard discovery responses (Group 2) (.2); communicate with counsel regarding review of discovery responses (Group 1) (.1); draft information request email and consult with J. Wine regarding same (Group 3) (.1). Claims Administration & Objections
6/13/2023	JR	5.8	Continue working on claims, review claims submissions for properties (6217 Dorchester, 7834 Ellis, 8201 Kingston). Claims Administration & Objections
6/13/2023	JRW	4.8	Confer with A. Watychowicz regarding claimant discovery (Group 2) (.3); continued drafting and revision of submission regarding remaining claim groups and schedule and related exchange of redlines and discussions with team (set56) (2.8); telephone conference with SEC regarding claims process (set56) (.4); confer with A. Watychowicz regarding claimant inquiry (Group 2) (.1); confer with M. Rachlis regarding analysis of claim (1700 Juneway) (.5); work on analysis and generation of report regarding claims (7749 Yates) (.6); confer with A. Watychowicz regarding informal discovery request (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.1). Claims Administration & Objections
6/13/2023	MR	4.6	Meeting with J. Wine regarding and follow up regarding future groupings (set56) (.5); further work on revisions to proposed groupings of properties (set56) (1.8); conferences regarding groupings (set56) (.4); attention to issues regarding analysis of claim (1700 Juneway) (.6); conferences with J. Wine regarding analysis of claim (1700 Juneway) (.5); review claim (6949 Merrill) (.8). Claims Administration & Objections
6/13/2023	SZ	1.3	Attention to claim submission and related communication with J. Wine and A. Watychowicz (Group 2). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/14/2023	AW	2.9	Record responses to discovery and email confirmations to claimants (Group 2) (1.1); update email group to include additional counsel and attention to production (Group 2) (.3); attention to voluminous production and format of productions and communicate with counsel regarding same (Group 2) (.5); reach out to claimants to request additional documentation (Group 3) (.1); communicate with claimants regarding additional discovery requests (Group 2) (.2); call with E. Duff regarding produced documents and work to provide index of documents (6160 MLK) (.7). Claims Administration & Objections
6/14/2023	ED	3	Review and analysis of mortgage documents, releases, and related documentation relating to investor lenders' loans (6160 MLK) (1.2); review and analysis of discovery materials produced by lender (6160 MLK) (.7); prepare outline of notes and questions regarding discovery material for discussion with Receiver and counsel (6160 MLK) (.5); review files regarding communications with counsel (6160 MLK) (.6). Claims Administration & Objections
6/14/2023	JR	6.5	Continue working on claims, review claims submissions for properties, final review of EBF mortgagee sheets (5450 Indiana, 7834 Ellis, 7109 Calumet, 6160 MLK, 7026 Cornell, 7201 Dorchester, 4533 Calumet, 638 Avers, 4611 Drexel, 7237 Bennett, 6217 Dorchester, 7749 Yates, 8326 Ellis, 6437 Kenwood, 4315 Michigan, 6355 Talman, 701 S 5th, 7051 Bennett, 7442 Calumet, 7546 Saginaw, 7600 Kingston, 7701 Essex, 7748 Essex, 7957 Marquette, 8100 Essex, SSDF1). Claims Administration & Objections
6/14/2023	JRW	4.1	Exchange correspondence with claimants' counsel , A. Watychowicz and M. Rachlis regarding Group 2 discovery issues (1700 Juneway, 6949 Merrill) (.2); exchange correspondence with A. Watychowicz regarding claimant inquiries (Group 2) (.3); review and incorporate comments and further revise submission regarding claims process and various related communications with claimants' counsel , SEC, and K. Duff regarding proposal and suggested revisions thereto (set56) (1.4); attention to informal discovery requests (Group 3) (.3); conference with K. Duff and M. Rachlis regarding claims process proposal (set56) (.6); confer with E. Duff and A. Watychowicz regarding document production and related review of images and conference with K. Duff (6160 MLK) (.3); confer with J. Rak regarding claims review issues (7749 Yates) (.1); conference call with SEC , claimants' counsel and M. Rachlis regarding investigation of claims pending before court and discovery planning (Group 2) (.9). Claims Administration & Objections
6/14/2023	MR	4.6	Conference with J. Wine and K. Duff regarding proposal for groupings (set56) (.6); additional review and work on claims groupings (set56) (1.0); attention to claim (6949 Merrill) (.8); attention to discovery issues (1700 Juneway, 6949 Merrill) (.8); conference with J. Wine and counsel regarding discovery (Group 2) (.9); attention to opening appellate brief (Group 1) (.5). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/15/2023	AW	1.3	Call claimant and attention to email communication (Group 2) (.2); work with M. Rachlis on access to production of documents (1700 Juneway) (.1); attention to filed opening brief and separate appendix and related email to counsel (Group 1) (.1); prepare requested claims materials for K. Duff (6160 MLK) (.2); communicate with counsel regarding cloud storage and options for discovery documentation (set68) (.1); work with J. Wine and J. Rak regarding revisions to proposed grouping or remaining properties (set68) (.3); attention to claimant's request for oral argument and related email to counsel (Group 1) (.1); communicate with J. Wine and preliminary review regarding metrics about the discovery that was produced (Group 2) (.2).
			Claims Administration & Objections
6/15/2023	ED	1.9	Continue review of discovery documents produced (6160 MLK) (.7); prepare timeline and analysis relating to documents produced, for discussion with Receiver (6160 MLK) (1.1); confer with K. Duff regarding review of production documents (6160 MLK) (.1).
			Claims Administration & Objections
6/15/2023	JR	4.3	Continue working on claims, final review and updates to EBF mortgagee sheets (5450 Indiana, 1700 Juneway) (3.5); communication with A. Watychowicz related to Receiver's proposal regarding remaining claim group, study and file with the court (ser68) (.8).
			Claims Administration & Objections
6/15/2023	JRW	3	Confer with claimants' counsel regarding addition to claims process submission (set56) (.2); office conference with M. Rachlis and K. Duff regarding property groupings (set56) (.3); office conference with M. Rachlis and K. Duff regarding planning for July 6 hearing (Group 2) (.2); work with A. Watychowicz to finalize Receiver's submission regarding claims process for filing (set56) (.3); attention to claimant inquiry regarding class action settlement and related communication to class counsel (defer) (.3); confer with A. Watychowicz regarding claims process and potential changes thereto and related correspondence with claimants' counsel (set56) (.3); review and analyze claims for Receiver's recommendation regarding distribution (Group 3) (1.0); confer with M. Rachlis and K. Duff regarding issues relating to pending appeal and review related correspondence between M. Rachlis and claimants' counsel (Group 1) (.4).
			Claims Administration & Objections
6/15/2023	KMP	0.2	Communications with A. Watychowicz and J. Rak regarding filing of revised property groupings (Group 2, Group 3).
			Claims Administration & Objections
6/15/2023	MR	2.8	Attention to submission on groupings (set56) (.4); conference with K. Duff and J. Wine regarding proposed groupings of properties (set56) (.2); attention to discovery issues (Group 2) (.6); conference regarding upcoming hearing with K. Duff and J. Wine (Group 2) (.2); attention to claimant's appellate brief and conferences regarding same with K. Duff and J. Wine. (Group 1) (1.4).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/15/2023	SZ	0.2	Attention to claimant's voice message regarding his claim and exchange of communication with A. Watychowicz about his inquiry (2909 E 78th, 7549 Essex, 8047 Manistee). Claims Administration & Objections
6/16/2023	AW	0.8	Email claimant regarding class action (defer) (.1); communicate with counsel regarding email to claimants about proposed grouping of remaining properties (set68) (.1); email claimants regarding proposal regarding remaining groups (set68) (.3); communicate with counsel regarding feedback to filed proposed groupings (set68) (.1); email claimant regarding claims process and proposed groupings (7508 Essex) (.1); communicate with claimant regarding claims group email updates (Group 3) (.1). Claims Administration & Objections
6/16/2023	JR	2.3	Continue working on claims, final review and updates to EBF mortgagee sheets (1700 Juneway, 6160 MLK). Claims Administration & Objections
6/16/2023	JRW	7.2	Attention to claimant inquiries regarding discovery procedures (Group 2) (.2); detailed review of claims (2909 E 78th, 3030 E 79th, 4317 Michigan, 4520 Drexel, 4930 Cornelia, 7201 Dorchester, 7255 Euclid, 7301 Stewart, 7500 Eggleston, 7546 Saginaw, 7549 Essex, 7823 Essex, 8047 Manistee, 816 Marquette, SSDF4) (2.0); work on claims recommendations for Group 3 (2909 E 78th, 7549 Essex, 8047 Manistee) (3.1); work on claims recommendations for Group 3 (7927 Essex) (.4); prepare draft exhibit for Group 3 submission (Group 3) (1.1); review order and schedule for appeal (Group 1) (.1); review and revise draft motion for extension and related correspondence with counsel for claimants, M. Rachlis, and SEC (Group 1) (.3). Claims Administration & Objections
6/16/2023	MR	0.7	Further attention to appellate brief (Group 1). Claims Administration & Objections
6/17/2023	MR	1	Attention to draft submission regarding Group 3 claims and follow up regarding same (Group 3). Claims Administration & Objections
6/19/2023	AW	4.6	Communicate with claimants regarding proposed groupings and claims process (7051 Bennett, 7107 Bennett, Group 3, SSDF4) (.3); communicate with counsel regarding proposed email to claimants regarding received discovery responses and attention to proposed revisions (Group 2) (.2); detailed review of claims and research in database and related email to J. Wine (2909 E 78th, 7546 Saginaw, 7549 Essex, 8047 Manistee) (.8); review database documents to confirm interest payments and related email to J. Wine (7927 Essex) (1.9); research and communicate with M. Rachlis regarding production of documents (Group 2) (.6); prepare index of document and extract requested documents relating to claim from document production (1700 Juneway) (.8). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/19/2023	JR	4.4	Continue working on claims, final review and distribution updates to EBF mortgagee sheets (6160 MLK) (1.9); review emails from J. Wine regarding clarification of claim notes on various properties and confirm claims submitted from claimant (2909 E 78th, 7024 Paxton, 7300 St Lawrence, 7549 Essex, 7760 Coles, 7927 Essex, 8047 Manistee) (2.5). Claims Administration & Objections
6/19/2023	JRW	12	Work on claims recommendations for Group 3 (7927 Essex) (5.1); confer with K. Pritchard regarding account balances (Group 3) (.1); work with A. Watychowicz on procedure for sharing discovery responses with claimants (Group 2) (.1); analysis of potential additional discovery required and related exchange of correspondence with claimants' counsel and M. Rachlis (Group 2) (.4); confer with J. Rak regarding claim (2909 E 78th) (.2); conference call with K. Duff and M. Rachlis regarding Group 3 submission (Group 3) (.8); conference call with K. Duff and M. Rachlis regarding Group 2 discovery (Group 2) (.2); attention to claimant inquiry (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.1); confer with K. Pritchard regarding preparation of subpoenas (Group 2) (.2); continued preparation of charts supporting Receiver's submission on Group 3 and related analysis and communications (Group 3) (4.8). Claims Administration & Objections
6/19/2023	KMP	0.4	Review account information in banking portal to compile account balances for Group 3 properties and related communication with J. Wine (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee). Claims Administration & Objections
6/19/2023	MR	9.5	Conferences with J. Wine regarding Group 3 submission (Group 3) (.8); communicate with J. Wine regarding Group 2 discovery (Group 2) (.2); various exchanges on Group 2 discovery issues with J. Wine and counsel for claimants (Group 2) (.3); further work Group 3 submission and draft narrative (Group 3) (5.2); review document production (1700 Juneway) (3.0). Claims Administration & Objections
6/20/2023	AEP	1	Teleconference with K. Duff, M. Rachlis, and J. Wine regarding overview of facts associated with loan originations by private lenders in Group 2 claims process (Group 2). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/20/2023	AW	4.5	<p>Follow up with claimants regarding requested documents and supplement contact information (Group 3) (.2); email claimants regarding claims process and receiver's upcoming recommendation (Group 3) (.3); email response to claimant regarding his claim (8100 Essex) (.1); complete spreadsheet and prepare link to share with claimants regarding received discovery responses and produced documents and attention to emails and updates from claimants and related email exchanges with numerous claimants (Group 2) (2.2); follow up with M. Rachlis regarding produced documents (1700 Juneway) (.1); continued research regarding produced email communications and related email to M. Rachlis (1700 Juneway) (.3); review claim and communicate with J. Wine regarding proposed claims analysis update (6356 California) (.3); research regarding supporting documentation submitted with claim and related email to K. Duff (2909 E 78th) (.5); attention to accessing discovery responses and documents (Group 2) (.1); prepare draft email regarding Receiver's recommendation regarding Group 3 and related communications with counsel and K. Pritchard (Group 3) (.4).</p> <p>Claims Administration & Objections</p>
6/20/2023	JRW	7.3	<p>Review claimant's discovery responses and related correspondence with M. Rachlis (1700 Juneway) (.3); attention to claimant response to informal discovery request (2909 E 78th, 7549 Essex, 8047 Manistee) (.2); attention to claimant inquiry (Group 2) (.1); review and revise correspondence to claimants (Group 3) (.1); conference call with A. Porter, M. Rachlis, and K. Duff regarding analysis of claims and potential additional discovery needed (Group 2) (1.1); confer with A. Watychowicz regarding discovery (Group 2) (.1); exchange correspondence with claimant regarding informal discovery (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.3); review and revise narrative submission (Group 3) (2.1); work with K. Duff and M. Rachlis on exhibits supporting Receiver's recommendation regarding claims and continued analysis of same (Group 3) (3.0).</p> <p>Claims Administration & Objections</p>
6/20/2023	KMP	0.7	<p>Research and communication with A. Watychowicz regarding reporting relating to properties (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee) (.4); communicate with J. Wine regarding discovery for Group 2 properties and begin compiling documentation to issue subpoenas (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (.3).</p> <p>Claims Administration & Objections</p>
6/20/2023	MR	5.3	<p>Attention to discovery (1700 Juneway) (1.5); participate in meeting regarding discovery with A. Porter, K. Duff and J. Wine (1.1) (Group 2); continue review of claims and follow up regarding same (Group 3) (2.4); conferences with K. Duff regarding review of claims (Group 3) (.3).</p> <p>Claims Administration & Objections</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/21/2023	AW	6.6	Record responses to discovery and email confirmations to claimants (Group 2) (.3); attention to emails from claimants with clarifications regarding discovery responses, update shared files and spreadsheet, and related response emails to numerous claimants (Group 2) (2.8); communicate with claimant regarding claims process and receiver's recommendation (Group 3) (.1); communicate with claimants regarding proposed grouping (109 Laramie, 6250 Mozart) (.2); extensive review of claim and related email exchanges with counsel (4520 Drexel, 7024 Paxton, 7546 Saginaw) (1.1); communicate with counsel regarding additional discovery procedures (Group 2) (.1); research database for recorded assignment document and related email to counsel (Group 2) (.4); communicate with counsel regarding standard response to claimants regarding submissions including access (Group 2) (.2); communications with J. Wine and class counsel regarding submitted claims (defer) (.5); detailed research of claim and bank records to confirm amount invested (2909 E 78th, 7549 Essex, 8047 Manistee) (.6); follow up regarding pending response to claimant (Group 1) (.1); review claim and add claim to database (7748 Essex) (.1); attention to motion for leave to file amicus brief and related email to counsel (Group 1) (.1).
			Claims Administration & Objections
6/21/2023	JRW	2.9	Attention to claimant inquiries (Group 2) (.7); informal discovery exchange with claimant, review analysis from A. Watychowicz, and additional fact research (3030 E 79th, 7301 Stewart, 7500 Eggleston, 7546 Saginaw) (.4); work with K. Duff and M. Rachlis on recommendations regarding Group 3 claims and update charts (Group 3) (1.5); exchange correspondence with A. Watychowicz and class counsel regarding claim forms (defer) (.2); review and revise draft motion for extension and related correspondence (Group 1) (.1).
			Claims Administration & Objections
6/21/2023	KMP	2.3	Confer with A. Watychowicz regarding issues relating to upcoming filing of Group 3 submission and email notification to Group 3 claimants (Group 3) (.4); prepare subpoenas and riders for Group 2 discovery to title companies, compile related documentation, and forward materials to J. Wine (Group 2) (1.9).
			Claims Administration & Objections
6/21/2023	MR	3	Review and work on Group 3 claims submission (Group 3) (2.8); attention to motion to set schedules and emails on same (Group 1) (.2).
			Claims Administration & Objections
6/22/2023	JRW	11.1	Incorporate comments into internal notes regarding Receiver's recommendation and update exhibits to Group 3 submission accordingly (Group 3) (2.7); conference calls with K. Duff regarding analysis of claims (Group 3) (1.4); review revisions, incorporate comments, and further revise narrative submission (Group 3) (2.9); continued analysis of claims, related factual research, prepare notes and further update exhibits to Receiver's Group 3 submission (Group 3) (4.1).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/22/2023	KMP	2.4	Work with K. Duff, M. Rachlis, and J. Wine on Group 3 submission (Group 3) (1.8); finalize and file Group 3 submission and forward as-filed copy to EB team (Group 3) (.3); forward submission to Group 3 claimants via email (Group 3) (.3). Claims Administration & Objections
6/22/2023	MR	1.9	Attention to group 3 narrative and submission (Group 3) (1.7); further attention to motion on scheduling (Group 1) (.2). Claims Administration & Objections
6/23/2023	AW	0.2	Communicate with claimants regarding discovery responses (Group 2). Claims Administration & Objections
6/23/2023	ED	0.2	Email correspondence with J. Wine relating to document production and additional review and analysis required (6160 MLK). Claims Administration & Objections
6/23/2023	JRW	1.3	Review notes regarding claimants' document production and related exchange of correspondence with E. Duff regarding follow-up (6160 MLK) (.8); review correspondence from claimant and related follow-up correspondence to A. Watychowicz (.1); attention to claimant inquiry regarding Receiver's Group 3 recommendation (2909 E 78th, 7549 Essex, 8047 Manistee) (.2); correspondence with claimant's counsel regarding document productions (1700 Juneway, 6160 MLK) (.1); review motion and corrected motion for extension and related correspondence (Group 1) (.1). Claims Administration & Objections
6/23/2023	MR	0.3	Attention to filing on scheduling motion and corrected motion (Group 1) (.2); attention to issues regarding claimants (6949 Merrill) (.1). Claims Administration & Objections
6/25/2023	MR	1.9	Continue review of discovery documents (1700 Juneway). Claims Administration & Objections

Date	Indiv	Hours	Description
6/26/2023	AW	3.8	<p>Confirm received responses to discovery (Group 2) (.1); communicate with claimants and counsel regarding received claims in class action and resend requested claims (defer) (.2); communicate with numerous claimants regarding Receiver's submission (Group 3) (1.1); communicate with counsel and claimant regarding additional discovery (Group 2) (.2); communicate with J. Wine regarding reviewed claim and recommendation (6160 MLK) (.2); further review of claim and related email exchanges with counsel and claimant (4520 Drexel, 7024 Paxton, 7546 Saginaw) (.4); request confirmation of claimants' names in class action and follow up email exchanges with J. Wine and J. Rak (defer) (.2); review master claims sheet and Receiver's recommendation and related email to J. Wine (Group 3) (.7); communicate with J. Wine regarding production from claimant (6160 MLK) (.1); communicate with J. Wine regarding custodian issues and how to record updates properly (set73) (.1); email M. Rachlis regarding claimant's discovery responses (1700 Juneway, 6949 Merrill) (.1); review claimants' production and confirm same with claimants' counsel (Group 2) (.2); prepare index of documents and communicate with J. Wine and E. Duff regarding supplement production (6160 MLK) (.2).</p>
6/26/2023	ED	3.3	<p>Claims Administration & Objections</p> <p>Review lender discovery responses against prior interrogatory and document requests (6160 MLK) (.8); email correspondence with J. Wine relating to document production and additional discovery requests (6160 MLK) (.5); email correspondence with J. Rak regarding documentation of recording and release of liens (6160 MLK) (.1); review and analysis of additional documents and questions regarding lender discovery requests and production (6160 MLK) (.9); prepare draft of additional discovery requests (6160 MLK) (1.0).</p>
6/26/2023	JR	5.1	<p>Claims Administration & Objections</p> <p>Review email from A. Watychowicz requesting to review claimants self identified claims, review same and further communicate with A. Watychowicz (defer) (1.6); continue review of EBF mortgagee sheet and various claims submitted on various properties in preparation for transfer of data (1700 Juneway, 6160 MLK, 5450 Indiana) (2.0); review email from E. Duff requesting a search for public records related to property, perform search and further communicate with E. Duff and J. Wine with production of same (6160 MLK) (1.5).</p> <p>Claims Administration & Objections</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
6/26/2023	JRW	8.4	Confer with A. Watychowicz regarding claimant class action submission (defer) (.1); review claim and related correspondence regarding necessary amendment to Group 3 submission (1131 E 79th, 2909 E 78th, 7549 Essex, 8047 Manistee) (.7); confer with A. Watychowicz regarding document productions (Group 2) (.1); review and analyze claim and document production (5450 Indiana, 7749 Yates) (2.7); attention to claimant inquiry (6160 MLK) (.1); confer with E. Duff regarding analysis of production documents and related review of same (6160 MLK) (3.3); preparation of subpoenas and document riders and related discussions with M. Rachlis (Group 2) (1.0); attention to claimant inquiries (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.3); attention to claimant inquiry (4520 Drexel, 7024 Paxton, 7546 Saginaw) (.1).
			Claims Administration & Objections
6/26/2023	KMP	0.2	Communications with J. Wine regarding Group 2 discovery (Group 2).
			Claims Administration & Objections
6/26/2023	MR	11.1	Attention to review of thousands of pages of discovery documents produced by claimant (1700 Juneway) (8.0); review materials produced by claimant (6949 Merrill) (1.0); continued review of materials produced by claimant (5450 Indiana, 7749 Yates) (.7); attention to discovery generally and conferences with J. Wine regarding same (Group 2) (1.0); attention to order on appeal and follow up regarding same (Group 1) (.1); attention to submitted claims (2909 E 78th, 7549 Essex, 8047 Manistee) (.3).
			Claims Administration & Objections
6/27/2023	AW	4.4	Attention to emails from claimant with request for clarification regarding discovery responses, update shared files and spreadsheet, and related response email to claimant (Group 2) (.2); attention to and update claimant's contact information (Group 3) (.1); draft response and email claimant regarding receiver's submission (Group 3) (.2); communicate with counsel regarding proposed response to claimant (Group 1) (.1); follow up with counsel regarding claimant in class action (defer) (.1); follow up communication with J. Wine regarding custodian issues and updates (set73) (.1); redraft email to claimant regarding additional discovery and related email to J. Wine (6160 MLK) (.1); continued work on confirmation of names in class action and related email exchanges with counsel (defer) (.8); research and communicate with J. Wine and K. Pritchard regarding requests for documents (Group 2) (.3); attention to appellate court filings and related emails to counsel (Group 1) (.1); work with counsel to complete additional discovery requests to institutional lenders and email Group 2 regarding same and subpoenas issued to third-parties (Group 2) (2.3).
			Claims Administration & Objections
6/27/2023	ED	1.5	Review and revise documents regarding additional discovery (6160 MLK) (.7); telephone conference with M. Rachlis and J. Wine regarding additional discovery requests and subpoenas (Group 2) (.8).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
6/27/2023	JRW	8.8	Attention to several claimant inquiries (Group 2, Group 3) (.2); review and revise draft document rider (6160 MLK) (.3); confer with K. Pritchard regarding subpoenas and service issues (5450 Indiana, 7749 Yates) (.1); telephone conference with M. Rachlis and E. Duff regarding additional discovery requests (Group 2) (.8); attention to drafting, revising and finalizing requests for documents, subpoenas and notice pursuant to Rule 45 (Group 2) (6.5); database research regarding factual investigation and contact addresses (Group 2) (.7); confer with A. Watychowicz regarding communications with class counsel (defer) (.1); exchange correspondence with claimants' counsel regarding service of subpoenas (5450 Indiana, 7749 Yates) (.1).
			Claims Administration & Objections
6/27/2023	KMP	4.7	Work with K. Duff, M. Rachlis, J. Wine and A. Watychowicz on drafting, revising, finalizing and serving Group 2 discovery (Group 2).
			Claims Administration & Objections
6/27/2023	MR	8.1	Draft, review and revise discovery requests consistent with the Court ordered deadline, and various documents regarding same (Group 2) (7.0); conferences with E. Duff and J. Wine regarding discovery (Group 2) (.8); attention to issues regarding appeal on Group 1 and follow up on order on motion (Group 1) (.3).
			Claims Administration & Objections
6/28/2023	AW	0.6	Email claimant clarification regarding additional discovery (Group 2) (.1); communicate with J. Wine regarding Receiver's submission and proposed revision on Group 3 (Group 3) (.2); attention to appellate court filings and related emails to counsel (Group 1) (.1); communicate with J. Wine regarding post deadline submissions of discovery and record same (Group 2) (.2).
			Claims Administration & Objections
6/28/2023	JR	1.9	Continue working on claims, final review and distribution updates to EBF mortgagee sheets (6160 MLK).
			Claims Administration & Objections
6/28/2023	JRW	1.5	Review and revise transmittal letters for subpoenas (Group 2) (.1); telephone conference with A. Watychowicz regarding service issues (Group 2, Group 3) (.2); factual research regarding service of subpoena and related communications with K. Pritchard (5450 Indiana, 7749 Yates) (.2); prepare amended spreadsheet for Group 3 recommendation (Group 3) (.9); exchange correspondence regarding claimant inquiry (4520 Drexel, 7024 Paxton, 7546 Saginaw) (.1).
			Claims Administration & Objections
6/28/2023	KMP	1.5	Prepare instruction letters and service transmittals for Group 2 discovery, and related communication with J. Wine (Group 2).
			Claims Administration & Objections
6/28/2023	MR	0.6	Further attention to Group 2 subpoenas and service (Group 2) (.2); attention to jurisdictional submission and court order regarding appeal (Group 1) (.4).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
6/29/2023	AW	2.9	Communicate with J. Wine regarding and record responses to discovery and email confirmations to claimants (Group 2) (.3); email claimant regarding receiver's submission and time to respond (Group 3) (.1); finalize Receiver's amended submission, file with the court and related email to claimants (Group 3) (.9); draft and response to claimant regarding claims process (Group 1) (.2); further review of Receiver's submission and exhibits to same and related email exchanges with J. Wine (Group 3) (.7); finalize Receiver's revised submission, file with the Court, and email claimants regarding same (Group 3) (.6); draft email to claimant regarding Receiver's recommendation and related exchange with counsel (Group 3) (.1).
			Claims Administration & Objections
6/29/2023	JR	5.9	Continue working on claims, final review and distribution updates to EBF mortgagee sheets (6160 MLK).
			Claims Administration & Objections
6/29/2023	JRW	2.7	Confer with M. Rachlis regarding Group 1 distribution issues (Group 1) (.2); prepare amended submission and recommendation on claims and related communications with A. Watychowicz (Group 3) (.6); confer with A. Watychowicz regarding discovery responses (Group 2) (.1); exchange correspondence with claimants' counsel regarding service of subpoenas (5450 Indiana, 7749 Yates) (.2); attention to claimant inquiry regarding distributions (Group 1) (.2); confer with A. Watychowicz regarding email to claimants (Group 3) (.1); detailed review of claims against properties (109 Laramie, 1700 Juneway, 2909 E 78th, 3915 Kimball, 5209 Warwick, 7442 Calumet, 7549 Essex, 7600 Kingston, 8047 Manistee, 8326 Ellis, SSDF4) (1.3).
			Claims Administration & Objections
6/29/2023	KMP	0.4	Attention to communications with claimant's counsel regarding Group 2 discovery and communications with J. Wine regarding service transmittals for Group 2 discovery (Group 2) (.2); review and comment on amended submission with respect to Group 3 claims (Group 3) (.2).
			Claims Administration & Objections
6/29/2023	MR	0.4	Conferences regarding upcoming hearing (set68) (.2); further attention to issues on service (5450 Indiana, 7749 Yates) (.2).
			Claims Administration & Objections
6/30/2023	AW	1.5	Communicate with claimant's counsel regarding update to email and forward emails directed to group (Group 3) (.2); research regarding claimed amount and related email to counsel (Group 3) (.6); obtain information and communicate with class action counsel regarding claimants' classification (defer) (.7).
			Claims Administration & Objections

Date	Indiv	Hours	Description
6/30/2023	JR	7	Continue working on claims, final review and distribution updates to EBF mortgagee sheets (6160 MLK, 6949 Merrill) (1.3); extensive review of claims, communication with J. Wine and A. Watychowicz regarding claim, update records (6160 MLK, 6250 Mozart) (1.7); review claims submissions for properties (701 S 5th) (1.5); communication with J. Wine requesting to review and update claim review checklist with Group 3 property claim submissions (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7927 Essex, 8047 Manistee) (2.5).
			Claims Administration & Objections
6/30/2023	JRW	2.5	Database research regarding distributions related to claims against property (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.6); exchange correspondence with claimants' counsel regarding meet and confer on discovery responses (5450 Indiana, 7749 Yates) (.1); exchange correspondence with claimants' counsel regarding subpoena (5450 Indiana, 7749 Yates) (.1); exchange correspondence with J. Rak regarding claim review issue (6160 MLK, 6250 Mozart) (.2); telephone conference with J. Rak regarding claims review and discovery issues (Group 2, Group 3) (.3); telephone conference with claimants' counsel regarding upcoming hearing and proposal to streamline proceedings (6949 Merrill) (.3); review court order changing hearing date, related voice message and email exchange with courtroom deputy and SEC and discussions with M. Rachlis and K. Duff (Group 2) (.6); draft motion to reschedule hearing (Group 2) (.3).
			Claims Administration & Objections
6/30/2023	MR	1.3	Attention to issues regarding upcoming hearing regarding claims (set68) (.7); several conferences and exchanges with J. Wine and K. Duff (set68) (.6).
			Claims Administration & Objections
SUBTOTAL:			[329.2 79,556.00]

Distributions

6/7/2023	JRW	0.2	Exchange correspondence with K. Duff regarding updated analysis of claim and prepare amended distribution plan (3074 Cheltenham). Distributions
6/7/2023	MR	0.2	Attention to issues on distribution (Group 1). Distributions
6/23/2023	MR	0.3	Attention to issues on Group 3 distribution (Group 3). Distributions
6/27/2023	JRW	0.1	Confer with A. Watychowicz regarding process for verifying lender names prior to distributions (set73). Distributions
6/29/2023	MR	0.2	Conference with J. Wine on Group 1 distribution (Group 1). Distributions

SUBTOTAL:

	_____	_____
	[1	351.00]
	347.8	\$83,301.00

Other Charges

Description

Business Operations

Google suite for June 2023 144.00

SUBTOTAL: [144.00]

Claims Administration & Objections

Online research for June 2023 77.65

SUBTOTAL: [77.65]

Total Other Charges \$221.65

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Jodi Wine	116.90	260.00	\$30,394.00
Ania Watychowicz	57.10	140.00	\$7,994.00
Justyna Rak	68.80	140.00	\$9,632.00
Kathleen M. Pritchard	20.10	140.00	\$2,814.00
Stoja Zjalic	2.30	110.00	\$253.00
Andrew E. Porter	1.00	390.00	\$390.00
Ellen Duff	13.70	390.00	\$5,343.00
Michael Rachlis	67.90	390.00	\$26,481.00

SUMMARY

Legal Services	\$83,301.00
Other Charges	\$221.65
TOTAL DUE	\$83,522.65