UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 20-CIV-21964-CMA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TCA FUND MANAGEMENT GROUP CORP., *et al.*,

Defendants.
_____/

RECEIVER'S FIRST INTERIM OMNIBUS APPLICATION FOR ALLOWANCE AND PAYMENT OF PROFESSIONAL FEES AND REIMBURSEMENT OF EXPENSES FOR MAY 11, 2020 THROUGH JUNE 30, 2020

Jonathan E. Perlman, as court-appointed Receiver (the "Receiver") over the Receivership Defendants TCA Fund Management Group Corp. ("TCA") and TCA Global Credit Fund GP, Ltd. ("GP") (TCA and GP are hereinafter referred to collectively as "Defendants") and Relief Defendants TCA Global Credit Fund, LP ("Feeder Fund LP"), TCA Global Credit Fund, Ltd. ("Feeder Fund Ltd.," and with Feeder Fund LP, "Feeder Funds"), TCA Global Lending Corp. ("Global Lending"), and TCA Global Credit Master Fund, LP ("Master Fund," together with Feeder Funds, and Global Lending, the "Funds") (Defendants and the Funds are hereinafter referred to collectively as the "Receivership Entities"), pursuant to this Court's order appointing the Receiver [ECF No. 5], files his First Interim Omnibus Application for Allowance and Payment of Professional Fees and Reimbursement of Expenses for May 11, 2020 through June 30, 2020 (the " First Application").

PRELIMINARY STATEMENT

By this First Application, the Receiver seeks Court approval to pay Genovese Joblove & Battista, P.A ("GJB"), Collas Crill, Yip Associates, Development Specialists Inc. ("DSI"), Rehmann, and E-Hounds, Inc. (collectively, the "Retained Professionals") fees and reimbursement of expenses. The Receiver and his Retained Professionals have taken on this engagement at significantly discounted rates. In addition, after consultation with the SEC, GJB and Collas Crill have voluntarily discounted their initial fees for this First Application period by an additional 10%, and DSI has further discounted its fees for this First Application period by an additional $10,000. In addition, the Receiver and his Retained Professionals have agreed to a 20% holdback for the benefit of the Receivership Estate. Accordingly, the amounts the Receiver seeks approval to pay at this time are: (1) $421,089.84 to GJB (including the Receiver's time); (2) $193,907.70 to Collas Crill; (3) $17,946.40 to Yip Associates; (4) $117,990.56 to DSI; (5) $28,655.20 to Rehmann; and

(6) $20,342.40 to E-Hounds, Inc.[1] Additionally, the Receiver seeks approval to pay reimbursement of $5,048.29 in expenses, for a total payment of $804,980.39.

As described more fully herein and in the Receiver's First Interim Report. [ECF No. 48], this is an extremely complex and vast receivership. Additionally, the Receiver is working through various challenges resulting from the ongoing Coronavirus pandemic.

The nature of this case has required careful time management by the professionals involved because of the need to resolve issues efficiently and economically. The speed required for quick identification of assets demanded that the Receiver task many members of his team to the case in the early weeks of the receivership. Consequently, the number of hours expended during the time covered by the initial fee application is usually higher than those in subsequent applications, during which the receivership can take on a slower pace. At that point, the Receiver will likely task fewer members of his team to the case, and those engaged will have to spend fewer hours per billing period on the case.

The Receiver is currently managing 60 special purpose vehicle related entities (the "SPVs"), registered in a number of jurisdictions.[2] The Receivership Estate has a total of 69 portfolio loan files and currently oversees six employees and six contractors. The Receiver is participating on behalf of Receivership Entities in approximately 48 active litigation proceedings in various jurisdictions across the country and internationally, including two Canadian bankruptcy proceedings, two Canadian foreclosure actions, one Australian proceeding, one appeal, and one class action lawsuit. Additionally, parallel competing liquidation proceedings are taking place in the Cayman Islands. Against this backdrop, the Receiver and his professionals have recovered

[1] This First Application seeks approval of the entire amounts, as discounted, for the Receiver and his Retained Professionals, including the 20% being held back.
[2] 60 SPV related entities likely distills down to about 47 entities as some of these entities may be either dissolved or dormant. The Receiver is currently investigating these entities.

$13,634,117.34 to date, which is being maintained in the Receiver's bank accounts. In short, this Receivership is much more complicated than other receiverships that simply involve securing and liquidating non-operational assets.

As more fully described herein and in the Receiver's First Interim Report, the professionals have provided valuable services, billed at significantly reduced rates, taken voluntary reductions in the fees sought, and are entitled to reasonable payment of the fees and reimbursement of their expenses.

I. BACKGROUND

On May 11, 2020, the Securities and Exchange Commission ("SEC") filed a complaint [ECF No. 1] (the "Complaint") in the United States District Court for the Southern District of Florida alleging that the Defendants engaged in various conduct in violation of Section 17(a) of the Securities Act of 1933 (the "Securities Act"), 15 U.S.C. § 77q(a), and Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act"), and 15 U.S.C. § 78j(b), and Exchange Act Rules 10b-5, 17 C.F.R § 240.10b-5; and TCA violated Sections 206(1), (2), and (4), and 207 of the Investment Advisers Act of 1940 (the "Advisers Act"), 15 U.S.C. §§ 80b-6(1), 80(b)-6(4), and 80b-7, and Advisers Act Rules 206(4)-7 and 206(4)-8, 17 C.F.R. §§ 275.206(4)-7, 275.206(4)-8. [ECF No. 1 at ¶ 9].

According to the Complaint, since 2010 and continuing through at least November 2019, Defendants fraudulently engaged in revenue recognition practices that inflated Master Fund's revenue and the Funds' net asset value ("NAV"). Defendants caused the Funds to report to investors that the Funds were profitable every month, with an ever-increasing NAV. In fact, according to the Complaint, the booking of loan fees at the time of term sheet execution artificially inflated the NAV—at some points in time by as much as $29 million. The booking of investment

banking revenue at the time of agreement execution inflated the NAV by at least $130 million as of November 2019. The inflated performance and NAV values were provided to investors, and the inflated asset values were included in forms ("Forms ADV") that Defendants filed with the SEC.

On May 11, 2020, upon the SEC's Motion for Appointment of Receiver [ECF No. 3], the Court entered an order [ECF No. 5] appointing Jonathan E. Perlman, Esq. as the Receiver over the Receivership Entities (the "Receivership Order), which empowers the Receiver to, among other things, "engage and employ persons in Receiver's discretion to assist Receiver in carrying out Receiver's duties and responsibilities. . . ." [ECF No. 5 at § II ¶ 5.F]. The Receivership Order also provides that the Receiver may solicit persons and entities to assist the Receiver in carrying out his duties under the Receivership Order, with a Court order authorizing such engagement. [*Id*. at § XIV ¶ 52]. Moreover, the Receiver and his Retained Professionals are entitled to reasonable compensation and expense reimbursement from the receivership estate, subject to approval of the Court. [*Id.* at § XIV ¶ 53].

The Receivership Order directs the Receiver to file "within forty-five (45) days after the end of each calendar quarter" applications for reasonable compensation. [*Id.* at § XIV ¶ 54]. The Receiver believes there are funds available to pay the Retained Professionals, which will not take away resources from operating, maintaining and preserving the assets of the Receivership Entities.

II. INFORMATION ABOUT APPLICANTS AND FIRST APPLICATION

This First Application has been prepared in accordance with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (the "Billing Instructions"). Pursuant to the Billing Instructions, the Receiver states as follows:

(a)	Time period covered by the First Application:	May 11, 2020 – June 30, 2020
(b)	Date of Receiver's appointment:	May 11, 2020

(c) Date services commenced: May 11, 2020

(d) Names and rates of all professionals: *See* Exhibit 4(a) – (f)

(e) Interim or Final Application: Interim

(f) Records supporting fee application: *See* Exhibit 5

The following exhibits are provided in accordance with the Billing Instructions:

Exhibit 1: Receiver's Certification

Exhibit 2: SEC's Standard Fund Accounting Report ("SFAR")

Exhibit 3: Total compensation and expenses requested; any amounts previously requested; and total compensation and expenses previously awarded

Exhibit 4: Fee Schedule: Names and Hourly Rates of Retained Professionals and Paraprofessionals & Total Amount Billed for each Retained Professional and Paraprofessional:

Exhibit 4(a): Genovese Joblove & Battista, P.A.

Exhibit 4(b): Collas Crill

Exhibit 4(c): Yip Associates

Exhibit 4(d): Development Specialists, Inc.

Exhibit 4(e): Rehmann

Exhibit 4(f): E-Hounds, Inc.

Exhibit 5: The Retained Professionals' time records for the time period covered by this First Application, sorted in chronological order, including a summary and breakdown of the requested reimbursement of expenses:

Exhibit 5(a): Genovese Joblove & Battista, P.A.

Exhibit 5(b): Collas Crill

Exhibit 5(c): Yip Associates

Exhibit 5(d): Development Specialists, Inc.

Exhibit 5(e): Rehmann

Exhibit 5(f): E-Hounds, Inc.

III. CASE STATUS

A. Cash on hand.

The amount of cash in the Receivership bank accounts as of the date of filing this First Application is $13,430,798.66.

B. Summary of creditor claims proceedings.

The Receiver has not yet established a formal claims process. The unique nature of this Receivership may present the need for multiple classifications of claims. This claims process will be developed over time and submitted to the Court for approval when finalized.

C. Description of assets.

In additional to the descriptions provided herein, for detailed information about the assets of the Receivership Estate, the Receiver respectfully refers the Court and interested parties to the First Interim Report filed on or about August 4, 2020. [ECF No. 48].

D. Description of liquidated and unliquidated claims held by the Receiver.

The Receiver continues to review potential causes of action against the principals of the Receivership Entities and various third parties. These claims may include common law claims and claims under fraudulent transfer statutes. While the Receiver cannot yet predict the likelihood, amount, or cost-effectiveness of particular claims or the claims as a whole, the Receiver continues to diligently evaluate claims against third parties.

IV. THE PROFESSIONALS

A. Genovese Joblove & Battista, P.A.

GJB is a 40-lawyer law firm with offices in Miami, Fort Lauderdale, Tampa, and Caracas, Venezuela. The Receiver's team at GJB has decades of experience handling all aspects of

bankruptcies and receiverships, including representing receivers, trustees, committees, and defrauded investors. Thus, in addition to being adept at operating businesses in receivership/bankruptcy, GJB has significant experience (1) prosecuting director and officer liability claims, complex fraud claims, fraudulent transfer claims, and claims for accounting and legal malpractice, and (2) investigating and pursuing claims and assets in connection with all varieties of deceptive schemes, including recovery of those assets. At GJB, the Receiver has ready access to professionals who specialize in complex commercial litigation, insolvency, bankruptcy, foreign liquidation proceedings, real estate, corporate, and other pertinent practice areas. The Receiver has used these professionals' expertise to administer the Receivership Estate.

The Receiver is a partner at the law firm of GJB and leads GJB's Receivership, Securities and Class Action Litigation Practice Group. The Receiver has practiced law for over thirty years; specializes in receivership, fraudulent and deceptive practices, and securities law; and has been appointed receiver in numerous cases in federal court.

At the Receiver's request, GJB has agreed to reduce its billing rate and the rates of its professionals for this case. Instead of their standard partner billing rates, which range from $400.00 to $745.00, in this case all partners (including the Receiver) are billed at the significantly reduced hourly rate of $340.00. Associates rates, which normally range from $285.00 to $425.00, have been set at $265.00 per hour. Paraprofessionals, who regularly bill at rates anywhere from $120.00 to $195, are billed at the hourly rate of $100.00. Lastly, the paraprofessional who handles the receivership hotline and all investor communications is billed at the reduced hourly rate of $50.00. As an additional benefit to the Receivership Estate, the Receiver and GJB are not requesting reimbursement for the work by certain members of the receiver's team employed by GJB who regularly provide critical functions in IT, internal accounting, and consumer relations. During the

period covered by this First Application, the Receiver and GJB billed 2,032.80 hours for fees totaling $584,847.00.[3] Based upon discussions with the SEC, GJB and the Receiver agreed to reduce their fees for this First Application period by 10% (i.e., $58,484.70), for a total amount of fees to be approved of $526,362.30. GJB and the Receiver have also agreed to holdback 20% of their fees sought at this time, and seek payment of $421,089.84. GJB and the Receiver also seek reimbursement of expenses in the amount of $4,974.34, for a total of $426,064.18 to be paid at this time.

B. Collas Crill

Stephen Leontsinis and Rocco Cecere, partners at the law firm Collas Crill located in the Cayman Islands are special litigation counsel to the Receiver for the parallel liquidation proceedings taking place in the Cayman Islands. Mr. Leontsinis is the Head of the Dispute Resolution Department at Collas Crill and the Managing Partner of the Cayman Islands office. He has significant litigation experience arising from the representation of liquidators and receivers, as well as shareholders and creditors of companies and hedge funds. Mr. Leontsinis' experience includes the claw back of fraudulent conveyances and undue preferences, allegations of investment fraud, and investment manager disputes. Mr. Cecere is an offshore commercial litigator, specializing in international insolvency, restructuring, and investment funds disputes. He has extensive experience conducting complex cross-border litigation, often involving fraud and asset tracing.

Collas Crill has also agreed to reduce the rates of its professionals for this case. Instead of the standard hourly billing rate of $950.00, all partners are billed at the hourly rate of $725.00. Counsel hourly rates, which are normally $850.00, have been set at $675.00. Senior associate

[3] GJB's blended hourly rate is $287.71.

hourly rates, which are normally $800.00, have been set at $650.00. Associate hourly rates, which are normally $650.00, have been set at $600.00. Paraprofessionals, who regularly bill at $320.00 per hour, are set at the hourly rate of $290.00. This represents a significant reduction from Collas Crill's standard billing rates and, for this First Application period, the Receivership Estate will save $94,978.75- due to this significant reduction. During the period covered by this First Application, Collas Crill billed 484.2 hours and seeks payment of fees in the amount of $269,316.25.[4] Based upon discussions with the Receiver, Collas Crill agreed to reduce their fees for this First Application period by 10% (i.e., $26,931.63), for a total amount of fees to be approved of $242,384.62. Collas Crill has also agreed to holdback 20% of their fees sought at this time, for a total of $193,907.70 to be paid at this time.

C. Yip Associates

Maria M. Yip, CPA, CFE, CIRA, CFF and the accounting firm Yip Associates provide accounting and forensic work for the Receiver. Ms. Yip's practice specializes in forensic accounting, financial investigations, receiverships and other fiduciary roles, bankruptcy related matters, and valuations. She has conducted numerous forensic and fraud investigations, and has served as an accountant and financial advisor to receivers appointed in numerous SEC, CFTC, and FTC matters. Ms. Yip is also a panel trustee for the United States Bankruptcy Court in the Southern District of Florida. Ms. Yip has agreed to reduce the rates of her professionals to the following hourly rates: $340.00 for Partners, $295.00 for Directors, $245.00 for Managers and Senior Associates, $195.00 for Associates, and $100.00 for Paraprofessionals. During the period covered by this First Application, Yip Associates billed 77.3 hours and seeks approval of fees in the amount

[4] Collas Crill's blended hourly rate for May 13, 2020 through May 20, 2020 is $327.74 and from May 21, 2020 through June 29, 2020 is $670.83.

of $22,433.00.[5] Yip Associates has agreed to holdback 20% of their fees sought at this time, and seeks payment of $17,946.40 to be paid at this time.

D. Development Specialists, Inc.

Joseph Luzinski of DSI has been retained as the Chief Restructuring Officer (the "CRO") and is responsible for the day-to-day management of the TCA Fund Management Corporation and TCA Global Credit Fund GP, Ltd. and certain affiliated entities as is necessary to the administration of the Receivership Estate. Mr. Luzinski is an expert financial advisor, consultant, and fiduciary with more than thirty years' of hands on business experience successfully advising, managing, and administering matters involving public and private companies' workout and restructuring out of court and in Chapter 11 and Chapter 7 bankruptcies, receiverships, assignments, and federal and state court proceedings. DSI has agreed to reduce the rates of its professionals to the following range of hourly rates: between $436.00 to $680.00 for the Senior Managing Director; between $280.00 to $428.00 for Directors/Managing Directors; and between $120.00 to $300.00 for Associates/Senior Associates. In additional to the rate reduction, all time billed to long distance travel is reduced by an additional 50%.

During the period covered by this First Application, DSI billed 362.20 hours and seeks approval of fees in the amount of $157,488.20.[6] Based upon discussions with the Receiver, DSI agreed to reduce the amount of fees to be approved for this First Application period by $10,000, for a total amount of $147,488.20. DSI agreed to holdback 20% of payment of their approved fees at this time, and seeks payment in the amount of $117,990.56. DSI also seeks reimbursement of expenses in the amount of $73.95, for a total of $118,064.51 to be paid at this time.

[5] Yip Associates' blended hourly rate is $293.33.
[6] Development Specialists, Inc.'s blended hourly rate is $434.81.

E. Rehmann

Rehmann and Mr. Mitch Hall provide tax accounting and business analysis services to the Receiver for the Receivership Entities. Mr. Hall is an Executive and a member of the firm's Turnaround, Restructuring, and Insolvency Practice. He is licensed as both an accountant and a lawyer in the State of Florida and has extensive experience in bankruptcy and receivership matters, aiding in recovery of millions of dollars for victims of fraudulent schemes perpetrated at home and abroad. He is also a member of the American Bankruptcy Institute and the National Association of Federal Equity Receivers, where he currently serves on the IRS Committee. Rehmann has agreed to reduce the rates of its professionals to the following hourly rates: $300.00 for Executives, $215.00 for Seniors, $150.00 for Staff, and $75.00 for Administrative. In additional to the rate reduction, all time billed to long distance travel is reduced to $150.00 per hour. During the period covered by this First Application, Rehmann billed 122.6 hours and seeks approval of fees in the amount of $35,819.00.[7] Rehmann has agreed to holdback 20% of their fees sought at this time, and seeks payment of $28,655.20.

F. E-Hounds, Inc.

E-Hounds, Inc. and Adam Sharp provide data storage and electronic data management for the extensive amount of electronic information in the Receivership. Mr. Sharp is the CEO and founder of E-Hounds, Inc. and has been qualified as an expert and/or has provided sworn testimony in nearly 170 cases. Additionally, E-Hounds, Inc. has successfully recovered data for several thousand clients globally and has provided forensic services for over 5000 clients since 1999, including several court appointments. E-Hounds, Inc. has agreed to reduce the rates of its professionals to the following hourly rates: $300.00 for Standard, $300.00 for Expert Consultants,

[7] Rehmann's blended hourly rate is $292.16.

$95.00 to $195.00 for File Conversion per gigabyte, $225.00 for Intake and Preservation per media, and $1000.00 for Triage Service per computer. During the period covered by this First Application, E-Hounds, Inc. seeks approval of fees in the amount of $25,428.00. E-Hounds, Inc. has agreed to holdback 20% of their fees sought at this time, and seeks payment of $20,342.40.

V. SUMMARY OF SERVICES RENDERED DURING THE FIRST APPLICATION PERIOD

Summaries of the services rendered during the First Application Period are provided below. More detailed information of the services provided are included in the Retained Professionals' time records which are attached hereto as Exhibits 5(a) – (f).

A. The Receiver and Genovese Joblove & Battista

Receiver and GJB have separated their time into the activity categories provided in the Billing Instructions. Narrative summaries of these activity categories are provided below.

Asset Analysis and Recovery

Asset Analysis and Recovery consists of the identification and review of potential assets including causes of action and non-litigation recoveries. The Receiver and GJB initially familiarized themselves with the operations of the Receivership Entities and the extent of the Receivership assets. The Receiver and GJB analyzed documents and researched potential claims against third parties, prepared document demands to financial institutions and third parties whom may be holding receivership assets, and filed the Complaint and Judgment of Permanent Injunction and Other Relief [ECF No. 7] in the federal districts where Receivership property is located, pursuant to 28 U.S.C. § 754. The Receiver located accounts at financial institutions, which were not part of the Receivership Estate, and brought those funds into the Receivership Estate. The Receiver and his professionals also took control of receivership property located in various storage units and are actively working to auction the property for the benefit of the Receivership Estate

and the investors.

In accordance with the Receivership Order, the Receiver and GJB identified financial accounts associated with the Receivership Entities, advised the financial institutions of the existence of the Receivership Estate and the asset freeze ordered by the Court. Additionally, the Receiver liquidated bank accounts and opened new accounts, which were under the Receiver's control. The Receiver immediately transferred the funds he recovered to the Receiver's new TCA operating accounts to address cash flow issues, pay employees and to operate the existing lawful businesses. To date, the Receiver has recovered $13,636,436.80 for the Receivership Estate.

Additionally, the Receiver is currently managing 60 SPVs registered in a number of jurisdictions. The Receivership Estate also has a total of 69 portfolio loan files. The Receiver is participating on behalf of Receivership Entities in approximately 48 active litigation proceedings in various jurisdictions across the country and internationally, including two Canadian bankruptcy proceedings, two Canadian foreclosure actions, one Australian proceeding, one appeal, and one class action lawsuit.

Business Operations

Business Operations covers the issues related to operation of the ongoing legitimate Receivership Entities' businesses. The Receiver retained DSI to manage the day-to-day operations of the SPVs and Receivership Entities. The Receiver confers with the DSI team regularly and reviews weekly reports from the SPVs to assess these assets and formulate a plan to preserve and maximize their value to the Receivership Estate.

The Receiver and GJB professionals also worked on numerous operational issues with the Receivership Entities, including working with DSI on the management of the Receivership Entities, addressing employment issues relating to payroll, and analysis of cash flow.

Case Administration

Case Administration includes coordination and compliance activities, preparation of reports and responding to investor inquiries. Within the first couple of weeks of the Receivership, the Receiver and GJB drafted a letter to all known investors and potential creditors and conducted targeted meetings with creditors, contractors and interested parties. The Receiver and other attorneys at GJB continue to respond personally to inquiries, usually through e-mail and telephone calls.

Since the Receiver cannot respond to every inquiry, the Receiver has established a toll-free investor hotline, an email address for general inquiries, and a website to provide up to date information for investors and interested parties. The Receiver has posted copies of court filings and other pertinent information on the website. The Receiver continually posts on his website. The Receiver also prepared and posted his First Interim Report on the website.

Employee Benefits/Pensions

Employee Benefits/Pensions covers issues such as severance, retention, 401K coverage and continuance of pension plans. The Receiver directed GJB professionals who specialize in employee benefits to review issues related to employees' 401K plans and respond to employee inquiries. Additionally, GJB attorneys communicated with the 401K plan administrator for the Receivership Entities regarding termination of the 401K plan.

Tax Issues

Tax issues includes the analysis of tax issues and preparation of state and federal tax returns. The Receiver and GJB professionals attended to many issues relating to the Receivership Entities' tax filings in communication with the retained tax accountant, Mitch Hall, including Receivership Entities' tax liabilities, pre-Receivership handling of tax issues, IRS issues relating

to certain SPVs, and execution of various IRS forms on behalf of the Receivership Entities. Additionally, GJB professionals worked in conjunction with the tax accountant to develop a strategy regarding the tax issues of the Receivership Entities on a going forward basis.

Banking

Banking coves issues related to general banking matters, document requests to various financial institutions, as well as fund transfers to the Receivership Entities' bank accounts. The Receiver and GJB professionals created new bank accounts for the Receivership Entities and transferred funds to the new accounts. Additionally, the Receiver and GJB secured loan documents, requested all documents available on the Receivership Entities pre-Receivership bank accounts, and delivered the documents to Yip Associates for their review.

Open Litigation Matters

To the extent possible, the Receiver and GJB has divided its litigation efforts into specific matters for each pending active litigation. *See* Exhibit 5(a).

As of the date of filing this First Application, the Receivership Entities are involved in approximately 48 active litigation or bankruptcy proceedings, including two Canadian bankruptcy proceedings, two additional Canadian foreclosure actions, one appeal, one Australian litigation proceeding, and a class action lawsuit. Additionally, of the 48 active cases, 19 are currently pending in Broward County, Florida, and those actions include 46 gigabytes of materials (which amounts to over 22,000 documents).

The Receiver and the GJB attorneys reviewed the case memoranda for each case the Receivership Entities are currently involved in (provided by the Receivership Entities' prior counsel) in order to understand each individual proceeding and develop a case strategy. Additionally, GJB attorneys reviewed dockets for upcoming deadlines, filed the Receivership

Order in various jurisdictions, as well as filed substitutions of counsel in the proceedings. The Receiver and his professionals have participated extensively in litigation decisions, meetings and conferences regarding strategy and case administration, as well as case management decisions. Moreover, joint liquidation proceedings are taking place in the Cayman Islands. In order to clearly identify the time spent on Cayman Island proceedings, the Receiver and GJB created a specific sub-matter for the Cayman Island proceedings, as described below.

General Litigation

General litigation covers all matters directly relating to the pending SEC litigation, including preparation, review, and modification of pleadings; drafting motions to approve retained professionals; and interviews and review of documents relating to the relevant whistleblower action. Additionally, the Receiver and GJB monitored all of the filing in this case and participated in matters which relate to the operation of the Receivership Entities.

Cayman Islands Litigation

On May 13, 2020, the Grand Court of the Cayman Islands appointed Joint Official Liquidators ("JOLs") over TCA Global Credit Fund, Ltd. a Receivership Entity after the Complaint was filed and after the Receivership Order was entered on May 11, 2020. On April 1, 2020, a Feeder Fund Ltd. purported creditor, Banque Pictet & Cie, S.A., a Swiss entity purportedly on behalf of a holding company incorporated in the Isle of Man, filed a petition for liquidation ("Banque Petition") before the Grand Court of the Cayman Islands.

Under the terms of the Winding Up Order, the JOLs are given a range of powers. Significantly, Paragraph 9 of the Winding Up Order states that "*[t]he Liquidators shall have the authority and are directed to take all reasonable steps to take control of the Company's subsidiary, TCA Global Lending Corp., including by exercising voting or other rights attached to the shares*

in that subsidiary." (emphasis added). Under paragraph 6(d) of the Winding Up Order, the JOLs are given power to obtain recognition of the JOLs and/or their appointment in any other relevant jurisdictions.

The appointment of the JOLs created several unique circumstances, and comity of laws issues, which required the Receiver to retain counsel in the Cayman Islands; decided whether or not take steps to marshal and protect receivership assets and gain control over the Receivership Entities incorporated in the Cayman Islands through the Cayman court for the ultimate benefit of the defrauded investors; and diligently research and understand issues with regard to these joint liquidation proceedings, including purported attempts by the JOLs to assert control over the assets of Receivership Entities located in the U.S. through Chapter 15 proceedings and seek concurrent control over Receivership assets located in the United States and foreign jurisdictions. Additionally, the Receiver and GJB, with counsel from Collas Crill, drafted prosed agreements in the Cayman Islands liquidation proceeding between concurrent fiduciaries over TCA Global Credit Fund, Ltd. (the "Protocols").

B. Collas Crill

Collas Crill has separated its time into the activity category provided below due to the highly specialized work Collas Crill undertakes for the Receiver. A narrative summary of this activity is provided below:

Cayman Islands – General Litigation

On May 13, 2020, the Grand Court of the Cayman Islands appointed Joint Official Liquidators ("JOLs") over TCA Global Credit Fund, Ltd. a Receivership Entity after the Complaint was filed and after the Receivership Order was entered on May 11, 2020. On April 1, 2020, a Feeder Fund Ltd. purported creditor, Banque Pictet & Cie, S.A., a Swiss entity purportedly

on behalf of a holding company incorporated in the Isle of Man, filed a petition for liquidation ("Banque Petition") before the Grand Court of the Cayman Islands.

Under the terms of the Winding Up Order, the JOLs are given a range of powers. Significantly, Paragraph 9 of the Winding Up Order states that "*[t]he Liquidators shall have the authority and are directed to take all reasonable steps to take control of the Company's subsidiary, TCA Global Lending Corp., including by exercising voting or other rights attached to the shares in that subsidiary*." (emphasis added). Under paragraph 6(d) of the Winding Up Order, the JOLs are given power to obtain recognition of the JOLs and/or their appointment in any other relevant jurisdictions.

The appointment of the JOLs created several unique circumstances, and comity of laws issues, which required the Receiver to retain counsel in the Cayman Islands; decided whether or not take steps to marshal and protect receivership assets and gain control over the Receivership Entities incorporated in the Cayman Islands through the Cayman court for the ultimate benefit of the defrauded investors; and diligently research and understand issues with regard to these joint liquidation proceedings, including any attempts by the JOLs to assert control over the assets of Receivership Entities located in the U.S. through Chapter 15 proceedings, foreign jurisdictions, and seek to usurp the powers of this Court over the same assets.

Additionally, the Receiver and GJB, with counsel from Collas Crill, drafted proposed agreements in the Cayman Islands liquidation proceeding between concurrent fiduciaries over TCA Global Credit Fund, Ltd. (the "Protocols"). Collas Crill also drafted filings for the liquidation proceedings in the Cayman Islands, is the main point of contact for the JOLs, and attended meetings with regard to the joint liquidation proceedings on behalf of the Receiver.

C. Yip Associates

Yip Associates has separated its time into the activity category provided in the Billing Instructions. A narrative summary of this activity category is provided below:

Forensic Accounting

Forensic Accounting comprises restructuring books and records from past transactions, bringing accounting current, and tracing and sourcing assets. Yip Associates analyzed asset flows and cash transactions; reviewed bank statements, corporate documents, tax records for the Receivership Entities, and audit files; and prepared summaries for entities related to the Receivership Entities.

Ms. Yip and her professionals analyzed hundreds of bank records in order to trace any disbursement of funds to third parties. Ms. Yip and her professionals also prepared a vast database of records.

D. Development Specialists, Inc.

DSI has separated their time into the activity categories provided in the Billing Instructions. Narrative summaries of these activity categories are provided below:

Asset Analysis and Recovery

Asset Analysis and Recovery consists of the identification and review of potential assets including potential causes of action and non-litigation recoveries. DSI reviewed loan portfolios and engaged in extensive communications with TCA employees and borrowers in order to assess the initial value of the portfolio assets. DSI spent significant amount of time overseeing and analyzing the SPVs in order to begin the process of maximizing the value of these assets.

Business Analysis

Business Analysis covers preparation and review of company business plans, development

and review of ongoing business strategies, and preparation and review of cash flow forecasts and feasibility studies. In addition to the day-to-day operational role of DSI, Mr. Luzinski and his team prepared cash flow forecasts for the Receivership Entities, engaged in weekly meetings to assess the current business overview, project pipeline, and cash flow situation for the SPVs and portfolio assets, and reviewed cash flow statements, bank records, financial statements, and other documents to assess and analyze the data related to the SPV and loan portfolio.

Monthly Bktcy/Semi-Annual Rpts

Monthly Bktcy/Semi-Annual Rpts covers the work DSI did with regard to initial case management and set up, as well as creation of accounting software templates, Quickbooks review, and evaluation of existing cash reporting and accounting functions.

Business Operations

Business Operations cover the issues related to operation of the Receivership Entities' operating businesses. DSI oversees the six employees and six contractors employed by the Receivership Entities, and makes recommendations to the Receiver for the ongoing the day-to-day operations of the Receivership Entities' businesses including cash flow preparation, fund management strategy for loan payments and processing, payroll processing, cash disbursement requests, and Receivership Estate operational needs. Mr. Luzinski and his professionals currently manage the 60 SPVs, registered in a number of jurisdictions, and the Receivership Estate's loan portfolio files.

Managing Foreign Operations

DSI and its professionals worked with GJB and Collas Crill to draft the Protocols.

E. Rehmann

Rehmann has separated their time into the activity categories provided in the Billing

Instructions. Narrative summaries of these activity categories are provided below:

Tax Issues

Tax issues includes analysis of tax issues and preparation of tax returns. Mr. Hall and his professionals reviewed the tax returns and confirmed the timing and requirements for filings for the Receivership Entities. Mr. Hall and his professionals gathered information needed to prepare tax forms, prepared tax forms, reviewing outstanding tax issues, and coordinated tax compliance matters.

Business Analysis

Business Analysis covers preparation and review of company business plan, development and review of strategies, preparation and review of cash flow forecasts and feasibility studies. Rehmann and Charles Hoebeke III worked with GJB professionals to develop a strategy regarding the Cayman Islands liquidation proceeding, as well as other offshore matters including issues regarding related entities in the United Kingdom.

F. E-Hounds, Inc.

E-Hounds. Inc. has separated its time into the activity category provided below due to the highly specialized work E-Hounds, Inc. undertakes for the Receiver. A narrative summary of this activity is provided below:

Data Retrieval/Litigation Support

E-Hounds, Inc. and its professionals provided data intake services for the Receiver including: photographing and documenting computers, laptops, phones, etc. in order to document and access key components; forensic imaging of digital media; and ongoing storage and maintenance of electronic devices and associated forensic images. E-Hounds, Inc. and its professionals also extracted relevant data from Receivership Entities' technology and provides an

"in-house" review system, which allows the Receiver to access and review specific data sets through an encrypted website interface. Lastly, E-Hounds, Inc. and its professionals assisted in taking over and managing the pertinent IT from the Receivership Entities.

VI. MEMORANDUM OF LAW

The Receiver and his professionals are entitled to reasonable compensation and expenses, pursuant to the Receivership Order. Receivership courts have traditionally determined reasonableness by utilizing the familiar lodestar approach, calculating a reasonable hourly rate in the relevant market and the reasonable number of hours expended. *See, e.g., S.E.C. v. Aquacell Batteries, Inc.*, No. 6:07-cv-608-Orl-22DAB, 2008 WL 276026, *3 (M.D. Fla. Jan 31, 2008); *see also Norman v. Hous. Auth.*, 836 F.2d 1292, 1299-1302 (11th Cir. 1988).[8] The hourly rates billed by the Receiver and his professionals are reasonable for professionals practicing in the Southern District of Florida. The Receiver has reduced his standard rate by $200.00 per hour and the rates of the GJB professionals by $405.00 to $20.00 (depending on the individual's standard rate). All Retained Professionals have also significantly reduced their rates. These reductions have resulted in a substantial savings to the receivership estate.

"In general, a reasonable fee is based on all circumstances surrounding the receivership." *SEC v. W. L.Moody & Co., Bankers*, 374 F. Supp. 465, 480 (S.D. Tex. 1974), *aff'd*, 519 F.2d 1087 (5th Cir. 1975); ("[T]he court may consider all of the factors involved in a particular receivership in determining an appropriate fee." *Gaskill v. Gordon*, 27 F.3d 248, 253 (7th Cir. 1994). "In determining the amount of their compensation, due consideration should be given to the amount

[8] The law in this circuit for assessing the reasonableness of fees is set out in *Norman v. Hous., Auth. of Montgomery*, 836 F.2d 1292 (11th Cir. 1988). According to *Norman*, the starting point in determining an objective estimate of the value of professional services is to calculate the "lodestar" amount, by multiplying a reasonable hourly rate by the number of hours reasonably expended. *Id*. at 1299 (citing *Hensley v. Eckerhart*, 461 U.S. 424, 433, 103 S.Ct. 1933, 76 L.Ed.2d 40 (1983)).

realized, as well as the labor and skill needed or expended, and other circumstances having a bearing on the question of the value of the services." *Sec. & Exch. Comm'n v. Striker Petroleum, LLC* (N.D. Tex., 2012) (citing *City of New Orleans v. Malone*, 12 F.2d 17, 19 (5th Cir. 1926)). Part of "determining the nature and extent of the services rendered," however, includes an analysis as to the reasonableness of the services rendered, bearing in mind the nature of a receivership. As the Supreme Court has noted:

> The receiver is an officer of the court, and subject to its directions and orders . . . [H]e is . . . permitted to obtain counsel for himself, and counsel fees are considered as within the just allowances that may be made by the court. . . . So far as the allowances to counsel are concerned, it is a mere question as to their reasonableness. The compensation is usually determined according to the circumstances of the particular case, and corresponds with the degree of responsibility and business ability required in the management of the affairs intrusted to him, and the perplexity and difficulty involved in that management.

Stuart v. Boulware, 133 U.S. 78, 81-82 (1890).

The circumstances of this receivership are unique. The Receiver quickly needed to assess the financial situation of the Receivership Entities and determine how to preserve the facilities in order to maximize the value of the assets for the benefit of the investors and creditors. Within the first few weeks of the receivership, the Receiver responded to the concerns of the investors, creditors, and employees. The Receiver relied on his business skills and the expertise of attorneys specializing in international insolvency, creditors' rights, fraud, commercial litigation, and employee benefits. The Receiver utilized the skills of forensic accountants and specialists in information technology to create an accurate representation of the finances and trace transfers of the investors' funds. The Receiver also retained attorneys in the Cayman Islands to assist with the parallel liquidation proceedings taking place there.

In addition to fees, the receiver is "also entitled to be reimbursed for the actual and necessary expenses" that the receiver "incurred in the performance of [its] duties." *Fed. Trade*

Comm'n v. Direct Benefits Grp., LLC, No. 6:11-cv-1186-Orl-28TBS, 2013 WL 6408379, at *3 (M.D. Fla. Dec. 6, 2013). The Receiver and his professionals support their claims for reimbursement of expenses with "sufficient information for the Court to determine that the expenses are actual and necessary costs of preserving the estate." *Sec. & Exch. Comm'n v. Kirkland*, No. 6:06-cv-183-Orl-28KRS, 2007 WL 470417, at *2 (M.D. Fla. Feb. 13, 2007) (citing *In re Se. Banking Corp.*, 314 B.R. 250, 271 (Bankr. S.D. Fla. 2004)).

A receiver appointed by a court who reasonably and diligently discharges his duties is entitled to be fairly compensated for services rendered and expenses incurred. *See SEC v. Byers*, 590 F.Supp.2d 637, 644 (S.D.N.Y. 2008); *see a SEC v. Elliott*, 953 F.2d 1560 (11th Cir. 1992) ("[I]f a receiver reasonably and diligently discharges his duties, he is entitled to compensation."). As more fully described herein and supported by the time records, the Receiver and his professionals have reasonably and diligently discharged their duties, and provided a benefit to the Receivership Estate, the investors, and creditors.

WHEREFORE, the Receiver seeks entry of an Order granting an award of fees and costs to GJB for fees in the amount of $526,362.30 ($421,089.84 payable now), and costs in the amount of $4,974.34; Collas Crill for fees in the amount of $242,384.62 ($193,907.70 payable now); Yip Associates, Inc. for fees in the amount of $22,433.00 ($17,946.40 payable now); Development Specialists, Inc. for fees in the amount of $147,488.20, ($117,990.56 payable now), and costs in the amount of $73.95; Rehmann for fees in the amount of $35,819.00 ($28,655.20 payable now); and E-Hounds, Inc. for fees in the amount of $25,428.00 ($20,342.40 payable now). As noted above, the Receiver requests authorization to pay only 80% of the fees awarded, with a 20% holdback of the fees awarded to be paid at a later date, and 100% of the costs awarded to the professionals during the period of this First Application.

LOCAL RULE CERTIFICATION

Pursuant to Local Rule 7.3, the Receiver hereby certifies that he has conferred with counsel for Plaintiff, the Securities and Exchange Commission. The Securities and Exchange Commission has no objection to the First Application. A hearing is requested only in the event that someone files an objection thereto.

/s/ Jonathan E. Perlman
Jonathan E. Perlman, Esq., Receiver

Respectfully submitted this 28th day of August, 2020.

/s/ Jonathan E. Perlman
Jonathan E. Perlman, Esq., Receiver

-and-

GENOVESE JOBLOVE & BATTISTA, P.A.
Attorneys for Jonathan E. Perlman, Esq., Court-appointed Receiver
100 Southeast 2nd Street, 44th Floor
Miami, FL 33131
Tel: (305) 349-2300
Fax: (305) 349-2310

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served on all counsel of record identified on the attached Service List via transmission of Notices of Electronic Filing generated by CM/ECF this 28th day of August, 2020

/s/ Jonathan E. Perlman
Jonathan E. Perlman, Receiver

SERVICE LIST
Securities and Exchange Commission v. TCA Fund Management Group Corp., et al.
Case No. 20-Civ-21964-CMA

Gregory M. Garno, Esq.
ggarno@gjb-law.com
Heather L. Harmon, Esq.
hharmon@gjb-law.com
Irina R. Sadovnic, Esq.
isadovnic@gjb-law.com
GENOVESE JOBLOVE & BATTISTA, P.A.
100 Southeast 2nd Street, Suite 4400
Miami, Florida 33131
Telephone: (305) 349-2300
Facsimile: (305) 349-2310
Attorneys for Jonathan E. Perlman, Receiver

Andrew O. Schiff
schiffa@sec.gov
Stephanie N. Moot
moots@sec.gov
Attorneys for Plaintiff Securities and Exchange Commission
801 Brickell Avenue, Suite 1950
Miami, Florida 33131
Telephone: (305) 982-6300
Facsimile: (305) 536-4146

12455-001/3207602/9

Exhibit “1”

CERTIFICATION

STATE OF FLORIDA)
) SS:
COUNTY OF MIAMI-DADE)

BEFORE ME, the undersigned authority, personally appeared JONATHAN E. PERLMAN (the "Applicant"), who, after first having been duly sworn, deposes and says:

1. The Applicant is a shareholder in the law firm of Genovese, Joblove & Battista, P.A. ("GJB") and the Receiver in this action. This Certification is based on the Applicant's first-hand knowledge of and review of the books, records and documents prepared and maintained by GJB in the ordinary course of its business. The Applicant knows that the facts contained in this Application regarding work performed by the Receiver and his staff and the facts contained in this Certification are true, and the Applicant is authorized by GJB to make this Certification. Having reviewed the time records and data which support the Application, the Applicant further certifies that said Application is well grounded in fact and justified.

2. The billing records of GJB which are attached to this Application are true and correct copies of the records maintained by GJB. These records were made at or near the time the acts, events, conditions or opinions described in such records occurred or were made. The Applicant knows that the records were made by persons with knowledge of the transactions or occurrences described in such records or that the information contained in the records was transmitted by a person with knowledge of the transactions or occurrences described in the records. The records were kept in the ordinary course of the regularly conducted business activity of GJB and it is the regular business practice of GJB to prepare these records.

3. To the best of the Applicant's knowledge, information and belief formed after reasonable inquiry, this motion and all fees and expenses herein are true and accurate and comply with the Billing Instructions for Receivers in Civil Actions Commenced by the SEC.

4. All fees contained in this Application are based on the rates listed in the fee schedule attached hereto and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed.

5. The Applicant has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission).

6. In seeking reimbursement for a service which GJB justifiably purchased or contracted for from a third party, the Applicant requests reimbursement only for a service which the Applicant justifiably purchased or contracted for from a third party, the Applicant requests reimbursement only for the amount billed to the Applicant by the third-party vendor and paid by the Applicant to such vendor. If such services are performed by the Applicant, the Applicant will certify that he is not making a profit on such reimbursable service.

7. The fees and expenses included herein were incurred in the best interest of the Receivership Estate.

JONATHAN E. PERLMAN, Receiver

12455-001 / #1744

Exhibit “2”

STANDARDIZED FUND ACCOUNTING REPORT for TCA Global - Cash Basis
Receivership; Civil Court Case No. 20-21964
REPORTING PERIOD 01/01/2020 TO 08/27/2020

FUND ACCOUNTING (See Instructions):				
		Detail	Subtotal	Grand Total
Line 1	**Beginning Balance (As of 01/01/20)**			$0.00
	Increases in Fund Balance:			
Line 2	**Business Income**	$51,772.12		
Line 3	**Cash and Securities**	$13,496,906.08		
Line 4	**Interest/Dividend Income**	$17,749.26		
Line 5	**Business Asset Liquidation**	-		
Line 6	**Personal Asset Liquidation**	-	-	
Line 7	**Third-Party Litigation**	-	-	
Line 8	**Miscellaneous - Other**	$67,689.88		
	Total Funds Available (Lines 1-8):		$13,634,117.34	$13,634,117.34
	Decreases in Fund Balance:			
Line 9	**Disbursements to Senior Secured Lenders/Investors**	-	-	
Line 10	**Disbursements for Receivership Operations**			
Line 10	*Internal Loans*	-		
Line 10a	*Disbursements to Receiver or Other Professionals*			
	1. Fees:	-		
	Receiver	-		
	Legal Advisers	-		
	Accountants	-		
	Consultants	$1,625.00		
Line 10b	*Business Asset Expenses*	$201,693.68		
Line 10c	*Personal Asset Expenses*	-		
Line 10d	*Hospital Settlements & Investment Expenses*	-		
Line 10e	*Third-Party Litigation Expenses*	-		
	1. Attorney Fees	-		
	2. Litigation Expenses	-		
	Total Third-party Litigation Expenses		-	
Line 10f	*Tax Administrator Fees and Bonds*	-		
Line 10g	*Federal and State Tax Payments*	-		
	Total Disbursements for Receivership Operations		$203,318.68	$203,318.68
Line 11	**Disbursements for Distribution Expenses Paid by the Fund:**	-	-	
Line 11	*Distribution Plan Development Expenses*	-		
Line 11a	*Distribution Plan Development Expenses:*	-		
	1. Fees:	-		
	Fund Administrator	-		
	Independent Distribution Consultant (IDC)	-		
	Receiver	-		
	Legal Advisers	-		
	Accountants	-		
	Consultants	-		
	2. Administrative Expenses	-		
	3. Approved Living Allowance	-		
	4. Miscellaneous	-		
	Total Plan Development Expenses		-	
Line 11b	*Distribution Plan Implementation Expenses:*	-		
	1. Fees:	-		
	Fund Administrator	-		
	IDC	-		

	Receiver	-		
	Legal Advisers	-		
	Accountants	-		
	Consultants	-		
	2. Administrative Expenses	-		
	3. Investor Identification:	-		
	Notice/Publishing Approved Plan	-		
	Claimant Identification	-		
	Claims Processing	-		
	Web Site Maintenance/Call Center	-		
	4. Fund Administrator Bond	-		
	5. Miscellaneous	-		
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses	-		
	Total Plan Implementation Expenses		-	
	Total Disbursements for Distribution Expenses Paid by the Fund		-	-
Line 12	**Disbursements to Court/Other:**		-	
Line 12	*Disbursements to Court*	-		
Line 12a	*Investment Expenses/Court Registry Investment System (CRIS) Fees*	-		
Line 12b	*Federal Tax Payments*	-		
	Total Disbursements to Court/Other:		-	-
	Total Funds Disbursed (Lines 9-12):			$203,318.68
Line 13	**Ending Balance (As of 08/27/20):**			$13,430,798.66
Line 14	**Ending Balance of Fund - Net Assets:**			
Line 14a	*Cash & Cash Equivalents*			$13,430,798.66
Line 14b	*Investments*			-
Line 14c	*Other Assets or Uncleared Funds*			-
	Total Ending Balance of Fund - Net Assets			$13,430,798.66

	OTHER SUPPLEMENTAL INFORMATION:			
		Detail	**Subtotal**	**Grand Total**
	Report of Items NOT To Be Paid by the Fund:			
Line 15	**Disbursements for Plan Administration Expenses Not Paid by the Fund:**	-	-	
Line 15	*Disbursements for Plan Administration Expenses*	-		
Line 15a	*Plan Development Expenses Not Paid by the Fund:*	-		
	1. Fees:	-		
	Fund Administrator	-		
	IDC	-		
	Receiver	-		
	Legal Advisers	-		
	Accountants	-		
	Consultants	-		
	2. Administrative Expenses	-		
	3. Approved Living Allowance	-		
	4. Miscellaneous	-		
	Total Plan Development Expenses Not Paid by the Fund		-	
Line 15b	*Plan Implementation Expenses Not Paid by the Fund:*	-		
	1. Fees:	-		
	Fund Administrator	-		
	IDC	-		
	Receiver	-		
	Legal Advisers	-		
	Accountants	-		

	Consultants	-		
	2. Administrative Expenses	-		
	3. Investor Identification:	-		
	Notice/Publishing Approved Plan	-		
	Claimant Identification	-		
	Claims Processing	-		
	Web Site Maintenance/Call Center	-		
	4. Fund Administrator Bond	-		
	5. Miscellaneous	-		
	6. FAIR Reporting Expenses	-		
	Total Plan Implementation Expenses Not Paid by the Fund		-	
Line 15c	*Tax Administrator Fees & Bonds Not Paid by the Fund*	-		
	Total Disbursements for Plan Administrative Expenses Not Paid by the fund		-	-
Line 16	**Disbursements to Court/Other Not Paid by the Fund:**	-	-	
Line 16a	*Investment Expenses/CRIS Fees*	-		
Line 16b	*Federal Tax Payments*	-		
	Total Disbursements to Court/Other Not Paid by the Fund:		-	-
Line 17	**DC & State Tax Payments**	-	-	
Line 18	**No. of Claims:**			
Line 18a	*# of Claims Received This Reporting Period*			-
Line 18b	*# of Claims Received Since Inception of Fund*			-
Line 19	**No. of Claimants / Investors:**			
Line 19a	*# of Claimants / Investors Paid This Reporting Period*			-
Line 19b	*# of Claimants / Investors Paid Since Inception of Fund*			-

Receiver:

By: _____
(signature)
Jonathan E. Perlman
(printed name)

Receiver
(title)

Date: Aug 27, 2020

Exhibit “3”

Total Compensation And Expenses Requested;
Any Amounts Previously Requested;
And Total Compensation And Expenses Previously Awarded

Name	Specialty	Hours	Fees	Expenses	Total
Receiver and Genovese Joblove & Battista, P.A.	General Counsel	2032.80	$584,847.00	$4,974.34	$589,821.34
Collas Crill	Special Counsel to Receiver in Cayman Islands	484.20	$269,316.25	--	$269,316.25
Yip Associates	Forensic Accountants	77.30	$22,433.00	--	$22,433.00
Development Specialists, Inc.	Financial Adviser and Restructuring Consultants	362.20	$157,488.20	$73.95	$157,562.15
Rehmann	Tax and Consulting	122.60	$35,819.00	--	$35,819.00
Ehounds, Inc.	Electronic Data Management	--	$25,428.00	--	$25,428.00
Total:		**3079.1**	**$1,095,331.45**	**$5,048.29**	**$1,100,379.75**

Exhibit “4”

Exhibit 4(a)

The Receiver and Genovese, Joblove & Battista, P.A.

Name	Title	Year Licensed	Total Hours	Discounted Hourly Rate	Total Amount Billed
Jonathan E. Perlman	Partner	1988	450.5	340.00	$153,170.00
John H. Genovese	Partner	1979	131.00	340.00	$44,540.00
Paul J. Battista	Partner	1991	37.20	340.00	$12,648.00
Gregory M. Garno	Partner	1996	161.40	340.00	$54,876.00
Heather L. Harmon	Partner	2003	130.90	340.00	$44,506.00
Theresa Van Vliet	Partner	1983	0.50	340.00	$170.00
Jesus M. Suarez	Partner	2008	9.20	340.00	$3,128.00
Brett Halsey	Associate	2005	213.50	265.00	$56,577.50
Jean-Pierre Bado	Associate	2016	174.90	265.00	$46,348.50
Elizabeth G. McIntosh	Associate	2018	84.40	265.00	$22,366.00
Angelo M. Castaldi	Associate	2015	37.80	265.00	$10,017.00
Irina R.Sadovnic	Associate	2016	460.20	265.00	$122,271.00
Joyce A. Delgado	Associate	2017	0.60	265.00	$159.00
Jessey Sardina	Paralegal	n/a	9.80	100.00	$980.00
Colleen Hopkins	Paralegal	n/a	24.60	100.00	$2,460.00
Catherine Monzon	Paralegal	n/a	59.40	100.00	$5,940.00
Steve Siff	Paralegal	n/a	0.40	100.00	$40.00
Carolyn Esser	Paralegal	n/a	1.00	100.00	$100.00
Jay Bushman	IT Specialist	n/a	45.50	100.00	$4,550.00
Report Totals:			**2032.80**		**$584,847.00**

Exhibit 4(b)

Collas Crill

Name	Title	Experience	Hours	Discounted Hourly Rate (May 13-20)	Total Amount Billed
Stephen Leontsinis	Partner	17 Years	52.30	$272.73	$14,263.96
Rocco Cecere	Partner	17 Years	67.50	$725.00	$48,937.50
Jennifer Colegate	Counsel	14 Years	57.70	$253.93	$14,651.52
Natalie Bell	Senior Associate	12 Years	10.80	$244.52	$2,640.83
Farrah Sbaiti	Senior Associate	11 Years	23.00	$244.52	$5,623.97
Genevieve White	Associate	3 Years	17.20	$225.71	$3,882.23
		Totals:	**228.50**		**$90,000.00**

Name	Title	Experience	Hours	Discounted Hourly Rate (May 21-29)	Total Amount Billed
Stephen Leontsinis	Partner	17 Years	19.70	$725.00	$15,280.00
Rocco Cecere	Partner	17 Years	28.10	$725.00	$20,847.50
Jennifer Colegate	Counsel	14 Years	21.65	$675.00	$14,613.75
Natalie Bell	Senior Associate	12 Years	5.10	$650.00	$3,315.00
Farrah Sbaiti	Senior Associate	11 Years	5.50	$650.00	$3,575.00
Genevieve White	Associate	3 Years	6.95	$600.00	$4,170.00
Rupert Stanning	Senior Associate	10 Years			
		Total	**87.00**		**$61,801.25**

Name	Title	Experience	Hours	Discounted Hourly Rate (May 29-June 29)	Total Amount Billed
Stephen Leontsinis	Partner	17 Years	40.90	$725.00	$29,652.50
Rocco Cecere	Partner	17 Years	82.70	$725.00	$58,725.00
Jennifer Colegate	Counsel	14 Years	23.10	$675.00	$15,592.50
Farrah Sbaiti	Senior Associate	11 Years	6.10	$650.00	$3,965.00
Rupert Stanning	Senior Associate	10 Years	.80	$650.00	$520.00
Genevieve White	Associate	3 Years	15.10	$600.00	$9,060.00
		Total	**168.70**		**$117,515.00**

Exhibit 4(c)

Yip Associates

Name	Title	Experience	Hours	Discounted Hourly Rate	Total Amount Billed
Maria M. Yip, CPA, CFE, CFF, CIRA	Partner	27 years	3.1	$340.00	$1,054.00
Shawna B. Amarnani, CPA, CFE, CIRA	Director	10 Years	64.0	$295.00	$18,880.00
Danny D. Zamorano, CPA	Senior Associate	5 Years	10.2	$245.00	$2,499.00
		Total:	**77.3**		**$22,433.00**

Exhibit 4(d)

Development Specialists, Inc.

Name	Title	Experience	Hours	Discounted Hourly Rate	Total Amount Billed
Joseph J. Luzinski	Senior Managing Director	33Years	128.70	$520.00	$66,924.00
Mark T. Iammartino	Senior Managing Director	23 Years	85.6 5.50	$436.00 $218.00	$37,321.60 $1,199.00
Bradley D. Sharp	President & CEO	30 Years	10.5	$576.00	$6,048.00
Daniel J. Stermer	Managing Director	20 Years	61.70	$388.00	$23,939.60
George E. Shoup	Managing Director	26 Years	8.30	$356.00	$2,954.80
Thomas P. Jeremiassen	Senior Managing Director	24 Years	8.70	$476.00	$4,141.20
Nicholas R. Troszak	Managing Director	16 Years	0.50	$408.00	$204.00
Thomas J. Frey	Senior Associate	10 Years	52.70	$280.00	$14,756.00
		TOTAL	**362.20**		**$157,488.20**

Exhibit 4(e)

Rehmann

Name	Title	Experience	Hours	Discounted Hourly Rate	Total Amount Billed
Haley Arndt	Senior	5 Years	3.5	$215.00	$752.50
Lina Breland	Staff	1 year	3.8	$150.00	$570.00
Mitch Hall	Executive	33 Years	70.2	$300.00	$12,060.00
Charles Hoebeke II	Executive	22 Years	43.4	$300.00	$13,020.00
Sejla Kulaglic	Senior	7 years	1.1	$215.00	$236.50
Michael Patterson	Executive	37 Years	0.6	$300.00	$180.00
		Total:	**122.6**		**$35,819.00**

Exhibit 4(f)

E-Hounds, Inc.
32815 US Highway 19 North
Suite 100
Palm Harbor, Florida 34684

Local / International (727) 726-8985
support@ehounds.com

Staff Assignment and Fees used for Case E9618 TCA Fund Management Group

Staff Member	***Position***	***Init***	***Rate***
Adam D Sharp	President-CEO	ADS	$300 per hour
David A Bukas	VP Operations	DAB	$195 per hour
Robert T Rohr	Lead Analyst	RTR	$195 / 300 per hour
Ernesto Rojas Castro	Forensics Lead	ERC	$195 per hour
Sean P Organ	Technical Services	SPO	$195 per hour
James C Schooler	Technical Services/LE Liason	JCS	$195 per hour

Flat Rate Fees

E-Hounds utilizes flat rate fees for certain services, to help minimize cost overruns and provide stable estimates for fees. Often, these services would vastly exceed the flat rate charged if they were billed hourly.

Intake, Handling, Storage and Secure Preservation **$225 per medium**
Intake services include photographing and documenting the particular item, disassembly of devices (computers, phones, etc) to document and access key components, forensic imaging digital media, ongoing storage and maintenance of the device and associated forensic images, and secure destruction of both data and devices if and when requested (usually at case closure).

E-Hounds Review Platform **$995 per month / $95 per user per month**
E-Hounds provides an "in-house" review system which allows specific clients to access and review specific data sets, regardless of size, through an encrypted website interface. All data is hosted in E-Hounds controlled servers with zero third party intervention.

Forensic Triage & Recovery **$1000 per computer**
E-Hounds provides a singular service, per computer, which goes beyond normal "search and produce". "Triage" recovers data, metadata and artifacts which may not be normally available during a standard search or "E-Discovery" role. This includes generating reports related to internet history, search terms entered by the user, WiFi and network drive connections, USB devices, Passwords and Cloud services utilized, identifying and recovering deleted data, dates of use, and a general picture of how a computer was used (or misused).

Exhibit “5”

Exhibit 5(a)

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

Billing Attorney: Jonathan E Perlman
Originating Attorney: Jonathan E Perlman
Originating Attorney: Paul J Battista

CLIENT: 12455 - Jonathan Perlman, Receiver (TCA)
MATTER: 12455-001 - Jonathan Perlman, Receiver / TCA Fund - TCA Global Receivership

ATTN: Jonathan Perlman

PreBill Summary	
Total Fees	$394,734.00
Total Disb	$4,958.71
Total Bill	$399,692.71
-Retainer App	$0.00
Previous Bal	
Bal Due	$399,692.71
Trust Balance	$0.00
Retainer Bal	$0.00

===== BILLING INSTRUCTIONS =======
RETURN FINAL TO: _____
BILL: INITIALS _____
HOLD: INITIALS _____
W/O WIP: _____

Type of Work: LT
Rate Table: Override Table

Billing Instructions: PARTNERS $340/hr, ASSOC. $265/hr, PARA $100/hr & Laise $50/hr

TASK CODES ADDED PER HLH EMAIL 5/14/20
TASK CODES FOR MATTER 12455-001 ONLY PER GMG

=====UNBILLED TIME==========

Date	Lawyer	Work Description	Time	Rate	Value
001 / Asset Analysis and Recovery					
05/11/20	JB	Call Kevin Vinitsky who's TCA's IT Vendor to discuss TCA's IT infrastructure.	1.00	100.00	100.00
05/11/20	JB	Email to Adam at eHounds to retain for SEC vTCA case. Request documentation for Jonathan to review.	0.40	100.00	40.00
05/12/20	JEP	Review TCA Aerospace financials and subsidiaries 1.0). Discuss same (.6).	1.60	340.00	544.00
05/12/20	JEP	Call with Jay Bushman (GJB IT DIrector) regarding progress on identifying all IT and gaining control, follow up meeting with IT for Defendants (.5), Review end of day status memo re same; multiple calls with management and others to obtain understanding of business operations and areas for follow up to obtain control, discuss same with counsel and instruct team; work on understanding of operations (3.2)	3.70	340.00	1,258.00
05/12/20	JEP	Finalize agreement with YIP for forensics and discuss same (.5). Work on obtaining Cayman counsel (1.0). Discuss same with C. Hobeke (.5).	2.00	340.00	680.00
05/12/20	JEP	Work on myriad of issues obtaining control of assets and data (2.0),	2.50	340.00	850.00

Genovese Joblove & Battista, P.A.
==========
PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

		communications re same (.5).			
05/12/20	JEP	Correspondence with Alyce Schreiber enclosing appointment order and requesting meeting.	0.50	340.00	170.00
05/12/20	JEP	Follow up with IT on why AIG claims manager email keeps bouncing back.	0.20	340.00	68.00
05/12/20	JEP	Further communications w/ CEO Alyce Schreiber re email containing documents and information about witnesses. Review same..	0.50	340.00	170.00
05/12/20	JPB	Conference call with receivership team to outline responsibilities for analyzing TCA entities, personnel and documents.	1.00	265.00	265.00
05/12/20	JPB	Phone call with attorneys for receivership entities to review and discuss key TCA concerns, personnel and operations	2.00	265.00	530.00
05/12/20	IRS	Conduct employee interview of Nelson Lamis. (.6) Conference call with J.Bushman regarding IT issues and control over admin accounts. (.5) Call with Bill Fickling (.4) Strategize with JEP regarding retained professionals rates and motion to approve same. (.6) Confer with GGarno regarding possible additional receivership assets. (.3) Confer with JP Bado regarding analysis on TCA SPVs. (.4)	2.80	265.00	742.00
05/12/20	JB	Create TCA email distribution group for internal and external use	0.50	100.00	50.00
05/12/20	JB	Discuss on phone and Retrieve initial set of documentation from Kevin Vinitsky to gain access to TCA programs.	1.50	100.00	150.00
05/13/20	JEP	Communications with Tom Hunt, CEO Pivot Energy re setting up meeting and company value.	0.50	340.00	170.00
05/13/20	JEP	Communication with potential acquirer of TCA portfolio.	0.20	340.00	68.00
05/13/20	JEP	Receipt of letter from Israeli TCA investors.	0.20	340.00	68.00
05/13/20	JEP	Call with Kedi Chang Circle Partners TCA Funds manager/administrator (1.0). Memo to file re same (.4).	1.40	340.00	476.00
05/13/20	GMG	Exchange emails with Fickling (.2); review various financial documents re asset analysis (.5); review motion for application to employ professionals (.3); review loan documents re PPE loan for Marley (.3); call with Fickling (1.8); exchange multiple emails re receivership assets and immediate action needed (2.5); review multiple documents re receivership assets (2.); internal conference re strategy (1.5).	9.10	340.00	3,094.00
05/13/20	HLH	Intensive handling of asset analysis issues, including transition document	9.90	340.00	3,366.00

Genovese Joblove & Battista, P.A.
==========
PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

		review and communications (8.4); Team meeting regarding same (1.5)			
05/13/20	JPB	Review and analyze TCA asset list provided by TCA attorneys in anticipation of phone call with portfolio administrator	1.60	265.00	424.00
05/13/20	JPB	Phone conference with Jacquelyn Going, TCA portfolio administrator, regarding her role and responsibilities.	1.00	265.00	265.00
05/13/20	JPB	Phone conference with Bill Fickling, TCA portfolio manager, regarding his role and responsibilities.	1.80	265.00	477.00
05/13/20	JPB	Conference call with TCA receivership team to outline breakdown of responsibilities and outline initial analysis from employee interviews.	2.00	265.00	530.00
05/13/20	JPB	Review and analyze TCA and SPV asset list provided by TCA attorneys in anticipation of phone call with portfolio manager.	3.20	265.00	848.00
05/13/20	IRS	Strategize with JEP regarding pending matters, internal organization, bank account creations. (2) Conduct employee interview with Jacqueline Going. (1.8) Prepare correspondence to TCA employees requesting interview times. (.3) Coordinate internal GJB team meeting to discuss ongoing actions and internal organization. (.3) Confer with Kedi Chang from circle partners regarding TCA entities' receivership, and provide service of the TRO. (1.2) GJB attorney case management and general strategy meeting regarding next steps and task assignments (2)	7.60	265.00	2,014.00
05/13/20	JB	Reach out to Kevin Vinitsky to discuss domain credentials and various GoDaddy accounts found in documentation with credentials.	0.50	100.00	50.00
05/13/20	JB	Phone call with Kevin to discuss both GoDaddy TCA domains and Asset domains owned by TCA. Explained that Asset domains were purchased for purpose of resell at higher amount.	0.50	100.00	50.00
05/13/20	JB	Schedule phone meeting between Kevin and Ehounds.	0.20	100.00	20.00
05/13/20	JB	Troubleshoot alongside Kevin and Ehounds with gaining access to TCA Office 365 admin account.	1.00	100.00	100.00
05/13/20	JB	Briefly discuss over the phone about Virtual Machines at TCA's Datacenter that need to get copied off to an external drive and shipped to Ehounds.	0.50	100.00	50.00
05/14/20	JEP	Additional work processing transfer of funds to Receivership Accounts. Multiple communications, signatures, provide drivers license.	1.00	340.00	340.00
05/14/20	JEP	Correspondence with tax accountant Hall re ownership structure, draft motion	0.70	340.00	238.00

Genovese Joblove & Battista, P.A.
==========
PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

		to expand over TCA Global Lending Corp.			
05/14/20	JEP	Review various liquidator options and rates. Discuss same.	0.70	340.00	238.00
05/14/20	GMG	Review Cayman order re liquidation (.2); exchange emails with Fickling re open issues with subsidiary assets (1.); conference call with Shraiberg re Zynergy bankruptcy (.5); call with Fickling re open items (.4); call with Males re Cayman liquidation order (.3); review retention order (.1); conference with receiver re Synergy and other issues (.3); call with possible Cayman counsel (.5).	3.30	340.00	1,122.00
05/14/20	HLH	Numerous communications with former professionals regarding various case status (2.0); Detailed review of case transition documents (1.5); Attention to transfer of funds from Butterfield, call with K. Chang and numerous e-mails regarding same (1.5)	3.50	340.00	1,190.00
05/14/20	JPB	Phone conference with Miriam Cunningham, TCA human resources administrator, regarding her role and responsibilities.	1.20	265.00	318.00
05/14/20	EGM	Draft emergency motion to expand receivership and confirm receivership asset to include TCA Global Lending Corp.	1.50	265.00	397.50
05/14/20	IRS	Conduct employee interview with Carlos Sandino (1.3) Prepare correspondence to IT regarding access to TCA sharepoint online files. (.2) Strategize with JEP regarding pending matters and internal organization. (1.4) Attend to correspondence with Nelson Lamis regarding access to PODS storage units and coordinate inventory. (.3) Prepare correspondence regarding mail forwarding and take over (.2); Confer with G. Garno regarding employee interviews and provide detailed summary of daily administrative matters. (.3); Prepare draft social media press release regarding appointment order. (.2); Confer with JPBado regarding employee interview with Miriam Cunningham and specific issues relating to payroll of existing operations. (.5)	4.40	265.00	1,166.00
05/15/20	JEP	Team meeting(s) to go over all aspects of to do's, progress reports.	1.80	340.00	612.00
05/15/20	GMG	Review multiple emails re Cayman Islands (.5); review multiple emails re operating subsidiaries (1.); conference call re Swedish subsidiary (.5); review class action and exhibits (.5); review litigation notice (.2); review consulting agreements (.4); review EY letter (.2); review management report (.5); internal conference (.5); multiple calls with TCA personnel re operational analysis and asset invest plan (1.); call with S. Kapila (.3); work on motion to expand receivership (.5).	6.10	340.00	2,074.00

Genovese Joblove & Battista, P.A.
==========
PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

05/15/20	HLH	Attention to SEC Request for access (.8); Attention to transition documents and transfer of funds from Butterfield (1.5); Attention to transition documents and other asset analysis communications (1.0); Consider issues regarding Nevada expansion (1.0)	4.30	340.00	1,462.00
05/15/20	JPB	Phone interview with Michael Klein, TCA corporate restructure specialist, regarding his role and responsibilities.	1.30	265.00	344.50
05/15/20	JPB	Review and analyze SPV list and loan documentation provided by TCA attorneys in anticipation of phone call with corporate restructure specialist.	2.40	265.00	636.00
05/15/20	JPB	Review and analyze SPV list and loan documentation provided by TCA attorneys in anticipation of phone call with corporate restructure specialist.	3.80	265.00	1,007.00
05/15/20	EGM	Finish drafting motion to confirm and expand receivership to include TCA Global Lending Corp. (2.0); draft proposed order regarding same (.2);	2.20	265.00	583.00
05/15/20	EGM	Conference call with Jonathan Perlman regarding TCA Global Lending Corp.; conference call w/ G. Garno regarding draft motion to expand and confirm receivership to include TCA Global Lending Corp.	0.40	265.00	106.00
05/15/20	EGM	Conference call w/ H Harmon regarding opening misellaneous case in NV	0.30	265.00	79.50
05/15/20	EGM	Review tax returns in order to identify where TCA Global Lending Corp. is identified as a wholly owned subsidiary of Feeder Fund, Ltd. (.6); conference call w/ tax accountants and I. Sadovnic regarding same (.3)	0.90	265.00	238.50
05/15/20	IRS	Indumate conference call with Peter Whalberg regarding standing operations and follow up call with Greg Garno regarding Indumate proposal (.6)	0.60	265.00	159.00
05/15/20	IRS	Update and review internal organization and workflow chart. (.5); Attend to correspondence regarding billing code set up and organization. (.3); Prepare to correspondence regarding investigatory files received from Schoeppl's law office. (.1) Conference call with J. Bushman regarding IT access to certain TCA internal files and attend to correspondence regarding same (.7)	1.60	265.00	424.00
05/15/20	IRS	Prepare and file motion for expansion of receivership (1) Staretgize regarding motion with E. Mcintosh and review edits provided by (.7)	1.70	265.00	450.50
05/15/20	IRS	Confer with JP Bado regarding employee interview with Miriam Cunningham (.4)	0.40	265.00	106.00
05/15/20	CE	Prepare 19 Notices of Filing Order Appointing Receiver for filing in Broward County state court cases (.8); Meeting with C. Hopkins re: same (.2).	1.00	100.00	100.00

Genovese Joblove & Battista, P.A.
==========
PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

05/15/20	CBH	Attention to filing notices of receiver in state court and district court cases (1.0); meeting with H. Harmon regarding filings (.2); meeting with C. Esser regarding state court pleadings (.2); attention to new filings and documents received in case (.6).	2.00	100.00	200.00
05/15/20	JB	Communicate with Kevin about creating a separate account for Ehounds in the TCA Office 365 account for the beginning of preserving and extracting of Office 365 data.	0.50	100.00	50.00
05/16/20	JEP	Multiple emails with I. Sadovnic, TCA employees, following up on various documents needed (.5). Follow up on investor related information (.3). Obtain information on SPVs and location of documents (.4).	1.20	340.00	408.00
05/16/20	GMG	Exchange emails with Schoeppel re Kapila documents (.2); exchange emails with Cayman counsel and review documents re liquidation (1.); work on motion to expand receivership (1.); attention to issues re service on international banks (.2); conference call with B. Fickling (1.); work on D&O notice of claims (1.).	4.40	340.00	1,496.00
05/16/20	IRS	Confer with JEP and GG regarding case management strategy, to discuss payments and asset recovery for storage units. (.6) Update workflow and internal organization chart. (.4); Prepare correspondence to JBado regarding employee interview and receivership assets in storage. (.3)	1.30	265.00	344.50
05/17/20	JEP	Call with hedge fund liquidation attorney re potential vendors for referral as asset managers.	0.30	340.00	102.00
05/17/20	JEP	Review 6 emails from Fickling re various issues, including operations of certain SPVs, location of documents. Direct counsel re same.	0.80	340.00	272.00
05/17/20	IRS	Attend to correspondence with Kedi Chang from circle partners regarding fund redemption requests. (.3) Strategize with JEP regarding redemption requests and legal analysis regarding avoidance of same. (.4)	0.70	265.00	185.50
05/18/20	JEP	Work on getting filed in courts throughout country complaint and order of appointment.	0.60	340.00	204.00
05/18/20	JEP	Approval of payment of storage facilities for access to inventory.	0.20	340.00	68.00
05/18/20	JEP	Investigation into potential additional receivership entities, transferees, including other TCA family entities and funds.	1.00	340.00	340.00
05/18/20	JEP	Multiple communications by email with Circle Partners to obtain reports on	5.30	340.00	1,802.00

Genovese Joblove & Battista, P.A.
==========
PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

		investors, redemptions requests, and other information, including reports re same. Multiple phone calls with Circle managing director Kedi Chang to discuss spreadsheets and backup document; phone calls with Cayman counsel and Kedi to discuss same, phone calls with SEC.			
05/18/20	HLH	Detailed attention to recording of Receivership Order in 30 jurisdictions (3.5); Additional attention to employee notice (.8); Additional attention to borrower issues (2.0); Attention to mail forwarding (.4)	6.70	340.00	2,278.00
05/18/20	JPB	Review and analyze TCA Global Credit Fund Offering memorandum in anticipation of additional employee interviews.	3.80	265.00	1,007.00
05/18/20	JPB	Review and analyze TCA Fund Management Group Corp RIA Operations manual in anticipation of additional employee interviews.	1.90	265.00	503.50
05/18/20	IRS	Confer with J.Perlman regarding case management strategy, pending deliverables, and internal organization. (1) Call with L. Lowachee regarding mailbox and mail forwarding and attend to correspondence regarding same. (.6) Attend to correspondence regarding pending document requests from A. Schreiber (.2) Prepare correspondence to IT department regarding access to TCA servers (.2) Attend to correspondence and coordinate access to IT storage facility. (.3) Coordinate payment of PODS storage system invoices and coordinate access to same. (.4) Prepare correspondence regarding service on employees, banks, and auditors. (.2)	2.90	265.00	768.50
05/18/20	EGM	Review cover letter and civil cover sheet to send to various districts to file receivership order under 28 USC 754 (.3); assemble and send first packet to the District of Nevada (.4)	0.70	265.00	185.50
05/18/20	EGM	Call PODS in order to sort out payment of storage units in order for receivership team to access (.3); call w/ E. Serres and I. Sadovnic regarding payment of PODS (.3)	0.60	265.00	159.00
05/18/20	JB	Schedule a data with Kevin and JP to meet at the TCA's storage unit that contains IT equipment.	0.20	100.00	20.00
05/19/20	JEP	Receipt and review and discuss additional reports received today from Circle Partners re investor balances and pending subscriptions return requested	1.50	340.00	510.00
05/19/20	JEP	Phone call with M. Yip re status on bank accounts and accounting records for analysis of money flows. Follow up on same with team.,	0.50	340.00	170.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/19/20	HLH	Detailed attention to recording of Receivership Order in 30 jurisdictions (3.4); Consider issues regarding Harney's (.3)	3.70	340.00	1,258.00
05/19/20	HLH	Detailed review of documents from former counsel regarding potential assets of receivership estate, including artwork	1.60	340.00	544.00
05/19/20	JPB	Review and analyze documents related to TCA's acquisition of National Health Corporation located in TCA's internal data storage database.	4.40	265.00	1,166.00
05/19/20	IRS	Confer with JPerlman regarding case management strategy and overall team organization. (2.5) Coordinate PODS storage unit payment, coordinate change of ownership and account information, coordinate and plan for inventory access. (1) Prepare correspondence to Carl Scheoppl regarding books and records, and status of directors resignations over receivership entities. (.4) Prepare correspondence to Schoeppl regarding payment of storage unit under Bob Press name. (.2)	4.10	265.00	1,086.50
05/19/20	EGM	Organize and review documents to include in packets for filing receivership order and underlying complaint in 35 districts across the country in accordance with 28 usc 754 (.6); assemble fedex pacakges regarding same (1.2)	1.80	265.00	477.00
05/19/20	IRS	Review spreadsheets with investor contact and location information split up by account from circle partners (.3) Attention to service of TRO on international and domestic financial institutions (.4)	0.70	265.00	185.50
05/19/20	CBH	Attention to preparation and filing receiver's order and corresponding pleadings in approx. 30 district court's (1.7); multiple e-mail correspondence with E. McIntoch and H. Harmon regarding same (.5).	2.20	100.00	220.00
05/20/20	JEP	Receipt of investor communications, folllow up same.	0.20	340.00	68.00
05/20/20	JEP	Review response of UK's Coutts bank to Court notice denying jurisdiction. Direct follow up, including continued investigation into amount there, and process necessary to obtain if worthwhile.	0.30	340.00	102.00
05/20/20	JEP	Communication from Circle Parners re status of wire transfers.Refer to counsel for response.	0.20	340.00	68.00
05/20/20	JEP	Review and respond to letter from investor counsel Darshan Leitner.	0.50	340.00	170.00
05/20/20	HLH	Consider valuation ideas for SPV, numerous communications regarding same (1.2); Team call regarding SPV disbursements (1.3)	2.50	340.00	850.00
05/20/20	HLH	Review correspondence from Coutts bank regarding jurisdiction and lack of	1.60	340.00	544.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		accounts (.4); Numerous additional communications regarding same (1.2)			
05/20/20	HLH	Prepare for and attend team strategy meeting (3.0); Review correspondence regarding Israeli investors (.3)	3.30	340.00	1,122.00
05/20/20	JPB	Photograph, inventory and take possession of TCA property held at Cube Smart facility in Aventura, Florida.	5.30	265.00	1,404.50
05/20/20	JPB	Investor communications procedures (1.7).	1.70	265.00	450.50
05/20/20	EGM	Case management meeting/ conference with entire attorney team to discuss bonging matters and outstanding issues and tasks in order to continue marshalling and securing receivership assets	2.80	265.00	742.00
05/20/20	IRS	Prepare correspondence regarding transitional change of registered agents and officers for receivership entities. (.2) Case management meeting with all team attorneys to discuss ongoing matters relating to overall marshalling and securing receivership assets (2.8) Attention to internal IT issues and related IT asset location and inventory. (.5) Review correspondence from Scheoppl regarding books and records and resignation of officers and directors. (.1) Review analysis regarding domestication of US judgment in UK courts. (.2) Confer regarding expansion of consulting roles and delineate accounting firm's role in analysis of claims. (.5) attend to correspondence from Israeli investor representative and review notice of filing letter with the court regarding same (.3) Prepare agenda for team strategy meeting and attend to internal workflow and organizational chart. (.6)	5.20	265.00	1,378.00
05/20/20	JB	Meet Kevin and JP and Cube Storage in Aventura to create inventory log and remove IT equipment from storage unit to take with us to Miami office to prepare to discuss equipment with GJB TCA team and possibly send to Ehounds for forensic review.	5.00	100.00	500.00
05/21/20	JEP	Obtain updates on UK Coutts account balances per UK contractor and direct HH re follow up.	0.40	340.00	136.00
05/21/20	JEP	Communications with prospective CRO from Glass Rattner, meet in person to interview same.	1.20	340.00	408.00
05/21/20	JEP	Phone call with Master Fund borrower Pacific Ventures re potential interference in payments by possible Press relative, and memo to file re same.	0.70	340.00	238.00
05/21/20	JEP	Communications with Solic Partners Neil Luria re interview for CRO role.	0.30	340.00	102.00
05/21/20	HLH	Consider issues regarding SPV payables, numerous communications regarding same	0.80	340.00	272.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/21/20	JPB	Further review and analysis of documents related to TCA's acquisition of National Health Corporation located in TCA's internal data storage database.	2.60	265.00	689.00
05/21/20	EGM	Conference call with Eastern District of Virgina regarding opening of miscellaneous case in the district (.3); draft notice of filing appointment of receiver (.2); confer w/ C. Hopkins regarding same (.1)	0.60	265.00	159.00
05/21/20	IRS	Call with JEP to discuss IT related issues and investor communications. (.8) Attention to securing domain names, website, 1800 number call, and creation of new email addresses. (.7) Attention to PODS storage account and information change. (.3) Conference with Maria Yip regarding document search and data collection necessary to support tracing analysis. (1) Review sharepoint documents and confer with IT regarding proper storage and production of same. (.4) Review list of entities which have been served and confer regarding notice and service on tax accountants (.3) Prepare correspondence to investor through broker Trevor Reynolds. (.2) Attend to internal organization and workflow chart. (.4)	4.10	265.00	1,086.50
05/21/20	CBH	Attention to miscellaneous cases and filings and review districts; update chart (.7); meeting with E. McIntosh regarding same (.3).	1.00	100.00	100.00
05/22/20	JEP	CRO issues; memo to key team members re status, interviews, timeline (.3); communications with Solic partner Luria and review bio and materials provided, (.3), set up call with DSI partner Luzinski (.2), Interview Luria (1.).	1.90	340.00	646.00
05/22/20	JEP	Work with Sadovnic on securing International assets, investor communications draft, correspondence with cayman counsel regarding ey meeting today, re line of credit issues, whistleblower communications of which Harmon was added to call regarding banking issues, new accounts, Transmarine entity and borrower notice of new accounts. (1.5); Review and analysis of current issues and required follow ups to secure assets and, follow up on witness interviews, ensure IT completion of control, and follow up on litigation matter control. (3.2).	4.70	340.00	1,598.00
05/22/20	JPB	Review and analyze emails regarding Spence Novick, NY analyst, in anticipation of employee interview.	3.10	265.00	821.50
05/22/20	JPB	Review and analyze emails regarding Joseph Erbe, NY analyst, in anticipation of employee interview.	3.20	265.00	848.00
05/22/20	JPB	Review and analyze emails regarding Joseph Erbe, Aventura office analyst, in anticipation of employee interview.	3.20	265.00	848.00
05/22/20	IRS	Confer with EMC regarding website copy, review and revise draft copy (.7)	4.40	265.00	1,166.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Confer regarding investor communications and prepare draft regarding same. (.5) Strategize and prepare correspondence regarding protection of international assets and entities. (.3) Confer with Carl Schoeppl regarding London operations, 401k issues and setting up conference with bob press. (.3) Attention to filings and docket correction in NDFLA of miscellaneous case relating to jurisdiction over receivership assets. (.5) Prepare correspondence to proposed expert restructuring officer regarding operating SPVs and valuable assets. (.2) Review Sharepoint files to download and prepare folders of corporate records for expert review. (1.3) Attention to service on Bernard Sumner and Bruce Wookey. (.3) Attention to correspondence from Schoeppl regarding incoming correspondence from swiss entities. (.2) Prepare correspondence regarding access to London CRM files. (.1)			
05/22/20	EGM	Phone call w/ Clerk of Court of Northern District of Florida regarding opening of 28 USC 754 case and the fact that they opened the case wrong and what the the best mechanism to remedy the situation (.8); draft email regarding 28 USC 754 and how the case should have been opened in the NDFLA (.4); draft notice of appointment of receiver for filing in the NDFLA (.2)	1.40	265.00	371.00
05/22/20	CBH	Attention to notice of receiver preparation for northern district of florida; meeting with E. McIntosh regarding same.	0.40	100.00	40.00
05/22/20	JB	Discuss with Kevin about Highrise CRM program used by TCA and employees and understand how it was used in TCA's environment.	1.00	100.00	100.00
05/23/20	JEP	Interview of DSI's Joe Luzinski as chief restructuring officer candidate.	0.80	340.00	272.00
05/23/20	JEP	Review and draft changes to website for Receivership (.7); edit letter responding to investor (.2) ; edit letter to Press counsel re needed documents (.2)..	1.10	340.00	374.00
05/23/20	GMG	Call with J. Luzinski (.9); review letter to banks (.2); review information and emails re payables for SPV companies (.5); review and comment on proposed website contract (.4); review multiple Schoeppel emails and documents (.5); review investor communications (.3).	2.80	340.00	952.00
05/24/20	JEP	Follow up on status of CARSTAR franchise status, contracts, and direct discussions with franchisor.	0.30	340.00	102.00
05/24/20	JEP	Follow up on CRM open issue.	0.30	340.00	102.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/24/20	JEP	Investigation into overlapping relationship with sister fund, and GP control of same for possible expansion of receivership.	1.40	340.00	476.00
05/24/20	JEP	Communications with potential purchasers of loans, discuss same with team.	0.50	340.00	170.00
05/24/20	IRS	Attention to additional and revised website copy and prepare correspondence regarding same. (1) Review and save documents from pacer. (.3) Review and revise draft response to investor communication. (.4) Prepare correspondence to Schoeppl regarding Bob Press' election to liquidate fund under the Master fund LPA. (.2) Attention to correspondence from FINMA (Switzerland). (.2)	2.10	265.00	556.50
05/25/20	JEP	Follow up on AIG premium payment, discovery of other policies, change of named insured.	0.30	340.00	102.00
05/25/20	JEP	Follow up with GJB franchise attorneys on strategy to maximize value of Carstar franchise(.2);	0.20	340.00	68.00
05/25/20	JEP	Go over all case issues, organize as necessary into charts/lists; direct follow ups.	2.00	340.00	680.00
05/25/20	IRS	Confer with JEP regarding case management strategy as related to asset recovery. (.5) Attend to correspondence regarding ehounds access and coordinate access to platform for attorney review. (.3) Prepare correspondence regarding IT asset recovery and storage status. (.2) Attention to internal workflow and organizational chart. (.5) Prepare documents and investor lists for access to PODS storage units. (.4) Attention to AIG invoice and other insurance payment matters. (.3) Review and finalize Website copy and investor communications correspondence. (1) Review analysis regarding UK TCA structure (.3)	3.50	265.00	927.50
05/25/20	JB	Send email to Kevin to request Highrise CRM information.	0.30	100.00	30.00
05/26/20	JEP	Review proposals for CRO from Solic, Glass Ratner, DSI, (.8), communications with FTI re potential retention (.2); same re BRG (.2)	1.40	340.00	476.00
05/26/20	JEP	Review Wells Fargo response to service demand for freeze, information, documents (.2); direct follow up (.2); communications and analysis of D&O policy issues and claims, email and phone call with Garno re same (.5); review Truist court filing re bank accounts (.2); obtain on site information from viewing of contents of pods containing art, furniture, etc. and direct inventory, valuation, liquidation strategy (.5),	1.60	340.00	544.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/26/20	JEP	Attend to phone call and email from potential purchaser of Pivot.(.2) Discuss with counsel (.2)..	0.40	340.00	136.00
05/26/20	JEP	Memo to file re Leland LTD.	0.80	340.00	272.00
05/26/20	JHG	Review engagement proposal from GlassRatner and review DSI proposal.	0.60	340.00	204.00
05/26/20	JPB	Interview with TCA analyst Giovanni Carmona.	1.50	265.00	397.50
05/26/20	JPB	Review and analyze valuation document related to SPV owning land in Scotland	2.00	265.00	530.00
05/26/20	JPB	Review and analyze valuation document related to SPV in the vehicle repair business	2.60	265.00	689.00
05/26/20	EGM	Travel to and secure PODS storage units; conduct initial assessment and analysis of contents of POD storage units (1.6) Travel to and secure mail and packages from PO box and Fedex locations; confer w/ PO box vendor regarding forwarding of mail (2.5) Meet with ArtMoves regarding Picasso; switch the name of the ArtMoves account into GJB name in order to ensure no one else has access; assess and secure painting (1.2)	5.30	265.00	1,404.50
05/26/20	JPB	Draft and revise investor communication correspondence.	0.50	265.00	132.50
05/26/20	IRS	Attend to correspondence regarding CRM access and other IT issues. (.3) Call with JEP regarding PODS storage issues (.2) View PODS storage units to conduct initial assessment of contents. (2) Secure mail from PO box and Fedex locations. (2) confer with Carl Schoeppl regarding access to Bob Press' storage unit and attend to correspondence regarding same. (.3) Update internal organization and workflow chart. (.5) Organize and prepare condensed proposals from expert restructuring officers. (.3) Coordinate investor communications phone call with Israeli investor. (.2) Submit proposed website copy to site developer. (.2)	6.00	265.00	1,590.00
05/26/20	CBH	Attention to receivership cases in various district courts; update chart; attention to district of illinois case; send responsive email; meeting with E. McIntosh regarding same.	0.80	100.00	80.00
05/26/20	JB	Call with Kevin in regards to employees that are still active and have TCA laptops.	0.50	100.00	50.00
05/27/20	JEP	Review communication with investor (.1), go over and update protocol for communications, as well as proper management of same, with team (.5);	0.90	340.00	306.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		review summary of interview with investor (.2); email to counsel Bado re same (.1).			
05/27/20	JEP	Draft and edit various investor communications, including mass emails (2.5), phone calls with Rocco and Sadovnic re same (.5); phone call with Circle Partners Kedi Change re same and re production of documents.(1.0) Receipt and review of investor communications, direct additional phone call and follow up (.2).	3.70	340.00	1,258.00
05/27/20	JEP	Communications re potential purchase offer of Zenergy SPV.	0.20	340.00	68.00
05/27/20	JEP	Review communications with UK employees, including re census, for anlaysis of work and need to keep on payroll, and investigate location of all accounts. (.3)	0.30	340.00	102.00
05/27/20	JEP	Analysis of SPV businesses, and restructure prospects (1.)..	1.00	340.00	340.00
05/27/20	GMG	Exchange emails re Excel and Transamerica (.4); call with B. Schreiberg re Zynergy (.3); review documents re Salem property and exchange emails re same (.3).	1.00	340.00	340.00
05/27/20	JPB	Review and analyze loan and valuation documents related to Sweedish SPV	3.10	265.00	821.50
05/27/20	JPB	Review and analyze loan and valuation documents related to boat engine repair SPV	3.70	265.00	980.50
05/27/20	EGM	Email correspondence with SEC counsel regarding filing order of appointment in various districts (x2) (.2); review docket of Central District of California regarding filing of complaint and order of appointment (.2); review dockets of other districts in order to ensure filing miscellaneous cases is adequate (.5)	0.90	265.00	238.50
05/27/20	JPB	Phone call with investor regarding his TCA investment and documentation to provide to Receiver.	0.50	265.00	132.50
05/27/20	IRS	Review correspondence from SEC regarding issues with misc. cases filed to secure in rem jurisdiction over receivership assets. (.2)	0.20	265.00	53.00
05/27/20	IRS	Prepare correspondence to Schoeppl regarding return of unused retainer funds. (.2)	0.20	265.00	53.00
05/27/20	IRS	Prepare correspondence regarding website, additional receivership email domain name and redirect from all tca owned domains. (.3) Call with Kedi Chang from Circle partners regarding investor communications (1) Attend to internal organization and workflow chart and prepare meeting agenda for attorney team meeting to discuss pending matters. (.5) Attention to investor communications from international investors and proposed responses	3.30	265.00	874.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		to same (1.5)			
05/27/20	JB	JP request for me to find out about ir@tcacap email address. I chat with Kevin about ir email he mentioned that it's Investor Realtion email group created for TCA with specific employees in there.	0.50	100.00	50.00
05/27/20	JB	Received email from JP asking about ir@tca email account and discussed with Kevin that ir email is an email group for Investor Relations. Responded back to JP.	0.50	100.00	50.00
05/28/20	JEP	Call with Fred Blanchard (.2); phone call with Nitsana Darshan-Leitner and Israeli investor group (1); multiple communications with Sadovnic/Chang re investor emails sent today, including confirmation, and communications re production of books and records per Receiver' s request (7 emails, and call) (1.); communication and review of documents and allegations against TCA for "guaranteed 12% rate of return" by investor Aubrey Dan Holdings/Dancap Family Office. Direct investigatory follow up. (.6). Review interview summary by Bado on another investor (.1); draft response for further follow up re same in investigation (.2),	3.10	340.00	1,054.00
05/28/20	JEP	Email from and to SEC re status on documents requested from SEC (.2); review and analysis of spread sheets of SPVs with analysis, spread sheet with restructuring opinions for same, spread sheets on loans status (3.); work on setting up interviews with whistleblowers (.2).; receive and respond to interested purchaser of TCA assets (.2).	3.60	340.00	1,224.00
05/28/20	JEP	Communications with Circle re logistics of data productiojn, expense, contract (3 emails, plus contract review and discussion internatly (.5). Direct changes to letters with document demands for other Service Providers, communicate re same to Sadovnic and Rocco (Cayman counsel) re same, strategy, and relation to protocols.(.4).	0.90	340.00	306.00
05/28/20	JEP	Communications with potential consultant Glass Ratner. (2 emails).3.; communications with potential consultant DSI (.2); communications with potential consultant BRG (.2). Speak with reference for consultant (.5). Communications with potential consultant FTI (.1).	1.30	340.00	442.00
05/28/20	MSF	[W/O PER GMG] Reveiw of NHC Asset Memorandum; review of NHC term sheet for financing; review of credit facility; review of historical balance sheet and income statement; consideration of communications related to asset sale.	0.00	340.00	0.00
05/28/20	JPB	Review and analyze loan and valuation documents related to solar energy development SPV	3.90	265.00	1,033.50
05/28/20	JPB	Review and analyze loan and valuation documents related to the SPV owning	2.00	265.00	530.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		artwork			
05/28/20	EGM	Conference call w/ I. Sadovnic and Saira Iqbal of the UK office to ascertain information regarding the books and records in the London office, the length of the lease, where the IT and equipment is located, and information regarding her employment with TCA Management, the marketing for the master fund, and investor relations (.8); update employee memorandum regarding same (.2)	1.00	265.00	265.00
05/28/20	IRS	Call with JEP regarding general case management strategy. (1.5) Attention to GJB final investor communication, email and domain registration. (1) Attention to correspondence with KChang regarding investor communication confirmation and cost of document request. (.4)	2.90	265.00	768.50
05/28/20	CBH	E-mail correspondence regarding notice of filing receiver in Texas case; attention to district court miscellaneous filings.	0.40	100.00	40.00
05/28/20	JB	Address the TCA receivership 1(800) situation International callers were experiencing and provided a local number to Laise to be published on website which corrected the issue.	1.00	100.00	100.00
05/28/20	JB	Discuss TCA email traffic with Jonathan and Irina over email. Explained that site forwarding would not affect TCA employee emails.	1.00	100.00	100.00
05/28/20	JB	Discuss with Kevin about TCA domains hosting email accounts.	0.50	100.00	50.00
05/28/20	JB	Provide Jonathan and TCA Receivership Group with list of domains hosting email accounts.	0.30	100.00	30.00
05/28/20	JB	Log into TCA Office 365 account to review all 26 domains and tag which domains were hosting email addresses that could be used in TCA environment. Will confirm domains with email accounts with Kevin V.	1.00	100.00	100.00
05/28/20	JB	After receiving confirmation from Irina of Receivership site was up, apply forwarding rules to all 26 TCA domains to Non-Secure tcafundreceivership.com site.	2.00	100.00	200.00
05/29/20	JEP	Approve and direct Cayman counsel re additional service provider letters (.2); multiple emails (3) re inventorying and obtaining proposals from auction firms for art, furniture, misc in storage pods (.5); disable access to NY employee who quit, folllow up on laptops etc; follow up on UK employees, now terminated, obtain report on interview with them, (.8). Discuss Zenergy bankruptcy status with Garno, review budget and motion to set status conference along with Foley Lardner email re operational expenses.(.6).	2.10	340.00	714.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/29/20	JEP	Attend to issues re website, domain routing/transfers (.5), response to particular invesotrs (.7).	1.20	340.00	408.00
05/29/20	JEP	Communications with interested purchaser of Galveston property (2 emails)..	0.20	340.00	68.00
05/29/20	GMG	Exchange emails with CRO candidates (.8); various calls with CRO candidates (1.5); exchange investor emails (.3); attention to issues re Transamerica tax protest (.4); call with B Dervishi re pending litigation (.5); exchange emails with P. Scott re Broward Collision (.3); review proposals for CRO (.5); communicate with receiver re CRO (.5); exchange emails with S. Brodie (.2).	5.00	340.00	1,700.00
05/29/20	JPB	Further and analysis of loan and valuation documents related to solar energy development SPV	3.20	265.00	848.00
05/29/20	JPB	Further review and analysis of loan and valuation documents related to boat engine repair SPV	3.40	265.00	901.00
05/29/20	IRS	Strategize with JEP regarding general case management strategy. (1) Attention to suspension of terminated employees' access to cloud services and TCA computers. (.7) Attend to investor correspondence (.3) Review correspondence regarding investor data request from circle partners. (.2) Attention to receivership website design, copy, and security. (1) Confer with JBado regarding TCA employee interview for NYC employees. (.3) Prepare correspondence regarding auction house for receivership assets. (.2) Prepare correspondence regarding invoice for storage of Picasso at Artmoves. (.2)	3.90	265.00	1,033.50
05/29/20	CBH	Preparation and filing of notice of appointment of receiver in Texas related case; e-mail correspondence regarding same (.5); attention to showing of property in sunrise; meeting with I. Sadvonic regarding same (.5).	1.00	100.00	100.00
05/29/20	JB	Purchase GoDaddy SSL Certificate for TCA Receivership Site. Installed and tested certificate on site was valid. Then redirected all 26 TCA domains from Non-Secure to Secure TCA Receivership Site.	3.00	100.00	300.00
05/29/20	JB	Discuss with Irina Termination of TCA Employee, Joseph Erbe. Reviewed documentation showing laptop still with active employees.	1.00	100.00	100.00
05/29/20	JB	Confirm with Ehounds that Joseph Erbe's account had been disabled in Office 365 and other TCA programs.	0.50	100.00	50.00
05/29/20	JB	Brief discussion with Kevin over two TCA employees and their status with TCA. Mentioned about laptops and backups from these two individuals (Spence and Joseph).	0.50	100.00	50.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/30/20	JEP	Phone conference interviewing M. Katzenstein and others at FTI re potential retention as CRO and other tasks. (1.4) Discuss same after call. (.2)	1.60	340.00	544.00
05/30/20	GMG	Call with FTI re CRO (1.3); exchange emails with Fickling re employees (.2); exchange emails with possible buyer of Galveston land (.2); review BRG proposal (.5); review Hearts and Hand bankruptcy pleadings and exchange emails re same (.6); work on AIG letter (.4.).	3.20	340.00	1,088.00
05/30/20	IRS	Attention to AIG insurance coverage for defense costs. (.2) Prepare correspondence regarding SBA disaster relief loans for the SPVs. (.2)	0.40	265.00	106.00
05/31/20	JEP	Attend to phone call and email from potential purchaser of Pivot.(.2) Discuss with counsel (.2)..	1.80	340.00	612.00
06/01/20	JEP	Phone conference with SEC re status of Cayman/protocols.	0.40	340.00	136.00
06/01/20	HLH	Review Kapila lookback report and supporting documents	2.00	340.00	680.00
06/01/20	HLH	Consider issues regarding return of retainer	0.40	340.00	136.00
06/01/20	JPB	Further review and analysis of loan and valuation documents related to boat engine repair SPV	2.20	265.00	583.00
06/01/20	JPB	Review and analysis of documents related to the SPV owning artwork and artwork itself	1.70	265.00	450.50
06/01/20	JPB	Consolidate and analyze TCA investor information of those who contacted any member of Receivership (.5). Draft language suitable for initial response (.4).	0.90	265.00	238.50
06/01/20	IRS	Call with JEP re: document requests from circle partners, documents available for accounting experts, and expert CRO proposals. (.4) Prepare correspondence to A.Taubman regarding request for information and coordinate initial meeting. (.2) Call with A. Taubman regarding tax returns and available documents at Kaufman Rossin (.5) Attend to correspondence from KChang regarding cost for data production. (.2) Call with J. Bushman re: IT matters (.4) Call with JBado re employee information and investor communications (.3) Prepare correspondence regarding notes on communications with Israeli investors. (.1) Prepare correspondence to AIG insurance matters. (.2) Call with JEP regarding internal investigations done by NMR Law. (.6) Review ehounds and internal sharepoint regarding internal investigations documents. (.5) Download and save documents received from Schoeppl law regarding their internal investigation. (.3) Download and save corporate documents from sharepoint to xdrive. (1) Revise expert CRO proposal summaries and confer with JEP regarding same. (.4) Review new org chart and index for receiver	6.50	265.00	1,722.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		transition file dropbox. (.2) Attention to internal billing codes and time entries for administrative staff. (.3) Attention to contractor invoices (HR and IT). (.5) Attention to resignation of NYC employees and restricting access to TCA cloud services. (.4)			
06/01/20	EGM	Review correspondence regarding filing receivership order and appointment order under 28 usc 754 in SDNY; confer w/ C. Hopkins regarding same	0.20	265.00	53.00
06/01/20	CBH	Attention to district court cases; meeting with SDNY regarding N. District filing.	0.50	100.00	50.00
06/01/20	JB	Received and review Kevin Vinitsky's MSA May invoices and forwarded along to JP and Irina for review. On my part, confirmed MSA amount and time spent helping us through May.	0.50	100.00	50.00
06/01/20	JB	Discussions with Ehounds on preserving Dropbox data and loading into Ehounds platform for review. Give them access to Admin account access to begin preserving, downloading data.	1.00	100.00	100.00
06/02/20	JEP	Review of all CRO proposals, multiple emails re same (.6); multiple phone calls with Solic finalists re proposals (1.2); communications with DSI finalist (..3); review final engagement letter from DSI to ensure compliance with deal terms and SEC billing requirements. (.3); Provide to SEC for review (.2). Direct preparation of motion for approval by Court. (.2).	3.60	340.00	1,224.00
06/02/20	JEP	Provide CRO engagement letter to SEC.	0.30	340.00	102.00
06/02/20	JEP	Communication re urgent Indumate deal for June 30 closing.	0.00	340.00	0.00
06/02/20	JPB	Conduct telephone interview with former employee in New York office,	0.60	265.00	159.00
06/02/20	JPB	Further review and analysis of loan and valuation documents related to boat engine repair SPV	2.00	265.00	530.00
06/02/20	JPB	Review and diagram allegations contained in whistleblower complaint in anticipation of conversation with with investors	2.80	265.00	742.00
06/02/20	JPB	Conduct telephone interview with foreign investor (0.5). Review call notes with L. Lowachee (0.5).	1.00	265.00	265.00
06/02/20	EGM	Conference call w/ PODS regarding updating account name and paying invoice; review mail from Fedex and PO box; confer w/ E. Serres regarding same	0.70	265.00	185.50
06/02/20	IRS	Call with JBushman and MValdivia regarding download and storage of sharepoint files. (.5) Review documents and prepare sharefile for expert forensic accountants with relevant documents. (1)	6.40	265.00	2,014.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

		Attention to expert CRO proposal summaries. (.3) Prepare correspondence to CHopkins regarding translation of Swiss regulator correspondence. (.1) Attention to storage units name transfer (.6) Confer with JEP regarding service of TRO to all interested parties. (.5) Prepare correspondence to CHopkins and H Harmon requesting service letter and document request form. (.2) Call with Schoeppl regarding NMR investigation and review documents on sharepoint to locate same (.4) Prepare correspondence to Schoeppl regarding Press' authorization for Maples to communicate with GJB. (.4) Review SEC billing guidelines and reconcile with proposed CRO expert proposal. (.2) Coordinate Meeting with SPVs (.2) Prepare document request for service providers. (.5) Call with G Garno and AIG Insurance broker Alia regarding policy renewal (.3) Attention to terminated employees and coordinate return of TCA laptops to forensic analysts. (.7) Attention to correspondence and payment offer for Kedi Chang regarding investor relations data. (.2) Prepare correspondence to A Schreiber regarding may master fund payment requests. (.1) Attention to correspondence with JP Bado regarding investor communications with EY liquidators. (.2)			
06/02/20	JB	Confirm with Ehounds that Dropbox data has been uploaded to Ehounds review platform and is ready for our Attys to review.	0.30	100.00	30.00
06/02/20	JB	Create Custody Log of TCA IT equipment (Laptops, Desktops, SPV Equipment) JP removed from Cube Smart Storage facility and is now in our Miami office.	2.00	100.00	200.00
06/02/20	JB	Review SyncTool (Online Laptop Backups Software) and review documentation on whether Spence Novick had a TCA laptop and check on his last activitys and report findings back to JP.	0.30	100.00	30.00
06/03/20	JEP	Communications with potential asset purchasers. (.3).	0.30	340.00	102.00
06/03/20	JEP	Pacific Ventures, email from HK, set up meeting re ICAV interference. Review notes of prior call, and reference to PV by whistleblower.	0.70	340.00	238.00
06/03/20	JEP	Review communications from former employee re: Picasso. Direct full interview and investigation.	0.20	340.00	68.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

06/03/20	JEP	Communications with SEC regarding DSI retention as CRO (.2); communications with DSI re same and to set up meetings (.3); put together package of documents for DSI review (.8); provide documents to Yip Firm and discuss same (.3); investigation meetings and calls with Sadovnic, Garno, Harmon, direct re additional production demands, eta on oustanding bank demands, potential targets (.8); review and edit new demand letters for turnover of documents (.3); review sharepoint files (1.5); communications regarding whistleblower information (.5); review and edit motion for approval of DSI as consultant, review proposed order. (.6).	4.50	340.00	1,530.00
06/03/20	HLH	Attention to Kapila lookback report	2.40	340.00	816.00
06/03/20	JPB	Review and diagram allegations contained in whistleblower complaint in anticipation of conversation with with investors	2.80	265.00	742.00
06/03/20	JPB	Review and analyze TCA documents related to real estate property owned in Texas.	3.20	265.00	848.00
06/03/20	IRS	Call with M Valdivia regarding data production for expert accountant (.8) Prepare correspondence to expert accountants regarding available data production. (.4) Attention to correspondence from AIG regarding notice of coverage under policy. (.2) Attention to correspondence from insurance broker re: request for meeting on cancellation or renewal of policy. (.2) Attention to cube smart storage issues and payment (.3) Prepare correspondence to tara grider from trinet providing service of order of appointment and requesting trinet access information. (.3) Confer with V.Garcia from TriNet regarding service of TRO and immediate access to payroll information (.2) Confer with Miriam Cunningham regarding access to trinet log in information and requirement to comply with receivership requests for turnover. (.3) Attention to internal organization matters and case management strategy (.8) Review and respond to investor correspondence (.4) Submit document request to Kaufman Rosin and prepare correspondence regarding additional document requests on service providers. (.3) Coordinate meetings with DSI for onboarding discussions. (.3) Attention to terminated employee cloud access. (.4)	4.90	265.00	1,298.50
06/03/20	JB	Email JP and Irina about disabling all access for Spence Novick to TCA environment. Waiting on JP and Irina to confirm.	0.20	100.00	20.00
06/03/20	JB	Received email from JP on disabling Spence Novick's accounts across TCA environment and forwarded request to Ehounds for their records.	0.20	100.00	20.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

06/03/20	JB	Review and retrieve activity log for Bob Press in all TCA applications for Irina.	2.00	100.00	200.00
06/04/20	JEP	Develop agenda and documents for first meeting with DSI and review documents (1.5.); meeting with DSI (1); additional review of documents received and follow up on requests; direct production from Ocean Bank. (1).	3.50	340.00	1,190.00
06/04/20	JEP	Review and analysis of multiple memos by whistle blowers (1.5), begin review of supporting documentation (1), discussions re same with Garno, Joe Luzinski. (.8)	2.30	340.00	782.00
06/04/20	GMG	Exchange emails and review materials re Pivot contracts (.4); exchange emails with Kaufman Rossin (.3); exchange emails with Cayman counsel (.2); exchange emails with Zynergy (.2); review order re DSI (.1); conference call with DSI (1.0); conference call with Fickling (1.0); exchange emails re TPN (.3); exchange emails with Shraiberg re Hearts & Hands bankruptcy (.2).	3.70	340.00	1,258.00
06/04/20	JPB	Conduct research on prospective TCA asset purchaser in anticipation of phone conference.	0.70	265.00	185.50
06/04/20	JPB	Review and analyze TCA documents related to former employee interested in purchasing TCA assets	2.30	265.00	609.50
06/04/20	JPB	Conduct telephone interview with prospective asset purchaser (0.5). Review call notes with L. Lowachee (0.5).	1.00	265.00	265.00
06/04/20	JPB	Conduct telephone interview with foreign investor (0.5). Review call notes with L. Lowachee (0.5).	1.00	265.00	265.00
06/04/20	IRS	Attention to data request from Circle Partners (.5) Confer with JBushman and MValdivia regarding ehounds data and ongoing data download from TCA sharepoint (.4) Call with MCunningham and H Harmon regarding trinet access. (,3) Attention to correspondence regarding access to SEC investigatory files. (.2) Attention to investor communications and correspondence from potential asset purchasers. (.3) Review order denying motion to approve retained professionals and prepare and file corrected version, and prepare correspondence regarding order granting motion to approve DSI. (.5) Attention to storage payment and invoicing issues (.7)	2.90	265.00	768.50
06/04/20	EGM	Conference call w/ CubeSmart in order to pay invoice and changing name of storage unit into Jonathan's name; confer w/ E. Serres regarding same; email J. Perlman regarding approval for CubeSmart payment	0.70	265.00	185.50
06/05/20	JEP	Communications regarding purchaser interested in property ,and Canada purchaser interested in an SPV. (.5).	0.50	340.00	170.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/05/20	JEP	Review documentation regarding assets and businesses, lengthy conference with Sadovnic re status on all issues, and comprehensive list of follow up to do's assignment and directives; draft lengthy memo to DSI and and team re same. (3)Conference call with G. Garno re same. (.4)	3.40	340.00	1,156.00
06/05/20	GMG	Exchange emails re Indumate (.2); exchange emails re payroll and payable issues foe SPVs (.3); call with SEC re Zenergy (.3)' exchange emails re insurance issues (.2); call with receiver re outstanding issues and strategy (.4); exchange emails re meeting (.2).	1.60	340.00	544.00
06/05/20	JPB	Conduct telephone interview with foreign investor (0.5). Review call notes with L. Lowachee (0.5).	1.00	265.00	265.00
06/05/20	JPB	Conduct research on prospective TCA asset purchaser in anticipation of phone conference.	0.50	265.00	132.50
06/05/20	IRS	Call with JEP regarding case management strategy (1.5) Strategize regarding initial correspondence and documents for DSI. (.4) Confer with JBushman regarding TCA sharepoint download issues and attend to correspondence regarding same (1.2) Attend to correspondence with insurance broker regarding AIG renewal policy. (.2) Review correspondence regarding PacV attorney meeting. (.2) Prepare and coordinate service of TRO on Cayman banks. (.5) Confer with JEP regarding available insurance for SPVs and prepare correspondence regarding same. (.4) Attention to correspondence with Yip associates re: data production. (.2)	4.60	265.00	1,219.00
06/06/20	JPB	Review and anlyze EY documents submitted by TCA investor (.7) and draft email to Receivership team to discuss stated concern and propose next steps (.3)	1.00	265.00	265.00
06/07/20	JEP	Discuss updated SPV lists, discussions regarding same (.2). Communications re update on accounting files in native format.(.2).	0.40	340.00	136.00
06/07/20	IRS	Attention to correspondence with JEP regarding ownership tracing of SPVs. (.3)	0.30	265.00	79.50
06/08/20	JEP	Review Schoeppl investigation files and interviews (1.); speak with Sadovnic re same (.5); communications with SEC re same and set up call (.3); prepare for and attend call with Pacific Ventures counsel, draft memo to file (.9); follow up on NV stock originals and other documents, phone calls re same (.7); follow up on status of all production requests, communications of follow up in particular with accounting and banking records requests and productions. (multiple emails and phone calls) (1.5); receipt and review of certain internal	5.80	340.00	1,972.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

		investigatory interview dsummaries, including Bob Press, discuss same (1.5).			
06/08/20	JEP	[W/O PER GMG] INVESTOR communications. Review and direct call. (.1).	0.00	340.00	0.00
06/08/20	JEP	Multiple communications with DSI (.3), and pull and provide information needed for its analysis re operations, valuations, and business issues (1.1).	1.40	340.00	476.00
06/08/20	JHG	Review issues to be discussed with Brad Sharp of DSI.	0.00	340.00	0.00
06/08/20	GMG	Conference call with creditors re Pacific Ventures (.8); exchange emails and review materials re SPVs (.5); attention to issues re Big Rhino assets (.2).	1.50	340.00	510.00
06/08/20	JPB	Phone conference with UK company rep who asserts that the company is a creditor of TCA.	1.50	265.00	397.50
06/08/20	IRS	Review internal investigation memos prepared by Schoeppl. (1.5) Prepare memo re: Schoeppl investigatory memos. (.8) Confer with Carl Schoeppl regarding organizational structure for Credit Strategies ICAV. (.3) Attention to investor communications re: Iteknik and prepare correspondence TCA litigation against Iteknik to B Halsey. (.3) Prepare correspondence to A. Taubman requesting access to accounting records and prepare correspondence to consulting team regarding same. (.4)	3.30	265.00	874.50
06/09/20	JEP	Review and analysis information about payroll and other services TCA has been handling for certain SPVs without reimbursement (.5); provide information to DSI, tax accountant, forensic team to document and discuss reimbursement strategy.(.5).	1.00	340.00	340.00
06/09/20	JEP	Call with SEC providing update on investigation.	0.50	340.00	170.00
06/09/20	JEP	Communicatios with Nelson Lamis, DSI, re corporate documents for various SPVs.	0.50	340.00	170.00
06/09/20	JEP	Communications to Jeff Marcus re follow up on MNR's TCA investigation.	0.20	340.00	68.00
06/09/20	JEP	Communications with Bill Fickling re estimated value of Broward Collision business.	0.30	340.00	102.00
06/09/20	JPB	Review and analysis of documents related to the SPV in car repair business	0.80	265.00	212.00
06/09/20	IRS	Call with JBushman regarding receivership website and email domains coordination and attention to correspondence regarding same (.4) Call with JBushman regarding status of servers and laptop inventory and shipment to ehounds (.2) Call with SEC to discuss ICAV ownership and sharing of internal investigatory files. (.6) Confer with JEP regarding status of document requests for circle partners. (.2) Attention to instructions received from circle partners for data	3.10	265.00	821.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		download and coordinate same with internal IT department. (.4) Prepare correspondence regarding Marcus investigation and follow up call (.1) Attention to correspondence and documents provided by Israeli investor representative (.5) Attention to correspondence with Schoeppl regarding corporate structure for ICAV and prepare internal correspondence regarding same. (.3) Review correspondence from Yip associates regarding banking records. (.2) Prepare quick reference employee guide for DSI onboarding process. (.2)			
06/09/20	IRS	Review TCA sharepoint files and sunbiz reports to confirm SPV ownership. (.3)	0.30	265.00	79.50
06/10/20	JEP	Interview of Jeff Marcus.	1.10	340.00	374.00
06/10/20	JEP	Inquiry for purchase of Maney Aircraft, Communications with DSI re same.	0.20	340.00	68.00
06/10/20	EGM	Fill out paperwork and provide to PODS in order to effectuate name change in the name of Jonathan E. Perlman; conference call w/ PODS regarding name change and documents needed to complete name change	0.90	265.00	238.50
06/10/20	IRS	Call with Yip Associates to discuss their document review and missing banking information. (.5) Call with Jeff Marcus re: internal investigatory roll with TCA. (1.1) Confer with J Bushman re: former D&O access to online files and review correspondence regarding same (,4) Call with J Bushman regarding Margill access. (.2) Review SEC access request follow up from EMC. (.1) Attention to data download from circle partners (.3) Prepare correspondence requesting access to online accounting files. (.2) Attention to PODS change of name request (.1) Prepare correspondence to IT regarding TCA sharepoint "audit" file download. (.1)	3.00	265.00	795.00
06/10/20	JB	Review Tierpoint Datacenter Invoice for TCA and forward to Irina, JP and Jonathan.	0.20	100.00	20.00
06/10/20	JB	Assist Mike with installing new FTP program into Prod server to download data sent to us with TCA data. Then sending off to Ehounds to host.	0.50	100.00	50.00
06/10/20	JB	Review and send email to TCA about Margill account creation request from Bill at TCA. Talked to Kevin about this. He's awaiting my response on wheather to move forward with Bill's request.	0.50	100.00	50.00
06/11/20	JEP	Communications with Pacific Ventures re loan payment.	0.50	340.00	170.00
06/11/20	JEP	Attend to Amian Agenls and arrange for wire transfer to Master Fund account.	0.50	340.00	170.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

06/11/20	JEP	Asset Analysis and Recover. Review communications with debtor Independent Charter Network. Review pleadings, judgment and Halsey analysis. Request additional informaiton before deciding on course of action to collect.	0.60	340.00	204.00
06/11/20	JPB	Conference call with Fund Administrator and local counsel regarding identification and tracking of subscribers.	1.50	265.00	397.50
06/11/20	JPB	Review and analyze TCA documents regarding investor accounts to determine need for additional expert review.	2.20	265.00	583.00
06/11/20	EGM	Email Raynette at the SEC regarding document production on hard drive and where to send hard drive; edit letter correspondence regarding hard drive; confer w/ C. Monzon regarding shipping hard drive to SEC	0.40	265.00	106.00
06/12/20	JEP	Review Pacific Ventures communications, direct re follow up on total debt calculations and potential default issues/acceleration rights.	0.50	340.00	170.00
06/12/20	IRS	Call with JBushman re IT Matters, data download, and back up search capability for TCA employee laptops(.4) Confer with JBushman regarding logickull subscription and prepare correspondence regarding same. (.3) Confer with JEP regarding general case management matters. (.5) Call with S.Amarnani re:document sharing protocols between consulting firms, and prepare internal recommendation and plan for same. (.7) Prepare correspondence to interested asset purchaser. (.1)	2.00	265.00	530.00
06/12/20	JB	Discuss Logicull eDiscovery with Kevin and consider cancellation of service with Logicull. Get info on SyncTool to review backups files. Ask Kevin to consolidate invoice.	1.00	100.00	100.00
06/12/20	JB	Discuss with Kevin about Margill Loan Software Access for DSI employees. VM will be set up on Tierpoint Datacenter environment for access to Margill.	0.50	100.00	50.00
06/13/20	JPB	Further review and analysis of TCA documents regarding investor accounts to determine need for additional expert review (corporate entity clients).	3.10	265.00	821.50
06/13/20	JPB	Further review and analysis of TCA documents regarding investor accounts to determine need for additional expert review (tax related documents).	3.30	265.00	874.50
06/14/20	JEP	Asset analysis and recovery. Additional follow up and communications with Pacific Ventures re loans and amounts due and payment schedule.	0.50	340.00	170.00
06/14/20	JPB	Further review and analysis of TCA documents regarding investor accounts to	2.70	265.00	715.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		determine need for additional expert review (account statements).			
06/15/20	JEP	Follow up on pod name change and contents.(.3). Follow up on Thermal Energy Sofame Techonologies deal (.2). Multiple emails communications (4) re potential auctioneers and proposals for personal property (.5). Review multiple emals (2) between Wahlberg and Iammartino re indicative bids for Undumate subsidiaries, and strategy for same (.4).	1.40	340.00	476.00
06/15/20	JEP	Review Bickling email re access to certain documents, and necessary research into ownership of TCA Aerospace (.3); communications with DSI and team re note between Master Fund and Opportunities fund and research into possible securities agreement. (.4).	0.70	340.00	238.00
06/15/20	JEP	Communication with adviser to TCA borrower.	0.20	340.00	68.00
06/15/20	JEP	Follow up on bank accounts of TCA at Ocean US Bank, Morgan Stanley and BBT (.5). Follow up on potential documents held by Baank Leumi (.2).	0.70	340.00	238.00
06/15/20	IRS	Attention to PODS storage name change. (.2) Attention to auction houses and storage issues with artwork and office equipment (.4) Coordinate status update meeting with DSI. (.2) Attention to document sharing protocol between expert consulting firms. (.3) Call with Schoeppl regarding information sharing and access to information from DSI. (.1) Attention to IT issues and outstanding IT manager invoices. (.7) Confer with JEP regarding internal case management strategy and work flor organization. (.3)	2.20	265.00	583.00
06/15/20	EGM	Phone calls with Artmoves, Stampler, and Moecker auctions regarding auction proposals for receivership property; research other auction houses to sell the receivership property	0.30	265.00	79.50
06/15/20	EGM	Conference call with customer support at PODS regarding name change, new pin number, and customer ID; ensure all PODS account are now in the name of Jonathan Perlman and not any former employees at TCA	0.80	265.00	212.00
06/15/20	JB	Discuss with Kevin, Global Relay and Logicull accounts and how to cancel and export data from them.	0.50	100.00	50.00
06/15/20	JB	Forward Irina, Kevin's responses on Global Relay, Logicull, and consolidated invoice for her to review.	0.30	100.00	30.00
06/16/20	JEP	Review asset and document outstandings. Meet with Harmon, go over all outstanding document requests, known and possibly unknown bank accounts, status of demands and recoveries, set second meeting for later today. (1.5); Review and discuss whistleblower documents.(1); further analysis and review of additional documents relating to transfer of certain Florida operations to	3.50	340.00	1,190.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		London in 2020. (1.).			
06/16/20	JEP	Follow up on investigation into ICAV and UK TCA affiliates.	1.00	340.00	340.00
06/16/20	IRS	Attention to mail forwarding issues. (.6) Confer with JEP regarding internal organization (.7) Call with JEP to discuss corporate document availability (1) Review sharepoint files and create internal organizational folder with available documents. (.5) Prepare folder with documents relating to affiliated funds from sharepoint review (1.2) Coordinate meeting with consulting firms (.2) Attention to books and records request follow up with HHarmon. (.1) Attention to auction house communications re office furniture and artwork appraisals. (.5) Attention to investor and interested purchaser communications (.3) Prepare analysis of current fund investors and their locations. (.4) Call with JEP and JBushman regarding IT security considerations. (.3) Attention to former employee access to online TCA files and active user list adjustments for access to same. (.5) Review analysis from Rehmann containing UK fund structure findings. (.2) Prepare correspondence regarding additional service parties (.1) Review documents from circle partners regarding Bank Leumi investors and prepare correspondence regarding same (.4) Confer with JEP regarding investor status and US investors in Ltd fund. (.4).	7.70	265.00	2,040.50
06/16/20	EGM	Conference call with Moecker Auction House regarding inventory, storage, and auction of receivership propertt (.4); conference call with Stampler Auction House regarding same (.2); conference call with Todd Wohl regarding auctioning art and receivership property and advice regarding same (.3)	0.90	265.00	238.50
06/17/20	JEP	Further review of two investor On Trust demands, analysis of documents, (.8) review EY proposed letter (.3), obtain accurate information and provided for suggested changes regarding representations re monies, location and freeze. (.5).	1.60	340.00	544.00
06/17/20	JEP	Further analysis of IT issues, security, transfer of controls, review of protocols, disable access to employess let go.	1.30	340.00	442.00
06/17/20	JEP	Multiple email communications re Cleland SPV, including with Scottish Counsel, DSI, (.5) set up meeting to discuss property.(.2).	0.70	340.00	238.00
06/17/20	JEP	International Charter/E-Learning analysis and discussion re settlement and potential sale of business. (.8)Follow up with DSI re same. (.3); Additional communications regarding securing financial information and documents from various sources (.5); obtain update on US Bank documents and direct (.2); obtain update on Circle potential documents and update (.3);	1.60	340.00	544.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/17/20	JEP	Strategy discussion re obtaining information from Circle and Financial Matters. (.6).	0.60	340.00	204.00
06/17/20	JEP	Obtain update on Cleland SPV, property status, call with counsel tomorrow, multiple emails re same. (.6).; follow up on US Bank Custodian, direct inventory and copying of all files (.6); follow up and on banks who have not provided balances (.4); follow up outstanding document requests and seek status (.4); research re TCA Capital Market Services Group and accounts in its name (.5); travel to USPS Office downtown to establish permanent PO boxes and obtain keys (1.8).	3.90	340.00	1,326.00
06/17/20	IRS	Confer with JEP re: general case management strategy. (1.5) Call with JBushman regarding IT security issues and attention to correspondence regarding (.7) Prepare internal correspondence regarding documents received from third parties (.3) Attention to audit folder data download from sharepoint (.2) Attention to auction house proposals for office furniture and artwork (.3) Attention to document request from Circle Partners regarding corporate books and records (.5) Attention to invoice payment for circle partners (.2)	3.70	265.00	980.50
06/17/20	EGM	Continue conducting interviews with auction houses regarding auctioning off property contained in PODS (.7); review proposals submitted by auction houses (.2)	0.90	265.00	238.50
06/17/20	EGM	Conference call with PODS regarding duplicative invoices and ensuring no one at TCA Management Group has access to the PODS account	0.80	265.00	212.00
06/17/20	CBH	E-mail correspondence with G. Garno regarding keys to warehouse property in Sunrise and showing of property.	0.40	100.00	40.00
06/17/20	JB	Disable Bob Press from Office365 and other accounts.	0.50	100.00	50.00
06/17/20	JB	Held discussions with Kevin and eHounds about server synchronization with disabled users.	1.00	100.00	100.00
06/18/20	JEP	Attend conference call with Scotland counsel Gillian Campbell , Alan Kelly, DSI	1.90	340.00	646.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		and Fickling re Cleland SPV, its property, valuation, development options, security and insurance and other issues (1); draft memo to file re same (.5); receipt and reivew of further communications re property owned by Cleland and issues re same. (.4).			
06/18/20	JEP	Marcus communications re document production.	0.30	340.00	102.00
06/18/20	JEP	Receipt and initial review of files for On Trust clamaints i Homaer Global Strategies Fund SPC for Anshun Income Fund SP (represented by George Chen) Banque de Luxembourg (represented by Nicholas Galmiche); discuss with Cayman and US counsel assignments for review and processing.	0.90	340.00	306.00
06/18/20	JEP	Research re TCA Tamweel UK, LP, including review of org chart, search for additional documention, and direct questioning of Press counsel.	1.00	340.00	340.00
06/18/20	JEP	Follow up with J. Marcus on documents promised (.3); communications from SEC, set up call (.2); further review of documents from Schoeppl firm (1); discuss production issues with counsel (.3).	1.80	340.00	612.00
06/18/20	IRS	Confer with JBushman re: new possible IT vendors and IT security issues. (.4) Attention to sharefile preparation for SEC documents. (.3) Attention to sharefile request for Audit folder documents (.2) Review response to information request sent to Circle Partners. (.3) Confer with JEP and GGarno regarding insurance coverage issues (.4) Confer with JEP and GGarno re: parallel fund investigations. (.2) Attention to correspondence and analysis regarding potential related European fund structure (.5) Confer with GGarno re: document review and available internal investigation reports. (.3) Attention to correspondence with SEC re: status update (.2) Attention to follow up with Jeff Marcus re: document request (.1) Attention to invoice requests for pre-receivership work and confer regarding same (.7)	3.60	265.00	954.00
06/18/20	CBH	E-mail correspondence with G. Garno regarding keys to warehouse property.	0.30	100.00	30.00
06/18/20	JB	Respond to email regarding potential IT providers to take over TCA IT support and Maintenance.	0.20	100.00	20.00
06/19/20	JEP	Further review on Tritium and Zohari on trust claims documents, process for same, direct US and Cayman counsel re same.	1.00	340.00	340.00
06/19/20	JEP	Review correspondence and deal documents regarding Pacific Venture provided by HK, and analyze same (.8); Email to team re follow up.(.2)	1.00	340.00	340.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/19/20	JEP	Follow up on IP ownership investigation and direct re same (.5); review and analysis of GT audit drafts and related correspondence (.9).	1.40	340.00	476.00
06/19/20	IRS	Call with SEC to provide status update and confer regarding protocol issues. (.7) Prepare Schoeppl files for production to SEC. (.3) Attention to production of documents for consulting firms. (.2)	1.20	265.00	318.00
06/20/20	JEP	Review multiple communications regarding Bellside Brae property, valuation issues, engineer assistance and opinion.	0.30	340.00	102.00
06/20/20	JB	Respond to Jonathan about who owns TCACAP.com domains	0.10	100.00	10.00
06/20/20	JB	Go into detail about ownership of tcacap.com, and respond to a list of questions from Jonathan on domain and hosting.	0.50	100.00	50.00
06/20/20	JB	Respond to JEP via email regarding domain accounts owned by TCA.	0.50	100.00	50.00
06/21/20	IRS	Prepare correspondence regarding UK lease agreement and UK entity incorporation. (.3) Attention to investor correspondence internal protocols and response procedures. (.4) Conduct USPTO search for TCA logo and trademark information. (.6)	1.30	265.00	344.50
06/22/20	JEP	[W/O PER GMG] Review and analysis of SEC Liu Decision that came out today, and impact on potenital claims of Receiver. Draft memo re same..	0.00	340.00	0.00
06/22/20	JEP	Meet with I. Sadovnic and go over IT assets and obtaining control of remainder, further shut off of any former employees, research into IT, and trademarek, discuss factors for expansion over TCA Credit Managerment Ltd. (.9); research re creation of master chart of entities and documents (1.1).	2.00	340.00	680.00
06/22/20	JEP	Follow up on cross obligations between GCMF and Opportunities Fund. (.5); Research re relationships between TAP Financial Partners, T-Cap Management and TCA Credit Management. (.6).	1.10	340.00	374.00
06/22/20	JEP	Follow up on issues re Bank Leumi, as registered holder of shares.	0.50	340.00	170.00
06/22/20	JEP	Receipt of second batch of Kaufrman Rossin documents, review and discuss same.	0.90	340.00	306.00
06/22/20	JEP	Receipt and Review of documents pertaining to purchase of TCA Aerospace by Opportunity Fund from Master Fund in July 2019 for $8.5M promissory note, security agreement, draft memo re same.	1.50	340.00	510.00
06/22/20	IRS	Conduct corporate research regarding TCA parallel funds to determine the	1.50	265.00	397.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		overall corporate structure of all related TCA entities. (1.5)			
06/22/20	EGM	Review docket in N.D. Illinios regarding receivership order being filed in order to determine why A. Schiff was receiving a scheduling order regarding the case (.3); confer w/ C. Hpokins regarding same (.1)	0.40	265.00	106.00
06/22/20	EGM	Review 28 USC 20001 regarding receivership property and ability to sell it privately verses at a public auction (2.1)); conference call with J. Perlman regarding same (.6)	2.70	265.00	715.50
06/22/20	IRS	Prepare correspondence to K.Chang regarding status of payment and going forward costs. (.2) Call with JBushman re: disabling employee accounts and sharefile access (.5) Call with LLowachee regarding mail coordination and investor communications (.3) Attention to incoming investor communications from Circle partners (.2) Prepare correspondence regarding Israeli investor information (.1) Call with SSiff regarding general case overview in support of document review exercise. (.3) Call with JEP re: general case management strategy (.7) Attention to internal organization and workflow chart (.2) Call with JEP re asset realization strategy in relation to international assets. (.5) Download and circulate Kaufman Rossin documents to consulting professionals (Yip, Rehmann). (.2) Conduct research and analysis regarding TCA logo general IP ownership (1.5) Coordinate laptop return from UK employees (.4) Prepare initial memo re: receivership entities and available documents for SSiff(.2) Confer with Rehmann re: sharefile and document availability (.1) Prepare correspondence to SIqbal and RScarrott re: redundancy payments to former UK employees (.3) Review internal correspondence regarding service list on remaining interested parties. (.1) Prepare correspondence regarding research on internal TCA organization amongst the funds. (.2)	6.00	265.00	1,590.00
06/22/20	CBH	Detailed e-mail to the ND Illinois regarding status of miscellaneous case and conversion from civil case; e-mail correspondence with E. McIntosh regarding same.	0.40	100.00	40.00
06/22/20	JNS	Conference call with Irina Sadovnic regarding corporate information search and download of same (.5). Work downloading corporate information and creating information chart (2.7).	3.20	100.00	320.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

06/22/20	SS	[W/O PER GMG] Tcw I. Sadovnic re new document review project and background. Began review of documents provided by I. Sadovnic	0.00	100.00	0.00
06/22/20	JB	Log into Tierpoint data center Active Directory and disable all users that are not apart of Irina's active list of employees. Then test all disabled accounts to verify accounts are locked out via office365.	2.00	100.00	200.00
06/22/20	JB	Create forwarding rule in TCA's exchange to forward emails sent to itadmin@tcacap.com to jbushman@gjb-law.com	0.30	100.00	30.00
06/22/20	JB	Phone call with Irina to discuss updates on TCA user accounts.	0.30	100.00	30.00
06/23/20	JEP	Develop protocols for communications with suspended directors and communicate same.	0.80	340.00	272.00
06/23/20	JEP	Creating Mail distribution process and emailing TCA's incoming mail to the TCA team	0.50	340.00	170.00
06/23/20	JEP	Communications re Wookey, emails, review sampling, Direct further investigation.	0.80	340.00	272.00
06/23/20	JEP	Follow up on document production with Jeff Marcus.	0.20	340.00	68.00
06/23/20	EGM	Email Ananya from the UK office as to her availability for a Zoom call regarding her termination at TCA and her employment with TCA	0.20	265.00	53.00
06/23/20	EGM	Review incoming mail in order to get outstanding invoices paid and mail directed to the right party/contact	0.70	265.00	185.50
06/23/20	EGM	Conference call w/ clerk at ND Illinois regarding misdocketing of case	0.40	265.00	106.00
06/23/20	IRS	Strategize with JEP re: general case management strategy (2.5) Confer with JEP re: service on all service providers (.5) Call with HHarmon to review and prepare document request for all service providers and banks (.2) Attention to correspondence with UK employees re: interviews and laptop returns (.2) Prepare correspondence to DSI and Yip re: accounting records received from Kaufman Rossin. (.2) Attention to disabled access for former employees (.5) Call with JSardina re: corporate document research. (.2) Call with Carl Schoeppl re: UK lease novation adn attend to correspondence from Alyce Schreiber re: same. (.3) Attend to correspondence re: internal protocol for mail collection and distribution. (.3)	5.90	265.00	1,563.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Attention to billing requirements and request for compliance from all retained professionals (.4) Conduct corporate structure research (.5) Prepare GJB social media blast. (.1)			
06/23/20	CBH	Attention to warehouse showing and meeting with realtor regarding keys to property; e-mail correspondence with G. Garno regarding same (.5); call to ED Illinois regarding miscellaneous case filing and status of correction of type of case (.3).	0.80	100.00	80.00
06/23/20	JNS	Continue work gathering corporation incorporation documents and creating a chart containing same information.	2.40	100.00	240.00
06/23/20	JB	Send email to Jonathan about Bruce W. and how we was reaching out to Kevin to be able to gain access to his account that I had previously locked out.	0.20	100.00	20.00
06/23/20	JB	Verify for Jonathan that after a list of active user accounts was provided to me, all other accounts were disabled.	0.20	100.00	20.00
06/23/20	JB	Retrieve all activity logs from all applications on the ex-employee, Bruce W, for Jonathan and provide in an email to Jonathan, Irina, and Greg.	2.00	100.00	200.00
06/23/20	JB	Work with Elizabeth M. on giving her access to Bruce Wookey's email account and talked to her on best way to review.	0.30	100.00	30.00
06/24/20	JEP	Further analysis of related entities, T-CAP Marketing and Management and TCA Credit Management for liability and benefit to expansion, and tax issues. (1.2); communications with Sadovnie re same 3x's)(.3).	1.50	340.00	510.00
06/24/20	JEP	Attend to additional demands upon persons with property for return.	0.30	340.00	102.00
06/24/20	JEP	Multiple communications re discovery of additional persons to serve demands upon and direct re same. (.3)	0.30	340.00	102.00
06/24/20	HLH	Review Ocean Bank statements	0.80	340.00	272.00
06/24/20	HLH	Phone conference with counsel regarding payroll tax disputes of SPV assets	0.40	340.00	136.00
06/24/20	IRS	Call MValdivia regarding ehounds document upload (.2) Attention to billing and time keeping requirements with consulting firms (.7) Call with JEP re: UK entity employment issues (.6) Prepare correspondence to ASchreiber re: TCA fund management relationship to UK entities (.3)	3.80	265.00	1,007.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Call with JBushman re: restricted access to former TCA directors (.1) Confer with EMcIntosh regarding employee email review (.2) Call with JEP re: generla case management strategy and internal organization (.4) Attention to correspondence with former UK employee regarding intent to file claim for statutory redundancy payments (.3) Review subpoena served on Receiver (.2) Prepare list of service providers that require service of appointment order (.2) Prepare correspondence to KChang re: investor communication sharing with EY. (.2) Prepare letter to former employees requesting return of TCA laptop and document request. (.5)			
06/24/20	IRS	Review Mint Leasing loan portfolio documents and mechanic's liens and available assets (1) Call with JEP re: car titles and mechanic's liens (.3) Call with DSI and JGogin regarding historical analysis of Mint leasing and its asset locations. (.3)	1.60	265.00	424.00
06/24/20	EGM	Conference call w/ I. Sadovnic regarding reviewing of former TCA directors email accounts	0.40	265.00	106.00
06/24/20	EGM	Begin reviewing former TCA employees inboxes to gain additional facts and information regarding potential claims, assets, and other involved entities	2.80	265.00	742.00
06/24/20	EGM	Conference call with Jay Bushman regarding review of former TCA director's email accounts in order to gain additional facts	0.60	265.00	159.00
06/24/20	EGM	Review correspondence from former UK employee regarding Zoom interview (.4); review TCA termination letter regarding same (.2)	0.60	265.00	159.00
06/24/20	JNS	Continue work gathering corporation incorporation documents and creating a chart containing same information.	4.20	100.00	420.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/25/20	JEP	DSI/GJB update conference on all financial progress, including valuations, management of SPVs, initial decisions on liquidation for maximum value, problem assets, insurance, bankruptcy, tax issues. (3). Draft memo to file. (.5).	3.50	340.00	1,190.00
06/25/20	IRS	Review contact information for former TCA employees and send document demand (.3) Prepare correspondence regarding information received from Kaufman Rossin. (.2) Attend to internal organization and workflow chart. (.4) Coordinate service of receivership property demand on former employees (.2) Confer with JEP re: internal organization (.3) Coordinate sharepoint access for DSI team (.1) Review correspondence regarding investor communications (.2) Confer regarding mail review process. (.2) Review corporate records search chart completed by paralegal (.3)	2.20	265.00	583.00
06/25/20	EGM	Confer w/ I. Sadovonic and B. Halsey regarding storage of painting in climate controlled facility	0.20	265.00	53.00
06/25/20	JB	Show Soutec (IT Vendor) the infrastructure of TCA to be able to get a quote on running IT support if receiver decides to release Iron Oak Defense (Kevin V.)	2.00	100.00	200.00
06/26/20	JEP	Communications with SEC re case status.	0.20	340.00	68.00
06/26/20	EGM	Review incoming mail including bank statements, invoices, and incoming correspondence	1.50	265.00	397.50
06/26/20	EGM	Phone call w/ CubeSmart regarding changing name on lease and whether someone from GJB needs to be there in person (1.1); email Nelson Lamis regarding meeting at Aventura CubeSmart on Monday to change the lease name (.1)	1.20	265.00	318.00
06/26/20	IRS	Call with LLowachee re: incoming mail protocol (.2) Confer with JEP re: general case management strategy (4) Attention to investor communications (.3) Review incoming mail and route accordingly. (.4) Attention to Cubesmart storage invoice and name change process (.3)	5.20	265.00	1,378.00
06/29/20	JEP	Pacific Ventures. Review HK recent emails and loan documents and redacted email threads in preparation for call with HK partners on Pacific Venture Loans (1.4); phone conference with HK (..9); follow up analysis and discussion of same, regarding loans, payments, on multiple facilities, forbearance communications, direction re same (.6). Review whitleblower documents (.6); 11 emails setting up additional whistleblower interviews, logistics, documents.	6.30	340.00	2,142.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

		(1.); communications with US bank, updates.(.2); review and execute assignment of CubeBox lease, and new rental agreement with insurance. Discuss same. (.8). Obtain backup information from Luzinski, Fickling re PV, review and direct follow up on same. (.5). Communications re Edison Learning financials (2) (.3).			
06/29/20	JEP	Follow up on logo ownership issues.	0.20	340.00	68.00
06/29/20	HLH	Prepare for and attend phone conference regarding payroll tax issues (.4); Handle numerous issues regarding bank accounts and operating documents (1.5)	1.90	340.00	646.00
06/29/20	HLH	Consider issues regarding proposed custody agreement with US Bank and corresponding document production	1.50	340.00	510.00
06/29/20	EGM	Assume lease in favor of Receiver and secure property and receivership assets at CubeSmart location in order to determine value/inventory property	3.00	265.00	795.00
06/29/20	EGM	Conference call w/ N.D. Illinois clerk's office and intake supervisor regarding filing of receivership appointment order and complaint to get in rem and in personam jurisdiction over receivership assets in district(.7); draft email and left voicemail with JA office regarding status conference in N.D. Illinois to cancel status conference hearing (.3)	1.00	265.00	265.00
06/29/20	EGM	Prepare cover letter and Fedex for filing in the N.D. Illinois	0.20	265.00	53.00
06/29/20	IRS	Attention to CubeSmart storage account transfer and inventory (.7) Attention to internal organization and workflow chart. (.2) Call with EMcintosh regarding incoming SEC investigatory file. (.2) Attention to additional service on former TCA service providers (.5) Confer with EMcintosh regarding incoming mail organization. (.2) Coordinate internal GJB team meeting. (.3) Attention to correspondence regarding court approval for post-receivership payments (.3) Prepare draft motion to approve consulting agreements (.5) Prepare correspondence to experts regarding document review. (.2) Attention to investor communications: (.1) Attention to correspondence from fund administrator regarding accounting and record keeping data (.2) Prepare correspondence regarding invoice from Kaufman Rosin for document production and accounting records (.2) Prepare correspondence to former marketing team regarding logo ownership. (.1) Follow up with former employees regarding laptop return (.1)	3.80	265.00	1,007.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/29/20	SS	[W/O PER GMG] Continued review of background materials in anticipation of document review project	0.00	100.00	0.00
06/30/20	JEP	Follow up demand for documents from Jeff Marcus (.2).	0.20	340.00	68.00
06/30/20	JEP	Review and analysis of Sofame deal documents, phone conference re same, develop list of questions, obtain answers.	1.20	340.00	408.00
06/30/20	JEP	Attend TCA Receivership Team Zoom call with Sadovnic, Garno, Harmon, Bado, McIntosh, Genovese; and draft memo re all topics covered and assigned.	2.60	340.00	884.00
06/30/20	IRS	GJB attorney team meeting to discuss ongoing projects and internal organization matters. (2.5) Confer with JBushman regarding IT follow up with ehounds imagine. (.3) Confer with SSiff regarding corporate factual research and analysis. (.4) Analyze documents received from Jeff Marcus regarding internal investigation and confer with JEP regarding same (.4) Coordinate internal conference call with consulting firms. (.2) Attention to correspondence to KChang regarding TCA books and records from advent geneva. (.2) Attention to investor communications (,2) Attention to cubesmart storage issues. (.2)	4.40	265.00	1,166.00
06/30/20	EGM	Attended videoconference with Receiver and counsels for Receiver (Garno, Sadvonic, Genovese, Harmon, Bado, Halsey), to discuss pending matters and issues involving receivership current litigation affecting receivership, outstanding business operations, outstanding urgent issues and prepare strategy going forward	2.50	265.00	662.50
06/30/20	EGM	Conference call w/ SEC regarding investigative files and Apricorn access code to access the files	0.30	265.00	79.50
06/30/20	EGM	Conference call w/ JP Bado and J. Bushman regarding contents of CubeSmart, inventory, and plan moving forward to clear the contents of the unit	0.30	265.00	79.50
06/30/20	JPB	Conference with Receiver to review issues raised by investor communications and communications provided by fund administrator	2.10	265.00	556.50
06/30/20	JPB	Review and analyze documents provided by TCA investors/advisors to investors to the fund administrator	1.40	265.00	371.00
06/30/20	CBH	Attention to demand for additional service providers; update chart and mail out (.4); receipt and review of bank statements; organization (.5).	0.90	100.00	90.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

Total 001 / Asset Analysis and Recovery			**637.00**		**176,527.00**
003 / Business Analysis					
06/30/20	JEP	Receipt and review of Marcus Firm documents, including TCA compliance manuals, supervisory manuals, employment manuals, engagement and fees, and numerous other documents. Discuss same with counsel. (3.5). Further correspondence with Marcus (.2).	3.70	340.00	1,258.00
Total 003 / Business Analysis			**3.70**		**1,258.00**
004 / Business Operations					
05/12/20	JEP	Communications with acting chief executive officer Alyce Schreiber re AIG policy nnd contact information.	0.20	340.00	68.00
05/12/20	JEP	Send additional copy of TRO to AIG at new address obtained with cover letter.	0.20	340.00	68.00
05/13/20	JEP	Phone call with daily asset updates, developments with Bill Fickling (2.0); Zoom call with Comptroller Jackie Goggin (1.2); Review and analysis of business operations and documents, multiple communications re same.(4.8)	7.90	340.00	2,686.00
05/13/20	IRS	Attend to extensive correspondence regarding pivot energy and TCA aerospace holdings from Bill Fickling. (1.4) Conference with Bill Fickling. (2)	3.40	265.00	901.00
05/14/20	JEP	Review and discuss 20 emails from Bill Fickling, and many exhibits, regarding various operational issues. Discuss same.	2.90	340.00	986.00
05/14/20	JEP	Attend to mail issues, move online to PO Box opened for that purpose.	0.20	340.00	68.00
05/14/20	IRS	Coordinate new administrative billing matters for all Cayman Islands matters and IRS tax compliance matters. (.4)	0.40	265.00	106.00
05/14/20	JPB	Review and analyze human resources and payroll documents provided by TCA attorneys in anticipation of phone call with human resources manager.	2.90	265.00	768.50
05/15/20	JEP	Review AIG liability policy invoice, direct review of policy language and seek additional policies. Communication with A. Schreiber and team re same.	0.50	340.00	170.00
05/15/20	JEP	Meeting with Jackie Goggin to go over all bank accounts, lock boxes and various operational and business issues, authorize certain payments, understand business, close certain accounts and direct transfers to receivership accounts where possible.	3.50	340.00	1,190.00
05/15/20	IRS	Conference call with Jackie Goggin regarding status of lock box accounts and to make final determinations and approvals as to the opening of new	4.30	265.00	1,139.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		accounts.(2.5); Attend to extensive correspondence regarding wires from Butterfield bank and receipt and opening up of of new Axos bank accounts . (.7); Prepare correspondence to Miriam Cunningham regarding upcoming payroll and bank account management. (.5); Confer regarding checking accounts held by Tara Antal and Alyse Schreiberg at Ocean bank and movement of funds to master receivership accounts (.3); Prepare correspondence to Jackie Going memorializing all transactions and wires to be completed at BB&T bank. (.3).			
05/16/20	JEP	Vetting of potential asset managers for management and liquidation of operating entity assets.	0.50	340.00	170.00
05/16/20	IRS	Conference call with B Fickling and Garno regarding pending business operations and operating expenses and ordinary course of business payments. (1) Attend to correspondence with HR representative regarding employee payroll and pending contractor licenses. (.3) Review memo prepared by B. Fickling regarding interrelationships between the funds and various TCA entities and prepare correspondence regarding same to tax advisors (,3) Attend to correspondence with Nelson Lamis regarding mail capture and forwarding. (.2)	2.00	265.00	530.00
05/17/20	IRS	Confer with JEP and GG regarding case management strategy and business operations issues. (1.5)	1.50	265.00	397.50
05/18/20	IRS	Confer with Kedi Chang and J. Perlman regarding pending wire transfers and information requests regarding investor holdings and redemption requests. (.8) Attend to correspondence and review analysis from Circle Partenrs regarding redemption requests for Q3 2019 through January 2020. (.3) Attend to correspondence regarding new account opening with Axos . (.2) Attend to correspondence regarding payroll banking information. (.2)	1.50	265.00	397.50
05/18/20	IRS	Review operating balances and account statements for pivot solar so assess its current cash flow and assess viability of continues operations. (.3) Attend to correspondence from Tom hunt regarding approval for ACH	1.00	265.00	265.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		payments to vendors, payroll and general operating expenses. (.2) Review correspondence from Fickling regarding possible interest in portfolio assets. (.1) Review XCell networks cash positions and account balances for continued operations' analysis and prepare correspondence regarding same. (.2) Review TPNI cash positions and financial analysis regarding continued operations. (.2)			
05/19/20	JEP	Additional work on vetting potential restructuring officer to retain, including checking references.	0.50	340.00	170.00
05/19/20	JEP	Review and discuss certain payables items, including Fickling. DIrect further research into same.	0.50	340.00	170.00
05/19/20	HLH	Consider issues regarding SPV payables, numerous communications regarding same	1.00	340.00	340.00
05/19/20	IRS	Attend to correspondence regarding Pivot Energy ACH and payment runs. (.4) Review details regarding weekly Pivot energy payments and request approval information. (.3) Attention to Transmarine sweep request. (.5) Confer with B Fickling and GGarno regarding regular course of operations expenses and sweet requests for Transmarine. (.4) Prepare correspondence approving transmarine sweep requests and notice to customers (.2) Attend to correspondence regarding Xcell networks sweep request and improper usage of ppp funds. (.3) Prepare and review agenda for team meeting regarding internal company management and organization. (.4) Receipt and review fairness opinions from Carl Scheoppl relating to TCA Aerospace. (.3) Receipt and review financials for Zenergy, TPNI, and Broward collission. (.5)	3.30	265.00	874.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/19/20	IRS	Attend to correspondence from Kedi Chang regarding circle partners payment and transfer of remainder of funds. (.3) Confer with Jackie Going regarding frozen transfer requests and prepare internal correspondence regarding solution for same (.7) Attention to request from Maria Yip regarding bank account statements. (.2)	1.20	265.00	318.00
05/20/20	JEP	Conference call with FIckling on issues with various SPVs, review business reports and cash flow analysis, approve certain SPV expenditures.	2.00	340.00	680.00
05/20/20	JEP	Review and analysis of various reports provided by Fickling including Xcell sweep request; JLE financials, Nautilus Lett of Intent, JLE cashlow charts, Pivot weekly update.	2.30	340.00	782.00
05/20/20	JEP	Communications with counsel and Schoeppl re books and records and resignations by directors and officers.	0.30	340.00	102.00
05/20/20	JPB	Review and analyze ongoing TCA operations (1.1).	1.10	265.00	291.50
05/20/20	IRS	Attention to Pivot energy operations, sweet requests, and financial statement analysis. (.5) Conference call with B.Fickling regarding ongoing business operations and recommendations on payables for SPVs. (1) Attend to correspondence from Nelson Lamis regarding time keeping software for TCA consultants. (.3) Review master cash flow forecast (.2) Review correspondence and data regarding JLE financials. (.4) Review incoming Q1 quarterly reports regarding multiple SPVs and corporate restructuring entities. (.5) Attention to Pivot weekly ACH clearances and vendor payment request and evaluate for ordinary course of business expenses and specific attention to credit card charges. (1) Confer with GGarno regarding payment clearance protocol with SPVs and consultants. (.3) Attention to payment authorization request from TPNI (.1)	4.30	265.00	1,139.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/20/20	IRS	Attention to payroll issues with Miriam Cunningham. (.4)	0.40	265.00	106.00
05/20/20	IRS	Attend to correspondence from Kedi Chang at circle partner regarding frozen Butterfield accounts and confer regarding strategy of response to same. (.6) Prepare correspondence regarding US and Ocean bank account and review status of same (.4) Prepare correspondence to J Going regarding frozen accounts and new wiring instructions. (.3) Prepare correspondence requesting new receivership account information to set up payroll and other transfer requests. (.4) Attention to Coutts bank balance and access information and review sharepoint to locate additional online access information. (.3)	2.00	265.00	530.00
05/21/20	JEP	Call with Sadovnic and continue to work to locate ledgers and copy of corporate books, draft email instructions/directions re same.(.8). Discuss possible resolution of appointment to replacement former directors with Cayman counsel (.3).	1.10	340.00	374.00
05/21/20	JEP	Attend to business operations issues including providing key to certain property as requested (.2); Review and analysis of loan portfolio and CR (3). Bring K. Forrest up to speed on corporate and banking issues, and necessary reporting (.7); conference call with restructuring advisor of JLE SPV to obtain understanding of history, current future business of New Zealand business (1.5); meeting with I. Sadovnic to go over employment issues, self evaluation forms to be created/distributed, information and reports in sharepoint. (1.0).	6.40	340.00	2,176.00
05/21/20	IRS	Operations call with B. Fickling to discuss ongoing corporate restructuring concerns. (.7) Conference call with JLE to discuss business operations and forecast analysis. (1.2) Confer with JEP regarding protection of oversees assets including JLE and InduMate. (.5) Attention to operation payment request from TPNI (.2) Attention to correspondence regarding potential buyers for certain SPV assets	3.90	265.00	1,033.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		including Xcel (.3) Attention to weekly update from Pivot energy (.2) Confer with JEP regarding interview and proposal process for outside CRO (.5) Review analysis regarding potential impact of receivership order in Zenergy (.3).			
05/21/20	IRS	WebEx with Jackie Going and Carlos Sandino regarding ongoing loan portfolio and currently performing vs. non-performing assets within that portfolio. (1.2)	1.20	265.00	318.00
05/22/20	JEP	Daily call with Bill Fickling re operations issues, go over payments being made to payroll and vendors by TransMarine and Xcell; go over multiple bank account issues and attempt to resolve; CRM issues.	0.60	340.00	204.00
05/22/20	JEP	Communications with FTI and BRG re potential engagement as chief restructuring or CFOs.	0.80	340.00	272.00
05/22/20	JEP	Morning call with Swedish company and obtain update on developing deal with private equite from consultant in Sweeden and Fickling. Update counsel.	0.50	340.00	170.00
05/22/20	HLH	[W/O PER GMG] Research regarding directors and officers	0.00	340.00	0.00
05/22/20	EGM	Edit front page of the receivership website (.5); conference call w/ I. Sadovnic regarding receivership website and information to include on same (.2)	0.70	265.00	185.50
05/22/20	IRS	Call with B.Fickling to discuss ongoing concerns with SPV operations (.6) Confer with J.Bado regarding payroll issues and discuss employee evaluation report and task E.Mcintosh to prepare draft employee report. (1) Confer with J.Perlman regarding JLE business operations (.3) Attention to XCel, TPNI, and Pivot payroll and vendor payment requests. (1) Prepare correspondence to S.Iqbal regarding london office operations, employees and pending payroll issues. (.2) Review internal analysis regarding InduMate weekly conference call. (.2) Attention to Zenergy payment approvals and specific authority required due to pending bankruptcy. (.4)	3.70	265.00	980.50
05/23/20	JEP	Approve payment for TPNI and Xcell in ordinary courrse.	0.20	340.00	68.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/23/20	JEP	Communications with Bill FIckling (2) re location of various documents.	0.30	340.00	102.00
05/24/20	JEP	Follow up on status of open issues with NY TCA employees/contracdtors.	0.20	340.00	68.00
05/25/20	IRS	Prepare correspondence to C.Sandino and M.Klein regarding access to broward collision offices. (.1) Confer with JBado regarding NHC asset memo and loan agreement documents. (.2)	0.30	265.00	79.50
05/26/20	JEP	[CRO]Receipt and review of Glass Ratner proposal to become provide business and restructuring services (.8). Discuss with counsel (.3). .	1.10	340.00	374.00
05/26/20	JEP	Communications re status on completing changes to lock box and other BBT accounts to sweep status, and SPVs access to same(email from Transmarine (..2), email from Goggin (.1), email from Sadovivic, (.1), email to Sadovnic (.1); email from Jackie Goggin (2), (.2); email to and from Harmon (2), (2); review, analysis of Pivot Energry payroll, email re upcoming payroll through PEO (.5); Review multiple Fickiling emails re ops issues of day (.3), attend operations call with Fickling, discuss Scotland property, PACV loan default and complications with Credit Strategies on that loan; PIVOT payroll, with request for census to compare against PEO draft. (.8); attend to payroll taxes, next payroll, analysis of census and make employment determinations, direct re same (.7).	3.10	340.00	1,054.00
05/26/20	JEP	Communications re potential purchase of Morisson Brown tool to manage SPV PPP issues, as requested by Dennis McInosh.(5 emails).	1.00	340.00	340.00
05/26/20	GMG	Exchange emails re Harvest timekeeper (.3); call with A. Schreiber re insurance issues (.3); call with B. Fickling re SPV issues (.3); exchange emails re PPP loans with SPVs (.3); confer with receiver re various issues (.5); attention to issues re claims on D&O policy (.4); exchange emails with B. Fickling re SPV issues (.5); review BB&T answer to court order (.2); review correspondence from Ocean Bank (.2); review GR proposal (.2); review DSI proposal (.5).	3.70	340.00	1,258.00
05/26/20	IRS	Call with Alyce Schreiber re: insurance issues. (.2) Call with Miriam Cunningham regarding HR and payroll operations. (.5) Confer with JEP and HH regarding payment of employee salaries and total amounts due for June. (.5)	1.20	265.00	318.00
05/26/20	IRS	Call with B Fickling regarding pending operations issues including, Pivot financial payroll, Cleland registration, PacV default and ITS Solar issues (1) Attend to correspondence regarding Harvest, time tracking app for consultants.	2.90	265.00	768.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		(.3) Attend to correspondence regarding specialist for PPP loan forgiveness application. (.3) Review correspondence regarding slow down of TCA Aerospace operations related to less use of bomber planes. (.1) Review Xcell sweep request and prepare correspondence regarding same. (.2) Review internal analysis regarding Cleland land ownership and transfer of title to receiver. (.4) Review correspondence from potential buyer for Pivot energy. (.1) Confer regarding transmarine seep request and account opening status. (.5)			
05/27/20	JEP	Review Pivot smartsheet and approve payment for materials (.2); execute payroll transfer (.2); review and discuss sweep request for Transmarine operations request, multiple emsails. (.3); review and approve renewal of time entry software for TCA employees/contractors.(.2); attend to payroll taxes (.2);.discuss Luk loan (.3); discuss follow up with H. Perkins at US Bank all loan documents (.2).	1.50	340.00	510.00
05/27/20	HLH	Communications re status on completing changes to lock box and other BBT accounts to sweep status, and SPVs access to same(email from Transmarine ..2, email from Going .1, email from Sadovniic, .1, email to Sadovnic .1; email from Jackie Going(2), .2; email to and from Harmon (2), .2; review, analysis of Pivot Energry payroll, email re upcoming payroll through PEO (.5); Review multiple Fickiling emails re ops issues of day (.3), attend operations call with Fickling, discuss Scotland property, PACV loan default and complications with Credit Strategies on that loan; PIVOT payroll, with request for census to compare against PEO draft. (.8); attend to payroll taxes, next payroll, analysis of census and make employment determinations, direct re same (.7).	1.00	340.00	340.00
05/27/20	EGM	Draft employee information sheet to include employer, title, current salary, number of hours on tasks weekly in order to determine what roles each employee undertaking and if all are necessary	0.50	265.00	132.50
05/27/20	IRS	Call with Michael Klein regarding business operations of SPVs. (1) Meeting with Michael Klein to recover Broward Collision Keys and confer regarding pivot financials (.3)	3.70	265.00	980.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Attention to Pivot solar check run and prepare payment approvals. (.5) Attention to XCell tax matters. (.3) Prepare correspondence regarding Transmarine tax lien and hiring of attorney. (.5) Review offer information for Zynergy. (.1) Review additional information regarding TCA land holdings (.2) Confer with JEP regarding availability of original loan documentation and prepare correspondence to H Harmon regarding Us bank trust officer in possession of same. (.6) Review Transmarine sweep request. (.2)			
05/27/20	IRS	Call with N Lamis to transfer account and billing information for Harvest time keeping software. (.5) Attention to employee data sheet and request for information and confer with Schoeppl regarding forwarding communications to Receiver's office. (.5) Confirm payroll tax payment for May payroll (.3) Call with JBado regarding employee communications, revise employee information sheet, and prepare correspondence regarding employee information collection to support continued payroll decisions. (1)	2.30	265.00	609.50
05/27/20	IRS	Attend to correspondence regarding wires for AIG payment (.3) Review and confer regarding internal process for initiating wire transfers. (.3) Prepare correspondence regarding status of frozen accounts and transfer requests. (.2)	0.80	265.00	212.00
05/28/20	JEP	Review confirmation of wire to PEI for payroll (.1);;VM from Benjamins re 1-800 number and issues with UK TCA folks currently; follow up on same, (.5); business ops meeting with Bill Fickling, Garno, Sadovnic, to go over SPV immediate needs and update on developments, set up individual Zoom meeting with SPV CEOs, discuss critical employees and direct employee Zoom meeting as well. (1.1); review agenda and emails and documents received from Fickling for business ops meeting. (.5).	2.60	340.00	884.00
05/28/20	IRS	Call with S. Iqbal regarding London investor relations operations. (1) Call with B fickling regarding business operations (1.4).	4.20	265.00	1,113.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Call with JEP regarding performing and non-performing SPVs to prepare package for expert CRO interviews. (.5) Attention to Xcell sweep requests. (.4) Attention to Pivot payroll approval requests. (.3) Prepare correspondence to Jackie Going regarding loan portfolio assets and analysis regarding spreadsheet with loan information. (.4) Attention to correspondence from tom fiedberg regarding IPO proposal for pivot energy. (.2)			
05/28/20	IRS	Attention to AIG policy matters and coordinate meeting with insurance broker (.4) Call with JBado regarding employee evaluations and loan portfolio review. (.5) Confer regarding employee hiring and termination possibilities. (.3)	1.20	265.00	318.00
05/28/20	IRS	Attention to frozen lockbox and other accounts at BB&T. (.5) Prepare correspondence regarding wire transfer instructions for Carl Schoeppl and regarding payroll taxes for may payroll. (.3) Confer regarding internal protocol for banking procedures. (.2)	1.00	265.00	265.00
05/29/20	JEP	Phone call with DSI and review proposal (.6); phone call with Glass Ratner and further review of proposal as discounted further (.6); phone call with BRG and receipt and review of proposal (.8); communications with FTI and set up additional meeting (.3); communicaitons with SOIIC and additional review of prosoal(.2); draft memo of analysis of proposals and discuss with Garno Battista. (.8).	3.30	340.00	1,122.00
05/29/20	IRS	Attend to correspondence regarding meetings with Pivot solar leadership team and asset memorandum from tom hunt. (.4) Confer with Jackie Going regarding amounts due under original portfolio loans and settlement agreements (.5) Review correspondence regarding incoming PacV payments (.2) Attend to Transmarine sweep request and meeting coordination with Transmarine leadership. (.5)	2.10	265.00	556.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Review indumate agenda and cash flow analysis (.2) Prepare correspondence regarding real estate assets and attend to correspondence from interested purchasers. (.3)			
05/30/20	JEP	Receipt of correspondence from consultant McIntosh re Pulse EIDL loan, discuss same.	0.30	340.00	102.00
05/31/20	JEP	Review and circulate wind down memos and related resolutions. (1.)	1.00	340.00	340.00
05/31/20	JEP	Review Sandino invoice for monthly services on hourly basis.	0.20	340.00	68.00
06/01/20	JEP	Analysis of all CRO proposals (.7), conference with Battista re same (.5), further negotiations and requests for additional discounts.(.7).	1.90	340.00	646.00
06/01/20	IRS	Coordinate meeting with SPV leadership and review questions provided by Pivot Energy in advance of the meeting. (.3) Prepare correspondence to J Going regarding sweep requests for Transmarine and Xcell. (.2) Attention to PacV loan origination documents and additional financing options for continued operations (.4) Attention to correspondence regarding North Carolina real estate ownership. (.2) Review correspondence regarding XCell tax issues. (.1) Prepare employee and contractor memorandum with salary information and termination recommendations. (.4)	1.60	265.00	424.00
06/02/20	JEP	Prepare for Ops meetin with Fickling, reviewing 15 emails including various requested expenditures, cash projections,(1); attend meeting, go over same, discuss Indumate deal. (2). Review confirmation of receipt of Schoeppl Law firm return of retainer. Communication re same; set up meeting to be attended by DSI Monday with Indumate team (.2).	3.40	340.00	1,156.00
06/02/20	JEP	Communications with SPV CEOs, obtain questions, set up meetings.	0.50	340.00	170.00
06/02/20	IRS	Attention to XCell and Transmarine sweep requests. (.6) Attention to correspondence from InduMate regarding restructuring proposal. (.4)	3.40	265.00	901.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Confer with B Fickiling regarding ongoing business operations. (2) Review and approve Pivot payment requests (.4)			
06/02/20	IRS	Prepare internal memorandum regarding future personnel and staffing requirements. (.7) Prepare correspondence to MCunningham regarding change to payroll processing and confer with G Garno and JEP regarding same. (.5)	1.20	265.00	318.00
06/03/20	JEP	Communications with team on TriNet inputs and transition of payroll system directives away from contractor to only GJB control. (.3); obtain update on same and edit letter to HR consultant demanding turnover of Trinet passwords and discuss with Sadaovnic (.4); review Fickling and analyst Giavanni emails re ongoing deals and operations issues and necessary approvals (emails) and discuss with counsel. (1.3); review expense payments, follow up PO Box. (.5); communications with Pivot CEO, review documents provided for upcoming proposed transaction (1.); Indumate communications. (.5).	3.60	340.00	1,224.00
06/03/20	JEP	Draft letter to all employees.	0.60	340.00	204.00
06/03/20	IRS	Prepare files for DSI review and (1) Attention to Pivot financials and approval requests. (.5) Coordinate meetings with SPVs (.4) Attention to master fund expenses. (.2)	2.10	265.00	556.50
06/03/20	IRS	Call with H. Harmon and JEP regarding HR issues and securing trinet access (.6) Review and finalize correspondence to all employees regarding continued employment and payroll changes. (.3)	0.90	265.00	238.50
06/04/20	JEP	Attend to storage invoices.	0.20	340.00	68.00
06/04/20	JEP	Review numerous documents re payment requests and business needs of SPVs for ops meeting with Fickling and 8 emails with exs (1.3), attend meeting and introduce DSI, special attention to Pivot upcoming MIPA contracts to close; Indumate deal, Pivot auditor letter (1.).	2.30	340.00	782.00
06/04/20	HLH	Detailed attention to payroll issues	1.70	340.00	578.00
06/04/20	IRS	Call with Joe Luzinski and Mark Iammartino to discuss SPV's. (1.2) Confer with JEP regarding available SPV documents for DSI review (.3)	5.00	265.00	1,325.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Prepare sharefile for DSI review with portfolio and SPV information. (.8) Attention to sofame deal and correspondence from gio carmona regarding same (.3) Call with B Fickling and DSI team regarding ongoing business operations (1) Review additional portfolio analysis prepared by J. Going. (.5) Attention to InduMate deal and request from Peter Wahlberg regarding approval for consolidation. (.3) Review Pivot financial smart sheets and submit tax information to Rehmann. (,4) Attention to TPNI and XCell payroll approval request. (.2)			
06/05/20	JEP	Meeting with INDUMATE team for weekly meeting, introduce DSI team. (1); Review Cell Company payables and approve, communications re same (.5); multiple communications and handling of misc. business issues (1.5).	3.00	340.00	1,020.00
06/05/20	HLH	Detailed attention to payroll issues, numerous communications with Trinet and M. Cunningham regarding same	1.50	340.00	510.00
06/05/20	IRS	Attention to Sofame deal and asset purchase agreement. (.4) Call with Seth Abbey canadian counsel for thermal energy regarding offer to purchase Sofame IP. (.5) Call with Dennis McIntosh regarding XCell payroll. (.4) Call with DSI regarding XCell payroll and payable approval (.4) Review correspondence regarding InduMade deal and confer with JEP regarding same. (.5). Attend to correspondence re:Xcell payroll approval. (.3) call with B Fickling re: Sofame loan deal. (.2)	2.70	265.00	715.50
06/05/20	IRS	Confer with H Harmon regarding payroll changes and 401k final payment wire. (.5)	0.50	265.00	132.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/06/20	IRS	Prepare additional data production for DSI regarding SPVs and portfolio operations. (.5) Attention to correspondence with DSI re: employee and HR issues. (.3)	0.80	265.00	212.00
06/07/20	JEP	Additional review of insurance issues, coverage under existing GJB and other policies, and communications with Genovese and Arrastia re analysis of same.	0.50	340.00	170.00
06/08/20	JEP	Pivot energy transaction reviews, review communications from Tom Hunt. Discuss same with counsel. Draft letter of DSI introduction and for protocols moving forward (1.3); review communications regarding Indumate proposal, questions and answers to DSI re same (.6).	1.90	340.00	646.00
06/08/20	HLH	Attention to employee payroll, communications with Trinet regarding same	1.00	340.00	340.00
06/08/20	IRS	Attention to ADP account change process (.4) Attention to correspondence with Miriam Cunningham re: ADP invoices and distribution of costs amongst SPVs (.4) Confer with NLamis re: process for SPV invoicing and reimbursement. (.3) Prepare memorandum of HR and employment issues for DSI (.3) Attention to correspondence with DSi regarding sharefile documents. (.2) Update calendar invites for biweekly conference calls with B Fickling to add DSI team. (.1) Attention to correspondence re: Sofame deal (.2) Coordinate meetings with SPVs and prepare draft introductions to SPV leadership of DSI team (.3) Call with Holland and Knight attorneys for PacV regarding status of loans and ongoing discussions with the ICAV. (.8) Attention to correspondence from Tom Hunt at Pivot regarding receiver approval for ordinary course business operations. (.3)	3.30	265.00	874.50
06/09/20	JEP	Review 15 emails from Fickling, including attachments of updated cashflow reports, loan reports, credit reports. Multiple emails re same (2.6)i. Operations call with Fickling, DSI, Sadovnic. (1.3).	3.90	340.00	1,326.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/09/20	IRS	Call with D. McIntosh regarding TPNI payments and process going forward. (.2) Business operations call with BFicking and DSI team (1.2) Attention to correspondence regarding new cubesmart invoice. (.1) Attention to correspondence from MCunningham regarding transfer of ADP account title and payroll processing for SPVs. (.3) Review correspondence regarding historical administrative and accounting functions at TCA. (.3) Confer with DSI regarding questions or communications with former TCA accountants and finance managers. (.4) Prepare correspondence to N Lamis regarding DSI introduction and request for information. (.2) Review correspondence from B Fickling regarding suggested sale of assets in order of urgency. (.2) Prepare correspondence to DSI regarding portfolio information spreadsheet (.1) Attention to Pivot correspondence regarding pending ordinary course sales and business operations requiring receiver's approval. (.4) Review TPNI payroll request and DSI recommendations. (.2) Review XCell payroll and vendor payment request and DSI recommendations (.2)	3.80	265.00	1,007.00
06/10/20	JEP	Management of email access to employees/consultants and related issues. (.7).	0.70	340.00	238.00
06/10/20	HLH	Attention to employee payroll, including communications with Trinet (1.0); Attention to operating bank accounts (1.2)	2.20	340.00	748.00
06/10/20	IRS	Attention to margill access for DSI team to review loan portfolio information. (.4)	1.80	265.00	477.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Attention to Pivot payables (.3)			
		Attention to analysis from DSI regarding proposed Pivot transactions requiring Receiver's approval. (.4)			
		Review Pivot energy SPV list. (.2)			
		Attention to XCell payables and DSI recommendations. (.5)			
06/10/20	IRS	Attention to payroll issues and incoming correspondence from TriNet (.3)	0.30	265.00	79.50
06/11/20	JEP	Review June updated charts from Sandino re status of full loan portfolio and discuss (1.);	1.00	340.00	340.00
06/11/20	JEP	Multiple communications regarding SPV insurance policies and coverages, review same. (1) Review and approve various payrolls for SPVs, including TCPA. (.5); send wire transfer request re same (.1);.obtain summary of today operations meeting and provide direction/approvals (.6).	2.20	340.00	748.00
06/11/20	HLH	Review documents related to Transmarine and Xcell tax issues (1.0); Handle numerous issues related to operating bank accounts (2.5).	3.50	340.00	1,190.00
06/11/20	IRS	Call with BFickling and DSI regarding ongoing SPV business operations. (.5)	4.00	265.00	1,060.00
		Attention to SPV insurance information survey. (.4)			
		Attention to correspondence regarding DSI status for information review and requests for update meetings. (.3)			
		Attention to Margill access for DSI team (.2)			
		Attention to Amian Angels settlement agreement and payment matters (.4)			
		Review loan portfolio data sheet (.2)			
		Attention to PacV loan payment information. (.3)			
		Attention to TPNI vendor and payroll payments. (.4)			
		Attention to legal analysis re: edison learning portfolio (.3)			
		Attention to TCA HR and employment issues. (.5)			

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Review Pivot transactional documents and recommendations from DSI on approval for ongoing business opertaions. (.5)			
06/12/20	JEP	Review and approve Tier point host invoice for data; approve Art Moves invoice (.3).;	0.30	340.00	102.00
06/12/20	JEP	Communications regarding PIVOT upcoming subsidiary transaction, review and execute subordination agreement on behalf of Master Fund.	0.60	340.00	204.00
06/12/20	HLH	Review numerous communications regarding payroll and related employee issues (1.2); Handle issues regarding bank accounts and related noticing (1.0)	2.20	340.00	748.00
06/12/20	IRS	Attention to correspondence with S. Brookman regarding legal rep letter for Pivot audit. (.2) Attention to approval of art storage payments, data center fees, and e-discovery fees for pending litigation matters. (.4) Attention to correspondence with PAcV regarding loan documents and settlement agreement payments (.3) Prepare correspondence to Amian angels re: payment information. (.2) Prepare sharefile document relating to SPV audit information for expert accountants. (,5) Attention to correspondence with A.Taubman regarding fund accounting. (.2) Review name change correspondence from PODS storage. (.1) Prepare correspondence to Carlos sandino regarding DSI meeting. (.1) Review correspondence from D,McIntosh re: Zenergy deal. (.1)	2.10	265.00	556.50
06/14/20	IRS	Attention to correspondence from thermal energies regarding sofame transaction and prepare correspondence to DSI for update.	0.20	265.00	53.00
06/14/20	IRS	Attention to pending litigation update from Canadian attorneys. (.3)	0.30	265.00	79.50
06/15/20	JEP	Research on compensation of certain employees, and relationship to other TCA affiliates foir analayis of turnover motion. (.5). Communications re banking, checks remote deposit device (3 x's) (.3). Review new invoices and direct re same (.3); review wire payment from Pacific Ventures, discuss same (.3).	1.40	340.00	476.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/15/20	HLH	Phone conference with J. Luzinski regarding payroll and business operations (.6); Handle numerous issues related to business operations, including payroll and bank accounts (1.8)	2.40	340.00	816.00
06/15/20	IRS	Attention to TCA aerospace ownership and operating documents. (.4) Review correspondence from ASchrieber regarding prior HR practices. (.2) Attention to correspondence from ASchriber regarding email and data storage practices. (.1) Attention to DSI meeting with Carlos Sandino. (.2) Review correspondence from Gio Carmona regarding SoFame deal. (.1) Review legal analysis from Dennis McIntosh regarding pending Xcell litigation (.2)	1.20	265.00	318.00
06/16/20	JEP	Prepare for and attend Weekly briefing meeting with DSI over all business and asset issues (Joe and Mark), (1.3); work with J. Bushman on IT followup analysis of retention of TCA IT person, further IT securty protocols and investigate to confirm no unauthorized access (1); fattend to furtand Is draft memo re follow up items to team members (.5).	2.80	340.00	952.00
06/16/20	HLH	Handle numerous issues regarding noticing, document production and business operations	4.20	340.00	1,428.00
06/16/20	IRS	Review correspondence regarding legal fees in sofame deal analysis. (.2) Review correspondence regarding TCA Aerospace ownership. (.1) Review correspondence regarding TCA UK structure and review sharepoint files for related corporate documents (.5) Business operations call with DSI regarding ongoing SPV operations (1.2) Prepare correspondence to Scotland attorney regarding receivership and special situation with Scottish SPV. (.3) attention to Xcell sweep request. (.1) Attention to Transmarine/DSI introduction (.2)	3.10	265.00	821.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Review financial analysis regarding TPNI from DSI and DMcltosh. (.2) Attention to Pivot legal rep letter for audit purposes and analysis from Tom Hunt regarding going forward operations. (.3)			
06/16/20	IRS	Attention to restructuring consultants invoices and agreements. (.3)	0.30	265.00	79.50
06/17/20	JEP	Attend to payment of invoices.	0.20	340.00	68.00
06/17/20	IRS	Attention to edison learning valuation and settlement information. (.2) Review analysis from DSI re: general portfolio strategy. (.2) Attention to correspondence re: Cleland property in Scotland. (.4) Attention to XCell sweep request. (.2)	1.00	265.00	265.00
06/18/20	JEP	Work with DSI on operational issues regarding pre and post receivership invoices and expenses, financial record keeping and reporting re same; review sample invoice to discuss, roles of GJB and DSI in same (8); analysis of invoices, including any containing pre-receivership time and direct follow up for decisions, including review of Order, and consultation with counsel. (.9).	1.70	340.00	578.00
06/18/20	IRS	Call with Scottish counsel regarding Cleland real estate (1) Confer with JLuzinski from DSI re HR and payroll considerations. (.2) Attention to past due payment for regus nevada invoice. (.1) Review correspondence regarding InduMate consulting payments. (.3) Attention to Pivot AP request. (.2) Attention to XCell payroll wire info. (.1) Review Zenergy forecast and analysis. (.2)	2.10	265.00	556.50
06/19/20	JEP	Review emails re SOFAME Thermal Energy transaction and legal fees on same. (5 emails)(.6); email from J. Luzinski re London property status and proposal, respond to same (.2); review lengthy summary re Machado v. Xcell (TCA Property) litigation (.4), communication re same with DSI M. Iammartino, D> McIntosh and B Halsey (.2).	1.90	340.00	646.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/19/20	IRS	Attention to invoice payments for May services rendered to receivership entities (.5)	0.50	265.00	132.50
06/19/20	IRS	Attention to XCell insurance coverage and policy (.2)	0.60	265.00	159.00
		Attention to Cleland property and communications with former TCA analyst. (.1)			
		Attention to correspondence with counsel for PacV regarding loan documentation. (.2)			
		Attention to correspondence from GCarmona re: Sofame deal. (.1)			
06/20/20	JEP	Bus. Ops. Review and approve expenses payment including web site design..	0.30	340.00	102.00
06/21/20	IRS	Attention to UK employment matters (.5)	0.50	265.00	132.50
06/22/20	JEP	Discuss protocol for payment of invoices, and accounts to the charged. Approve invoice payment. (.3); attend to replacement Circle payment (.3)..	0.60	340.00	204.00
06/22/20	IRS	Attention to PacV loan agreements and payment terms (.4)	0.90	265.00	238.50
		Attention to TCA Aerospace ownership structure and security agreement terms (.5)			
06/22/20	IRS	Attention to consultant invoices. (.3)	0.30	265.00	79.50
06/23/20	JEP	Work on mail prrotocols, commkunicate same to team, discuss with key team members on mail pickup and review (L. Lowachee). .(6); discuss novation on sublease in London (.2). Review and analysis of month end May statements of multiple bank accounts received in mail (.7).. Follow up on same. (.3).	1.80	340.00	612.00
06/23/20	JEP	Receipt and review of batch of TCA mail and review same. Direct invoice payments and investigations, follow up on tax assessments..	0.90	340.00	306.00
06/23/20	IRS	Attention to Aerospace asset purchase agreement. (.3)	1.00	265.00	265.00
		Attention to correspondence re: TPNI stock redemption (.5)			
		Review correspondence to Michael klein re: broward collision operations (.2)			
06/23/20	IRS	Confer with JEP re: IT vendor contract review and payments (.4)	0.40	265.00	106.00
06/24/20	JEP	Receipt and review of loan payment from Amian Care (.2); review performing and nonperforming loan status (.5).	0.70	340.00	238.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

06/24/20	JEP	Further analysis of financial and accounting issues for flows of funds/income.	0.70	340.00	238.00
06/24/20	JEP	Attend to banking issues, wire transfer.	0.50	340.00	170.00
06/24/20	HLH	Handle numerous noticing issues to obtain company records, draft and finalize correspondence regarding same	2.60	340.00	884.00
06/24/20	IRS	Attend to correspondence regarding TCA employee vacation time. (.2) Attention to incoming invoices and mail for all entities and route to relevant parties. (.5) Confer with JEP re: agenda for business operations call with DSI. (.1) Attention to correspondence re: accounting of incoming loan payments from loan portfolio deals (.4) Attention to payment for office VOIP phones (.2)	1.40	265.00	371.00
06/25/20	JEP	Receipt of additional analysis of TCA regular IT invoices and follow up on same.	0.30	340.00	102.00
06/25/20	JEP	Discuss pre-receivership invoices for current contractors.	0.30	340.00	102.00
06/25/20	HLH	Handle numerous operations issues including payroll, document gathering and review of bank statements	0.80	340.00	272.00
06/25/20	IRS	Call with DSI re:ongoing business operations. (3) Attention to UK office historical operations issues (.5) Attend to correspondence from borrowers regarding TCA direct communications (.4) Confer regarding internal organization with communications with borrowers between DSI and GJB. (.5) Call with B Halsey re: pending edison learning settlement discussions (.3) Attend to correspondence regarding Picasso painting and storage (.2) Attention to consultant invoices for May 2020 (.3) Preapre correspondence to KVinitsky regarding it consulting invoice and confer	5.70	265.00	1,510.50

Genovese Joblove & Battista, P.A.

==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		with JBushman regarding same. (.5)			
06/26/20	JEP	Attend to TCA business issues, and review and analysis of various expenses. 1.2).	1.20	340.00	408.00
06/26/20	JEP	Receipt/review of communications received from investors, forward to communications team, and discuss response.	0.50	340.00	170.00
06/26/20	IRS	Attention to correspondence regarding internal business accounting practices. (.3) Review correspondence regarding tca UK branch operations (.2) Attention to outstanding consultant invoices. (.3) Attention to incoming PacV documents from counsel. (.3) Attention to XCell PPP application process (.4)	1.50	265.00	397.50
06/26/20	IRS	Attention to IT vendor invoicing and payment issues. (.6)	0.60	265.00	159.00
06/28/20	IRS	Review incoming loan documentation from PacV and coordinate call with counsel for PacV. (.3)	0.30	265.00	79.50
06/29/20	JEP	Discussion and 11 emails going over procedure for payment of employees and contracts in ordinary course, and any necessary court authorization.	1.30	340.00	442.00
06/29/20	IRS	Attention to SoFame deal analysis. (.3) Attention to XCell PPP loan application requirements (.4) Review proposed agenda from DSI for employee town hall. (.2) Call with JLuzinski re: general business operations update. (.3) Call with counsel for PacV regarding loan obligations and pending payments (.5) Call with JEP regarding PacV loan documentation and analysis (.4) Attention to regulatory complaince requirements (.5)	2.60	265.00	689.00
06/29/20	IRS	Review incoming invoices and prepare correspondence regarding payment of same. (.3)	0.30	265.00	79.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/30/20	JEP	Receipt and apply payment from Amian Care Servs; communication re same. (.3).	0.30	340.00	102.00
06/30/20	JEP	Follow up on issue of process/approval if necessary to continue employment of TCA contractors. (.2) Discuss continued employment of Circle Partners and responses to various investor inquiries. (,4).	0.60	340.00	204.00
06/30/20	JEP	Discuss ADV renewal issue.	0.20	340.00	68.00
06/30/20	HLH	Handle numerous issues regarding bank statements, and review of same (1.0); Handle numerous issues regarding employee payroll (1.4)	2.40	340.00	816.00
06/30/20	IRS	Attention to Payroll issues (.6) Call with KVinitsky re: comcast invoice. (.3) Prepare correspondence regarding comcast payment. (.2) Attention to correspondence regarding Sofame asset purchase agreement (.3) Confer with SAbbey (.1) , MIammartino (.1) and JEP (.2) re: offer to purchase sofame. (.4) Prepare correspondence to SIqbal re: UK operations (.2) Analyze compliance requirements and prepare correspondence to JBado and DSI regarding further review into same (.3) Attention to court approval of consultant fees and specific invoices from dmcintosh (.5) Prepare correspondence re cleland scotland property registration (.2) Attention to general HR matters (.3)	3.30	265.00	874.50
Total 004 / Business Operations			**241.30**		**72,997.00**
005 / Case Administration					
05/14/20	JEP	Investor communications	0.20	340.00	68.00
05/14/20	JEP	Communications with investor Sarcuni.	0.20	340.00	68.00
05/15/20	HLH	Draft e-mails to investors (.6); Attention to additional noticing communications	2.10	340.00	714.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		(1.5)			
05/21/20	HLH	Communications regarding FEIN numbers, review tax returns regarding same (.6); Numerous communications regarding case administration (.7)	1.30	340.00	442.00
05/28/20	IRS	Call with investor: Nitsana Darshan Leitner and other Israeli investors.	1.20	265.00	318.00
06/01/20	JEP	Process Israel investor call.	0.20	340.00	68.00
06/03/20	JEP	Review letter from Atlantic Financial Group on behalf of non-US investors through LTD Fund. Draft response to be used in multiple communication of same type, send, direct communications team re follow up.	0.50	340.00	170.00
06/05/20	JPB	Conduct telephone interview with prospective asset purchaser (0.5). Review call notes with L. Lowachee (0.5).	1.00	265.00	265.00
06/05/20	IRS	Attention to investor communications. (.6)	0.60	265.00	159.00
06/06/20	IRS	Attention to investor communications and queries regarding EY liquidation. (.3)	0.30	265.00	79.50
06/07/20	IRS	Attention to correspondence regarding ADP invoices and reimbursement for HR services from SPVs. (.5)	0.80	265.00	212.00
		Attemtion to correspondence from investors and prepare draft response. (.3)			
06/09/20	JEP	Receipt of Circle documents, and Israel Group documents. Direct analysis for complete individual investor identification. Multiple communications with team re same.	0.50	340.00	170.00
06/09/20	JPB	Phone call with investment advisors representing TCA investors.	0.70	265.00	185.50
06/09/20	JPB	Phone call with TCA investor regarding his investments.	1.60	265.00	424.00
06/10/20	IRS	Call with JBado regarding investor correspondence and uniform document request. (.4); Attention to investor correspondence. (.3)	0.70	265.00	185.50
06/11/20	IRS	Confer with avi and Haim (Israeli investors) regarding first meeting of creditors and general concerns. (.5)	3.40	265.00	901.00
		Confer with Circle Partners regarding redemption creditor calculations (1.5)			
		Call with JEP and JBado regarding circle partner data document review (.3)			
		Attention to general investor inquiry information and uniform responses (.4)			
		Coordinate conference call with SEC. (.2)			

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Prepare correspondence to forensic accountants re: additional documentation for reveiw (.1) Attention to SEC investigatory file collection (.2) Prepare correspondence regarding accounting and book keeping practices of receivership entities. (.2)			
06/12/20	JPB	Phone call with TCA investor regarding his investments and request for additional documentation.	1.70	265.00	450.50
06/12/20	JPB	Follow up phone call with advisors representing TCA investor regarding request for additional documentation from client.	0.60	265.00	159.00
06/12/20	JPB	Phone call with TCA investor regarding his investments.	1.50	265.00	397.50
06/12/20	JPB	Phone call with fund administrator regarding investor documents provided to Receiver.	1.40	265.00	371.00
06/12/20	IRS	Attention to investor correspondence from circle partners	0.20	265.00	53.00
06/15/20	JPB	Review and analyze documents provided by fund administrator related to calls from investors.	3.90	265.00	1,033.50
06/15/20	JPB	Conducted phone calls to investors and drafted follow up emails to inform them of next steps.	0.50	265.00	132.50
06/16/20	JEP	Research into investors who previously contacts us and compare against top 25, review summaries. Follow up with Bado on same.	0.80	340.00	272.00
06/16/20	JPB	Conducted phone calls to investors and drafted follow up emails to inform them of next steps.	1.00	265.00	265.00
06/16/20	JPB	Further review and analyze documents provided by fund administrator related to calls from investors.	2.30	265.00	609.50
06/17/20	JPB	Further review and analyze documents provided by fund administrator related to calls from investors.	2.50	265.00	662.50
06/17/20	IRS	Attention to investor communications.	0.20	265.00	53.00
06/18/20	JPB	Further review and analyze documents provided by fund administrator related to calls from investors.	0.80	265.00	212.00
06/18/20	JPB	Conducted phone calls to investors and drafted follow up emails to inform them of next steps.	1.30	265.00	344.50
06/18/20	IRS	Confer with JBushman re: new possible IT vendors and IT security issues. (.4)	0.10	265.00	26.50

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

		Attention to sharefile preparation for SEC documents. (.3) Attention to sharefile request for Audit folder documents (.2) Review response to information request sent to Circle Partners. (.3) Confer with JEP and GGarno regarding insurance coverage issues (.4) Confer with JEP and GGarno re: parallel fund investigations. (.2) Attention to correspondence and analysis regarding potential related European fund structure (.5) Confer with GGarno re: document review and available internal investigation reports. (.3) Attention to correspondence with SEC re: status update (.2) Attention to follow up with Jeff Marcus re: document request (.1) Attention to invoice requests for pre-receivership work and confer regarding same (.7)			
06/19/20	JPB	Review and analyze documents provided by TCA investors/advisors to investors	3.60	265.00	954.00
06/19/20	JPB	Further review and analyze documents provided by fund administrator related to calls from investors.	2.40	265.00	636.00
06/20/20	JEP	Receipt and review of Circle Partners communications from investors received June 19. (.6); COmmunications with team re necessary protocols re record keeping, follow up, analysis and circulation of categories of requests. (.3).	0.90	340.00	306.00
06/21/20	JPB	Review and analyze documents provided by TCA investors/advisors to investors	3.30	265.00	874.50
06/22/20	JPB	Review and analyze documents provided by TCA investors/advisors to investors to Circle Partners	2.40	265.00	636.00
06/23/20	JEP	Updating TCA investor log	0.50	340.00	170.00
06/23/20	JEP	Investor call with Ray Sipots and Jason Riley re: TCA Global Credit Fund	0.75	340.00	255.00
06/23/20	JEP	Discuss calls from investors and responses, logs with team.	0.50	340.00	170.00
06/23/20	HLH	Handle numerous noticing issues to obtain company records, draft and finalize correspondence regarding same (3.5); Phone conference with Receiver regarding business records (.5)	4.00	340.00	1,360.00
06/23/20	JPB	Review and analyze documents provided by TCA investors/advisors to investors to the fund administrator	2.90	265.00	768.50
06/23/20	IRS	Confer with JEP re: investor communications (.3) Prepare correspondence to circle partners re: investor communications. (.1) Confer regarding internal protocols for investor communications. (.2)	0.60	265.00	159.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/23/20	EGM	Review latest exchange, sharepoint, One Drive and Highrise activity by former TCA directors	0.60	265.00	159.00
06/24/20	JEP	Review of deadlines, provide reminders to team members and other professionals re assignments.	0.80	340.00	272.00
06/24/20	JPB	Review and analyze documents provided by TCA investors/advisors to investors to the fund administrator	2.60	265.00	689.00
06/24/20	JPB	Phone conference with TCA investor regarding investments in limited fund	1.00	265.00	265.00
06/25/20	JPB	Review and analyze emails provided by the fund administrator regarding redemption requests or cancelled subscriptions	2.10	265.00	556.50
06/25/20	EGM	Begin drafting first fee application	1.70	265.00	450.50
06/26/20	JEP	Receipt and review of numerous investor communications.	1.00	340.00	340.00
06/26/20	HLH	Handle numerous issues regarding outstanding document requests	0.80	340.00	272.00
06/26/20	JPB	Review and analyze emails provided by the fund administrator regarding redemption requests or cancelled subscriptions	3.10	265.00	821.50
06/28/20	IRS	Case Administration: Attention to CubeSmart storage inventory and consolidation (.4) Review correspondence re consultant invoices (.2)	0.60	265.00	159.00
06/29/20	JEP	Review numerous investor communications recently received, discuss responses with team on various types of requests.	1.20	340.00	408.00
06/29/20	JPB	Review and analyze emails provided by the fund administrator regarding redemption requests or cancelled subscriptions	1.10	265.00	291.50
06/29/20	JPB	Review and analyze documents provided by TCA investors/advisors to investors to the fund administrator	1.90	265.00	503.50
06/30/20	HLH	Prepare for and attend call with Receiver team regarding case administration issues	2.20	340.00	748.00
06/30/20	SS	[W/O PER GMG] continued background review, tcw I. Sadvonic re status and assignment, began review of documents	0.00	100.00	0.00
Total 005 / Case Administration			**76.65**		**21,696.00**

007 / Employee Benefits/Pensions

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/14/20	HLH	Review documents and handle issues regarding 401k Plan termination	1.10	340.00	374.00
05/26/20	JEP	Review prior email re 401k termination status (.1); review 2 emails re same (.2); send email re instructions on same (.1)i,	0.40	340.00	136.00
05/26/20	IRS	Attention to 401K termination issues. (.5)	0.50	265.00	132.50
05/27/20	JEP	Attend to 401k termination issues (.2).	0.20	340.00	68.00
05/27/20	IRS	Confer with Carl Schoeppl regarding 401k termination and attend to correspondence regarding process for termination and documents to be filled out. (.8)	0.80	265.00	212.00
05/28/20	JEP	Communications (2) with 401K plan administrator for TCA re termination of plan and directions re handling of same.	0.20	340.00	68.00
06/01/20	IRS	Call with Miriam Cunningham regarding 401k payment and employee matters. (.5)	0.50	265.00	132.50
06/01/20	IRS	Attention to transfer requests and new payroll account set up. (.4) Confer regarding 401k termination issues and review correspondence regarding return of wire and setting up of new accounts. (.5)	0.90	265.00	238.50
06/05/20	JEP	Follow up on 401k isssue raised by Schreiber with multiple emzils (.4).	0.40	340.00	136.00
06/09/20	JEP	Follow up on 401k termination issues, insurance review, discovery.	0.50	340.00	170.00
06/10/20	JEP	Attend to wire transfer to 401k account for employees at Charles Schwab.	0.20	340.00	68.00
06/10/20	IRS	Attention to wire for Schwab regarding 401k termination fees. (.3) Prepare correspondence to HHarmin regarding banking information update for yip associates. (.2) Review Yip associates chart with confirmed and unconfirmed bank information . (.3) Prepare correspondence to Ocean bank counsel re: document request. (.1)	0.90	265.00	238.50
06/11/20	HLH	Review numerous communications regarding 401(k) closure (.6)	0.60	340.00	204.00
Total 007 / Employee Benefits/Pensions			**7.20**		**2,178.00**
017 / Tax Issues					
05/14/20	JEP	Communications with Hall re tax issues and corporate structurers.	0.30	340.00	102.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/14/20	JEP	Handle communications with TCA tax attorney re TCA-owned entity.	0.50	340.00	170.00
05/19/20	JEP	Review and execute Form 56 tax notices for 4 receivership entities, communications with tax accountant seeking remainder asap.	0.20	340.00	68.00
05/19/20	IRS	Confer with accounting experts regarding corporate books and records availability. (.5)	0.50	265.00	132.50
05/20/20	JEP	Attend to remaining 2 IRS Fiduciary notices, execute and send.	0.20	340.00	68.00
05/26/20	HLH	Numerous communications regarding 401(k) termination	0.60	340.00	204.00
05/27/20	JEP	Attend to tax issues, communication with invesor and then accountant Miitch Hall re same.	0.50	340.00	170.00
05/27/20	JEP	Review multiple emails regarding SPV XCell's IRS issues, Kaufman Rossin handling of same, and turnover of files plus full accounting documentation from Kaufman Rossin. (.7); Draft directives re same (.3)..	1.00	340.00	340.00
05/27/20	JEP	Obtain update on K-1 eta information for investors.	0.10	340.00	34.00
05/27/20	GMG	Attention to issues re tax appeal.	0.40	340.00	136.00
06/03/20	JEP	Communications regarding 2019 ta returns preparation, obtaining draft and work papers from Kauffman Rossin re same.	0.40	340.00	136.00
06/09/20	JEP	Communication with tax advisor reminding of SEC billing guidelines.	0.20	340.00	68.00
06/09/20	HLH	Phone conference with I. Comisky regarding Xcell and Transmarine tax issues (.4); Document review in connection with same (1.5)	1.90	340.00	646.00
06/22/20	IRS	Attention to incoming documents from Kaufman Rossin and correspondence from ATaubman regarding 2019 returns (.3	0.30	265.00	79.50
06/24/20	JEP	Analysis of tax issues for numerous SPVs and subsidiaries and develop strategy. (.8) .Discuss with team. (.3).	1.20	340.00	408.00
06/24/20	IRS	Call with MHall re: UK entity tax liability (.4) Attention to correspondence regarding SPV tax preparations (.3) Attention to XCell and Transmarine tax issues (.2)	0.90	265.00	238.50
06/25/20	JEP	Review communications re prior tax handling, and use of entities.	0.30	340.00	102.00
06/29/20	JEP	Communications with tax accountant Hall re disregarded entities.	0.30	340.00	102.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

Total 017 / Tax Issues			**9.80**		**3,204.50**
019 / Banking					
05/13/20	JEP	Meet with bankers, choose AXOS, work on setting up accounts.	2.80	340.00	952.00
05/15/20	JEP	Communications with Circle's Kedi, re status of funds transfers to Axos Receivership Account. Confirm same. Multiple communications with Axos to confirm receipt, set up additional accounts..	1.30	340.00	442.00
05/15/20	JEP	Work with GJB CFO on setting up protocols for accounts and monies being received today,	0.60	340.00	204.00
05/19/20	JEP	Communications with banker and team re things needed banking wise.	0.80	340.00	272.00
05/19/20	JEP	Communications re update on wire transfer status from Butterfield Bank.	0.50	340.00	170.00
05/19/20	HLH	Detailed attention to banking issues and transfer of funds	1.00	340.00	340.00
05/20/20	JEP	Receipt of response by US Bank to notice and demand for turnover. Direct HH re follow up on same.	0.20	340.00	68.00
05/20/20	JEP	Email from consultant on UK bank account strategy and response.	0.20	340.00	68.00
05/20/20	JEP	Meeting re additional emergency banking issues re multiple accounts that require attending to..	0.70	340.00	238.00
05/20/20	HLH	Handle numerous issues regarding opening of BB&T dedication account (.7); Communications regarding same (.3)	1.00	340.00	340.00
05/21/20	HLH	Handle numerous issues regarding banking and opening of dedication BB&T account, including SPV transfers	1.50	340.00	510.00
05/21/20	IRS	Attention to US Bank communications regarding receipt of receivership order, account balance, and transfer of assets to axos. (.4) Review analysis of transfers in process and processing from BB&T bank to new axos accounts (.3) Review correspondence and bank account balance regarding Coutts bank in london. (.2)	0.90	265.00	238.50
05/22/20	HLH	Numerous communications regarding new BB&T dedication account and relationship to SPV's	1.30	340.00	442.00
05/22/20	IRS	Attention to pending bank accounts openings and status of frozen BB&T accounts and pending transfer requests. (.7)	0.70	265.00	185.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/26/20	HLH	Numerous communications and consider issues regarding BB&T Accounts and sweep requirements	0.80	340.00	272.00
05/26/20	IRS	Attention to new bank account openings, freeze orders on existing accounts and status of transfer requests into new receivership accounts. (.4)	0.40	265.00	106.00
05/27/20	HLH	Handle numerous issues regarding Transmarine and BB&T accounts	1.20	340.00	408.00
05/29/20	JEP	Multiple emails (7) re status of reopening various BBT accounts of SPVs (.7); drive to BBT office, work out BBT freeze issues and problems, sign signature cards and resolutions, reopen TCA accounts and handle Transmarine payroll issues(2.3).	3.00	340.00	1,020.00
05/29/20	HLH	Detailed attention to control over BB&T bank accounts (2.3); Numerous phone conferences with BB&T regarding same (1.2)	3.50	340.00	1,190.00
05/29/20	IRS	Call with Heather and JEP regarding BB&T account freeze. (.8)	2.10	265.00	556.50
		Call with Jackie Going to confirm account access information and lockbox retrieval. (.3)			
		Attend to correspondence regarding account freeze and transfer requests (1)			
06/07/20	IRS	Attention to correspondence from Butterfield Bank regarding service of TRO and request for information. (.3)	0.30	265.00	79.50
06/08/20	IRS	Confer with JEP regarding Buterfield Bank communications (.3)	0.40	265.00	106.00
		Prepare correspondence to Cayman counsel regarding response from Butterfield Bank to request for documents. (.1)			
06/11/20	IRS	Confer with HHarmon regarding open bank accounts for deposit of portfolio payments. (.3)	0.70	265.00	185.50
		Attention to document request from Ocean Bank. (.3)			
		Review Axos Bank wire instructions (.1)			
06/12/20	JEP	Banking communications with staff, Axos, team..	0.30	340.00	102.00
06/12/20	IRS	Attention to axos bank domestic wire information (.5)	0.80	265.00	212.00
		Confer with JEP re: Butterfield account information. (.3)			
06/15/20	IRS	Confer with JEP regarding bank account balances and review correspondence regarding same (.3)	0.50	265.00	132.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Attention to request for documents from US Bank and cost of same. (.2)			
06/16/20	IRS	Attention to Ocean Bank regarding document request and transfer of funds into new receivership accounts. (.3) Prepare correspondence regarding incoming wire recognition. (.1) Review updated banking information prepared by Yip associates. (.2) Review bank account balances (.1)	0.70	265.00	185.50
06/17/20	IRS	Confer with JEP regarding banking protocols. (.5) Attention to BB&T balances and transfer to AXOS accounts (.4) Review response from Cayman National Bank regarding document request. (.1) Attention to US bank records custodian document availability and request for same. (.6)	1.60	265.00	424.00
06/18/20	IRS	Review and revise bank account balance sheet and update with incoming wire descriptions. (.3) Confer with JGogin regarding BB&T account balance transfers (.4)	0.80	265.00	212.00
06/22/20	IRS	Confer with counsel for Ocean Bank regarding fund transfer (.3) Attention to correspondence regarding Ocean Bank document request and fund transfer steps (.3) Prepare correspondence regarding wire instructions for circle partners payment. (.2)	0.80	265.00	212.00
06/23/20	IRS	Confer with JEP re: general banking matters (.6) Review and coordinate download of incoming documents from Ocean bank (.3) Prepare correspondence regarding transfer of funds form Ocean bank to receivership account. (.2)	1.40	265.00	371.00

		Review bank statements received in the mail (.3)			
06/24/20	IRS	Prepare correspondence regarding transfer of signature cards for ocean bank accounts. (.2) Review bank and credit stubs (.3) Attention to charges listed on ocean bank account statement (.4)	0.90	265.00	238.50
06/26/20	JEP	Update on US Bank documents being held as custodian. Direct creation of inventory and copies.	0.40	340.00	136.00
06/26/20	IRS	Attention to correspondence regarding US Bank custodial agreement and document request. (.4) Review incoming bank statements (.4)	0.80	265.00	212.00
06/29/20	IRS	Review incoming bank statements (.3) Review documents provided by Ocean bank and provide same to yip Associates (.2) Attention to funds transfer to Receivership accounts (.3)	0.80	265.00	212.00
06/30/20	IRS	Attention to Ocean Bank transfer of funds request (.5)	0.50	265.00	132.50
Total 019 / Banking			**36.20**		**11,175.50**
020 / Open Litigation Matters					
05/14/20	JEP	Communications and correspondence with TCA counsel Brian Dervishi re his matters for company.	0.50	340.00	170.00
05/21/20	JEP	Further review memo from Schoeppl on all litigation matters and meet with B. Halsey to discuss strategy for handling same.	0.80	340.00	272.00
05/21/20	BH	Receipt and review of memorandum of active litigation on collections matters from C. Schoeppl.	1.00	265.00	265.00
05/25/20	JEP	Follow up on confirmation that class action Judge Scola has stayed that matter and direct re same. Review Schoeppl request re same.	0.30	340.00	102.00
05/26/20	JEP	Email from Halsey re management of loan enforcement litigation (.1); phone call re same (.3).	0.40	340.00	136.00
05/26/20	BH	Receipt and review of correspondence regarding pending litigation matters (.3); review of local dockets regarding upcoming deadlines in same (.3);	1.00	265.00	265.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		drafted summary correspondence to Receiver regarding status of same and strategy for proceeding (.4).			
05/27/20	JEP	Review notices of hearing and motions to withdraw in multiple cases by and againstTCA.	0.60	340.00	204.00
05/27/20	JEP	Communications with Schoeppl re his request as to class action (.2); discuss with Garno case strategy. (.2).;	0.30	340.00	102.00
05/27/20	IRS	Attention to pending litigation matters from B Halsey and upcoming deadlines in active cases. (.2)	0.20	265.00	53.00
05/28/20	JEP	Communications re putative class action with counsel for individual Defendants represented by Steve Brodie (.2); Greg Garno (.2); review correspondence between same. (.1).	0.50	340.00	170.00
05/28/20	JEP	Review 7 emails re ongoing Paycation litigation in TN (.7); discuss with B. Halsey (.2),	0.90	340.00	306.00
05/28/20	IRS	Prepare correspondence to B.Dervishi regarding Broward collision. (.2) Confer with B Halsey regarding pending litigation matters and internal procedure for outside counsel communications. (.7)	0.90	265.00	238.50
05/29/20	JEP	Phone call with Halsey to go over status of ongoing open litigation matters, handling of particular cases and progress of notices of filing orders in various courts. (.4); Emails re same (5).2;	0.90	340.00	306.00
05/29/20	JEP	Receipt of email from Bankruptcy Counsel in Hearts & Hands Chapter 11 in Alaska, review confirmation plan, disclosure and other documents; direct response.	0.80	340.00	272.00
05/29/20	IRS	Confer with GGarno regarding defense costs for class action attorneys, prepare letter to AIG regarding consent to pay defense costs , and attend to correspondence regarding same. (1) Confer with CHopkins regarding access to broward collision location and attend to correspondence regarding same. (.4) Call with Brian Dervishi regarding pending broward collision litigation (.5) Review memoranda regarding pending litigation claims involving receivership entities. (.3) Review correspondence regarding bankruptcy filings in hearts and hands of care (.2)	2.40	265.00	636.00

Genovese Joblove & Battista, P.A.

==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/30/20	JEP	Communications with counsel re AIG strategy, review letter consenting to AIG payment of defense costs of defendants in class action and discuss with Garno.	0.30	340.00	102.00
06/02/20	JEP	Communications re Groupe Mercator Transport law suit. (.3)	0.30	340.00	102.00
06/02/20	JEP	Review Dervishi memo re cases he is handling and requesting information about TCA 4675, review organizational documents, correspond and speak with Garno and Sadovnic and Halsey re same.	0.80	340.00	272.00
06/03/20	BH	Review of summaries and continued preparing matrix detailing status of pending litigation matters involving the Receivership entities, to prepare memorandum to advise the Receiver.	2.40	265.00	636.00
06/03/20	BH	Review of foreign dockets and secondary authority regarding pending litigation matters involving Receivership entities in jurisdictions outside Florida and the U.S.	2.60	265.00	689.00
06/04/20	JEP	Review Moot SEC email re Zenergy bankruptcy status, discuss with bankruptcy counsel and set up call for update to SEC. DIscuss Zynergy with Garno.	0.60	340.00	204.00
06/04/20	BH	Continued review of litigation matters involving the Receivership entities, to prepare matrix of pending actions to advise the Receiver.	1.80	265.00	477.00
06/05/20	JEP	Prepare for and attend call with SEC to provide status on Zenergy bankruptcy and obtain information, correspondence re same (1.1)	1.10	340.00	374.00
06/05/20	IRS	Review update re: Zynergy bankruptcy matters. (.3)	0.30	265.00	79.50
06/08/20	BH	Receipt and review of correspondence, pleadings and docket summaries for pending litigation involving Receivership entities, to prepare for and staff upcoming hearings and deadlines in all actions.	2.40	265.00	636.00
06/09/20	BH	Review of dockets for matters pending in Broward County and other jurisdictions, to prepare for any and all upcoming hearings, and to determine whether and where to file Notices of Appointment of Receiver.	1.30	265.00	344.50
06/10/20	JEP	Review Duckworth Firm litigation report.	0.50	340.00	170.00
06/11/20	JEP	Open Litigation. Obtain Zenergy bankruptcy update, re additional attempts to obtain financing and putting off confirmation hearing.	0.30	340.00	102.00
06/11/20	JEP	Analysis of stay with respect to class action, and strategy re same and AIG policy proceeds.	0.80	340.00	272.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/14/20	JEP	Review report on Burnet Duckworth Firm TCA litigation matters.	0.70	340.00	238.00
06/18/20	JEP	Phone call with defense counsel in TCA class action case. (.6) Draft memo to file. (.3)	0.90	340.00	306.00
06/23/20	JEP	Attend conference call with Garno, Jeff Schneider and Scott Silver (counsel for Benjamin class) in Benjamin v. TCA class action before Judge Scola (1.0). Draft memo (.4).	1.40	340.00	476.00
06/25/20	JEP	Prepare and attend meeting with B. Halsey and G. Garno re all open litigation matters, including 19 Broward cases, Australia, etc; discuss status, strategy and provide direction,	1.60	340.00	544.00
06/26/20	JEP	Follow up on correspondence with Schoeppl firm re substitution of counsel on multiple loan portfolio litigation matters.	0.30	340.00	102.00
06/26/20	JEP	Review communications from Benjamin Class Plaintiffs' counsel (.2); response (.1) Direct production of certain documents to counsel for Benjamin Class Plaintiffs.(.1).	0.40	340.00	136.00
Total 020 / Open Litigation Matters			**32.30**		**9,759.50**
031 / General Litigation					
05/05/20	GMG	[W/O PER GMG] Review E-hounds agreements; review proposed complaint.	0.00	340.00	0.00
05/07/20	GMG	[W/O PER GMG] Prepare for call with TCA counsel (1.); call with TCA counsel (1.); review proposed complaint and PI (1.); call with SEC (.3).	0.00	340.00	0.00
05/11/20	JEP	Communications with SEC, receipt of filed TCA complaint, filed Motion for appointment of receiver. Communications with team re status and preparation;Receipt of Order of appointment, multiple communications with team, review documents, preparation for access.	5.60	340.00	1,904.00
05/11/20	HLH	Analysis of transition documents provided by former counsel	2.00	340.00	680.00
05/11/20	HLH	Consider numerous issues regarding case administration for new case (2.0); Communications regarding same (.5)	2.50	340.00	850.00
05/11/20	BH	Receipt and review of Complaint filed today.	0.50	265.00	132.50
05/11/20	JPB	Review and outline TCA complaint and Order appointing Receiver.	1.00	265.00	265.00
05/11/20	IRS	Review filed SEC v. TCA complaint and motion to appoint receiver. (.7)	4.30	265.00	1,139.50
		Review order appointing receiver (.5)			

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Prepare correspondence regarding powers and authority of Receiver in SEC v. TCA action. (.5) Review motion for entry of judgment and proposed consent judgment (1) Prepare and coordinate filing of notice of appearances for GJB attorneys. (.5) Confer with JEP regarding staffing requirements and internal organization and workflow. (.4) Attend to extensive correspondence from Carl Schoeppel regarding transition documents and inventory lists. (.7)			
05/12/20	JEP	Review AIG insurancse policies, discuss with Carl and Kyle AIG approval of covwerage to defend class action case pending before Judge Scola. Draft letter with Appointment Order and Send to AIG Claims Adjuster putting on notice of litigation stay and asset freeze, and impact on same.	1.50	340.00	510.00
05/12/20	HLH	Conference call and e-mail communications with team regarding new filing (1.5); Conference call with SEC regarding new filing (.6); Detailed review of case transition documents (2.5)	4.60	340.00	1,564.00
05/12/20	HLH	Draft communications and handle issues regarding notice to financial institutions and others (2.2); Attention to notice to CIMA (.5)	2.70	340.00	918.00
05/12/20	GMG	Review proposed notices to banks and employees (.4); call with receiver (.5); review various documents and call with B. Fickling (.4); review various memos from Schoeppl (1.); internal conference re strategy (.8); call with SEC (.4); review complaint (.4); review TRO (.4).	4.30	340.00	1,462.00
05/12/20	JPB	Review and outline receivership transition files provided by TCA attorneys.	2.50	265.00	662.50
05/12/20	EGM	Team conference call regarding plan of action for first day items that need to be taken care of asap; conference call with SEC regarding same	0.80	265.00	212.00
05/12/20	IRS	Attend to correspondence regarding data storage. (.2) Review correspondence from TCA employees regarding service of appointment order. (.3) Review files provided by relief defendants counsel in regards to receivership transition and TCA internal organization. (2) Internal GJB conference call to discuss initial plan and internal organization. (1.7) Conference call with SEC to discuss initial set up, information sharing process, and staffing matters. (.5)	8.30	265.00	2,199.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Conference call with Receivership Defendants' counsel regarding Receivership transition matters. (2) Prepare motion to approve retained professionals. (1) Attend to correspondence with potential retained professionals regarding approval requirements and fee applications. (.6)			
05/12/20	CBH	Begin review and organization of case; attend telephone conference; organization of drop box documents from Defendants counsel (1.5); download pleadings (.5).	2.00	100.00	200.00
05/13/20	HLH	Attention to noticing financial institutions and other critical parties	1.00	340.00	340.00
05/13/20	IRS	Finalize motion to approve retained professionals and related exhibits and coordinate filing of same (.5) Confer with Stephanie Moot from SEC regarding suggested rates for retained professionals and attend to correspondence regarding same. (.4)	0.90	265.00	238.50
05/13/20	BH	Attended strategy and update call with J. Pelrman and receiver team on all pending issues.	1.50	265.00	397.50
05/13/20	JAD	Analysis of documents and information received from senior litigation counsel.	0.60	265.00	159.00
05/13/20	EGM	Team conference call regarding plan of action and assigned tasks for the next couple of days including securing inventory/assets. interviewing key employees, reaching out to various interested individuals	2.30	265.00	609.50
05/13/20	CBH	Attention to documents and e-mails received; organization; meeting with E. Serres regarding same.	0.50	100.00	50.00
05/14/20	JEP	Review and approve for filing notices of stay.	0.20	340.00	68.00
05/14/20	HLH	Detailed review of litigation memorandum and attention to Notices of Filing Receiver Order and communications with opposing counsel	4.30	340.00	1,462.00
05/14/20	IRS	Submit proposed order of motion to approve retained professionals to the Court. (.2); Prepare expedited motion to retain local counsel. (.6)	0.80	265.00	212.00
05/14/20	CBH	Attention to deadlines in receivership order; calendar (.4); preparation of notice of receivership in state court cases; meeting with H. Harmon regarding same (1.5).	1.90	100.00	190.00
05/15/20	JEP	Communications with Carl Schoeppl re additional tax returns and to provide confirmation to Kapila that I own privilge over his report.	0.20	340.00	68.00
05/15/20	HLH	Attention to pre receivership litigation and noticing issues	2.00	340.00	680.00
05/15/20	HLH	Attention to pre-receivership litigation, communications with opposing counsel	0.40	340.00	136.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/15/20	JMS	Review D&O policy and attention to potential claim.	1.50	340.00	510.00
05/15/20	IRS	Case strategy meeting with J. Perlman to discuss pending administrative matters and team coordination. (1.5) GJB- attorney Team meeting regarding pending deliverables and tasks. (1)	2.50	265.00	662.50
05/15/20	CM	Preparation of index re: receiver transition files.	3.00	100.00	300.00
05/16/20	IRS	Review and revise initial communications to whistleblower counsel and confer regarding same. (.5)	0.50	265.00	132.50
05/17/20	JEP	Discuss In re Tritium Fund complaint and strategy	0.30	340.00	102.00
05/17/20	HLH	Attention to CIMA response, communications regarding same	0.30	340.00	102.00
05/17/20	EGM	Draft emergency motion to file motion under seal to appoint Jonathan Perlman liquidator over receivership entities in Cayman Islands liquidation proceedings	1.10	265.00	291.50
05/17/20	EGM	Review relevant legal authority regarding case in which receiver was also appointed as joint liquidator in a foreign jurisdiction for insertion into emergency motion to permit liquidation in the Cayman Islands	1.30	265.00	344.50
05/18/20	HLH	Attention to collection litigation, including correspondence with opposing counsel (.5); Notice to borrowers (.8)	1.30	340.00	442.00
05/18/20	GMG	Call with C. Schoeppel re special set hearing (.3); call with B. Shraiberg (.3); attention to issues re pending cases and hearings (.5); finalize motion to seal and order (.5; finalize emergency motion re Cayman proceedings (2.5); review order re motion to expand (.1); exchange emails with Fickling (.4); internal conference re emergency motion (.4); exchange emails with Cayman counsel (.8); meet with receiver re open issues (.4).	6.20	340.00	2,108.00
05/18/20	IRS	Confer with Carl Schoeppl regarding pending general litigation matters and defendant cooperation. (.5)	0.50	265.00	132.50
05/18/20	EGM	Edit and finalize motion to file under seal and proposed order; confer w/ G. Garno and I. Sadovnic regarding same	0.60	265.00	159.00
05/18/20	EGM	Edit motion to permit liquidation in Cayman Islands (1.4); confer w/ I. Sadovnic regarding same (.2)	1.60	265.00	424.00
05/18/20	EGM	Conference call w/ G. Garno and I. Sadovnic regarding emergency motion to permit liquidation of cayman entities (.3); review relevant legal authority regarding instances where courts awarded relief regarding same (.6)	0.90	265.00	238.50
05/18/20	EGM	Review proposed order regarding motion to file under seal	0.10	265.00	26.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/18/20	CBH	Attention to filing complaint in district of nevada; meeting with E. McIntoch regarding same; preparation of documents (.8); final preparation and filing motion to file sealed motion; meeting with I. Sadovich regarding same (.6).	1.40	100.00	140.00
05/19/20	JEP	Prepare for and attend status hearing with Court.	0.80	340.00	272.00
05/19/20	PJB	Prepare for and attend exparte hearing on status conference and follow up on call.(.7) Attend follow up calls on same. (.4)	1.10	340.00	374.00
05/19/20	HLH	Numerous communications with opposing counsel regarding open collection litigation (1.2); Consider substitution of party and counsel issues (.4)	1.60	340.00	544.00
05/19/20	GMG	Exchange multiple emails with Pivot (.5); review Harvey letter (.2); review order re motion to seal (.1); review agreed order re Groupe Mercator (.2); review case law re chapter 15 issues (1.); attention to issues re registering order of appointment ((.5); review motion for status conference (.2); review Big Rhino arbitration and exchange emails re same (.3)	3.00	340.00	1,020.00
05/19/20	IRS	Prepare ex parte motion for status conference and attend to correspondence regarding same. (.7) Attend ex parte status conference. (.4) Attend to correspondence regarding Broward collision litigation. (.3)	1.40	265.00	371.00
05/20/20	JEP	Receipt of communications from counsel to whistler blower re cooperation and scheduling of interview. Response to same.	0.20	340.00	68.00
05/20/20	JEP	Team meeting to go over status of all issues and progress of same from team members and to instruct as to next steps and assignments, including status of filings in district courts for each county where property or persons likely to need to be sued and included within jurisdiction of court are located; review of status on all bank accounts, monies to receivership accounts, freezes, notices to payors to new lock boxes account set ups, status on seizures of assets, control of computers and IT, witness interviews, investor communications, domain name assets, issues for troubled assets, payroll issues and identification valued employees, setting up new storage facility; accounting records status; loan portfolio management; litigation portfolio management.	2.80	340.00	952.00
05/20/20	PJB	Review, consider and respond to memos on issues with SEC response and strategy.	0.50	340.00	170.00
05/20/20	JMS	Continued review of D&O Policy and related issues.	1.50	340.00	510.00
05/20/20	GMG	Review order denying motion and exchange emails re same (.3); exchange emails re P. Scott re Broward Collision (.2); call with Fickling re Broward Collision (.3); review materials re Broward Collision (.5); review order re	6.30	340.00	2,142.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		emergency motion (.1); internal conference call (1.5); call with Fickling (1.2); exchange multiple emails and review information re portfolio entities (1.0); review SEC motions and responses (.5); review letter (.2); internal call re operations issue (.5).			
05/20/20	IRS	Attention to engagement letters from retained professionals. (.3) Attention to correspondence to/from whistleblower counsel (.2) Confer with Larry West, counsel for whistleblowers in regards to information request. (.5)	1.00	265.00	265.00
05/20/20	EGM	Draft and send email to counsel for whistleblowers (.3)	0.30	265.00	79.50
05/20/20	EGM	Conference call w/ Larry West (counsel for the whistleblowers) in order to gain information regarding the case, introductions, and set up meetings with the whisteblowers	0.50	265.00	132.50
05/20/20	CBH	Attention to sealed pleadings filed; meeting with E. Serres regarding same.	0.50	100.00	50.00
05/21/20	JEP	Receipt and review of case law regarding cross jurisdictional issues and issues in have banks and asset owners in UK and elsewhere to acknowledge my jurisdiction and comply, including Stanford 70 page decision.	2.30	340.00	782.00
05/21/20	JEP	Provide case update to A. Schiff via phone call. Provide joint liquidator meeting notice.	0.50	340.00	170.00
05/21/20	GMG	Exchange emails and review materials re banking materials (1.0); review notice of compliance (.1); review Ocean Bank letters (.1); exchange emails with 3ynnergy counsel (.2); conference call re loan portfolio (1.2); meet with J. Howard (1.); conference call re JLE (1.0).	4.60	340.00	1,564.00
05/21/20	IRS	Call with B. Halsey to provide factual background on external litigation and management of collections actions. (.6)	0.60	265.00	159.00
05/21/20	BH	Conference with J. Perlman regarding active collections litigation matters (.3); conference with I. Sadovnic regarding same (.3); conference with H. Harmon regarding same (.2).	0.80	265.00	212.00
05/21/20	BH	Conference with C. Monzon regarding organization and summary excel spreadsheet to control and manage all active collections litigation.	0.30	265.00	79.50
05/21/20	BH	Review of C. Schoeppl memorandum and of individual dockets and pleadings for pending collections matters involving the TCA Master Fund to prepare to litigate all active matters.	2.30	265.00	609.50
05/21/20	EGM	Review emails with documents from counsel for the whistleblowers	0.30	265.00	79.50
05/21/20	AMC	Telephone conference with John Genovese regarding enforceability of court's	0.30	265.00	79.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		injunction on international transactions.			
05/21/20	CM	Review memo of C. Schoeppl; review (19) court dockets of cases referenced in memo, prepare chart re: case information, most recent activity and upcoming events; email to B. Halsey re: findings.	2.90	100.00	290.00
05/22/20	HLH	Review correspondence regarding Zenergy bankruptcy case	0.40	340.00	136.00
05/22/20	GMG	Exchange emails with P. Scott re Broward Collision (.3)' conference call with Luria and review materials re same (1.2); review Pivot materials (.3; review proposed order re illegal lawyer case (.1); conference call with Zenergy (.5); call with B. Schraiiberg re Zenergy (.2); confer with receiver (.3); exchange emails re Zenergy and SPV payables (.5); exchange emails with Zenergy counsel and review bankruptcy motion (.4)	3.80	340.00	1,292.00
05/22/20	IRS	Prepare analysis regarding communications with whistleblower counsel. (.3)	0.30	265.00	79.50
05/22/20	EGM	Begin reviewing documents from whistleblower's counsel (.6); confer w/ C. Monzon regarding document set, contents. and organization of documents (.2)	0.80	265.00	212.00
05/22/20	CM	Review email from L. West, download and organize emails and documents for attorney review (1.0); continue indexing of files and documents contained in receiver transition files (1.5).	2.50	100.00	250.00
05/23/20	JEP	Communicaitons via phone and email with Garno re Press intervview and testimony request.	0.30	340.00	102.00
05/23/20	PJB	Review and consider several update memos on issues and strategy and follow up memos on same.	0.80	340.00	272.00
05/24/20	JEP	Communications with legal counsel on jurisdictional issues.	0.20	340.00	68.00
05/24/20	CM	Continued indexing of files and documents contained in receiver transition files.	2.00	100.00	200.00
05/25/20	GMG	Exchange emails with Schoeppl (.3); exchange emails re insurance issues (.3).	0.60	340.00	204.00
05/25/20	IRS	Attention to correspondence regarding stay of class action litigation. (.2)	0.20	265.00	53.00
05/25/20	CM	Complete indexing of files and documents contained in receiver transition files.	4.00	100.00	400.00
05/26/20	JEP	Communication with B. Halsey re default judgment against Unitiv and Ludvik Holdings and Kristans on loan for $6,5M, and prospects of collection.(2 emails).	0.30	340.00	102.00
05/26/20	HLH	Consider strategy and logistics for various active litigation	1.20	340.00	408.00
05/26/20	IRS	Call with Greg re: Broward Collision (.2)	0.30	265.00	79.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Review additional internal billing codes relating to pending TCA litigation (.1)			
05/26/20	IRS	Prepare correspondence regarding key copy for broward collision. (.1)	0.10	265.00	26.50
05/26/20	EGM	Begin reviewing documents produced from Larry West, whistleblower counsel	1.20	265.00	318.00
05/26/20	BH	Receipt and review of spreadsheet and summary of pending collection matters and civil litigation matters involving the receivership entities.	1.50	265.00	397.50
05/27/20	GMG	Review Zynergy motion (.2); call with B. Schreiberg re same (.3); review various pleadings and emails re pending litigation (.4); exchange emails re investor communication (.2); review Sobi proposal (.4); conference call with BRG (1.); review Zynergy term sheet and exchange emails re same (.4).	2.90	340.00	986.00
05/28/20	HLH	Attention to active litigation, numerous communications regarding same	0.80	340.00	272.00
05/28/20	GMG	Exchange multiple emails with receiver re tax and operational issues (.5); review various proposed investor communications (.3); exchange emails re pending litigation (.4); exchange emails with Schoeppel re 401K and retainer ().3); call with broker re D&O policy (.1); exchange emails and review materials re Pivot (.6); call with S. Silver re class action (.5); call with R. Schmidt re ITS Solar (.1); exchange emails re Zenergy (.2); call with S. Brodie (.3); call with Shraiberg re Zenergy (.3); exchange emails with receiver (.2); call with B. Fickling (1.5); attention to issues re pending litigation matters (.4).	5.70	340.00	1,938.00
05/28/20	IRS	Attend to new matter number creation for class action complaint. (.1)	0.10	265.00	26.50
05/29/20	IRS	[W/O PER GMG] Review and compile fee proposals for expert CROs (.3)	0.00	265.00	0.00
05/29/20	EGM	Conference call w. I. Sadovnic regarding issues and edits to receivership website (.3); email w/ J. Perlman regarding meeting with whistleblowers and whistleblower's counsel (.1)	0.40	265.00	106.00
06/01/20	JEP	Follow up communications- with Kedi at Circle; meet with team on status bank productions (.4); follow up on status of production from Kaufman Rossin, including ledgers.(.4); Phone call with attorney M. Pineiro at Jeff Marcus Firm re production of documents (.3); follow up with team members on document production status from others (.3)..	1.20	340.00	408.00
06/01/20	JEP	Multiple communications re all outstanding document requestions, production status, necessary reports and indices. Review same.	1.50	340.00	510.00
06/01/20	JEP	Provide DSI with SEC billing requirements. Email re final terms of engagement letter.	0.30	340.00	102.00
06/01/20	PJB	Work on issues with selection of advisors, review memos on same and call with client.	0.90	340.00	306.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/01/20	GMG	Exchange emails with Schraiberg re Hearts & Hands (.2); review Brodie edits to AIG and exchange emails re same (.3); exchange emails re CRO retention and other related issues (.4); exchange emails re investor communications (.3); exchange emails and review information re SPVs (.5); review FTC proposal (.4).	2.10	340.00	714.00
06/01/20	EGM	Review index of transition documents from TCA counsel	0.20	265.00	53.00
06/02/20	GMG	Exchange emails with class action lawyers (.2); call with receiver (.2); exchange emails with Berman re class action (.2); exchange emails with CRO candidates (.3); call with insurance broker re AIG (.3); review CRO engagement letter and exchange emails with receiver (.3); exchange emails and review information re employee retention (.4); review Indomate emails and documents (.2); review memo re pending litigation (.2); exchange emails with Cayman counsel (.2); review Maples letter (.2).	2.70	340.00	918.00
06/02/20	EGM	Review documents from whistleblower's counsel	2.20	265.00	583.00
06/02/20	IRS	Attention to ongoing litigation matters involving TCA entities. (1) Confer with JEP regarding broward colision deal and review the relevant loan documents. (1)	2.00	265.00	530.00
06/02/20	CBH	Begin service and filing of notice of appointment of receiver in multiple out of state cases; e-mail correspondence with counsel regarding same.	2.00	100.00	200.00
06/03/20	GMG	Exchange emails and review materials re payroll and personnel (.2); review memo pending litigation and exchange emails re same (.3); work on employee communications (.2); review Kaufman & Rossin document request (.2); call with B. Berman re class actions (.4); call with receiver re various issues (.3); review documents in preparation of D&O demand (1.5); work on DSI retention motion (.5).	3.60	340.00	1,224.00
06/03/20	IRS	Confer with whistleblower regarding additional contact information, initial intake and prepare internal correspondence regarding notes from conversation. (.6) Review supplemental memorandum prepared by whistleblowers. (1) Prepare motion and supporting exhibits for approval of DSI (1)	2.60	265.00	689.00
06/03/20	IRS	Attend to correspondence from whistleblower counsel regarding meeting and specific requests for information from whistleblowers. (.3) Confer regarding pending issues with PacV and possible litigation concerning same. (.5)	0.80	265.00	212.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

06/03/20	CBH	Attention to correspondence in German; translate; send copy to G. Garno (.5); attention to service of notices of receiver in various state court proceedings (1.5); meeting with B. Halsey regarding canadian cases (.5).	2.50	100.00	250.00
06/04/20	HLH	Attention to documents requested from SEC, communications regarding same	0.60	340.00	204.00
06/04/20	IRS	Confer with BHalsey regarding status of external pending litigation and status update. (.3) Strategize with JEP re: whistleblower interviews. (.3)	0.60	265.00	159.00
06/04/20	IRS	Call with Martha Mora from Ocean bank regarding document request and pending information. (.4).	0.40	265.00	106.00
06/04/20	CM	Prepare index of documents from whistleblower counsel, prepare documents for attorney review.	0.80	100.00	80.00
06/05/20	IRS	Coordinate whistleblower meetings and organization of documents prepared by whistleblowers for SEC review. (.3)	0.30	265.00	79.50
06/08/20	IRS	Coordinate meetings with whistleblowers (.5) Prepare correspondence to counsel for whistleblower attar requesting documents. (.2) Review whistleblower documents (1.3) Prepare brief memo regarding whistleblower documents. (.5) Strategize with JEP regarding investigatory reports and whistleblower documents (1)	3.50	265.00	927.50
06/08/20	EGM	Review relevant legal authority regarding privilege implications of whistleblower documents and whether turning over documents to SEC waives privilege and to what extent	1.80	265.00	477.00
06/08/20	EGM	Review and draft correspondence with whistleblower counsel regarding meeting with clients; confer w/ I. Sadovnic regarding same	0.20	265.00	53.00
06/08/20	CM	Organize and Index interview memos for attorney review.	0.80	100.00	80.00
06/09/20	JEP	Review memo by Halsey re issues relating to Broward Collision litigation. (.3) Draft lengthy analysis for discussion with team and circulate for discussion.(.7)	1.00	340.00	340.00
06/09/20	GMG	Exchange emails with Fickling re Pivot (.3); exchange emaiils with Pivot (.3); conference call with SEC (.5); call with receiver (.4); exchange emails with Berman re class action (.2); exchange emails re Zenergy (.3); review Schoeppel email and Cayman liquidation documents (.4).	2.40	340.00	816.00
06/09/20	IRS	Prepare correspondence to whistleblower counsel regarding meeting with whistleblower. (.2) Confer with EMC regarding legal research on whistleblower communications' privilege issues (.3)	0.50	265.00	132.50

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

06/09/20	BH	Review of Order Appointing Receiver and legal authority regarding procedure and basis for filing motions to substitute Receiver as party, and for approval of continued or new counsel for Receiver in each proceeding.	1.10	265.00	291.50
06/09/20	IRS	Review Motion to lift stay filed by Broward Collision creditor and prepare correspondence regarding same. (.5) Review order denying motion to lift stay. (.1) Confer with B Halsey regarding pending litigation matters communications with Broward collision counsel. (.6) Prepare correspondence regarding Broward Collision and related entity ownership structure (.3) Prepare correspondence to JEP and GG regarding necessary steps regarding pending Broward Collision litigation. (.2) Attention to Zenergy litigation and bankruptcy matters. (.5) Review correspondence from local Texan counsel relating to costs for certain litigation expenses in Paycation matter. (.2) Confer regarding privilege issues and document sharing request from defendant's counsel in T. Benjamin class action. (.4)	2.80	265.00	742.00
06/10/20	JEP	Multiple communications with both counsel for whistleblowers, including rescheduling of interviews..	0.30	340.00	102.00
06/10/20	JEP	Review motion for stay relief and court order denying same.	0.30	340.00	102.00
06/10/20	GMG	Review motion for stay relief filed by LCA (.3); review order (.1); call with B Shraibert (.3); exchange emails with Shraiberg re Zenergy (.3); exchange emails and review materials re Broward Collision (.4); internal conference re turnover of notes to SEC (.5); exchange emails with Silver and Berman re class action (.5).	2.40	340.00	816.00
06/10/20	TVV	Telephone conference with G. Garno regarding privilege waiver issues with internal investigations.	0.50	340.00	170.00
06/10/20	IRS	Confer with G. Garno regarding internal investigation privilege. (.2) Call with counsel to whistleblowers regarding interviews (.4) Attention to correspondence with counsel re prohibition on new litigation. (.3) Attention to correspondence with counsel regarding documents from whistleblower. (.3)	1.20	265.00	318.00
06/10/20	EGM	Conference call w/ Raynette at the SEC regarding copying of documents in SEC possession;	0.30	265.00	79.50
06/10/20	EGM	Review relevant legal authority regarding disclosure of internal investigations memos with SEC and whether that consitutes a waiver of the privilege	2.50	265.00	662.50
06/10/20	IRS	Attention to broward collision litigation matters. (.3)	0.80	265.00	212.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Review litigation memo from local californis counsel in the Quants and First Capital cases. (.3) Review litigation update from BHalsey regarding Paycation matter and request for receiver approval to maintain current texas counsel on the matter. (.2)			
06/11/20	JEP	Work on privilege issues for production of documents to SEC	0.40	340.00	136.00
06/11/20	GMG	Review order re Zenergy (.2); call with B. Shraiberg (.2); exchange emails with Brodie re class action case (.2); exchange emails with Buckley (.3); review litigation status report (.3); review closing documents re Pivot sale and exchange emails re same (1.0) call with Shraiberg re Zenergy (.3); exchange emails re Zenergy confirmation hearing (.3); exchange emails re Pacific Ventures (.2); review investigation notes (.5); conference call with class action lawyers (.5).	4.00	340.00	1,360.00
06/11/20	IRS	Attention to correspondence regarding stay provisions in appointment order. (.2)	0.20	265.00	53.00
06/11/20	CM	[W/O PER GMG] Prepare letter to ENF-CPU (Carrie Holt) forwarding hard drive for document upload.	0.00	100.00	0.00
06/12/20	GMG	Review Eidson Learning Center settlement documents and exchange emaiils re same (.7); exchange emaiils re personnel issues (.3); exchange emails re Pivot closing (.3); review liquidator responses re protocol (.2); exchange numerous emails with DSI re various SPV issues (.5); review Arena term sheet and exchange emails with DSI re Zenergy (.3); exchange emails with Brodie (.2); call with Mack re Zenergy (.3); exchange emails re protocol (.5); continue reviewing interview notes (.5); review Jackson letter re Eidson (.2); review Niewirth letter (.2).	4.20	340.00	1,428.00
06/12/20	IRS	Attention to edison learning settlement negotiations. (,2)	0.20	265.00	53.00
06/14/20	EGM	Review relevant legal authority regarding extent of waiver of communications regarding the privileged communications of the internal investigation and to what extent the waiver applies to the subject matter of the documents	2.20	265.00	583.00
06/15/20	JEP	Review ongoing analysis (5 emails) into internal investigations and review for privilege materials. (.8).	0.80	340.00	272.00
06/15/20	GMG	Exchange emails with Fickling re personnel issues (.2); exchange multiple emails re Cayman protocol (.7); review order setting trial in Petron case (.1); exchange emails with Warren re Pacific Ventures (.3); review proposed motion for stay and order re class action complaint (.3); continue reviewing interview	2.60	340.00	884.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		notes production re SEC (1.0).			
06/15/20	IRS	Call with both whistleblower counsel regarding status of interview. (.5) Confer with JEP regarding whistleblower claims and counsel concerns. (.5)	1.00	265.00	265.00
06/15/20	IRS	Attention to pending litigation matters. (.2) Conduct legal research and analysis re waiver of privilege in producing internal investigation documents to the SEC. (.5)	0.70	265.00	185.50
06/16/20	GMG	Exchange emails with Shraiberg re Zenergy (.3); attention to issues re inventory and liquidation of property (.3); exchange emails with Buckley re whistleblowers (.2); review research re privilege waiver and exchange emails re same (.4); exchange emails with DSI and review corporate documents re TCA Aerospace (.2); exchange emails with McIntosh re Zenergy (.1); exchange emails re Cleland (.2); conference call with DSI re update (1.2); conference call with receiver re SEC production (.3).	3.20	340.00	1,088.00
06/16/20	IRS	Attention to correspondence regarding privilege issues surrounding internal investigations. (.2)	0.20	265.00	53.00
06/16/20	IRS	Attention to pending xcel litigation matters. (.2) conduct legal research and analysis regarding stay orders as made applicable to all pending matters involving receivership property or entities and prepare correspondence regarding same. (.5) Review correspondence re: paycation litigation issues. (.2) Review request for payment of e-discovery in pending litigation matter. (.1)	1.00	265.00	265.00
06/16/20	AMC	Research of federal bankruptcy authorities concerning Chapter 15 “public policy” limitations to recognition under Chapter 15 (2.6), and meet with John Genovese to discuss going-forward research tasks (.5)	3.10	265.00	821.50
06/17/20	HLH	Extensive attention to noticing, bank accounts and document production, numerous communications regarding same	6.50	340.00	2,210.00
06/17/20	GMG	Exchange emails with P. Scott re Broward Collision (.3); exchange emails with DSI re Zenergy (.2); call with B. Shraiberg re Zenergy (.3); exchange emails with Schoepel re licensing issue (.2); attention to issues re Eidson Learning Center (.3); exchange emails with Brodie re class action (.3): review law re TCA licensing issues (.5).	2.10	340.00	714.00
06/17/20	IRS	General litigation:	1.50	265.00	397.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Attention to access to Broward collision locations (.3) Review correspondence regarding general receivership law in defense of motion to lift blanket stay. (.2) Review information request from DSI re broward collision/ICAV relationship. (.2) Attention to correspondence regarding Dervishi memo on broward collission. (.3) Review legal analysis by Scheoppl regarding lending license matters and TCA litigation relating to same (.5)			
06/18/20	GMG	Exchange e-mails with receiver and DSI re SPVs (.3); exchange e-mails re whistleblower interviews (.3); exchange e-mails re original TCA documents (.3); exchange e-mails re investor interviews (.2); exchange e-mails with Shraiberg re Hearts & Hands bankruptcy and plan (.2); exchange e-mails with P. Scott re Broward Collision (.2); call with receiver re insurance issues (.5); call with Brodie re class action defendants (.5); multiple calls re production of investigatory files (.7); review Schoeppel investigatory file (1.0).	4.20	340.00	1,428.00
06/18/20	IRS	Confer with JEP and GGarno regarding privilege issues relating to turnover of internal investigation reports (.5) Attention to correspondence whistleblower counsel regarding meeting with whistleblower and provide insurance policy information. (.3) Prepare correspondence to A.Taubman re: follow up on document request. (.1)	0.90	265.00	238.50
06/18/20	EGM	Review documents provided by counsel for the whistleblowers in preparation for meeting with whilstleblower.	3.10	265.00	821.50
06/18/20	EGM	Confer w/ G. Garno regarding limited waiver of attorney-client privilege in internal investigations	0.20	265.00	53.00
06/18/20	IRS	Call with B Halsey regarding motion to lift stay in one of the broward collision cases (.4) Call with opposing counsel in broward collision action requesting good faith conference on motion to lift. (.1) Attention to correspondence re ownership of broward collision SPVs. (.4)	1.10	265.00	291.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Review claims relating to texas pending litigation matters. (.2)			
06/19/20	JEP	Review whistleblower memos and documents. (1). Attend initial interview of whistleblower. (4.5). Draft memo to file.(.3).	5.80	340.00	1,972.00
06/19/20	JEP	Prepare for and attend phone conference with SEC re status; including pending motion for relief from stay, production of certain documents by Receiver, protocol negotiation status (.6); draft memo to file re follow ups from same (,2) and discuss with team members (.2).	1.00	340.00	340.00
06/19/20	GMG	Review materials and prepare for whistleblower interview (2.0); call with SEC (.8); attend whistleblower interview (4.5); exchange emails with class action plaintiffs (.3); exchange email with I. Martino re Zenergy (.3); review Warren email and loan documents re Pacific Ventures Group (.5).	8.40	340.00	2,856.00
06/19/20	IRS	Participate in interview with whistleblower (4) Review and download relevant documents relating to the TCA Audit 2018 from ehounds (.7) Attention to invoices from London office. (.4) Attention to investor communications received by Kedi. (.2)	5.30	265.00	1,404.50
06/19/20	IRS	Review legal memo prepared by B Halsey relating to Australia pending TCA litigation. (.4) Attention to correspondence regarding settlement offers in Edison Learning matter. (.2) Attention to Paycation litigation motion to stay. (.2)	0.80	265.00	212.00
06/19/20	EGM	Review documents from whistleblowers in preparation for initial phone call w/ whistleblower.	2.30	265.00	609.50
06/19/20	EGM	Interview with whistleblower.	4.80	265.00	1,272.00
06/22/20	JEP	Further discussion into Pie Face in qliquidation in Australia and Australia Worldwide (also in liquidation) matters with Cecere, review case law and further strategy for same (1.1).	1.10	340.00	374.00
06/22/20	GMG	Exchange emails re stay of class action case.	0.30	340.00	102.00
06/22/20	IRS	General Litigation: Attention to correspondence to whistleblower counsel to schedule meeting for additional interview. (.2)	0.20	265.00	53.00
06/22/20	EGM	Review and edit notes from meeting with whistleblower	0.50	265.00	132.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/23/20	GMG	Review turnover demand (.4); call with B. Shriaberg re Hearts & Hands (.3); review bankruptcy agreements re Hearts & Hands (.4); exchange emails re Ocean Bank production (.2); exchange emails re tax documents (.2); conference call with class action lawyers (1.3); exchange emails and review documents re TCA Media services (.4); call re TCA Media (.3).	3.50	340.00	1,190.00
06/23/20	IRS	Prepare correspondence regarding legal invoices from Canadian counsel (.2) Coordinate interviews with remaining whistleblowers (.3) Review analysis regarding motion to lift stay by lease corp in one of the broward collision matters. (.3)	0.80	265.00	212.00
06/23/20	SS	Reviewed SEC Complaint as background.	0.40	100.00	40.00
06/24/20	JEP	Receive service of subpoena for production of documents: review and process same.	0.30	340.00	102.00
06/24/20	GMG	Exchange emails with M. Klein re Lease Corp. of America (.3); call with Klein re same (.3); attention to issues re Broward Collision (.4); call with Shraiberg re Hearts & Hands confirmation and agreement (.4); exchange emails with Buckley re whistleblower interviews (.3); conference with receiver re pending deadlines (.5); exchange emails re fee applications (.4); review case management order in Strikeleather case (.2); call with A. Fuller re Lease Corporation of America (.3); exchange emails with SEC re TCA stay relief (.2); conference call re Pulse Network redemptions (.3).	3.60	340.00	1,224.00
06/24/20	IRS	Call with B Halsey regarding pending litigation update and substitution of counsel process. (.4) Attention to correspondence regarding costs and fees associated with pending TCA litigation actions. (.3) Review analysis re: edison learning settlement negotiations. (.2) Attention to whistleblower interview coordination. (.2)	1.10	265.00	291.50
06/24/20	BH	Conference with G. Garno regarding substitution as counsel on all proceedings with Schoeppl Law currently represents receivership entities.	0.40	265.00	106.00
06/24/20	CBH	Receipt and review of e-mail correspondence regarding upcoming deadlines in case; calendar (.4); receipt and review of subpoena from Defendants J. Thomas and J. Francis; calendar response deadline (.3).	0.70	100.00	70.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/25/20	JMS	Work on D&O Policy demand.	3.20	340.00	1,088.00
06/25/20	GMG	Review final documents, sale documents and emails re work out of Edison Learning Center (1.0); review bankruptcy pleadings and agreements re Hearts & Hands confirmation (.4); attention to issues re turnover demands (.3); review SEC subpoena re Nevada action (.3); exchange emails re Pulse redemption (.2); conference with receiver re outstanding litigation (1.0); conference call with DSI re SPVs (2.8); exchange emails with DSI re Broward Collision (.2); exchange emails re SPV tax issues (.2).	6.40	340.00	2,176.00
06/25/20	IRS	Attend to correspondence regarding whistleblower interviews (.3)	0.30	265.00	79.50
06/25/20	CBH	Receipt and review of service providers demand letters; e-mail to C. Oscario regarding mailing; meeting with C. Esser regarding addresses for chart (.6); attention to NV case regarding subpoena; pull related pleadings; meeting with G. Garno regarding same (.5).	1.10	100.00	110.00
06/26/20	JEP	Multiple email communications with with Whistleblower counsel (4x's)(.2), phone conference (.3).	0.50	340.00	170.00
06/26/20	JEP	Buckley call re whistleblower documents, remaining interviews, and request for relief from stay. (.7). Draft memo to file and discuss with Garno and Sadiovnic separate aspects of same. (.4). Receipt and review of draft complaint (.7) and further communications from Buckley, re same and re scheduling (.3)	2.10	340.00	714.00
06/26/20	JMS	Continued work on D&O Demand.	1.00	340.00	340.00
06/26/20	IRS	Prepare correspondence re: fee application process (.2).	0.40	265.00	106.00
06/26/20	IRS	Coordinate whistleblower interviews (.4) Call with counsel for whistleblowers regarding blanket receivership stay. (.6) Attention to correspondence regarding possible motion to lift stay by whistleblower counsel (.5) Prepare correspondence to class action counsel providing documents re: internal investigation (.2) Prepare correspondence to B Halsey re: litigation invoices. (.2) Review letter to Schoeppl re: substitution of counsel (.2)	2.10	265.00	556.50
06/26/20	BH	Completed review of matters currently in litigation in Broward County where	2.90	265.00	768.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

		Schoeppl Law is counsel of record for Recievership entities, to prepare formal termination of engagement and substitution of counsel to C. Schoeppl and T. Gray on all such matters.			
06/26/20	SS	[W/O PER GMG] Review background materials in anticipation of document review project.	0.00	100.00	0.00
06/27/20	GMG	Review proposed complaint (.5); exchange emails re whistleblower complaint and motion for stay (.3); exchange emails with B. Berman re production of documents (.3); attention to fee application issues (.3); revise Schoeppel letter (.2); attention to issues re D&O demand (.3).	1.90	340.00	646.00
06/29/20	JEP	Follow up on investigation into Australia Worldwide in liquidation in Australia and Pieface in liquidation in Australia matters research and analysis with B. Halsey and Cerere.	0.60	340.00	204.00
06/29/20	GMG	Exchange emails with receiver re whistleblower interviews (.3); exchange emails with Warren re Pacific Ventures (.3); review documents re Pacific Ventures (.7); call with Warren re Pacific Ventures (.9); review bankruptcy pleadings re Hearts & Hands settlement (.2); conference call re tax protests (.5); review amended motion for stay relief (.2); exchange emails with Brodie re whistleblowers (.4).	3.50	340.00	1,190.00
06/29/20	GMG	Exchange emails with receiver re Pacific Ventures (.2); exchange emails with Grey re open litigation (.3).	0.50	340.00	170.00
06/29/20	IRS	Call with whistleblower counsel regarding pending interviews. (.3) Attention to coordinating remaining whistleblower interviews and request for relief from stay (.7)	5.10	265.00	1,351.50
06/29/20	IRS	Call with B Halsey regarding pending litigation matters (.3) Attention to correspondence regarding communications with litigation parties by DSI regarding loan payment information. (.3) Review correspondence regarding pending australian litigation (.2)	0.80	265.00	212.00
06/29/20	CBH	Attention to SD Ill case and re-issuance of filing fee check; prepare letter to clerk; meeting with E. McIntoch regarding same (.5); preparation and filing of notice of appointment of receiver in additional Broward County case; meeting with B. Halsey regarding same (.4).	0.90	100.00	90.00
06/30/20	JMS	Work on D&O Demand.	2.00	340.00	680.00
06/30/20	GMG	Review documents produced by J. Marcus (1.5); exchange emails with Buckley re stay (.2); exchange emails with Marcus (.2); exchange emails re	6.60	340.00	2,244.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

		TPNI redemption rights (.2); exchange emails re PPP loans with SPVs (.2); exchange emails re Australian litigation and retention of counsel (.3); review substitution of counsel pleading (.2); review memo re class action claims (.3); review order on amended motion for stay relief (.1); exchange emails re Morgan Stanley account (.2); exchange emails re compensation of consultants (.3); exchange emails re kcell (.2); attention to issues re outstanding litigation (.5); conference with receiver (2.0); review and revise stipulation (.2).			
06/30/20	IRS	Strategize re: request for relief from stay by whistleblower counsel (.3)	0.30	265.00	79.50
06/30/20	IRS	Review correspondence re Australian litigation claims. (.3) Review SOWs from BDervishi for collections actions. (.2) Attention to correspondence re: edison learning (.1)	0.60	265.00	159.00
06/30/20	BH	Attended videoconference with Receiver and counsel for Receiver, to discuss all pending matters affecting receivership and current litigation, resolve urgent issues and prepare strategy going forward.	2.50	265.00	662.50
Total 031 / General Litigation			**328.80**		**95,938.50**
		Total:	**1,372.95**		**394,734.00**

=====UNBILLED DISBURSEMENTS ==========

			AMOUNT
05/04/20	H273	Website domain and maintenance GoDaddy (12455-001) American Express	300.12
05/12/20	S100	Photocopy	0.30
05/12/20	S100	Photocopy	3.15
05/15/20	S101	Postage	1.80
05/13/20	H249	Telephone cell phone charges (12455-001) Irina Sadovnic	34.74
05/14/20	H221	Fedex Airbill No.770468122169 (12455-001) FedEx	15.02
05/14/20	H221	Fedex Airbill No.770468147460 (12455-001) FedEx	15.02
05/14/20	H221	Fedex Airbill No.770468196399 (12455-001) FedEx	22.50
05/18/20	H222	Filing Fees (12455-001) Clerk, U.S. District Court	47.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001)	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001)	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fees (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/18/20	H222	Filing Fee (12455-001) Clerk, U.S. District Court	47.00
05/20/20	H231	Miscellaneous/ Cubesmart (12455-001) J.P. Bado	207.90
05/21/20	H273	Website domain and maintenance GoDaddy (12455-001) American Express	128.08
05/21/20	H273	Website domain and maintenance GoDaddy (12455-001) American Express	28.16
05/19/20	H231	Miscellaneous/PODS - Storage units (12455-001) American Express	306.74
05/19/20	H231	Miscellaneous/PODS - Storage units (12455-001) American Express	662.65
05/18/20	H231	Miscellaneous/USPS - PO Box 3 month rental (12455-001) American Express	65.00
05/18/20	H221	Fedex Airbill No.770486050783 (12455-001) FedEx	29.59
05/19/20	H221	Fedex Airbill No.770497581853 (12455-001) FedEx	29.59
05/19/20	H221	Fedex Airbill No.770497621725 (12455-001) FedEx	39.23
05/19/20	H221	Fedex Airbill No.770497659590 (12455-001) FedEx	28.29
05/19/20	H221	Fedex Airbill No.770497704243 (12455-001) FedEx	25.71
05/19/20	H221	Fedex Airbill No.770497734599 (12455-001) FedEx	25.21
05/19/20	H221	Fedex Airbill No.770497769089 (12455-001) FedEx	25.71
05/19/20	H221	Fedex Airbill No.770497833698 (12455-001) FedEx	28.29
05/19/20	H221	Fedex Airbill No.770497860522 (12455-001) FedEx	25.21
05/19/20	H221	Fedex Airbill No.770497903654 (12455-001) FedEx	28.05
05/19/20	H221	Fedex Airbill No.770497946716 (12455-001) FedEx	24.70
05/19/20	H221	Fedex Airbill No.770497979648 (12455-001) FedEx	29.59
05/19/20	H221	Fedex Airbill No.770498014984 (12455-001) FedEx	23.56
05/19/20	H221	Fedex Airbill No.770498048261 (12455-001) FedEx	25.71
05/19/20	H221	Fedex Airbill No.770498078827 (12455-001) FedEx	25.71
05/19/20	H221	Fedex Airbill No.770498116085 (12455-001) FedEx	28.85

Genovese Joblove & Battista, P.A.

==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

05/19/20	H221	Fedex Airbill No.770498152576 (12455-001) FedEx	25.71
05/19/20	H221	Fedex Airbill No.77049819778 (12455-001) FedEx	25.21
05/19/20	H221	Fedex Airbill No.770498224546 (12455-001) FedEx	25.21
05/19/20	H221	Fedex Airbill No.770498460116 (12455-001) FedEx	25.21
05/19/20	H221	Fedex Airbill No.770498499470 (12455-001) FedEx	23.56
05/19/20	H221	Fedex Airbill No.770498551581 (12455-001) FedEx	25.21
05/19/20	H221	Fedex Airbill No.770499793855 (12455-001) FedEx	25.71
05/19/20	H221	Fedex Airbill No.770499840350 (12455-001) FedEx	25.21
05/19/20	H221	Fedex Airbill No.770499882633 (12455-001) FedEx	25.71
05/19/20	H221	Fedex Airbill No.770499921233 (12455-001) FedEx	25.21
05/19/20	H221	Fedex Airbill No.770501462303 (12455-010) FedEx	29.59
05/19/20	H221	Fedex Airbill No.770501494618 (12455-001) FedEx	25.21
05/19/20	H221	Fedex Airbill No.770502648518 (12455-001) FedEx	23.56
05/28/20	S101	Postage	3.20
05/26/20	H229	Meals- site inspection (12455-001) Irina Sadovnic	42.51
06/05/20	S101	Postage	23.60
06/06/20	H232	Office Supplies - UPS boxes and bubble wrap for TCA equipment shipped to Ehounds (12455-001) Jay D. Bushman	184.15
06/01/20	H221	Fedex Airbill No.770589733656 (12455-001) FedEx	15.28
06/08/20	H222	VOID and DELETED Check from CheckRec - Filing Fee (12455-001)	-47.00
06/08/20	S100	Photocopy	215.10
06/10/20	S100	Photocopy	0.15
06/12/20	H211	Courier Service (12455-001) Executive 2000 Courier Systems, Inc.	19.10
06/11/20	H221	Fedex Airbill No.770672598770 (12455-001) FedEx	88.18
06/11/20	H221	Fedex Airbill No.770672598666 (12455-001) FedEx	88.18
06/11/20	H221	Fedex Airbill No.770672598379 (12455-001) FedEx	88.18

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-001

06/11/20	H221	Fedex Airbill No.770672597626 (12455-001) FedEx	88.18
06/11/20	H221	Fedex Airbill No.770672598390 (12455-001) FedEx	88.18
06/11/20	H221	Fedex Airbill No.770672599169 (12455-001) FedEx	62.65
06/11/20	H221	Fedex Airbill No.770686155327 (12455-001) FedEx	24.58
		Total:	**$4,958.71**

=====WORKING TIMEKEEPER SUMMARY==========

Professional	Hours	Rate	Value
JEP - Perlman	325.95	340.00	110,823.00
JHG - Genovese	0.60	340.00	204.00
PJB - Battista	3.30	340.00	1,122.00
GMG - Garno	151.40	340.00	51,476.00
HLH - Harmon	130.90	340.00	44,506.00
MSF - Feluren	0.00	340.00	0.00
TVV - Vliet	0.50	340.00	170.00
JMS - Suarez	9.20	340.00	3,128.00
BH - Halsey	26.30	265.00	6,969.50
JPB - Bado	174.90	265.00	46,348.50
EGM - McIntosh	82.00	265.00	21,730.00
AMC - Castaldi	3.40	265.00	901.00
IRS - Sadovnic	366.60	265.00	97,467.00
JAD - Delgado	0.60	265.00	159.00
JNS - Sardina	9.80	100.00	980.00
CBH - Hopkins	24.60	100.00	2,460.00
CM - Monzon	16.00	100.00	1,600.00
SS - Siff	0.40	100.00	40.00
CE - Esser	1.00	100.00	100.00
JB - Bushman	45.50	100.00	4,550.00
Totals	1,372.95		394,734.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-001

=====DISBURSEMENT SUMMARY ==========

S101	Postage	28.60
S100	Copies	218.70
H273	Website domain and maintenance	456.36
H249	Telephone	34.74
H232	Office Supplies	184.15
H231	Miscellaneous/Others	1,242.29
H229	Meals	42.51
H222	Filing Fees	1,363.00
H221	Fedex Airbill No.	1,369.26
H211	Courier Service	19.10

Total Fees	**394,734.00**
Total Disbursements	**4,958.71**
Total Bill	**$ 399,692.71**
Previous Balance	
Outstanding Balance	**$ 399,692.71**

Trust Balance: **$0.00**

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-002

Billing Attorney: Jonathan E Perlman
Originating Attorney: Jonathan E Perlman
Originating Attorney: Paul J Battista

CLIENT: 12455 - Jonathan Perlman, Receiver (TCA)
MATTER: 12455-002 - Jonathan Perlman, Receiver / TCA Fund - Cayman Islands

ATTN: Jonathan Perlman

PreBill Summary	
Total Fees	$135,008.50
Total Disb	
Total Bill	$135,008.50
-Retainer App	$0.00
Previous Bal	
Bal Due	$135,008.50
Trust Balance	$0.00
Retainer Bal	$0.00

===== BILLING INSTRUCTIONS =======
RETURN FINAL TO: _____
BILL: INITIALS _____
HOLD: INITIALS _____
W/O WIP: _____

Type of Work: LT
Rate Table: Override Table

Billing Instructions: PARTNERS $340/hr, ASSOC. $265/hr, PARA $100/hr & Laise $50/hr

=====UNBILLED TIME==========

Date	Lawyer	Work Description	Time	Rate	Value
05/12/20	JEP	Analysis of Cayman issues.(1.0).	1.00	340.00	340.00
05/13/20	IRS	Strategize with J Perlman regarding cayman island litigation issues. (.6) Call Christian LaRoda Thomas from Maples in London and set up time for initial interview and meeting regarding TCA Cayman islands operations and litigation. (.4)	1.00	265.00	265.00
05/14/20	JEP	Receipt and review or order in Cayman appointing liquidator over Feeder Fund LTD (.1). Discuss with potential counsel in Cayman and Rehmann's Hoebeke. (1.6). Further communication with potential counsel re case , receipt and reveiw of notes from hearing (1.3); direct drafting of emergency order to employ, negotiate retainer terms (.5); conference with SEC to update on Cayman developments and plan to employ/strategy. (.5).	4.00	340.00	1,360.00
05/14/20	IRS	Review internal analysis regarding Transmarine tax compliance issues. (.2)	0.20	265.00	53.00
05/14/20	IRS	Attend to correspondence regarding Cayman Islands court proceedings and review liquidation order. (.5) Strategize with JEP regarding Cayman Islands related litigation matters. (.5)	5.90	265.00	1,563.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		Conference with Chip Hoebeke from Rehmann regarding Cayman Islands Winding up order. (.5) Conference with local Caymans counsel regarding pending issues with winding up order (.5) Conference with Cayman counsel and Rehmann tax accountants regarding litigation strategies available with regards to cayman islands litigation. (1.5) Prepare correspondence to local counsel regarding public cayman islands orders and pleadings. (.4) Conference call with SEC regarding the pending litigation in Cayman Islands. (1.3) Review and attend to correspondence from Rehmann with evidence of relating to relationship between TCA entities in Nevada and Cayman Islands. (.7)			
05/15/20	JEP	Meetings with Cayman local counsel, work on strategy, liquidator issues (2.0). Phone call with SEC to discuss plans. (1.3)	3.30	340.00	1,122.00
05/15/20	JEP	Draft memo of facts for Chapter 15 research and questions, provide to Battista (1.0) . Discuss same (.5).	1.50	340.00	510.00
05/15/20	JEP	Review correspondence received from Harneys, counsel for Banque Picktet, on behalf of EY liquidators with numerous exhibits, and cover letter from my local Cayman counsel. Review and analysis of same. Direct research of issues.	0.80	340.00	272.00
05/15/20	EGM	Conference call with attorneys in the Cayman Islands regarding TCA Global Lending Corp. and the need to bring the entitiy into the Receivership Estate, as well as other pending issues regarding the liquidation proceedings	1.50	265.00	397.50
05/15/20	IRS	Conference call with local counsel regarding communications with cayman island liquidators, document requests, and case management strategy. (1.5) Attend to correspondence regarding FIT consulting information and proposal. (.2) Conference call with SEC counsel to provide update on Cayman islands liquidation issues and expanding the receivership. (1.3) Call with Rehmann regarding possible Chapter 15 legal analysis relating to	4.40	265.00	1,166.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		Nevada TCA global lending corp. (.7) Review order granting motion for approval of local counsel (.1) Review internal memorandum regarding chapter 15 factual components in support of expert review. (.2) Review incoming correspondence from Harneys, counsel to cayman islands liquidators and internal correspondence regarding same (.4)			
05/16/20	JEP	Multiple emails (1.0), Zoom meeting with Rehmann Hoebeke, (.4) go over audit reports, for analysis of jurisdictional issues, waterfall analysis, claims discussions, documents needed to obtain (.6); follow up on obtaining same (.3).	2.30	340.00	782.00
05/16/20	JEP	Review Cayman counsel legal opinion on consequences of various courses of action, including filing petition for liquidation or just defending in Cayman, or doing nothing in Cayman. Multiple communications with Cayman counsel and GJB re US and Cayman opinions on various matters, including Chapter 15 bankruptcy proceedings.	3.80	340.00	1,292.00
05/16/20	PJB	Review and consider issuers with Cayman liquidation proceedings, review and respond to several memos on same (1.7), call with A. Castaldi on strategy and review case law (1.0).	2.70	340.00	918.00
05/16/20	IRS	Attend to extensive correspondence with Cayman counsel and internal GJB communications regarding possible cayman islands liquidation proceedings (1.5) Review internal case strategy memoranda regarding possible chapter 15 issues with US and cayman liquidation. (.9) Prepare correspondence to TCA employees regarding corporate structure and document requests in support of cayman islands litigation (.3)	2.70	265.00	715.50
05/16/20	AMC	Attend to substantial research, and prepare research memorandum concerning various Ch. 15 issues implicated by Cayman liquidation proceedings.	6.40	265.00	1,696.00
05/16/20	AMC	Attend to various communications with P. Battista and J. Perlman regarding research issues.	0.80	265.00	212.00
05/16/20	IRS	Confer with Rehmann tax counsel and review analysis regarding differences in creditor distribution between US courts and Cayman courts. (.4)	0.40	265.00	106.00
05/17/20	JEP	Analysis of GJB memo on Chapter 15 (1.0). Numersous written and telephonic communications with Cayman and GJB regarding strategies, and applicable facts, etc (2.0), Develop strategy (1.0). Draft memo to file (1.5). Phone calls	9.80	340.00	3,332.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		with P. Battista re analysis (1.0). Review numerous documents for analysis including corporate structures, SPV and other asset lists (3.3).			
05/17/20	JEP	Prepare for and attend conference call with SEC, Cayman counsel and Chapter 15 counsel (P. Battista) reporting on case developments in Cayman and Receiver's intended courses of action.	1.70	340.00	578.00
05/17/20	PJB	Work on issues with Cayman proceedings, including review of case law memo on chapter 15 interplay and memos to and from client on strategy for same. (1.2) Prepare for and attend follow up call with client, counsel and SEC on same and strategy.(1.5)	2.70	340.00	918.00
05/17/20	GMG	Multiple calls re Cayman issues (1.); exchange multiple emails re Cayman issues (1.); review research re Cayman issues (1.); work on motion for authority to institute Cayman proceedings (2.); work on motion to file under seal (1.).	6.00	340.00	2,040.00
05/17/20	IRS	Attend to extensive correspondence regarding Cayman liquidation issues and strategy. (1.5) Review legal analysis regarding chapter 15 litigation in the US. (.5) Conference call with SEC and Cayman counsel (1.3) Confer with Rocco Cecere regarding redemption request information (.3)	3.60	265.00	954.00
05/17/20	EGM	Review draft of Motion to Permit Receiver to File for Liquidation of the Receivership Entities Located in the Cayman Islands (.7); confer w/ I. Sadovnic and G. Garno regarding same (.2)	0.90	265.00	238.50
05/17/20	IRS	Prepare emergency motion to permit receiver to file liquidation in foreign states. (1.0)	1.00	265.00	265.00
05/18/20	JEP	Edit motion for approval to file for joint liquidator status in Cayman (1.8). DIscuss with counsel (.5)	2.30	340.00	782.00
05/18/20	JEP	Obtain information on Maples prior opinions from Schoeppl. Analysis of same	0.80	340.00	272.00
05/18/20	JEP	Review of notices from LTD Fund Liquidators to US entities.	0.60	340.00	204.00
05/18/20	JEP	Communications with Cayman counsel re additions to motion for court in US, answers to various questions on process.	0.50	340.00	170.00
05/18/20	JEP	Multiple discussions with Cayman counsel, bankruptcy counsel re joint petition in Caymarn (3.); Phone call with SEC re same. (.6). .	3.60	340.00	1,224.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

05/18/20	JHG	Review and assess insurance issues regarding potential Cayman proceedings.	1.10	340.00	374.00
05/18/20	PJB	Review, consider and respond to memos on issues with additional information on creditors and strategy on same.(1.2) Review, consider and revise proposed emergency motion and memo on same.(.3) Extended call with client and follow up call with Cayman counsel on issues with liquidation proceedings and strategy on same.(1.1)	2.60	340.00	884.00
05/18/20	IRS	Call with Maples counsel Christian Thomas regarding prior engagement and litigation. (.4) Call with Carl Schoppl regarding advice from Maples counsel. (.5) Prepare internal memoranda regarding analysis of litigation issues as presented by Carl Schoppl and Maples. (.3) Attend to correspondence with maples counsel regarding attorney client privilege as held by tca entities. (.2) Call with SEC regarding pending litigation issues and proposal for liquidation in Cayman Islands. (1.2) Prepare motion for authorization to file for liquidation in Cayman, exhibits, and proposed order. (1.5) Call chambers of judge Altonaga regarding motion to file motion under seal . (.2) Internal conference and coordinate filing of motion to authorize liquidation in caymans. (.4) Phone conference with Cayman counse and tax advisor regarding potential claims and litigation ourcome in the caymans. (2.5)	7.20	265.00	1,908.00
05/18/20	IRS	Confer with Kedi from circle partners regarding analysis of redemptions made before and after the redemption suspension request was sent to investors. (.5) Review spreadsheets with analysis and date regarding redemption requests which have been processed and which had been paid. (.5)	1.00	265.00	265.00
05/19/20	PJB	Prepare for and attend conference call with client and SEC counsel on issues with liquidation proceedings in Cayman.(1.2) Follow up call on same.(.3) Work	2.50	340.00	850.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		on issues with same and call with client on same.(.7) Review and respond to follow up memos on same.(.3)			
05/19/20	JEP	Phone conference with SEC, Battista re petition to file in Cayman (1.2); review order granting leave to file under seal (.1); internal discussions re same (.3); research re statutes of limitations and tolling in Cayman (.4). Analysis of location of foreign directors/officers (.3).	2.30	340.00	782.00
05/19/20	JEP	Edit letter in response to counsel to Liquidator for LTD Fund's letter re meeting to discuss protocols and other issues.	0.40	340.00	136.00
05/19/20	JEP	Emails with Cayman Counsel and Rehmann re directives on strategy (.8). Phone call with Hoebeke re requisite to dos by receivership team and Rehmann (.5).	1.30	340.00	442.00
05/19/20	JEP	Additional communications with Cayman and bankruptcy counsel on best course of action.	2.50	340.00	850.00
05/19/20	JHG	Extensive review of complaint and order appointing Receiver (2.3); review case law on enforceability of Judge Altonaga order in Cayman Islands (2.1); preparation for telephonic hearing and review motion for status conference (1.1); attend telephonic status conference (.5); telephone conference with P. Battista regarding hearing (.4); telephone conference with J. Perlman regarding hearing (.4).	6.80	340.00	2,312.00
05/19/20	GMG	Exdhange emails with Cayman counsel (.5); call with receiver re Cayman motion (.5).	1.00	340.00	340.00
05/19/20	IRS	Conference Call with SEC to discuss possible chapter 15 litigation with respect to Cayman Islands (1.3) Attend to correspondence with Cayman Counsel regarding possible statute of limitation issues for Auditor claims, and domestication of foreign judgment in the caymans. (.5) Strategize regarding possible conflict of interests that may arise out of receiver's dual role in Us and Cayman liquidation and receivership proceedings. (1) Conference regarding SEC position on Receiver's motion to file liquidation in the Caymans. (.2) Confer with Rocco Cecere regarding current officers and directors for TCA Global Credit Fund GP. (.3)	5.20	265.00	1,378.00

Genovese Joblove & Battista, P.A.

==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		Conduct legal research and analysis regarding SEC receiver's entering into protocol with foreign courts and liquidators over the the same entities. (.6) Review and confer regarding legal analysis of chapter 15 issues (1.3)			
05/20/20	JEP	Review SEC response to motion for approval to file as joint liquidator. (.3). Direct research on COMI impact of participating in Cayman as Joint Liquidator and discuss same (1).	1.30	340.00	442.00
05/20/20	JEP	Review Castaldi research memo re Chapter 15 issues.	0.50	340.00	170.00
05/20/20	JEP	Review court order on motion to file as joint liquidator and notify Cayman counsel, and discuss Cayman strategy as result.	0.80	340.00	272.00
05/20/20	JHG	Review email from J. Perlman and evaluation of issues arising from motion for authority to file in Cayman Islands (1.1); analysis of issues of application of Cayman law on distributions in chapter 11 or chapter 15 and issues of comity (2.4); review analysis of investors received from H. Harmon (.8); review and analysis of SEC response to motion for authorization and exhibit (2.8); review and analyze email from J. Perlman regarding Cayman proceedings (.3); continued review of email regarding jurisdictional issues (1.3); review and analysis of District Court order (1.3).	10.00	340.00	3,400.00
05/20/20	IRS	Review SEC response in opposition to motion for approval to file liquidation in the Caymans. (.3) Review order denying motion for liquidation authority (.2) Review internal legal analysis and correspondence regarding possible chapter 15 issues in relation to Cayman liquidation proceeding. (1). Review analysis of investor location as related to liquidation in Caymans. (.2) Attend to correspondence from Cayman counsel regarding service of cayman class a banks. (.2) Attend to correspondence from Cayman counsel regarding SEC response to motion for approval to file liquidation. (.3)	2.20	265.00	583.00
05/20/20	AMC	Research concerning withdrawal of bankruptcy reference vis-a-vis Chapter 15 and prepare brief memorandum concerning same.	4.30	265.00	1,139.50
05/20/20	AMC	Substantial research of federal bankruptcy authorities concerning applicability	5.40	265.00	1,431.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		of foreign law to determining the priority of bankruptcy claims; basis to separate claims based on application of foreign law.			
05/21/20	JEP	Review email from Cayman counsel in preparation for Cayman strategy conference, attend conference call, direct strategy.[.5] Follow up email communications re same. [.3].	0.80	340.00	272.00
05/21/20	JHG	Review email from Cayman counsel outlining various issues (.2); analysis of email from Cayman counsel and proposed protocols regarding distribution (1.4); conference with A. Castaldi regarding research on Chapter 15 issues (.6).	2.20	340.00	748.00
05/21/20	GMG	Review Cayman liquidation correspondence.	0.20	340.00	68.00
05/21/20	IRS	Confer with Rocco Cecere regarding possible strategic appointment of JEP as formal officer of the Cayman entities. (.6) Prepare internal memorandum regarding service on international entities including financial institutions and confer with J.Genovese regarding same. (.5) Confer with local counsel regarding steps forward after order denying approval to file liquidation in the Caymans. (.5) Review Cayman islands action plan prepared by local counsel. (.3) Review investor correspondence sent by EY liquidators. (.2)	2.10	265.00	556.50
05/21/20	IRS	Call with JEP to discuss strategy regarding formal registration as officer and director in Cayman over the entities and prepare and circulate internal memoranda regarding same. (1)	1.00	265.00	265.00
05/22/20	JEP	Review Cayman counsel notes of minutes from first meeting with joint liquidators. (.5). Phone conference with Cayman counsel and Sadovnic re same and strategy, and protocol meeting to follow (.8); muleiple phone calls with Sadovnic on same and research needed (.2); draft memo re issues (.8); communications with Battista re setting up protocol meeting with Baker McKenzi partner bloom and pre-meeting action items. (.3).	2.50	340.00	850.00
05/22/20	JHG	Review and analysis of email from Cayman counsel (.3); review and analysis of proposed action plan, review emails from G. Garno (.2); continued review of chapter 15 research on applicability of foreign law (2.2).	2.70	340.00	918.00
05/22/20	PJB	Work on issues with Caymans, including review and consider several memos on same and develop strategy.	1.20	340.00	408.00

Genovese Joblove & Battista, P.A.
==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020
12455-002

05/22/20	GMG	Exchange emails with Cayman counsel.	0.30	340.00	102.00
05/22/20	IRS	Draft informal request for information from bob press regarding notice and intent to liquidate under the limited partnership agreements and confer with cayman counsel regarding same. (.5)	0.50	265.00	132.50
05/22/20	IRS	Attention to correspondence with Maples counsel regarding communications regarding prior tca representation. (.2) Confer with Cayman Counsel to discuss outcome of first meeting with EY liquidator counsel and issues with maples communications. (1.3)	1.50	265.00	397.50
05/23/20	JEP	Draft memo re control, possible actions by joint liquidator affecting various receivership entities.	0.50	340.00	170.00
05/23/20	JEP	Call with Battista, discuss terms for negotiation with Joint Liquidator counsel Bloom later this morning.	0.30	340.00	102.00
05/23/20	GMG	Exchange multiple emails re Cayman liquidators & strategy.	0.70	340.00	238.00
05/24/20	JEP	Review and analysis of summary of Battista initial call with EY counsel Bloom (.4); draft response and list of issues for team discussion and analysis and circulate. (.6).l	1.00	340.00	340.00
05/24/20	JEP	Review SEC judgment, research re impact of civil penalty provision on Receiver enforcement of judgments and ability to obtain relief abroad, and re Chpter 15 issues (2.0). Draft memo to file and to counsel requesting advice (.5).	2.50	340.00	850.00
05/24/20	PJB	Prepare for and attend extended call with M. Bloom as counsel to EY liquidators.(.9) Prepare detailed memo to client and counsel on same.(.4)	1.30	340.00	442.00
05/24/20	IRS	Review internal analysis regarding communications with EY Liquidator's US counsel relating to potential protocols and chapter 15 litigation. (.4)	0.40	265.00	106.00
05/25/20	JEP	Receipt and review of email from Scheoppl at my request regarding status of latest corporate resolutions and whether any action had been taken for liquidation prior to receivership appointment, including Memorandum re closure of Cayman Entitites; Liquidation and Dissolution of a Cayman Islands Company pdf, Voluntary Dissolution and WInding Up of a Cayman Exempted Limited Partnershipt PDF; Regulatory Procedure Cancellation of Mutual Funds and certain resolutions re same. (1.5); ; email correspondence with counsel re same (.5); phone conference with Sadovnic and Cayman counsel re same and strategy re obtaining Maples documents, and further securing of control of GP and other Receivership Entities (.6).	2.60	340.00	884.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

05/25/20	JHG	Review resumes of proposed forensic consultants (.9); review Luria's Taylor Bean Whitaker case (.5); continued research on COMI cases regarding potential chapter 15 (2.3).	3.70	340.00	1,258.00
05/25/20	GMG	Exchange emails and review information re Cayman proceedings, foreign assets and other related issues.	0.50	340.00	170.00
05/25/20	IRS	Confer with Cayman counsel regarding status of election under limited partnership agreement in light of resolution documents. (1.2) Confer with JEP regarding analysis of cayman islands law and pending litigation matters. (.5)	1.70	265.00	450.50
05/26/20	JEP	Review and analysis of Collas Crill legal memorandum on potential actions to enforce Receivership Entities' rights and obligations under Court's Appointment Order. (.8); Draft response and consult with US counsel re same. (.7).	1.50	340.00	510.00
05/26/20	JEP	Receipt and review of email from Funds Administrator Kedi at Circle Investments, re status and position of Administrator regarding Joint Liquidators, draft lengthy email to Cayman counsel and Garno re issues identified for immediate response. Collect and provide documentation relevant to same.	0.90	340.00	306.00
05/26/20	IRS	Attend to correspondence regarding response to Circle partners on investor communications and joint liquidation proceedings (.3)	0.30	265.00	79.50
05/26/20	IRS	Review legal analysis regarding formal appointment of JEP as director over Cayman entities. (.5) Review draft correspondence to Maples regarding document request in respect of former TCA representation. (.4) Review draft document request correspondence to service providers in Cayman islands and comments relating to same. (.5)	1.40	265.00	371.00
05/27/20	JEP	Review draft email re progress of protocols prepared by Cayman counsel (.2); draft email re same to Battista and discuss (.3).,	0.50	340.00	170.00
05/27/20	JEP	Communications with US and Cayman counsel re negotiating protocols with EY.	0.80	340.00	272.00
05/27/20	JHG	Review analysis from Cayman counsel regarding various issues (2.0) and email from J. Perlman (.2) and review SEC complaint (.5).	2.70	340.00	918.00
05/27/20	GMG	Exchange emails and review drafts from Cayman counsel.	0.50	340.00	170.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

05/27/20	IRS	Confer with JEP and R. Cecere regarding investor communications and document requests from service providers. (.6) Prepare draft correspondence to Circle Partners for circulation to investors on behalf of US Receiver. (1.5) Review draft correspondence to EY counsel and analysis regarding response to same. (.3)	2.40	265.00	636.00
05/27/20	AMC	Researched and analyzed federal law concerning extra jurisdictional scope of injunctive orders / judgements.	2.10	265.00	556.50
05/28/20	JHG	Research chapter 15 issues (3.0), email analysis sent to J. Perlman (.3).	3.30	340.00	1,122.00
05/28/20	JEP	Obtain update from Battista. Communications with Cayman counsel on protocols (2 emails) and discuss with US counsel (.4). Communications with Genovese on research re distributions, review same (.5);	0.90	340.00	306.00
05/28/20	IRS	Revise letters to cayman islands service providers. (.3) Review legal analysis regarding request for Ltd. fund documents from cayman islands entities and correspondence regarding same. (.4) Review legal analysis regarding possible chapter 15 analysis for main and non-main proceedings in relation to disparate treatment of creditors under foreign laws. (.4)	1.10	265.00	291.50
05/29/20	PJB	Work on issues with protocol with Caymans, including extended call with M. Bloom on same.	0.80	340.00	272.00
05/29/20	JEP	Review memo re distribution scheme issues from J. Genovese, respond to questions, correspondence to obtain additional answer (.5). Receipt and review of Cayman Counsel service or order and demands for documents from various Cayman Service Providers and Maples Firm (excluding LTD Feeder Fund Documents) (.4); draft memo to team re same and re addition of remaining documents to EY protocol negotiations.(.5).	1.40	340.00	476.00
05/29/20	IRS	Review legal analysis regarding redemption creditors and general waterfall scheme under Cayman islands law. (.2) Confirm to cayman counsel regarding requests for documents to cayman island service providers (.2) Review case law summaries relating to comity and main case proceedings	0.70	265.00	185.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		under chapter 15. (.3)			
05/30/20	JEP	Receipt, review, analysis of summary of Protocal call between Battista and EY counsel Bloom (.5), discuss same (.5); review Genovese analysis of additional Chapter 15 issues and discuss re protocols (.8); communications with Cayman counsel re above for input on Protocols. (.3).	2.10	340.00	714.00
05/30/20	JEP	Review further research and thoughts provided by JG on Chapter 15 issues, distribution scheme options, protocols (.4); draft lengthy follow up response (.6); additional JG communications re same (.2).	1.20	340.00	408.00
05/30/20	PJB	Work on issues with cross border protocol, structure of same and strategy on same, including detailed memo to client.	0.80	340.00	272.00
05/30/20	GMG	Review turnover letter re Cayman entities.	0.40	340.00	136.00
05/30/20	IRS	Review internal legal analysis and case law regarding strategy of main case v. non main case recognition of cayman islands liquidation proceedings. (.7)	0.70	265.00	185.50
05/31/20	PJB	Review and consider several update memos on protocol, investor letters and related matters.	0.30	340.00	102.00
06/01/20	JEP	Receipt and review of additional list of protocol issues from Cayman counsel for discussion, analysis of same, multiple follow up emails re same.	1.00	340.00	340.00
06/01/20	JEP	Receipt of communication of Maples Firm re its response to Receiver's latest request for documents. Direct strategy in responsive email.	0.20	340.00	68.00
06/01/20	IRS	Attend to correspondence regarding Maples prior involvement with TCA and legal recommendations on voluntary wind-down procedures. (.4) Review response to document request from grant thornton and maples in cayman islands and prepare response to same. (.3) Review proposal from Cayman counsel for protocol requirements (.2)	0.90	265.00	238.50
06/02/20	IRS	Attend to correspondence from Cayman Counsel regarding communications with Maples. (.4) Review response from Grant Thornton for document request (.3) Review response from Campbells for document request. (.4)	1.10	265.00	291.50
06/02/20	AMC	Review of proposed protocol topics for discussion among Receiver and Cayman liquidators.	0.30	265.00	79.50
06/03/20	JEP	Review multiple communications with Maples Firm, Schoeppl, Press, Cayman	0.50	340.00	170.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		counsel, regarding necessary consents to obtain files.			
06/03/20	IRS	Attention to correspondence from Scheoppl regarding authorization for Maples to communicate with Receiver. (.3)	0.30	265.00	79.50
06/04/20	JEP	Communications with Cayman counsel re Cayman litigation issues, strategy, retention of advisor with experience as Cayman liquidator and in protocol negotiations, production of document status by TCA's former Cayman and UK counsel and other service providers.	0.50	340.00	170.00
06/04/20	IRS	Review correspondence regarding potential protocols with Cayman liquidators.	0.30	265.00	79.50
06/04/20	IRS	Attend to correspondence regarding service on Cayman islands banks (.3)	0.30	265.00	79.50
06/07/20	JEP	Review update on Chapter 15 issues and EY strategy based on case law research (.5), communication with J. Genovese re same (.2).	0.70	340.00	238.00
06/07/20	JEP	Emaiils with Cayman team (7), including initial communications with DSI' Brad Sharp re Cayman/JOL issues and strategy; set follow up call (.2); review of inquiries from investors, discuss same. (.3).	1.20	340.00	408.00
06/07/20	IRS	Review correspondence from JEP to DSI regarding strategy and legal considerations surrounding EY liquidation. (.4) Review correspondence with Cayman counsel regarding status of redemption creditors under Cayman law and communications with EY liquidators counsel. (.4) Confer with JEP regarding analysis of EY letter to creditor in relation to upcoming meeting of creditors. (.2)	1.00	265.00	265.00
06/09/20	JEP	Review EY correspondence to Press re first Creditors Meeting. (.5) Phone conference with Cayman counsel, Battista, Genovese re Cayman strategy and protocols. (1.2), Receipt and review of correspondence from EY counsel Baker McKenzie (.5). Multiple internal communications re same, strategy for response. (1.2).	3.20	340.00	1,088.00
06/09/20	JEP	Receipt and review of proposed protocols from Mark Bloom (1.0). Communications re same (1.0). Draft memos re same (.5).	2.50	340.00	850.00
06/09/20	JEP	Analysis of EY protocol proposal and draft summary of key points for further discussion with advisors.	0.90	340.00	306.00
06/09/20	JHG	Attend telephone conference (.8); review and analysis of TCA Global Credit Fund JOL report (1.8); review letter to creditors, claim form and evaluate committee issues (2.1).	4.70	340.00	1,598.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

06/09/20	PJB	Prepare for and attend conference call with client and counsel on issues with Caymans proceeding.(.7) Call with M. Bloom on issues with EY, Caymans proceeding and protocol, and memos on same.(.4)	1.10	340.00	374.00
06/09/20	IRS	Call with DSI, and local cayman counsel to discuss ongoing cayman islands strategy and potential protocols. (1.5) Review internal legal analysis regarding chapter 15 recognition of foreign proceedings. (.2) Review EY liquidator's first report and supporting documents and prepare internal correspondence regarding same. (.5) Attention to correspondence regarding EY liquidator's meeting and receiver's participation at same. (.2) Prepare correspondence regarding purported investor communication with EY liquidator nominating JEP as proxy for purposes of attendance at initial EY liquidator's meeting and confer with Cayman counsel regarding same. (.4) Review received draft protocols from Ey US counsel (.8) Prepare internal memo regarding proposed EY protocols. (.5)	4.10	265.00	1,086.50
06/10/20	JEP	Further analysis of issues re protocols and EY proposal (2.5), research re same (.6), discuss LTD related funds, including subscribers who have not yet been invested on books (1.5), seek consent to sharing information with SEC (.2).	4.80	340.00	1,632.00
06/10/20	JEP	Draft lengthy strategy memo on protocols to team, discuss same, phone call with SEC re same, send protocols to SEC.	1.00	340.00	340.00
06/10/20	JHG	Review issues regarding sharing of proposed protocols with SEC and emails regarding same (.6); review and analysis of claims arising from investments with subscriptions of shares issued (.8); review Cayman law on priority of claims (.7); review emails from I. Sadovnic attaching memoranda and correspondence from Cayman counsel (3.4); review and analyze emails from J. Perlman outlining objectives (2.1).	7.60	340.00	2,584.00
06/10/20	PJB	Review and consider several memos on issues with protocol and memos to and from M. Bloom on same.	0.70	340.00	238.00
06/10/20	GMG	Exchange emails and review documents re Cayman liquidation.	0.40	340.00	136.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

06/10/20	IRS	Confer with S Moot from the SEC regarding draft protocols and SEC review of same. (.4) Prepare correspondence to SEC with protocols (.1) Confer with JEP regarding redemption creditor issues (.7) Review with JEP correspondence from Kedi Chang and investor information relating to potential redemption claims. (.5) Review extensive internal legal analysis regarding chapter 15 issues (.5) Attention to internal correspondence regarding draft protocols. (.4) Review update from cayman counsel regarding first creditors meeting hosted by EY liquidators. (.3) Review internal strategy memo regarding protocol draft. (.2)	3.10	265.00	821.50
06/10/20	AMC	Review and analyze internal communications / analyses concerning investor subscriptions, constructive trust issues, and chapter 15 venue / withdrawal of reference issues.	0.80	265.00	212.00
06/11/20	JEP	Prepare for and attend call with Circle Partners re documents and various questions on analysis of Fund business, accounts, investors, redemptions, etc.	1.70	340.00	578.00
06/11/20	JEP	Call with Cayman counsel go go over all issues in protocols.	3.75	340.00	1,275.00
06/11/20	JHG	Extensive review of Stanford and other receiverships issues in cross border matters and treatment of claims (4.7); review emails regarding receivership insurance and evaluate issues. (.3).	5.00	340.00	1,700.00
06/11/20	IRS	Call with Cayman counsel and JEP regarding proposed protocol (3.7) Review initial internal comments to draft protocols (.5) Legal research regarding subpoena and deposition authority of receiver in support of draft protocols and prepare correspondence regarding same. (.3)	4.50	265.00	1,192.50
06/12/20	JEP	Prepare for call, draft agenda, review prior notes, review updated redlined protocols.(1.6); Attend call, (1) draft memo to file re next steps. (.6); research and review of case law on Chapter 15 issues, discuss with J. Genovese. (2.).	3.40	340.00	1,156.00
06/12/20	JEP	Prepare for and attend call with SEC.(.9) Draft memo re same.(.6)	1.50	340.00	510.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

06/12/20	JHG	Preparation for and attend proposed protocol discussion conference call, continued review of SEC receivership in January (2.3); review J. Perlman summary of telephone conference with SEC (.6); participate in telephone conference (.9); review of issues regarding coordination with Cayman Courts and emails regarding same (2.2).	6.00	340.00	2,040.00
06/12/20	PJB	Review and consider proposed protocol from EY liquidators, and review memos on same. (.6) Attend conference call with client and team on same, and memos to M. Bloom on same.(1.0) Attend follow up call with client, counsel to and the SEC.(1.1)	2.70	340.00	918.00
06/12/20	IRS	Internal GJB call regarding protocol negotiations. (1.5) Call with SEC regarding draft protocol negotiations. (1.2) Review and approve follow up correspondence to Cayman entities prepared by cayman counsel. (.2) Coordinate zoom meeting for initial EY/GJB protocol negotiations. (.4) Review correspondence from Harneys regarding subsequent creditor's meeting (.2) Review revised protocols prepared by Cayman counsel after communications with Receiver. (.3)	3.80	265.00	1,007.00
06/12/20	AMC	Global call with SEC representatives and the GJB team concerning, inter alia, going-forward strategy and proposed protocols.	1.10	265.00	291.50
06/12/20	AMC	Review, analyze, and consider internal e-mails concerning proposed and revised international protocols.	0.60	265.00	159.00
06/12/20	AMC	Research concerning appointment of equity / shareholder committees in large multi-national SEC cases, and review of Stanford Finance docket and pertinent orders concerning appointment of shareholder committee.	1.20	265.00	318.00
06/13/20	AMC	Research of Bankruptcy Law concerning cooperation and direct communication between the court and foreign courts or foreign representatives, and he Guidelines for Communication and Cooperation Between Courts in Cross-Border Insolvency Matters, and prepare brief memorandum for J. Genovese concerning the same.	3.90	265.00	1,033.50
06/14/20	JEP	Review Cayman counsel memo on case law re redemption status and circumstances permitting net equity rule instead of waterfall due to internal	1.50	340.00	510.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		fraud.			
06/14/20	JEP	Initial receipt and review of Cayman memo re redemption creditor case law and internal fraud case law.	0.80	340.00	272.00
06/14/20	IRS	Review legal analysis regarding court to court communications in chapter 15 proceedings. (.5) Conduct legal research regarding chapter 15 as applicable in federal equity receiverships (1) Confer with ACastaldi regarding interplay between insolvency proceedings and receivership proceeding. (.3)	1.80	265.00	477.00
06/15/20	JEP	Review documents, memos re protocols (.8), draft and discuss outline for 130 call with EY (1); attend call (2.); edit draft protocols, review Sadovnic notes (.7). Review/consult on legal issues re same, including redemption, on trust, and Cayman potential claims. (1.5).	6.00	340.00	2,040.00
06/15/20	JHG	Consider issues regarding agenda for call (.2); review and analysis of chapter 15 main and non-main issues (3.4); review and analysis of email from J. Perlman (3.2); participation in TCA initial protocol conference call (1.1).	7.90	340.00	2,686.00
06/15/20	PJB	Prepare for and attend call with client and representatives of Cayman liquidators on protocol issues ad potential resolution.	1.50	340.00	510.00
06/15/20	IRS	Participate in initial protocol negotiations meeting with Ey liquidators and their counsel. (2) Confer with JEP regarding proposed protocol terms to submit to EY for review. (.5) Prepare clean version of protocols and make any edits for JEP review. (.5) Prepare correspondence regarding waterfall distribution under Cayman law and review case law and analysis provided by Cayman counsel on recent cayman court decisions re internal v. external fraud (.7) Prepare correspondence regarding agenda for initial protocol meeting and review JEP draft of same. (.3) Review legal analysis by JGenovese regarding relevance of non-main proceedings. (.3)	4.30	265.00	1,139.50

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

06/16/20	JEP	Work on protocols (.7); discuss with Genovese (.5); Cayman Counsel (.5).	1.20	340.00	408.00
06/16/20	JEP	Receipt of communications from Harneys and Rocco containing letters from two subscribers claiming On Trust status, based on representations made by either Circle of a non-ReceivershipTCA Entity's employees. (.5). Discuss with Sadovnic, and R. Cecere. (.8).	1.30	340.00	442.00
06/16/20	JHG	Telephone conference with Mark Bloom regarding protocols (.7); review spreadsheet of Feeder Fund investors and analysis of same as relate to COMI issues (1.8); review emails from I. Sadovnic (.4); email to A. Castaldi describing call regarding SOLs and need for further chapter 18 analysis after review of statute (1.1); review emails from J. Perlman (.4); review protocol provisions and analysis (2.1).	6.50	340.00	2,210.00
06/16/20	IRS	Call with JEP regarding investor analysis in each fund in relation to potential US investors in fund. (.6) Call with Rocco re: on trust funds and correspondence from on trust claimants. (.5) Prepare analysis re additional facts surrounding "on trust" investor communications (.4) Prepare correspondence regarding draft protocols for circulation to EY. (.3) Confer with JGenovese regarding determination of TCA investor locations. (.3) Review legal analysis regarding EY position for main v non main ch 15 proceedings (.3) Attention to correspondence from EY counsel regarding on trust claimants and proposed response. (.4) attention to request for extension of time from Maples Corporate Services to turnover documents (.3)	3.10	265.00	821.50
06/17/20	JHG	Review of correspondence from Conyers and Harneys (1.2); continued review of chapter 15 cases on main and non-main proceedings (3.2); review documents forwarded by I. Sadovnic received from third parties (1.1); review and analysis of redlined protocols draft (2.3).	7.80	340.00	2,652.00
06/17/20	IRS	Review sharefile for Feeder Ltd articles of association and provide copies of same to Cayman counsel for analysis relating to internal and external fraud	1.50	265.00	397.50

Genovese Joblove & Battista, P.A.

==========

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		claims (.3) Revise draft protocols for review by all attorneys. (.4) Attention to Maples document production. (.5) Attention to response to purported on trust investor communications (.3)			
06/17/20	AMC	Review of most recent (and redlined) proposed protocols.	0.40	265.00	106.00
06/17/20	AMC	Research concerning main versus non-main proceedings under Chapter 15.	4.70	265.00	1,245.50
06/18/20	JEP	Work on drafting protocols, further analysis of issues re protocols, review of all internal memos re same (2,5), separate communications with Battista (.3), Genovese (.5), Sadovnic (1.6) and Cayman counsel re same. Communications with EY re same (.2).	5.10	340.00	1,734.00
06/18/20	JHG	Continued analysis of protocols, case law and statutory provisions regarding main or non-main chapter 15 proceedings (4.4); review Judge Cristol order on main case, non-main case and analysis of same and authorities cited (1.3); review issues regarding Bloom proposed language regarding protocol (.2).	5.90	340.00	2,006.00
06/18/20	PJB	Review and consider memos on and case law for chapter 15 issues.(.3) Review and consider proposed revised protocol and memos on same.(.9)	1.20	340.00	408.00
06/18/20	IRS	Call with JEP regarding draft protocol revisions. (2.5) Review and revise draft protocols with edits from J Genovese. (.4) Attention to correspondence with MBloom counsel for JOLs re: status update on protocol language. (.2) Review correspondence from Cayman counsel regarding response from purported on trust investors. (.3) Review extensive analysis prepared by JEP regarding legal issues with proposed EY protocols. (.3)	3.70	265.00	980.50
06/18/20	AMC	Complete research concerning discretionary authority of the court under s. 1521 and s. 1507 to accord relief in “non-main” chapter 15 proceedings, and attend to internal communications with J. Genovese concerning the same.	2.10	265.00	556.50
06/19/20	JEP	Edit protocols with input from counsel (2.), circulate internally obtain comments, draft cover and provide to EY (subject to SEC comment) (.5); further communications re same (.3); receipt and review of additional proposed	3.20	340.00	1,088.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		language, correspond re same (.4).			
06/19/20	JHG	Review proposed protocol and language changes and consideration of chapter 15 provisions (2.8); preparation for and attend status call with SEC regarding protocols (1.1); review Bloom language and email regarding same (.4); review lengthy analysis and questions by J. Perlman (1.6); review email from Cayman counsel and analysis of "on trust" issues (1.4); review final proposed protocol (.9).	8.20	340.00	2,788.00
06/19/20	PJB	Review and consider several memos on staus of and issues with protocol.(.6) Attend all hands call on issues with same and finalize response to protocol.(.2)	0.80	340.00	272.00
06/19/20	IRS	Call with J Perlman re: protocol revisions (1.3) Review and revise protocol for circulation to EY (.5) attention to legal issues surrounding on trust investor claims. (.4)	2.20	265.00	583.00
06/20/20	JEP	Receipt and review of Battista summary of call with Bloom today re protocols. (.2); Review protocols and meeting summaries, and draft lengthy strategy memo re same. (1.4).	1.60	340.00	544.00
06/20/20	PJB	Review and consider further revised draft protocol, and follow up revisions and language from counsel to JOLs.(.8) Call with M. Bloom on same.(.6) Memos to and from client and counsel on same.(.6)	2.00	340.00	680.00
06/21/20	IRS	Attention comments and redline edits to draft protocols from Cayman counsel (.5) Review legal analysis prepared by JGenovese regarding comparison of Us and Cayman law on on trust funds. (.3)	0.80	265.00	212.00
06/21/20	IRS	Review correspondence regarding EY initial concerns with draft protocol as GJB revised. (.4)	0.40	265.00	106.00
06/22/20	JEP	Protocol status communication with SEC. (2xs) (.2).	0.20	340.00	68.00
06/22/20	JEP	Review case law and research from J. Genovese re Chapter 15/protocol negotiation issues, and discuss same.	0.90	340.00	306.00
06/22/20	JHG	Review receivership organizational funds and analyze provisions of SEC complaint regarding each entity (1.3); review emails among GJB team (.3); review issues regarding group call to address issues raised by JOLs and consideration of same (1.1).	2.70	340.00	918.00
06/22/20	PJB	Review, consider and respond to memo from M. Bloom on call re: protocol and	0.30	340.00	102.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		memo on same to client and team.			
06/22/20	IRS	Attention to correspondence from BDO regarding document request. (.3) Review correspondence re: call with counsel for EY. (.1)	0.40	265.00	106.00
06/23/20	JEP	Review and discuss Grant Thornton response to document production demand, discuss and authorize response by Cayman counsel.	0.50	340.00	170.00
06/23/20	PJB	Work on issues with protocol, including memos to and from client on same.	0.30	340.00	102.00
06/23/20	JHG	Review and analysis of UK note for $8.5mm (.5); review and analysis of security agreement regarding venue provisions and other issues pertaining to COMI (1.9); review email regarding SEC and related issues (.5); analyze issues under chapter 15 in preparation for call with Mark Bloom and related case law (2.1).	5.00	340.00	1,700.00
06/23/20	IRS	Review proposed response to grant thornton re: document request. (.3) Request draft authorization forms for Press to communicate with BDO service provider (.2) Confer with cayman counsel re: workflow streams and internal organization matters. (.2)	0.70	265.00	185.50
06/23/20	AMC	Review / analyze letter from counsel for Grant Thornton concerning document production	0.30	265.00	79.50
06/24/20	JHG	Extensive preparation for protocol discussion by reading and reviewing prior protocals and attendance on call (3.1); review and analysis of email from Cayman counsel regarding issues in protocol proposals (1.3).	4.40	340.00	1,496.00
06/24/20	PJB	Prepare for and attend lengthy conference call with all counsel on issues with protocol.	2.40	340.00	816.00
06/24/20	IRS	Review proposed work stream chart prepared by cayman counsel in respect of proposed scope of work. (.2) Attention to CIMA letter (.1) Review proposed analysis of protocol issues in advance of call with EY liquodators. (.3)	0.60	265.00	159.00
06/25/20	JEP	Phone conference with JG, PB RC, IS re meeting yesterday by counsel only with EY, discuss strategic path forward and next call with EY counsel. (2).Draft memo re same.(.7)	2.70	340.00	918.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

06/25/20	JHG	Extensive review of Cayman Islands chapter 15 to determine treatment of COMI and protocols (4.3); attend protocol conference call with Cayman counsel (1.5).	5.80	340.00	1,972.00
06/25/20	PJB	Work on follow up issues with protocol and memos on same.(.3) Prepare for and attend extended call with client and counsel on structure of protocol and comments on same. (1.8)	2.10	340.00	714.00
06/25/20	IRS	Attend to correspondence from Cayman counsel regarding fee application process (.1) Internal call to discuss communications with EY liquidator counsel regarding ongoing protocol negotiations. (1.8)	1.90	265.00	503.50
06/26/20	JEP	Multiple communications with team re discussion points and research for Protocols.	1.00	340.00	340.00
06/26/20	JHG	Review and analysis based on J. Perlman email summary and observations regarding strategy calls (1.1); review case law from S.D.N.Y., Cayman liquidators suing in U.S. (2.3); preparation for and attend call with Mark Bloom and John Dowd regarding protocols (1.); review Cayman counsel notes regarding call with Harney (.8).	5.20	340.00	1,768.00
06/26/20	PJB	Prepare for and attend zoom call with M. Bloom and counsel to JOLs on follow up issues and settlement discussions.	1.80	340.00	612.00
06/26/20	IRS	Call with RCecere re: service provider communications and document request (.3) Review outline prepared by Cayman counsel for follow up call with EY liquidators (.1)	0.40	265.00	106.00
06/28/20	IRS	Attention to correspondence regarding venue provisions for cayman entities (.2) Coordinate conference call with SEC re: protocol negotiations update. (.2)	0.40	265.00	106.00
06/29/20	JEP	Conference call with SEC re case status and protocols. (.8). Memo to file re same. (.4)	1.20	340.00	408.00
06/29/20	JEP	Multiple communications with J Genovese, receipt and review of case law on various issues related to Chatper 15, distribution issues, all relating to protocol negotiations.	2.60	340.00	884.00
06/29/20	PJB	Prepare memos to counsel and client on results of call with JOLs.(.8) Prepare	1.70	340.00	578.00

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

		for and attend follow up call with counsel to SEC on same.(.9)			
06/29/20	JHG	Review email and analysis regarding P. Battista and call with Mark Bloom regarding Chapter 15 (2.7); analysis of data in email from I. Sadovnic regarding redemption amounts (1.); preparation for and attend call with SEC (1.6); review complexities in Chapter 15 concurrent proceedings (2.2).	7.50	340.00	2,550.00
06/29/20	IRS	Call with SEC regarding protocol negotiation status update. (.7) Prepare draft correspondence to CIMA (.3) Review internal correspondence re notes on calls with EY liquidator counsel (.3)	1.30	265.00	344.50
06/30/20	JEP	PROTOCOLS/CHPTR 15. Review updated information from J. Genovese on Chapter 15 issues(.3), respond to same with current analysis of non-US claims and assets.(.3).	0.60	340.00	204.00
06/30/20	PJB	Review, consider and respond to memos on issues with “on trust” analysis from Cayman counsel.(.2) Review and follow up on memo with revised protocol.(.2)	0.40	340.00	136.00
06/30/20	JHG	Review email from B. Halsey regarding Australian liquidation and attachments including settlement offer and cost retainer (1.3); review email from J. Perlman and analyze issues raised (.9); preparation for and attend Zoom meeting (1.1); review email from Cayman counsel and analyze Butterfield transactions (1.4); review email to G. Garno and attached transactions (.9); attend Zoom meeting (1.); conference with A. Castaldi and review chapter 15 issues (1.1).	7.70	340.00	2,618.00
06/30/20	IRS	Attention to authorization and release relating to document request for BDO. (.3) Prepare correspondence regarding draft response to CIMA (.2) Review legal analysis prepared by JGenovese re: receiver's ability to file chapter 7 or 11 bankruptcy and effect on chapter 15 proceedings (.3) Attention to correspondence regarding JOLs analysis of on trust claims. (,3)	1.20	265.00	318.00
Total /			**425.65**		**135,008.50**
		Total:	**425.65**		**135,008.50**

Genovese Joblove & Battista, P.A.

PREBILL FOR SERVICES RENDERED THROUGH: 06/30/2020

12455-002

=====WORKING TIMEKEEPER SUMMARY==========

Professional	Hours	Rate	Value
JEP - Perlman	121.85	340.00	41,429.00
JHG - Genovese	130.40	340.00	44,336.00
PJB - Battista	33.90	340.00	11,526.00
GMG - Garno	10.00	340.00	3,400.00
EGM - McIntosh	2.40	265.00	636.00
AMC - Castaldi	34.40	265.00	9,116.00
IRS - Sadovnic	92.70	265.00	24,565.50
Totals	425.65		135,008.50

Total Fees	**135,008.50**
Total Disbursements	
Total Bill	**$ 135,008.50**
Previous Balance	
Outstanding Balance	**$ 135,008.50**

Trust Balance: **$0.00**

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98335
File # 12455-003

Re: Jonathan Perlman, Receiver / TCA Fund - IRS and Tax Matters

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/21/20	IRS	Locate and submit federal EIN numbers for receivership entities to Mutch Hall from Rehmann. (.2)	0.40hr $265.00/hr	$106.00
		Review list of required documents to begin completing tax structure analysis. (.2)		
06/03/20	IRS	Attention to 2019 tax return preparation and correspondence from Rehmann and Kaufman Rossin regarding same. (.3)	0.50hr $265.00/hr	$132.50
		Prepare correspondence re: Ira Cominsky Representation for Transmarine. (.2)		
		Total Legal Fees . . .	0.90	$238.50

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Irina R Sadovnic	0.90	$265.00	$238.50
Total Legal Fees . . .	**0.90**		**$238.50**

Total Invoice	$238.50
OUTSTANDING BALANCE	**$238.50**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98336
File # 12455-100

Re: Jonathan Perlman, Receiver / TCA Fund - Litigation - General

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/26/20	CM	Compile list of new matters to be opened, email to L. Rice re: same; prepare litigation spreadsheet.	0.70hr $100.00/hr	$70.00
05/27/20	BH	Review of pleadings and record documents in pending collections litigation involving TCA Fund to prepare summary of litigation for Receiver, to prepare litigation strategy for all pending matters.	2.50hr $265.00/hr	$662.50
05/28/20	BH	Continued review of pleadings and record documents in pending collections litigation involving TCA Fund to prepare summary of litigation and strategy for each case.	3.30hr $265.00/hr	$874.50
05/29/20	BH	Review of Schoeppl memoranda summarizing pending ltigation (.5), and review of pleadings and motion practice in pending proceedings to analyze and develop litigation recommendation on all matters for Reciever (1.0).	1.50hr $265.00/hr	$397.50
06/01/20	CM	Review memos, prepare chart re: litigation outside of Florida (1.0); email to B. Halsey re: same (.1).	1.10hr $100.00/hr	$110.00
06/11/20	BH	Review of summary spreadsheet of pending debentures for outstanding litigation matters, for use in litigation analysis and recommendation to Receiver on all pending matters.	1.50hr $265.00/hr	$397.50
06/11/20	BH	Review of Oncologix-Amien Angels matter and settlement payment arrangements to ensure continuation of same.	0.90hr $265.00/hr	$238.50
06/11/20	BH	Telephone conference with J. Going regarding Oncologix settlement	0.20hr $265.00/hr	$53.00
06/12/20	BH	Receipt, review and analysis of pending litigation matters in foreign jursidcitions, including matters pending in Australia involving Australia Worldwide.	2.00hr $265.00/hr	$530.00

06/14/20	BH	Receipt and review of spreadsheet summarizing all pending litigation involving Receivership entites (.8), and continued preparations to organize and prepare recommendations to Receiver on pending matters (1.0).	1.80hr $265.00/hr	$477.00
06/14/20	BH	Review of legal authority regarding authority of Receiver, and extent and scope of Receivership order in foreign jurisdcitions.	1.40hr $265.00/hr	$371.00
06/15/20	BH	Receipt and review of correspondence and settlement offer in Australia Worldwide litigation (1.2), and prepared for conference with local counsel regarding same (.5).	1.70hr $265.00/hr	$450.50
06/15/20	BH	Review of legal authority regarding scope of federal receivership power and stay order and its impact on cases pending in foreign jurisdictions.	1.50hr $265.00/hr	$397.50
06/15/20	BH	Receipt and review of pleadings and correspondence from new matters in Connecticut, Georgia and Arizona state courts, for review and recommendation to Receiver.	3.30hr $265.00/hr	$874.50
06/23/20	BH	Receipt and review of outstanding merchanics liens and invoices; drafted correspondence to J. Going regarding same; receipt and review of response to same.	0.80hr $265.00/hr	$212.00
06/24/20	BH	Review of pleadings, motion practice, orders, correspondence and record documents in the 19 matters which Schoeppl Law is currently counsel of record for the TCA Entities, to prepare to substitute new counsel for the Receiver and to open or re-open settlement discussions with borrowers in these underlying proceeings.	4.80hr $265.00/hr	$1,272.00
06/24/20	BH	Review of mechanics liens, and prepared and attended telephone conference with I. Sadovnic, DSI and J. Going regarding recovery of vehicles in Texas.	0.70hr $265.00/hr	$185.50
06/25/20	BH	Continued review of record documents in 17-19 matters which Schoeppl Law is currently counsel of record for the TCA Entities, to prepare response to T. Gray's letter and to substitute new counsel for the Receiver for these matters.	4.20hr $265.00/hr	$1,113.00
06/25/20	BH	Review of summaries for largest pending TCA Global matters currenty involving Schoeppl Law, to prepare for call with Receiver.	1.00hr $265.00/hr	$265.00
06/25/20	BH	Attended conference call with G. Garno and Receiver to discuss pending matters where Schoeppl Law is currently counsel of record for Receivership entities, and strategy for substituting as counsel on all 19 matters.	0.80hr $265.00/hr	$212.00
06/26/20	BH	Drafted and Completed Letter from Receiver's Counsel to Schoeppl Law terminating representation and agreeing to stipulate to substitute as counsel for pending matters in Broward County where Schoeppl is counsel of record.	2.00hr $265.00/hr	$530.00
06/29/20	BH	Revised and completed Letter to Schoeppl Law ending engagement for TCA entities now in Receivership.	0.70hr $265.00/hr	$185.50

06/29/20	BH	Drafted correspondence to T. Gray regarding stipulations for substitution of counsel; receipt and review of response to same; drafted correspondence to G. Garno regarding same.	0.90hr $265.00/hr	$238.50
06/29/20	BH	Review of legal authority regarding stipulations for substitution of counsel for receiver in ongoing litigation involving Receivership entities, and motion for substitution of receiver as real party in interest, to prepare for filing same in all matters where Schoeppl Law represented TCA entities.	1.90hr $265.00/hr	$503.50
06/29/20	BH	Revised and completed draft stipulations for substitution of counsel and orders incorporating research and procedures under Fla. R. Jud. Admin.	0.80hr $265.00/hr	$212.00
06/29/20	BH	Receipt, review and analysis of borrower ledger detailing outstanding loans, status of payment and recovery, to review of matters in pending litigation for meeting with DSI.	1.50hr $265.00/hr	$397.50
06/30/20	BH	Conference with G. Garno regarding status of pending litigation matters involving Receivership entities.	0.50hr $265.00/hr	$132.50
06/30/20	BH	Revised and completed template substitutions of counsel and orders for review by Schoeppl Law.	0.50hr $265.00/hr	$132.50
06/30/20	BH	Review of dockets and pleadings in pending litigation matters involving Receivership entities formerly represented by T. Gray and C. Schoeppl, to prepare and file substitutions of counsel and to clear conflicts in each matter.	2.10hr $265.00/hr	$556.50
		Total Legal Fees . . .	46.60	$12,052.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	44.80	$265.00	$11,872.00
Catherine Monzon	1.80	$100.00	$180.00
Total Legal Fees . . .	**46.60**		**$12,052.00**

Total Invoice	$12,052.00
OUTSTANDING BALANCE	**$12,052.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98337
File # 12455-101

Re: Jonathan Perlman, Receiver / TCA v. Preferred Secured Agents (15-552)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/04/20	BH	Review of pleadings, motion practice and record documents to prepare memorandum and recommendation to advise Receiver regarding litigation status, strategy and asset recovery regarding Sprocket Retail.	3.40hr $265.00/hr	$901.00
06/06/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review (2.2); email to B. Halsey re: same (.2).	2.40hr $100.00/hr	$240.00
06/10/20	BH	Review of dockets and pleadings in pending matters involving Receivership entities in jurisdictions outside Florida, to add pending hearings, contacts and summaries of local counsel communications to matrix and summary of proceedings.	3.00hr $265.00/hr	$795.00
06/29/20	CM	Preparation of stipulation for substitution of counsel and proposed order; email to B. Halsey re: same.	0.30hr $100.00/hr	$30.00
		Total Legal Fees . . .	9.10	$1,966.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	6.40	$265.00	$1,696.00
Catherine Monzon	2.70	$100.00	$270.00
Total Legal Fees . . .	**9.10**		**$1,966.00**

Total Invoice $1,966.00

	OUTSTANDING BALANCE	**$1,966.00**
TRUST BALANCE	$0.00	

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98338
File # 12455-102

Re: Jonathan Perlman, Receiver / TCA v. Cityworks (16-006991)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/04/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review (1.5); email to B. Halsey re: same (.3).	1.90hr $100.00/hr	$190.00
06/05/20	BH	Review of pleadings, motion practice, suggestions of bankruptcy, discovery requests and objections, and motion for summary judgment to prepare memorandum and recommendation to advise Receiver regarding litigation status, strategy and asset recovery regarding default action against Cityworks and Carl Nurse.	4.10hr $265.00/hr	$1,086.50
06/23/20	BH	Receipt and review of complaint, crossclaim and counterclaim, motion practice and orders to prepare litigation status summary and analysis of TCA's legal position, to prepare analysis of potential for recovery and litigation recommendation for Receiver.	1.80hr $265.00/hr	$477.00
06/29/20	CM	Preparation of stipulation for substitution of counsel and proposed order; email to B. Halsey re: same.	0.30hr $100.00/hr	$30.00
06/30/20	CM	Review file, submit conflict check.	0.10hr $100.00/hr	$10.00
		Total Legal Fees . . .	8.20	$1,793.50

FEE SUMMARY:

Professional	Hours	Rate	Amount
Brett M Halsey	5.90	$265.00	$1,563.50
Catherine Monzon	2.30	$100.00	$230.00
Total Legal Fees . . .	**8.20**		**$1,793.50**

Total Invoice	$1,793.50
OUTSTANDING BALANCE	**$1,793.50**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98339
File # 12455-103

Re: Jonathan Perlman, Receiver / TCA v. Paycation (16-19532)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/28/20	BH	Receipt and review of multiple correspondence from counsel for Paycation (.3); drafted responses to same (.2).	0.50hr $265.00/hr	$132.50
05/28/20	BH	Review of Schoeppl memorandum, docket and legal authority in preparation for initial call with counsel for Paycation.	2.10hr $265.00/hr	$556.50
05/28/20	BH	Conference call with local counsel for TCA in Texas.	0.30hr $265.00/hr	$79.50
05/28/20	BH	Conference calls with G. Garno, I. Sadvonic and H. Harmon in preparation for call with counsel for Paycation.	0.40hr $265.00/hr	$106.00
05/28/20	BH	Conference call with C. Schoeppl regarding Paycation matters in Florida and Texas.	0.30hr $265.00/hr	$79.50
05/28/20	BH	Review of pleadings and dockets in Florida and Texas proceedings to prepare summary of litigation and recommendation regarding local counsel and proposals by counsel for Paycation.	2.00hr $265.00/hr	$530.00
05/28/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	1.40hr $100.00/hr	$140.00
05/29/20	BH	Drafted and completed memorandum summarizing multiple conferences with opposing and local counsel.	1.10hr $265.00/hr	$291.50
06/01/20	BH	Receipt and review of pleadings and motion practice from the Texas proceeding to analyze case status and develop strategy to include in litigation recommendation to the Receiver.	3.30hr $265.00/hr	$874.50

06/08/20	BH	Review of pleadings, motion practice and record documents in proceeding by TCA Global in Broward County, in preparation for drafting recommendation to Receiver on litigation strategy, and to prepare for upcoming conference with Paycation's counsel.	3.70hr $265.00/hr	$980.50
06/09/20	BH	Receipt and review of correspondence with local Texas counsel, and drafted responses to same to set up conference before Thursday's call with counsel for Paycation.	0.30hr $265.00/hr	$79.50
06/10/20	JEP	Review case memo from Halsey on Paycation litigation in TX. (.3) Give instructions (.2)..	0.50hr $340.00/hr	$170.00
06/10/20	BH	Receipt, review and analysis of operative pleadings and motion practice from local Texas counsel, to prepare for today's conference call before call with opposing counsel.	2.50hr $265.00/hr	$662.50
06/10/20	BH	Receipt, review and analysis of operative pleadings and motion practice from Florida proceeding initiated by TCA Global against Paycation, Jeremy Monte, Xstream and Montbriar, to prepare for today's conference call with lcoal texas counsel before call with opposing counsel.	2.60hr $265.00/hr	$689.00
06/10/20	BH	Attended conference call with V. Henderson, local Texas counsel, in advance of conference with counsel for Paycation/Manning, to assist in litigation strategy and case analysis.	0.80hr $265.00/hr	$212.00
06/11/20	BH	Review of pleadings and motion practice from Texas proceeding regarding allegations of fraud and misconduct involving J. Montes and TCA Global, to prepare for call with counsel for Paycation and Manning.	1.70hr $265.00/hr	$450.50
06/20/20	JEP	Review Halsey request for payment of invoice on ediscovery storage and services in Texas matter. (.2) .Review Receivership Order and communicate with G. Garno re same. (.3).	0.50hr $340.00/hr	$170.00
06/29/20	CM	Preparation of stipulation for substitution of counsel and proposed order; email to B. Halsey re: same.	0.30hr $100.00/hr	$30.00
		Total Legal Fees . . .	24.30	$6,234.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Jonathan E Perlman	1.00	$340.00	$340.00
Brett M Halsey	21.60	$265.00	$5,724.00
Catherine Monzon	1.70	$100.00	$170.00
Total Legal Fees . . .	**24.30**		**$6,234.00**

	Total Invoice	$6,234.00
	OUTSTANDING BALANCE	**$6,234.00**
TRUST BALANCE	$0.00	

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98340
File # 12455-104

Re: Jonathan Perlman, Receiver / TCA v. Quants Corp. (16-22449)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/02/20	CM	Review court docket (.3) obtain copies of all documents filed to date for attorney review (1.0); email to B. Halsey re: same (.3).	1.60hr $100.00/hr	$160.00
06/03/20	BH	Review of pleadings, motion practice and record documents regarding Quants and First Capital litigation involving TCA Fund in California, to prepare for call with local counsel.	3.60hr $265.00/hr	$954.00
06/03/20	BH	Telephone conference with local California counsel for the receivership entities, J. Jensen.	0.40hr $265.00/hr	$106.00
		Total Legal Fees . . .	5.60	$1,220.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	4.00	$265.00	$1,060.00
Catherine Monzon	1.60	$100.00	$160.00
Total Legal Fees . . .	**5.60**		**$1,220.00**

Total Invoice	$1,220.00
OUTSTANDING BALANCE	**$1,220.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98341
File # 12455-105

Re: Jonathan Perlman, Receiver / TCA v. Peak PEH (17-4886)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/28/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	0.50hr $100.00/hr	$50.00
		Total Legal Fees . . .	0.50	$50.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.50	$100.00	$50.00
Total Legal Fees . . .	**0.50**		**$50.00**

Total Invoice	$50.00
OUTSTANDING BALANCE	**$50.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98342
File # 12455-106

Re: Jonathan Perlman, Receiver / TCA v. Champion Pain (17-7571)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/01/20	CM	Review court docket (.3), obtain copies of all documents filed to date for attorney review (.5); email to B. Halsey re: same (.2).	1.00hr $100.00/hr	$100.00
06/22/20	BH	Receipt and review of pleadings, correspondence and record documents to prepare analysis of current state of litigation, prospects for settlement and potential for recovery to advise Receiver.	2.20hr $265.00/hr	$583.00
06/30/20	CM	Preparation of stipulation for substitution of counsel and proposed order; email to B. Halsey re: same; submit conflict check.	0.30hr $100.00/hr	$30.00
		Total Legal Fees . . .	3.50	$713.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	2.20	$265.00	$583.00
Catherine Monzon	1.30	$100.00	$130.00
Total Legal Fees . . .	**3.50**		**$713.00**

Total Invoice	$713.00
OUTSTANDING BALANCE	**$713.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98343
File # 12455-107

Re: Jonathan Perlman, Receiver / TCA v. Stikeleather (17-11156)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/05/20	CM	Review court docket (.1), obtain copies of all documents filed to date for attorney review (1.0); email to B. Halsey re: same (.1).	1.20hr $100.00/hr	$120.00
06/23/20	BH	Review of record documents, pleadings and motion practice to prepare litigation summary and recommendations regarding potential for recovery and settlement, to advise Receiver.	2.60hr $265.00/hr	$689.00
06/24/20	JEP	Review order setting case management conference in Master Fund v. Stikeleather and discuss with counsel case progress and strategy.	0.50hr $340.00/hr	$170.00
		Total Legal Fees . . .	4.30	$979.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Jonathan E Perlman	0.50	$340.00	$170.00
Brett M Halsey	2.60	$265.00	$689.00
Catherine Monzon	1.20	$100.00	$120.00
Total Legal Fees . . .	**4.30**		**$979.00**

Total Invoice	$979.00
OUTSTANDING BALANCE	**$979.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98344
File # 12455-108

Re: Jonathan Perlman, Receiver / TCA v. Telco Worldwide (17-19907)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/01/20	CM	Review court docket (.3), obtain copies of all documents filed to date for attorney review (.5); email to B. Halsey re: same (.2).	1.00hr $100.00/hr	$100.00
		Total Legal Fees . . .	1.00	$100.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	1.00	$100.00	$100.00
Total Legal Fees . . .	**1.00**		**$100.00**

Total Invoice	$100.00
OUTSTANDING BALANCE	**$100.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98345
File # 12455-109

Re: Jonathan Perlman, Receiver / TCA v. American Gold Rush (17-21221)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/01/20	CM	Review court docket (.3), obtain copies of all documents filed to date for attorney review (1.0); email to B. Halsey re: same (.2).	1.50hr $100.00/hr	$150.00
06/15/20	CM	Review NY Supreme Court docket (.2), obtain copies of all documents filed re: domestication of foreign judgment for attorney review (.8); email to B. Halsey re: same (.2).	1.20hr $100.00/hr	$120.00
		Total Legal Fees . . .	2.70	$270.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	2.70	$100.00	$270.00
Total Legal Fees . . .	**2.70**		**$270.00**

Total Invoice	$270.00
OUTSTANDING BALANCE	**$270.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98346
File # 12455-110

Re: Jonathan Perlman, Receiver / TCA v. Cresent Construction (18-934)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/27/20	CM	Review court docket (.2), obtain copies of all documents filed to date for attorney review (.8); email to B. Halsey re: same (.2)	1.20hr $100.00/hr	$120.00
06/30/20	CM	Preparation of stipulation for substitution of counsel and proposed order; email to B. Halsey re: same.	0.20hr $100.00/hr	$20.00
		Total Legal Fees . . .	1.40	$140.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	1.40	$100.00	$140.00
Total Legal Fees . . .	**1.40**		**$140.00**

Total Invoice	$140.00
OUTSTANDING BALANCE	**$140.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98347
File # 12455-111

Re: Jonathan Perlman, Receiver / TCA v. Pulse Beverage (18-5773)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/27/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	0.70hr $100.00/hr	$70.00
		Total Legal Fees . . .	0.70	$70.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.70	$100.00	$70.00
Total Legal Fees . . .	**0.70**		**$70.00**

Total Invoice	$70.00
OUTSTANDING BALANCE	**$70.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98348
File # 12455-112

Re: Jonathan Perlman, Receiver / TCA v. Independent Charter (18-16887)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/05/20	CM	Review court docket (.4), obtain copies of all documents filed to date for attorney review (1.6); email to B. Halsey re: same (.2).	2.20hr $100.00/hr	$220.00
06/11/20	BH	Receipt and review of Demand Letter from T. Jackson and Edison Learning, request for enlargement of settlement deadlines and threat of injunction.	0.40hr $265.00/hr	$106.00
06/11/20	BH	Review of pleadings, motion practice and settlement agreement and consent judgment to prepare litigation history and summary of proceedings, to advise Receiver regarding T. Jackson and Edison Learning's Demand Letter.	3.60hr $265.00/hr	$954.00
06/11/20	BH	Analyzed settlement agreement, allegations in Demand Letter, and allegations in complaint from underlying litigation regarding Jackson and Edison Learning's fraudulent actions, to prepare response to Demand Letter.	1.50hr $265.00/hr	$397.50
06/12/20	BH	Completed review of pleadings, motion practice and settlement documents and completed analysis of T. Jackson and Edison's settlement obligations, and drafted recommendation to Receiver regarding Edison's threats and requests for enlargement in Demand Letter.	3.10hr $265.00/hr	$821.50
06/12/20	BH	Drafted proposed Response from Receiver to T. Jackson and Edison Learning's demand letter.	1.20hr $265.00/hr	$318.00
06/15/20	BH	Revised and finalized Receiver's Response to T. Jackson's demand letter and threat of injunction.	0.80hr $265.00/hr	$212.00
06/17/20	BH	Receipt and review of Settlement Agreement, TCA's complaint and Jackson's demand letter and response to prepare outline of issues for call with counsel for Edison Learning.	2.40hr $265.00/hr	$636.00

06/17/20	BH	Review of memoranda and communication with T. Gray (.5), and prepared outline of issues and Receiver's position for call with counsel for the Edison Learning (.6)	1.10hr $265.00/hr	$291.50
06/17/20	BH	Attend telephone conference with C. de Zayas, counsel for Jackson and EdisonLearning.	0.50hr $265.00/hr	$132.50
06/17/20	BH	Drafted summary of agreement to one-month extension of settlement agreement sale deadline and summary of call for Receiver.	0.50hr $265.00/hr	$132.50
06/22/20	BH	Drafted correspondence to opposing counsel regarding financial statements and records to EdisonLearning entities and sale of the E-Business; receipt and review of response to same.	0.20hr $265.00/hr	$53.00
06/22/20	BH	Receipt and initial review of financial statements and records for the Guarantor entities' businesses and the E-Learning business, in advance of call with DSI and with Defendants to discuss value of sale and compliance with settlement agreement.	2.00hr $265.00/hr	$530.00
06/23/20	BH	Receipt and review of correspondence from opposing counsel regarding submission of financial records and sales analysis for EdisonLearning, and drafted responses to same (.3); continued review of financial records (.7).	1.00hr $265.00/hr	$265.00
06/23/20	CM	Review emails from Carlos de Zayas; organize emails and documents for attorney review.	0.30hr $100.00/hr	$30.00
06/25/20	JEP	Communications with B. Halsey and J. Luzinski re payments, and settlement.	0.40hr $340.00/hr	$136.00
06/25/20	BH	Receipt and review of multiple correspondence from DSI and EdisonLearning's CFO regarding upcoming meeting to discuss sale of business, and financial records of Learning Business, and drated responses to same.	0.80hr $265.00/hr	$212.00
06/25/20	BH	Drafted multiple e-mails to C. de Zayas regarding status of review of financial records, and discussions with Receiver's consultant and EdisonLearning's CFO.	0.50hr $265.00/hr	$132.50
06/25/20	BH	Telephone conference with M. Immartino of DSI regarding next steps; receipt and review of e-mails from DSI regarding same.	0.40hr $265.00/hr	$106.00
		Total Legal Fees . . .	22.90	$5,686.00

FEE SUMMARY:

Professional	Hours	Rate	Amount
Jonathan E Perlman	0.40	$340.00	$136.00
Brett M Halsey	20.00	$265.00	$5,300.00
Catherine Monzon	2.50	$100.00	$250.00
Total Legal Fees . . .	**22.90**		**$5,686.00**

- - Costs - - -

06/15/2020	Fedex Airbill No.770710844740 (12455-112) FedEx 7-045-73675	15.63
	Total Costs . . .	$15.63
	Total Invoice	$5,701.63
	OUTSTANDING BALANCE	**$5,701.63**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98349
File # 12455-113

Re: Jonathan Perlman, Receiver / TCA v. Ostrowski (18-17089)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/01/20	CM	Review court docket (.6), obtain copies of all documents filed to date for attorney review (.8); email to B. Halsey re: same (.2).	1.30hr $100.00/hr	$130.00
06/25/20	BH	Receipt and review of pleadings and motion practice, along with summaries form prior counsel, to prepare litigation status summary and analysis of TCA's legal position against the Ostrowskis and the guarantor companies, to advise of potential for recovery and versus risks and costs associated with continued litigation of this substantial loan dispute.	3.60hr $265.00/hr	$954.00
		Total Legal Fees . . .	4.90	$1,084.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	3.60	$265.00	$954.00
Catherine Monzon	1.30	$100.00	$130.00
Total Legal Fees . . .	**4.90**		**$1,084.00**

Total Invoice	$1,084.00
OUTSTANDING BALANCE	**$1,084.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98350
File # 12455-114

Re: Jonathan Perlman, Receiver / TCA v. Medytox Solutions (18-18385)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/27/20	CM	Review court docket (.3), obtain copies of all documents filed to date for attorney review (.9); email to B. Halsey re: same (.2).	1.40hr $100.00/hr	$140.00
		Total Legal Fees . . .	1.40	$140.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	1.40	$100.00	$140.00
Total Legal Fees . . .	**1.40**		**$140.00**

Total Invoice	$140.00
OUTSTANDING BALANCE	**$140.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98351
File # 12455-115

Re: Jonathan Perlman, Receiver / TCA v. Ludvik Holdings (18-19469)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/27/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	0.50hr $100.00/hr	$50.00
06/30/20	CM	Preparation of stipulation for substitution of counsel and proposed order; email to B. Halsey re: same; submit conflict check.	0.30hr $100.00/hr	$30.00
		Total Legal Fees . . .	0.80	$80.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.80	$100.00	$80.00
Total Legal Fees . . .	**0.80**		**$80.00**

Total Invoice	$80.00
OUTSTANDING BALANCE	**$80.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98352
File # 12455-116

Re: Jonathan Perlman, Receiver / TCA v. Illegal Burger (18-23812)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/27/20	BH	Receipt and review of recent Case Management Order, and pleadings to prepare summary of proceedings for discussion with former counsel, and for upcoming status conference.	1.70hr $265.00/hr	$450.50
05/27/20	CM	Review court docket (.3), obtain copies of all documents filed to date for attorney review (1.0), calendar hearing, email to B. Halsey re: same (.3).	1.60hr $100.00/hr	$160.00
06/24/20	BH	Review of pleadings, motion practice, orders and record documents to prepare litigation summary and analysis of potential for recovery for Receiver.	2.50hr $265.00/hr	$662.50
06/24/20	BH	Review of memo and summary from C. Schoeppl (.4) and review of file regarding potential for settlement in advance of July 13 case management conference ordered by the court (.9).	1.30hr $265.00/hr	$344.50
06/30/20	BH	Review of operative pleadings, discovery and motion practice on contempt to prepare analysis of current litigation status and legal and factual risks/likelihood of success to prepare summary to advise Receiver, and to prepare for upcoming case management conference.	2.20hr $265.00/hr	$583.00
06/30/20	CM	Preparation of stipulation for substitution of counsel and proposed order; email to B. Halsey re: same; submit conflict check.	0.30hr $100.00/hr	$30.00
		Total Legal Fees . . .	9.60	$2,230.50

FEE SUMMARY:

Professional	Hours	Rate	Amount
Brett M Halsey	7.70	$265.00	$2,040.50
Catherine Monzon	1.90	$100.00	$190.00
Total Legal Fees . . .	**9.60**		**$2,230.50**

Total Invoice	$2,230.50
OUTSTANDING BALANCE	**$2,230.50**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98353
File # 12455-117

Re: Jonathan Perlman, Receiver / TCA v. Unitiv, Inc. (18-24498)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/26/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	0.80hr $100.00/hr	$80.00
		Total Legal Fees . . .	0.80	$80.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.80	$100.00	$80.00
Total Legal Fees . . .	**0.80**		**$80.00**

Total Invoice	$80.00
OUTSTANDING BALANCE	**$80.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98354
File # 12455-118

Re: Jonathan Perlman, Receiver / TCA v. Petron (18-24831)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/28/20	CM	Review court docket (.3), obtain copies of all documents filed to date for attorney review (1.0); email to B. Halsey re: same (.2).	1.50hr $100.00/hr	$150.00
05/29/20	BH	Telephone conference with counsel for TCA 4675 to discuss pending litigation matters and strategy going forward, in response to inquiries from opposing counsel.	0.50hr $265.00/hr	$132.50
05/29/20	BH	Review of pleadings, motions and record documents to prepare analysis of all pending matters related to Broward Collision and mortgaged properties in Oakland Park and Sunrise, to make recommendation to receiver regarding representation and strategy.	2.60hr $265.00/hr	$689.00
05/29/20	BH	Review of pleadings and memoranda to prepare for call with B. Dervishi, current counsel for TCA 4675.	1.00hr $265.00/hr	$265.00
06/30/20	CM	Preparation of stipulation for substitution of counsel and proposed order (.2); email to B. Halsey re: same (.1); submit conflict check (.1).	0.40hr $100.00/hr	$40.00
		Total Legal Fees . . .	6.00	$1,276.50

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	4.10	$265.00	$1,086.50
Catherine Monzon	1.90	$100.00	$190.00
Total Legal Fees . . .	**6.00**		**$1,276.50**

Total Invoice	$1,276.50
OUTSTANDING BALANCE	**$1,276.50**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98355
File # 12455-119

Re: Jonathan Perlman, Receiver / TCA v. Groupe Mercator (19-406)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/26/20	CM	Review court docket (.5), obtain copies of all documents filed to date for attorney review (1.3); email to B. Halsey re: same (.2).	2.00hr $100.00/hr	$200.00
06/02/20	BH	Receipt and review of complaint, counterclaims by Canadian corporations and individual against TCA, and record documents to prepare recommendation to Receiver on litigation prospects, strategy and recommendation for local counsel.	3.60hr $265.00/hr	$954.00
06/02/20	BH	Review of pleadings and record documents regarding D. Silverman to prepare for conference with C. Schoeppl regarding tomorrow's motion to withdraw as counsel.	1.50hr $265.00/hr	$397.50
06/02/20	BH	Attended conference call with T. Gray regarding motion to withdraw re: D. Silverman	0.30hr $265.00/hr	$79.50
06/29/20	BH	Receipt and review of pleadings and motion practice, and third-party claims invlolving D. Silverrman, to prepare litigation status summary and analysis of TCA's legal position, as well as possibility of representing Ms. Silverman, to advise receiver of risks and possible recovery of continued litigation of this substantial loan dispute.	2.50hr $265.00/hr	$662.50
06/30/20	CM	Preparation of stipulation for substitution of counsel and proposed order; email to B. Halsey re: same; submit conflict check.	0.40hr $100.00/hr	$40.00
		Total Legal Fees . . .	10.30	$2,333.50

FEE SUMMARY:

Professional	Hours	Rate	Amount
Brett M Halsey	7.90	$265.00	$2,093.50
Catherine Monzon	2.40	$100.00	$240.00
Total Legal Fees . . .	**10.30**		**$2,333.50**

Total Invoice	$2,333.50
OUTSTANDING BALANCE	**$2,333.50**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98356
File # 12455-120

Re: Jonathan Perlman, Receiver / TCA v. Luxe Boutiques (19-10149)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/26/20	CM	Review court docket (.2), obtain copies of all documents filed to date for attorney review (.6); email to B. Halsey re: same (.2).	1.00hr $100.00/hr	$100.00
		Total Legal Fees . . .	1.00	$100.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	1.00	$100.00	$100.00
Total Legal Fees . . .	**1.00**		**$100.00**

Total Invoice	$100.00
OUTSTANDING BALANCE	**$100.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98357
File # 12455-122

Re: Jonathan Perlman, Receiver / TCA 4675 NW 103 Ave vs. RZNK (18-19377)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

05/29/20	CM	Review court docket (.5), obtain copies of all documents filed to date for attorney review (1.2); email to B. Halsey re: same (.3).	2.00hr $100.00/hr	$200.00
06/09/20	BH	Review of pleadings, motion practice and record documents to prepare recommendation to Receiver regarding litigation strategy and retention of local counsel.	2.50hr $265.00/hr	$662.50
06/09/20	BH	Receipt and review of Lease Corp.'s Motion for Release from Blanket Stay (.4), and review of docket, pleadings and record documents regarding same (1.0).	1.40hr $265.00/hr	$371.00
06/09/20	BH	Drafted and completed memorandum regarding status of Lease Corp. proceeding and motion to lift stay.	0.70hr $265.00/hr	$185.50
06/09/20	BH	Review of pleadings and memorandum regarding pending TCA Broward Collision and TCA 4675 matters, to prepare for call with local counsel.	1.40hr $265.00/hr	$371.00
06/09/20	BH	Review of Motion for Final Judgment of Foreclosure, and conference with B. Dervishi regarding same.	0.80hr $265.00/hr	$212.00
06/18/20	BH	Receipt and review of pleadings, motion practice and record documents to analyze case history and current posture for recommendation to Receiver regarding representation and strategy.	2.20hr $265.00/hr	$583.00
		Total Legal Fees . . .	11.00	$2,585.00

FEE SUMMARY:

Professional	Hours	Rate	Amount
Brett M Halsey	9.00	$265.00	$2,385.00
Catherine Monzon	2.00	$100.00	$200.00
Total Legal Fees . . .	**11.00**		**$2,585.00**

Total Invoice	$2,585.00
OUTSTANDING BALANCE	**$2,585.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98358
File # 12455-123

Re: Jonathan Perlman, Receiver / Savings Bank of Danbury v. TCA (19-6046173)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/02/20	CM	Review court docket (.2), obtain copies of all documents filed to date for attorney review (.5); email to B. Halsey re: same (.2).	0.90hr $100.00/hr	$90.00
06/10/20	BH	Review of case notes and docket to prepare analysis of case and litigation strategy to advise Receiver, and prepared analysis to for summary of pending litigation.	1.00hr $265.00/hr	$265.00
		Total Legal Fees . . .	1.90	$355.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	1.00	$265.00	$265.00
Catherine Monzon	0.90	$100.00	$90.00
Total Legal Fees . . .	**1.90**		**$355.00**

Total Invoice	$355.00
OUTSTANDING BALANCE	**$355.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98359
File # 12455-124

Re: Jonathan Perlman, Receiver / TCA v. First Capital (17-60393 - 16-22381)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/12/20	BH	Review of docket, pleadings and summary from local counsel regarding pending litigation matters, to prepare analysis and recommendation to Receiver.	2.30hr $265.00/hr	$609.50
06/12/20	CM	Review state and federal court dockets (.4), obtain copies of all documents filed to date for attorney review (.6); email to B. Halsey re: same (.2).	1.20hr $100.00/hr	$120.00
		Total Legal Fees . . .	3.50	$729.50

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	2.30	$265.00	$609.50
Catherine Monzon	1.20	$100.00	$120.00
Total Legal Fees . . .	**3.50**		**$729.50**

Total Invoice	$729.50
OUTSTANDING BALANCE	**$729.50**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98360
File # 12455-126

Re: Jonathan Perlman, Receiver / Alliance Holdco v. TCA (19-4553)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/12/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	0.70hr $100.00/hr	$70.00
		Total Legal Fees . . .	0.70	$70.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.70	$100.00	$70.00
Total Legal Fees . . .	**0.70**		**$70.00**

Total Invoice	$70.00
OUTSTANDING BALANCE	**$70.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98361
File # 12455-127

Re: Jonathan Perlman, Receiver / Alliance Holdco v. TCA (19-20581)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/13/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	0.30hr $100.00/hr	$30.00
06/18/20	BH	Receipt and review of pleadings, motion practice and record documents to prepare analysis for recommendation to Receiver regarding representation and strategy.	1.60hr $265.00/hr	$424.00
		Total Legal Fees . . .	1.90	$454.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	1.60	$265.00	$424.00
Catherine Monzon	0.30	$100.00	$30.00
Total Legal Fees . . .	**1.90**		**$454.00**

Total Invoice	$454.00
OUTSTANDING BALANCE	**$454.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98362
File # 12455-128

Re: Jonathan Perlman, Receiver / Alliance Holdco v. TCA (20-1309)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/11/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	0.40hr $100.00/hr	$40.00
06/26/20	BH	Review of pleadings and motion practice, current docket status and correspondence regarding multiple litigation matters involving Alliance Holdco and Broward Collision, to prepare litigation summary and analysis of for Receiver, and to advise current local counsel, B. Dervishi, in response to his summary correspondence.	3.30hr $265.00/hr	$874.50
		Total Legal Fees . . .	3.70	$914.50

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	3.30	$265.00	$874.50
Catherine Monzon	0.40	$100.00	$40.00
Total Legal Fees . . .	**3.70**		**$914.50**

Total Invoice	$914.50
OUTSTANDING BALANCE	**$914.50**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98363
File # 12455-129

Re: Jonathan Perlman, Receiver / Atlantic Southern v. TCA (19-14792)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/13/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	0.70hr $100.00/hr	$70.00
		Total Legal Fees . . .	0.70	$70.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.70	$100.00	$70.00
Total Legal Fees . . .	**0.70**		**$70.00**

Total Invoice	$70.00
OUTSTANDING BALANCE	**$70.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98364
File # 12455-130

Re: Jonathan Perlman, Receiver / Lease Corp. v. TCA (20-4385)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/11/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	0.40hr $100.00/hr	$40.00
06/18/20	BH	Receipt and review of Lease Corp.'s Motion to Lift Blanket stay, and review of pleadings, motion practice and record documents to prepare for meet and confer conference.	1.80hr $265.00/hr	$477.00
06/23/20	BH	Review of complaint, correspondence, proposed motion to stay and operative lease agreement to prepare for call with counsel for Lease Corp regarding paint equipment currenty sitting at the Lauderdale Lakes location.	2.40hr $265.00/hr	$636.00
06/23/20	BH	Receipt and review of correspondence from opposing counsel regaridng motion to lift stay; drafted response to same.	0.20hr $265.00/hr	$53.00
		Total Legal Fees . . .	4.80	$1,206.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	4.40	$265.00	$1,166.00
Catherine Monzon	0.40	$100.00	$40.00
Total Legal Fees . . .	**4.80**		**$1,206.00**

Total Invoice	$1,206.00
OUTSTANDING BALANCE	**$1,206.00**

TRUST BALANCE	$0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98365
File # 12455-131

Re: Jonathan Perlman, Receiver / LSC19, LLC v. Petron (18-17586)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/17/20	CM	Review court docket (.2), obtain copies of all documents filed to date for attorney review (1.0); email to B. Halsey re: same (.2).	1.40hr $100.00/hr	$140.00
		Total Legal Fees . . .	1.40	$140.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	1.40	$100.00	$140.00
Total Legal Fees . . .	**1.40**		**$140.00**

Total Invoice	$140.00
OUTSTANDING BALANCE	**$140.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98366
File # 12455-132

Re: Jonathan Perlman, Receiver / Paycation v. TCA (471-03524-2016)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/13/20	CM	Review emails and documents from Texas counsel; review court docket, prepare document list; email to B. Halsey re: same.	0.80hr $100.00/hr	$80.00
06/15/20	BH	Receipt and review of correspondence from local Texas counsel regarding motion to stay (.1); drafted response to same (.1).	0.20hr $265.00/hr	$53.00
06/15/20	BH	Review of operative letters and agreements making up the APA, and evidence submitted with petition, answer and counterclaims, and on summary judgment to prepare summary of facts related to formation of APA in August 2016, and authority granted to J. Monte by same.	2.40hr $265.00/hr	$636.00
06/16/20	BH	Review of pleadings and motion practice regarding Paycation, Xstream and David Manning's allegations and evidence related to Jeremy Monte's fraud, and TCA's alleged failure to uncover it, in advance of pre-settlement call with counsel for Paycation, Manning and Xstream,	3.50hr $265.00/hr	$927.50
06/16/20	BH	Receipt and review of summary of meeting from local Texas counsel (.1); drafted response to same (.1).	0.20hr $265.00/hr	$53.00
06/16/20	BH	Review of legal authority regarding impact of federal court stay of claims and actions against receivership entities in all courts, and supporting authority for same to include in motion to stay in Texas litigation.	1.50hr $265.00/hr	$397.50
06/16/20	BH	Revised and drafted memorandum summarizing claims in Florida and Texas proceedings, facts, communications with counsel and outline of questions and issues for pre-settlement call with counsel for Paycation and Manning.	1.90hr $265.00/hr	$503.50

06/16/20	BH	Attended telephone conference with counsel for Payction, Xstream and David Manning to discuss issues impacting risks of continuing litigation against TCA Global and likelihood of success.	1.50hr $265.00/hr	$397.50
06/18/20	BH	Review of motions for summary judgment and record evidence in follow up to issues raised by counsel for Paycation regarding disbursement of loan proceeds and use of proceeds by Monte and Manning entities.	2.00hr $265.00/hr	$530.00
06/18/20	BH	Receipt and review of correspondence from local TX counsel.	0.10hr $265.00/hr	$26.50
06/19/20	BH	Receipt and review of correspondence from local counsel regarding litigation call with counsel for Paycation; drafted response to same.	0.20hr $265.00/hr	$53.00
06/19/20	BH	Review of operative "asset purchase" and letters of intent, and stock membership agreements between Montbriar and Paycation/Manning to prepare for call with counsel on authority of J. Monte.	2.60hr $265.00/hr	$689.00
06/24/20	BH	Review of correspondence and summary of open issues from call with counsel for Paycation, to prepare for conference call with local counsel in Texas.	1.10hr $265.00/hr	$291.50
06/24/20	BH	Attended conference call with local counsel in Texas on Motion to Stay and other evidentiary issues,	0.60hr $265.00/hr	$159.00
06/30/20	BH	Receipt and review of correspondence from V. Henderson regarding motion to stay; drafted response to same.	0.20hr $265.00/hr	$53.00
06/30/20	BH	Receipt and review of retainer agreement and record documents regarding Baker Donelson's representation of J. Monte and Montbriar.	0.80hr $265.00/hr	$212.00
		Total Legal Fees . . .	19.60	$5,062.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	18.80	$265.00	$4,982.00
Catherine Monzon	0.80	$100.00	$80.00
Total Legal Fees . . .	**19.60**		**$5,062.00**

Total Invoice	$5,062.00
OUTSTANDING BALANCE	**$5,062.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98367
File # 12455-133

Re: Jonathan Perlman, Receiver / TCA v. Moss, Welch (17-297030)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/13/20	CM	Review court docket; email to B. Halsey re: judgments.	0.20hr $100.00/hr	$20.00
		Total Legal Fees . . .	0.20	$20.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.20	$100.00	$20.00
Total Legal Fees . . .	**0.20**		**$20.00**

Total Invoice	$20.00
OUTSTANDING BALANCE	**$20.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98368
File # 12455-134

Re: Jonathan Perlman, Receiver / KAT Exploration v. Grim (15-268068)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/13/20	CM	Review court docket; email to B. Halsey re: order staying action.	0.20hr $100.00/hr	$20.00
		Total Legal Fees . . .	0.20	$20.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.20	$100.00	$20.00
Total Legal Fees . . .	**0.20**		**$20.00**

Total Invoice	$20.00
OUTSTANDING BALANCE	**$20.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98369
File # 12455-135

Re: Jonathan Perlman, Receiver / TCA v. Roswell Jeep Eagle (15-268155)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/13/20	CM	Review court docket; email to B. Halsey re: order staying case.	0.10hr $100.00/hr	$10.00
		Total Legal Fees . . .	0.10	$10.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.10	$100.00	$10.00
Total Legal Fees . . .	**0.10**		**$10.00**

Total Invoice	$10.00
OUTSTANDING BALANCE	**$10.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98370
File # 12455-136

Re: Jonathan Perlman, Receiver / TCA v. 1200 Wolcott (18-6043552-S)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/13/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same	0.40hr $100.00/hr	$40.00
		Total Legal Fees . . .	0.40	$40.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.40	$100.00	$40.00
Total Legal Fees . . .	**0.40**		**$40.00**

Total Invoice	$40.00
OUTSTANDING BALANCE	**$40.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98371
File # 12455-137

Re: Jonathan Perlman, Receiver / Big Rhino Corp. v. TCA (17-3585)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/13/20	CM	Review court docket; email to B. Halsey re: same.	0.10hr $100.00/hr	$10.00
		Total Legal Fees . . .	0.10	$10.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.10	$100.00	$10.00
Total Legal Fees . . .	**0.10**		**$10.00**

Total Invoice	$10.00
OUTSTANDING BALANCE	**$10.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98372
File # 12455-138

Re: Jonathan Perlman, Receiver / TCA v. First Capital (19-310)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/13/20	CM	Review court docket; email to B. Halsey re: same.	0.10hr $100.00/hr	$10.00
		Total Legal Fees . . .	0.10	$10.00

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Catherine Monzon	0.10	$100.00	$10.00
Total Legal Fees . . .	**0.10**		**$10.00**

Total Invoice	$10.00
OUTSTANDING BALANCE	**$10.00**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98373
File # 12455-139

Re: Jonathan Perlman, Receiver / AW Exports / Australian Worldwide (17-40926)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/17/20	BH	Receipt and review of settlement proposal and correspondence in underlying litigation in advance of call with Australian counsel for TCA.	1.20hr $265.00/hr	$318.00
06/17/20	BH	Attended telephone conference with local Australian counsel for TCA regarding Australia Worldwide and Pieface liquidation matters involving the Receivership entity.	1.00hr $265.00/hr	$265.00
06/17/20	BH	Drafted outline of issues for recommendation to Receiver regarding Australian pending litigation.	0.60hr $265.00/hr	$159.00
06/18/20	BH	Review of settlement offer and memorandum of call with local counsel to prepare initial recommendation regarding representation and pursuit of stay.	1.00hr $265.00/hr	$265.00
06/19/20	BH	Drafted and completed initial recommendation regarding continued representation by local Australian counsel and pursuit of stay of liquidation proceedings in Australian court.	1.20hr $265.00/hr	$318.00
06/19/20	BH	Review of legal authority regarding effect of and procedure for enforcing Receivership stay order in foreign jurisdictions.	1.50hr $265.00/hr	$397.50
06/20/20	JEP	Review Halsey memo re case status (.5); draft email re additional information requried for determination (.3).	0.80hr $340.00/hr	$272.00
06/22/20	BH	Review of legal authority regarding Cross Border act and procedures for effecting stay in Australia courts.	1.30hr $265.00/hr	$344.50
06/22/20	BH	Receipt and review of comments and question from the Receiver regarding pending proceedings and strategy; drafted response to same.	0.60hr $265.00/hr	$159.00
06/22/20	BH	Drafted correspondence to S. Taylor regarding status of pending offer to settle.	0.10hr $265.00/hr	$26.50

06/29/20	BH	Receipt and review of multiple correspondence from local Australian counsel and proposed retainer agreement; drafted response to same.	0.70hr $265.00/hr	$185.50
06/30/20	BH	Review of file and recent correspondence from S. Taylor and Receiver regarding pending litigation in Australia Worldwide and Pie Face matters for meeting with G. Garno.	1.70hr $265.00/hr	$450.50
06/30/20	BH	Review of legal authority regarding the Cross Border Insolvency Act and its application via a vis pending litigation in Australia.	1.40hr $265.00/hr	$371.00
		Total Legal Fees . . .	13.10	$3,531.50

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Jonathan E Perlman	0.80	$340.00	$272.00
Brett M Halsey	12.30	$265.00	$3,259.50
Total Legal Fees . . .	**13.10**		**$3,531.50**

Total Invoice	$3,531.50
OUTSTANDING BALANCE	**$3,531.50**

TRUST BALANCE $0.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

Attn: Jonathan Perlman
Jonathan Perlman, Receiver (TCA)
,

July 13, 2020
Inv. # 98374
File # 12455-140

Re: Jonathan Perlman, Receiver / TCA v. American Gold Jewelry (617857 / 2019)

Statement for Services Rendered Through Jun 30/20

- - - Legal Fees - - -

06/15/20	CM	Review court docket, obtain copies of all documents filed to date for attorney review; email to B. Halsey re: same.	0.60hr $100.00/hr	$60.00
06/17/20	BH	Receipt and review of pleadings, motion practice, orders and record documents to analyze case status and likelihood of recovery, in advance of call with local counsel regarding same.	3.10hr $265.00/hr	$821.50
06/17/20	BH	Telephone conference with J. Bodner, local counsel in NY, regarding case status and prospects for success.	0.60hr $265.00/hr	$159.00
		Total Legal Fees . . .	4.30	$1,040.50

FEE SUMMARY:

Professional	**Hours**	**Rate**	**Amount**
Brett M Halsey	3.70	$265.00	$980.50
Catherine Monzon	0.60	$100.00	$60.00
Total Legal Fees . . .	**4.30**		**$1,040.50**

Total Invoice	$1,040.50
OUTSTANDING BALANCE	**$1,040.50**

TRUST BALANCE $0.00

Exhibit 5(b)

COLLAS·CRILL

INVOICE SUMMARY OF PROFESSIONALS

Jonathan E. Perlman, Receiver
Genovese, Joblove & Battista
100 SE 2nd Street, Suite 4400
Miami, FL 33131

Invoice Number: BNC1-0004376
Date: 29 May 2020
Matter No: 50000764.0001

Re: TCA Fund Management Group Corp – Case No. 1:20-cv-21964-CMA

For Professional Services Rendered –
May 13 to May 20, 2020 (**Period 1**) and May 21 to May 29, 2020 (**Period 2**)

Professional	Initials	Position	Experience	Hours	Rate	Fees	Total
Period 1: May 13 to May 20, 2020							
Stephen Leontsinis	SL	Partner	17 years	52.30	$272.73	$14,263.96	
Rocco Cecere	RC	Partner	17 years	67.50	$725.00	$48,937.50	
Jennifer Colegate	JC	Counsel	14 years	57.70	$253.93	$14,651.52	
Natalie Bell	NB	Senior Associate	12 years	10.80	$244.52	$2,640.83	
Farrah Sbaiti	FS	Senior Associate	11 years	23.00	$244.52	$5,623.97	
Genevieve White	GW	Associate	3 years	17.20	$225.71	$3,882.23	
Blended Average Hourly Rate for Period 1				**$327.74**			
Total Hours for Period 1				**228.50**			
Total Fees for Period 1				**$90,000.00**			
Period 2: May 21 to May 29, 2020							
Stephen Leontsinis	SL	Partner	17 years	19.70	$725.00	$15,280.00	**$29,543.96**
Rocco Cecere	RC	Partner	17 years	28.10	$725.00	$20,847.50	**$69,785.00**
Jennifer Colegate	JC	Counsel	14 years	21.65	$675.00	$14,613.75	**$29,265.27**
Natalie Bell	NB	Senior Associate	12 years	5.10	$650.00	$3,315.00	**$5,955.83**
Farrah Sbaiti	FS	Senior Associate	11 years	5.50	$650.00	$3,575.00	**$9,198.97**
Genevieve White	GW	Associate	3 years	6.95	$600.00	$4,170.00	**$8,052.23**
Blended Average Hourly Rate for Period 2				**$670.83**			
Total Hours for Period 2				**87.00**			
Total Fees for Period 2				**$61,801.25**			
TOTAL HOURS							**315.50**
TOTAL FEES							**$151,801.25**

COLLAS·CRILL

Invoice

Perlman, Jonathan E.
100 S.E. Second Street, 44th Floor
Miami
FL
33131
United States

Invoice date	29/05/2020
Invoice number	BNC1-0004376
Invoice currency	USD
Our reference	50000764.0001
Your reference	

Details	Fees	Disbursements
Re: TCA Group receivership **Professional services rendered in relation to the above matter**	151,801.25	
Totals	**151,801.25**	**0.00**

Please see overleaf for payment details.

Invoice payable within 14 days.

	Total Charge
USD	**151,801.25**

With Compliments

All services detailed on our invoice have been performed outside the United States of America.

COLLAS·CRILL

WIRE TRANSFER DETAILS
UNITED STATES DOLLARS

IMPORTANT

All transfers must be routed through Scotiabank (Cayman Islands) Ltd.'s account with JP Morgan Chase Bank, New York, USA, for further credit to our US$ Client Account in Grand Cayman. In order to ensure your payment is successfully routed, it is important to ensure that all information set out below is clearly stated on the wire transfer instructions you provide to your bank.

Remit to:	JP MORGAN CHASE BANK N.A. 270 PARK AVENUE NEW YORK, NEW YORK 10017
SWIFT BIC:	CHASUS33
CHIPS ABA:	0002
FEDWIRE ABA:	021000021
To credit:	SCOTIABANK & TRUST (CAYMAN) LTD. GRAND CAYMAN CAYMAN ISLANDS
SWIFT BIC:	NOSCKYKX
For further credit to:	COLLAS CRILL
ACCOUNT NUMBER:	1048112
SENDER TO RECEIVER INFO:	REF: **[ATTORNEY]/[REFERENCE # NOTED ON OUTSTANDING INVOICE]** INVOICE NOs: **[INVOICE # NOTED ON OUTSTANDING INVOICE]**

Please Note:
The sender is responsible for all (sender and receiver) bank charges incurred in wiring funds. Please add all bank processing charges in order that the net amount we receive is the exact amount indicated on our Invoice.

All invoices are payable within 14 days of presentation. Interest at a rate of 3% above the base-lending rate of the Royal Bank of Scotland plc may be charged, at our discretion, on unpaid invoices.
Thank you

Floor 2, Willow House, Cricket Square, PO Box 709, Grand Cayman KY1-1107, Cayman Islands
T: +1 345 949 4544 F: +1 345 949 8460 E: cayman@collascrill.com
A Cayman Partnership. A list of partners is available at the above address.

Matter ID	Matter date	Fee earner	SEC Activity Category	Narrative	Contract currency	Hours	Original charge rate	Original time value (contract currency)	Effective charge rate	Amount invoiced (contract currency)
50000764.0001	2020-05-13	Cecere, Rocco	Cayman Islands - General Litigation	Team call to discuss priorities, next steps.	USD	0.70	850.00	595.00	725.00	507.50
50000764.0001	2020-05-13	Cecere, Rocco	Cayman Islands - General Litigation		USD	2.50	850.00	2,125.00	725.00	1,812.50
50000764.0001	2020-05-13	Cecere, Rocco	Cayman Islands - General Litigation	Further emails and calls re: potential TCA matter.		0.70				
50000764.0001	2020-05-13	Cecere, Rocco	Cayman Islands - General Litigation	Review of relevant authorities		1.30				
50000764.0001	2020-05-13	Cecere, Rocco	Cayman Islands - General Litigation	Emails to team setting out next steps and material to review.		0.50				
50000764.0001	2020-05-13	Cecere, Rocco	Cayman Islands - General Litigation	Drafting letter to EY and emails SL, calls SL.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-14	Colegate, Jennifer	Cayman Islands - General Litigation	Research and drafting step plan.	USD	2.50	750.00	1,875.00	253.92	634.81
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Draft letter to E&Y and email to client re: same. Calls and emails SL.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Calls with SL re: strategy proceedings in Cayman	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Revising list of documents and email to client	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Emails JC re: list of necessary documents.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Call with client and SEC re: strategy.	USD	1.20	850.00	1,020.00	725.00	870.00
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Call with clients.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Drafting letter to Harneys and email to client re: same.	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Heavy calls and emails re: TCA engagement, letter of engagement, conflicts, emails	USD	3.50	850.00	2,975.00	725.00	2,537.50
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Call with team to discuss tasks, priorities.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-14	White, Genevieve	Cayman Islands - General Litigation	Perusal of SEC filings in relation to TCA structure and background	USD	2.20	600.00	1,320.00	225.71	496.56
50000764.0001	2020-05-14	White, Genevieve	Cayman Islands - General Litigation	Telephone attendance in relation TCA with RC, SL, FS and JC	USD	0.70	600.00	420.00	225.71	158.00
50000764.0001	2020-05-14	White, Genevieve	Cayman Islands - General Litigation	Emailing FS in relation to research	USD	0.70	600.00	420.00	225.71	158.00
50000764.0001	2020-05-14	Sbaiti, Farrah	Cayman Islands - General Litigation	Reading SEC filings.	USD	1.40	675.00	945.00	244.52	342.33

50000764.0001	2020-05-14	Sbaiti, Farrah	Cayman Islands - General Litigation	Zoom meeting with team to discuss instruction and workstreams	USD	0.60	675.00	405.00	244.52	146.71
50000764.0001	2020-05-14	Colegate, Jennifer	Cayman Islands - General Litigation	Team update call with SL, RC, RS, FS and GW	USD	0.80	750.00	600.00	253.93	203.14
50000764.0001	2020-05-14	Colegate, Jennifer	Cayman Islands - General Litigation	Review of SEC Complaint documents consideration of additional documents required for Cayman proceedings.	USD	2.20	750.00	1,650.00	253.93	558.64
50000764.0001	2020-05-14	Colegate, Jennifer	Cayman Islands - General Litigation	Review of SEC Filings		1.10				
50000764.0001	2020-05-14	Colegate, Jennifer	Cayman Islands - General Litigation	Identifying documents required in document collection process		1.10				
50000764.0001	2020-05-14	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting email of doc requests	USD	1.00	750.00	750.00	253.93	253.93
50000764.0001	2020-05-14	Colegate, Jennifer	Cayman Islands - General Litigation	Review and comment on letter to EY	USD	0.30	750.00	225.00	253.93	76.18
50000764.0001	2020-05-14	Colegate, Jennifer	Cayman Islands - General Litigation	Briefing call with RC and SL	USD	0.50	750.00	375.00	253.92	126.96
50000764.0001	2020-05-14	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	9.00	725.00	6,525.00	272.73	2,454.61
50000764.0001	2020-05-14	Leontsinis, Stephen	Cayman Islands - General Litigation	Communications with Receiver and advisors and developing Cayman strategy in light of applicable legal principles. Instructions to team		4.30				
50000764.0001	2020-05-14	Leontsinis, Stephen	Cayman Islands - General Litigation	Calls to advance Cayman proceedings and strategy discussed with Receiver		1.10				
50000764.0001	2020-05-14	Leontsinis, Stephen	Cayman Islands - General Litigation	Reviewing and settling list of documentation required to advance proceedings in Cayman.		1.00				
50000764.0001	2020-05-14	Leontsinis, Stephen	Cayman Islands - General Litigation	Reviewing draft letter to Harneys. Discussions with Receiver		1.00				
50000764.0001	2020-05-14	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with RC re current outstanding issues and priorities		1.20				
50000764.0001	2020-05-14	Leontsinis, Stephen	Cayman Islands - General Litigation	Zoom call: instructions to team		0.40				
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Communications and initial stage advice. Review of relevant authorities / legislation. Communications with team setting our next steps and material to review.	USD	2.50	850.00	2,125.00	725.00	1,812.50
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Advice relating to proceedings in Cayman	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Calls with SL re: strategy, next steps. Assessment of proceedings in Cayman.	USD	0.70	850.00	595.00	725.00	507.50
50000764.0001	2020-05-14	Cecere, Rocco	Cayman Islands - General Litigation	Call with JC relating to proceedings in Cayman.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-14	White, Genevieve	Cayman Islands - General Litigation	Transcribing hearing for TCA in Cayman Grand Court before Justice McMillian	USD	1.10	600.00	660.00	225.71	248.28
50000764	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Further emails with Receiver regarding Nevada intermediary.	USD	0.20	850.00	170.00	725.00	145.00

50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Communications to client regarding documentation required in respect of Nevada intermediary.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Letter in from Harneys and call with Katie Pearson of Harneys.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Letter in from Harneys and email to client. Review documents	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Team call to discuss priorities and next steps, strategy.	USD	1.30	850.00	1,105.00	725.00	942.50
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation		USD	1.50	850.00	1,275.00	725.00	1,087.50
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Call with client to discuss strategy		1.00				
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Post call discussions		0.50				
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Call with SEC and client, post call discussion with SL.	USD	1.20	850.00	1,020.00	725.00	870.00
50000764.0001	2020-05-15	White, Genevieve	Cayman Islands - General Litigation	Perusal of SEC filings	USD	2.20	600.00	1,320.00	225.71	496.56
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Team call re workstreams	USD	0.80	750.00	600.00	253.93	203.14
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Communications to FS regarding revisions to draft documents.	USD	0.70	850.00	595.00	725.00	507.50
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Emails client, receipt of Cayman filings and review same.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Calls with SL and Chip Hoboke re steps required in Cayman and issues pertaining to Nevada intermediary.	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Calls with FS and JC re drafting of documents for prospective applications	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Emails with JC and FS re drafting issues	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation		USD	1.30	850.00	1,105.00	725.00	942.50
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Review and consideration of relevant authorities		0.50				
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Email regarding next steps and matter priorities of the day		0.20				
50000764.0001	2020-05-15	Cecere, Rocco	Cayman Islands - General Litigation	Outline of filings required		0.60				
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Internal team call to discuss issues arising in connection with steps to be taken by Receiver in Cayman	USD	1.00	750.00	750.00	253.93	253.93
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Review of relevant authorities	USD	0.80	750.00	600.00	253.93	203.14
50000764.0001	2020-05-15	Sbaiti, Farrah	Cayman Islands - General Litigation	Discussing documents with RC; drafting documents summary / headings	USD	0.30	675.00	202.50	244.53	73.36

50000764.0001	2020-05-15	Sbaiti, Farrah	Cayman Islands - General Litigation		USD	4.90	675.00	3,307.50	244.52	1,198.15
50000764.0001	2020-05-15	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing documents / SEC filings		2.00				
50000764.0001	2020-05-15	Sbaiti, Farrah	Cayman Islands - General Litigation	Drafting documents required in Cayman Proceedings		2.90				
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation		USD	9.20	750.00	6,900.00	253.93	2,336.11
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Internal calls		0.80				
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Considering case law		2.40				
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Plotting alternative Cayman strategy		1.80				
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Consideration of alternative course of action		1.80				
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Reading correspondence from Harneys		0.30				
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting evidence		1.30				
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Considering docs required for application of each entity		0.80				
50000764.0001	2020-05-15	Colegate, Jennifer	Cayman Islands - General Litigation	Step plan for next steps; briefing email to FS and GW re prep of documents.	USD	1.00	750.00	750.00	253.93	253.93
50000764.0001	2020-05-15	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	8.50	725.00	6,162.50	272.73	2,318.24
50000764.0001	2020-05-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Correspondence with Harneys in connection with Cayman Proceedings		0.40				
50000764.0001	2020-05-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Drafting of documents required in Cayman Proceedings		2.50				
50000764.0001	2020-05-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Letter in from Harneys for review and email to client to discuss.		0.40				
50000764.0001	2020-05-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of documents relevant to proceeding in Cayman		0.60				
50000764.0001	2020-05-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Communications with Receiver regarding Nevada intermediary		0.40				
50000764.0001	2020-05-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Review and consideration of relevant authorities		1.30				
50000764.0001	2020-05-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Preparation of outline of filings		1.20				
50000764.0001	2020-05-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with client to discuss strategy and feedback to the team.		1.70				

50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Emails team re: status of instructions and drafting.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Emails SL and CH	USD	1.50	850.00	1,275.00	725.00	1,087.50
50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Emails SL		0.30				
50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL and CH re: status of discussions with SEC and receiver, next steps and priorities.		1.20				
50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Second call with SL and CH re: status of receivership. Discussion on strategy and next steps and Cayman advice sent to the Receiver.	USD	1.00	850.00	850.00	725.00	725.00
50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Emails with CH with list of urgent documents	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Drafting advice to Receiver on issues of Cayman law. Emails SL re: same.	USD	0.70	850.00	595.00	725.00	507.50
50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Emails re: Irish and English entities.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Emails with US advisors and Receiver in connection with relevant legal issues	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Calls and emails with SL re: strategy and Cayman Islands legal issues.	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-16	Cecere, Rocco	Cayman Islands - General Litigation	Calls clients and CH re: legal issues.	USD	0.80	850.00	680.00	725.00	580.00
50000764.0001	2020-05-16	White, Genevieve	Cayman Islands - General Litigation		USD	1.50	600.00	900.00	225.71	338.57
50000764.0001	2020-05-16	White, Genevieve	Cayman Islands - General Litigation	Perusal of emails in relation to TCA instructions from RC and JC in connection with preparation of documents		0.50				
50000764.0001	2020-05-16	White, Genevieve	Cayman Islands - General Litigation	Reviewing legislation relevant to issues in Cayman proceedings		1.00				
50000764.0001	2020-05-16	White, Genevieve	Cayman Islands - General Litigation	Perusal of legislation	USD	0.50	600.00	300.00	225.72	112.86
50000764.0001	2020-05-16	Sbaiti, Farrah	Cayman Islands - General Litigation		USD	1.10	675.00	742.50	244.52	268.97
50000764.0001	2020-05-16	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing JC email re workstreams		0.10				
50000764.0001	2020-05-16	Sbaiti, Farrah	Cayman Islands - General Litigation	Drafting documents required in Cayman Proceedings		1.00				
50000764.0001	2020-05-16	Bell, Natalie	Cayman Islands - General Litigation	Review of email from RC. Call with JC to discuss applicable statutory provisions.	USD	0.90	700.00	630.00	244.52	220.07

50000764.0001	2020-05-16	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	4.30	725.00	3,117.50	272.73	1,172.76
50000764.0001	2020-05-16	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal emails re: status of instructions and drafting.		0.30				
50000764.0001	2020-05-16	Leontsinis, Stephen	Cayman Islands - General Litigation	Calls with client to update on discussions with SEC and Receiver.		0.70				
50000764.0001	2020-05-16	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of draft emails to CH with list of urgent documents and requesting addition of further entries.		0.50				
50000764.0001	2020-05-16	Leontsinis, Stephen	Cayman Islands - General Litigation	Emails to associated TCA entities		0.40				
50000764.0001	2020-05-16	Leontsinis, Stephen	Cayman Islands - General Litigation	Amendments to advice to Receiver		0.60				
50000764.0001	2020-05-16	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal discussions on applicable legal issues		0.60				
50000764.0001	2020-05-16	Leontsinis, Stephen	Cayman Islands - General Litigation	Calls and emails with RC re: strategy and Cayman Islands legal issues.		0.70				
50000764.0001	2020-05-16	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with client regarding legal issues.		0.50				
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Emails clients re: US connection documents	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation		USD	1.80	850.00	1,530.00	725.00	1,305.00
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Attendance on call with client		1.00				
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Post call discussions with SL re: strategy and issues outstanding.		0.80				
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Emails re: accounts and correspondence with CIMA.	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Call with Irina re: requests and other requested material.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation		USD	1.50	850.00	1,275.00	725.00	1,087.50
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Attendance on call with clients.		1.00				
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Post call discussions with SL re: same, next steps.		0.50				
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Draft email to team setting out tasks for tomorrow re: document drafting	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	emails with Receiver to obtain instructions	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Email client re: call with receiver, engagement.	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-17	Sbaiti, Farrah	Cayman Islands - General Litigation	Company searches	USD	0.30	675.00	202.50	244.53	73.36

50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Emails and calls JC re: necessary documents for Cayman Proceedings	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Review US counsel note on relevant law, draft comments / response and emails and calls re: same.	USD	1.00	850.00	850.00	725.00	725.00
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Draft email to team setting out tasks for tomorrow re: drafting.	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-17	Cecere, Rocco	Cayman Islands - General Litigation	Drafting documentation for Cayman Proceedings	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-17	Colegate, Jennifer	Cayman Islands - General Litigation		USD	9.10	750.00	6,825.00	253.93	2,310.72
50000764.0001	2020-05-17	Colegate, Jennifer	Cayman Islands - General Litigation	Supervision Work: drafting resolutions		1.60				
50000764.0001	2020-05-17	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing relevant authorities		1.80				
50000764.0001	2020-05-17	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting pleadings		1.70				
50000764.0001	2020-05-17	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting pleadings		1.50				
50000764.0001	2020-05-17	Colegate, Jennifer	Cayman Islands - General Litigation	Advice to Receiver on matters of Cayman law		1.50				
50000764.0001	2020-05-17	Colegate, Jennifer	Cayman Islands - General Litigation	Responding to Receiver's questions on questions of Cayman law		1.00				
50000764.0001	2020-05-17	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	5.00	725.00	3,625.00	272.73	1,363.67
50000764.0001	2020-05-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Review US counsel note, email to RC and call with RC re draft comments / response to US re: same.		1.00				
50000764.0001	2020-05-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of document request. Request to team to track documents requests.		0.30				
50000764.0001	2020-05-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Attendance on call with client and post call discussions with RC re: strategy and issues outstanding		1.20				
50000764.0001	2020-05-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with RC re CIMA letter		0.40				
50000764.0001	2020-05-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Various emails with Chip and clients responding to various queries		0.50				
50000764.0001	2020-05-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Calls with US advisors and RC regarding proceedings in Cayman		0.40				
50000764.0001	2020-05-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Consideration of documents to be drafted		0.40				
50000764.0001	2020-05-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Emails and instructions from Receiver		0.30				
50000764.0001	2020-05-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Email and call with Receiver in connection with engagement terms		0.50				
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL re Harneys correspondence and other matters.	USD	0.20	850.00	170.00	725.00	145.00

50000764.0001	2020-05-18	White, Genevieve	Cayman Islands - General Litigation	Review of TCA Fund documents and structure	USD	0.80	600.00	480.00	225.71	180.57
50000764.0001	2020-05-18	Sbaiti, Farrah	Cayman Islands - General Litigation	Review of fund documentation, discussion with JC re same	USD	0.40	675.00	270.00	244.53	97.81
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Email discussions with Receiver in connection with management of fund structure and communications with regulator.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails and calls with GW re communications with CIMA	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Receipt of corporate and constitutional documents	USD	0.10	850.00	85.00	725.00	72.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	receipt of additional constitutional documents from Receiver	USD	0.10	850.00	85.00	725.00	72.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Drafting response to Harneys and settling. Email to clients re same and call with client on Harneys letter.	USD	0.70	850.00	595.00	725.00	507.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails with JC regarding communications required with CIMA	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Email in from Receiver's office with letter from Harneys to director and emails and calls re same.	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Correspondence with Receiver regarding terms of correspondence from Harneys	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Correspondence with Receiver regarding terms of correspondence to EY	USD	0.10	850.00	85.00	725.00	72.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Phone attendance with Collas Crill team to discuss plan of action, priorities and next steps today.	USD	0.80	850.00	680.00	725.00	580.00
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails regarding documents required for Cayman proceedings.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Email from Receivers providing relevant documentation for review	USD	0.10	850.00	85.00	725.00	72.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Further emails received from Receiver's office with further constitutional documents and circulate.	USD	0.10	850.00	85.00	725.00	72.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails with clients re cost consequences and calls with Receiver re same.	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL re outcome of call with Paul and Receiver.	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Calls with SL re next steps and priorities	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Consideration and preparation of correspondence with CIMA.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-18	White, Genevieve	Cayman Islands - General Litigation	Telephone attendance with FS, JC, RC and SL in relation to next steps in advancing position of Receiver	USD	0.50	600.00	300.00	225.72	112.86
50000764.0001	2020-05-18	White, Genevieve	Cayman Islands - General Litigation	Perusal of correspondence and for and including the preparation of TCA worksteam spreadsheet	USD	1.40	600.00	840.00	225.71	316.00

50000764.0001	2020-05-18	White, Genevieve	Cayman Islands - General Litigation	Preparation of letter to CIMA in relation to TCA entities	USD	0.30	600.00	180.00	225.70	67.71
50000764.0001	2020-05-18	Sbaiti, Farrah	Cayman Islands - General Litigation	Completing Log of workstreams, docs and correspondence; internal email re folders and documents	USD	0.30	675.00	202.50	244.53	73.36
50000764.0001	2020-05-18	Sbaiti, Farrah	Cayman Islands - General Litigation	Discussing document requests and what we need; internal emails	USD	0.20	675.00	135.00	244.50	48.90
50000764.0001	2020-05-18	Sbaiti, Farrah	Cayman Islands - General Litigation	Zoom meeting to discuss workstreams	USD	0.50	675.00	337.50	244.52	122.26
50000764.0001	2020-05-18	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing matter; recording all document / info requests into spreadsheet; saving down documents all received into sub-folders	USD	1.90	675.00	1,282.50	244.52	464.59
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	4.00	725.00	2,900.00	272.74	1,090.94
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Emails regarding essential documents required from Receiver		0.20				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal calls and discussions regarding regulatory and compliance issues		0.20				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Further communications regarding compliance issues		0.30				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Emails from Receivers office		0.20				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Email communications with client regarding dealings with EY		0.30				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Email communications and documentation from Receiver		0.30				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of correspondence provided by Receiver		0.40				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Emails from Receiver's office regarding draft documents		0.10				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Emails with Receiver's office regarding amendments to draft documents		0.40				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Communications with Receiver regarding costs		0.30				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Review and amendment of documents for proceedings in South Florida District Court		0.50				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with Receiver		0.40				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with Clients as follow up		0.40				

50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	1.00	725.00	725.00	272.73	272.73
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal calls re next steps and priorities on matter.		0.20				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with RC re Harneys correspondence and other matters.		0.30				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with client to advise on matters arising in Cayman Proceedings		0.30				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Correspondence with regulator		0.10				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal email re email from Receiver		0.10				
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails of instructions from Receiver in connection with redemptions.	USD	2.10	850.00	1,785.00	725.00	1,522.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails with FS and JC re fund operations	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails with JC re strategy for proceedings	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails with client regarding regulatory issues	USD	0.10	850.00	85.00	725.00	72.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Email from Receiver in connection with proceedings before South Florida District Court	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Further emails from Receiver in connection with proceedings before South Florida District Court	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails with CH and Receiver in respect of issues arising in Cayman	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Considerations and review of documents relating to proceedings in Cayman	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails and call with JC re documents relating to proceedings in Cayman	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Emails with Receiver in connection with proceedings in Cayman	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Review and consideration of draft documents required in Cayman Proceedings	USD	1.50	850.00	1,275.00	725.00	1,087.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Review and consideration of draft documents required in Cayman Proceedings	USD	0.10	850.00	85.00	725.00	72.50
50000764.0001	2020-05-18	Cecere, Rocco	Cayman Islands - General Litigation	Call with NB to discuss constitutional documents and next steps required in Cayman proceedings	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-18	White, Genevieve	Cayman Islands - General Litigation	Identifying documents required to be filed with CIMA in relation to TCA entities and updating RC	USD	0.50	600.00	300.00	225.72	112.86
50000764.0001	2020-05-18	White, Genevieve	Cayman Islands - General Litigation	Preparation of draft documents required in Cayman proceedings	USD	0.80	600.00	480.00	225.71	180.57
50000764.0001	2020-05-18	Sbaiti, Farrah	Cayman Islands - General Litigation	Drafting documents	USD	0.50	675.00	337.50	244.52	122.26

50000764.0001	2020-05-18	Sbaiti, Farrah	Cayman Islands - General Litigation	Looking up various points in documents received for JC/RC in preparing documents	USD	0.70	675.00	472.50	244.51	171.16
50000764.0001	2020-05-18	Colegate, Jennifer	Cayman Islands - General Litigation		USD	9.10	750.00	6,825.00	253.93	2,310.72
50000764.0001	2020-05-18	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing documents; discussions with NB		2.50				
50000764.0001	2020-05-18	Colegate, Jennifer	Cayman Islands - General Litigation	Update calls with RC; team briefing call with FS, GW, SL and RC		1.00				
50000764.0001	2020-05-18	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting required documents		1.10				
50000764.0001	2020-05-18	Colegate, Jennifer	Cayman Islands - General Litigation	Finalising required documents		0.90				
50000764.0001	2020-05-18	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing and consideration relevant case law		2.20				
50000764.0001	2020-05-18	Colegate, Jennifer	Cayman Islands - General Litigation	Considering provisions in LPA and discussing with FS		0.80				
50000764.0001	2020-05-18	Colegate, Jennifer	Cayman Islands - General Litigation	Discussion with RC re comments on draft of required documents		0.60				
50000764.0001	2020-05-18	Bell, Natalie	Cayman Islands - General Litigation		USD	3.40	700.00	2,380.00	244.52	831.37
50000764.0001	2020-05-18	Bell, Natalie	Cayman Islands - General Litigation	Call with RC		0.20				
50000764.0001	2020-05-18	Bell, Natalie	Cayman Islands - General Litigation	Reviewing documents		0.60				
50000764.0001	2020-05-18	Bell, Natalie	Cayman Islands - General Litigation	Drafting required documents		0.50				
50000764.0001	2020-05-18	Bell, Natalie	Cayman Islands - General Litigation	Drafting required documents		0.40				
50000764.0001	2020-05-18	Bell, Natalie	Cayman Islands - General Litigation	Call with JC regarding provisions under the LPAs. Reviewing notice of suspension.		0.40				
50000764.0001	2020-05-18	Bell, Natalie	Cayman Islands - General Litigation	Call with SL and RC to discuss drafts of required documents		0.40				
50000764.0001	2020-05-18	Bell, Natalie	Cayman Islands - General Litigation	Email to team regarding provisions of the Master Fund LPA		0.50				
50000764.0001	2020-05-18	Bell, Natalie	Cayman Islands - General Litigation	Call with JC. Drafting and amending drafts of required documents		0.40				

50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	5.00	725.00	3,625.00	272.73	1,363.67
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Considering general strategy. Calls with CH and JP.		0.40				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Calls with RC re: proceedings status and issues for consideration		0.80				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Emails from Receiver regarding Nevada intermediary and regulatory issues		0.40				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Email in from Receiver's office attaching various documents and circulate.		0.30				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Emails in from Receiver's office attaching further constitutional documents and circulate.		0.30				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Reviewing draft response to Harneys and suggesting amendments.		0.60				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Email from Receiver and internal discussions with RC in connection with correspondence with Harneys		0.40				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Emails in from Receiver's office regarding correspondence with Harneys		0.40				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Phone attendance with Collas Crill team to discuss plan of action, priorities and next steps today.		0.60				
50000764.0001	2020-05-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Email communications and call with Receiver's team in connection with mechanics of the TCA Fund.		0.80				
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing documents comprising Nevada contribution set - recording separate docs and updating in spreadsheet	USD	0.20	675.00	135.00	244.50	48.90
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Review of company documents	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Revise letter to Harneys and email with Receiver re same.	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Email from Receiver regarding financial position of Fund	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-19	White, Genevieve	Cayman Islands - General Litigation	Preparing list of outstanding documents list and email FS	USD	0.40	600.00	240.00	225.70	90.28
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Amending email to client requesting documents	USD	0.30	675.00	202.50	244.53	73.36
50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing corporate fund documentation	USD	0.60	750.00	450.00	253.93	152.35
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Correspondence with regulator	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Communications with regulators	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Preparation of Cayman strategy	USD	0.80	850.00	680.00	725.00	580.00

50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Revise draft email re outstanding documents from clients and emails re same.	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-19	White, Genevieve	Cayman Islands - General Litigation	Updating TCA workstream spreadsheet	USD	0.40	600.00	240.00	225.70	90.28
50000764.0001	2020-05-19	White, Genevieve	Cayman Islands - General Litigation	Telephone attendance with JC in relation to review fund financials and updating documents	USD	0.10	600.00	60.00	225.70	22.57
50000764.0001	2020-05-19	White, Genevieve	Cayman Islands - General Litigation	Attendance with SL, RC, FS and JC in relation to next steps and current status	USD	0.30	600.00	180.00	225.70	67.71
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing Nevada documents and internal email to JC re same	USD	0.40	675.00	270.00	244.53	97.81
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Zoom meeting to discuss strategy	USD	0.40	675.00	270.00	244.53	97.81
50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation		USD	3.20	750.00	2,100.00	253.93	710.99
50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation	Team strategy call with SL, RC and NB		0.40				
50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation	Follow up call regarding outstanding corporate governance issues		0.50				
50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation	Follow up with RC regarding fund documentation		0.90				
50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation	Discussion of relevant case law		1.40				
50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation	Team briefing call	USD	0.80	750.00	600.00	253.93	203.14
50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation	Liaising with FS and GW re documents received	USD	0.40	750.00	300.00	253.93	101.57
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Email from Receiver regarding questions of Cayman law	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL, JC and NB re procedural and litigation strategy	USD	3.00	850.00	2,550.00	725.00	2,175.00
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Calls with FS regarding relevant issues of Cayman law	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Review of draft required documents; email to team re urgent next steps	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Review and commenting on draft documents required in Cayman Proceedings	USD	0.90	850.00	765.00	725.00	652.50
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Communications regarding point of Cayman law.	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Preparation of advice to Receiver on issues of Cayman law	USD	0.70	850.00	595.00	725.00	507.50
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Review and revise draft documentation	USD	0.40	850.00	340.00	725.00	290.00

50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Revision of draft documentation for Cayman proceedings.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation		USD	1.50	850.00	1,275.00	725.00	1,087.50
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Consideration of procedural and litigation strategy.		0.60				
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Consideration of relevant authorities		0.50				
50000764.0001	2020-05-19	Cecere, Rocco	Cayman Islands - General Litigation	Discussion with SL re same.		0.40				
50000764.0001	2020-05-19	White, Genevieve	Cayman Islands - General Litigation	Preparing documents required in Cayman Proceedings	USD	0.30	600.00	180.00	225.70	67.71
50000764.0001	2020-05-19	White, Genevieve	Cayman Islands - General Litigation	Review and consideration of draft documents	USD	1.80	600.00	1,080.00	225.71	406.28
50000764.0001	2020-05-19	White, Genevieve	Cayman Islands - General Litigation	Perusal of material in relation to financials of fund and preparation of documents	USD	0.50	600.00	300.00	225.72	112.86
50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting of required documents	USD	5.50	750.00	1,650.00	253.93	1,396.59
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation		USD	1.70	675.00	1,147.50	244.52	415.68
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Preparing list of information and documentation required from Receiver to advise		1.20				
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Drafting email to receiver regarding the same		0.50				
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing and update draft documents required	USD	0.70	675.00	472.50	244.51	171.16
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing and amending draft documents required for Cayman Proceedings	USD	0.50	675.00	337.50	244.52	122.26
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation		USD	3.90	675.00	2,632.50	244.52	953.63
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing and considering case law relevant to Cayman Proceedings		2.40				
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Considering relevant Cayman legislation.		0.60				
50000764.0001	2020-05-19	Sbaiti, Farrah	Cayman Islands - General Litigation	Considering GCR, CWR, FSD Guide.		0.90				
50000764.0001	2020-05-19	Bell, Natalie	Cayman Islands - General Litigation		USD	3.20	700.00	2,240.00	244.52	782.47
50000764.0001	2020-05-19	Bell, Natalie	Cayman Islands - General Litigation	Call with JC regarding corporate governance and regulatory issues		1.80				
50000764.0001	2020-05-19	Bell, Natalie	Cayman Islands - General Litigation	Reviewing terms in relation to contribution, call with SL and RC, call with SL, RC, JC regarding power and determining strategy. Further discussion with JC		1.40				

50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting required documents	USD	2.20	750.00	1,650.00	253.93	558.65
50000764.0001	2020-05-19	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing and considering relevant documents	USD	1.50	750.00	1,125.00	253.93	380.89
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	8.00	725.00	5,800.00	272.73	2,181.87
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal communications on legal issues and required next steps		0.40				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Review and consideration of draft documentation required in Cayman Proceedings		0.80				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal call regarding statutory provisions relevant to Cayman Proceedings		0.60				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Review and consideration of communications with regulators		0.90				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal emails regarding documents required in Cayman Proceedings		1.10				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Amendments to documents required in Cayman Proceedings		0.70				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of constitutional documents of Nevada Intermediary		0.50				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of email correspondence with regulators		0.40				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Discussions with Receiver regarding regulatory matters		0.60				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Email from Receiver steps relevant to Cayman proceedings		0.30				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal Emails to discuss steps relevant to Cayman proceedings		0.40				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Communications with receiver regarding financial position of the Fund		0.50				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Communications with Receiver regarding steps to be taken in Cayman		0.40				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal discussions re strategy		0.40				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	1.50	725.00	1,087.50	272.73	409.10
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Review and commenting on draft documents required in Cayman proceedings		0.60				
50000764.0001	2020-05-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Consideration of procedural and litigation strategy		0.90				
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Review draft list of documents for client and emails with JC re same.	USD	0.30	850.00	255.00	725.00	217.50

50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Discussions with SL regarding steps required in Cayman.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Emails in from client with update in US proceedings. Call with SL to discuss strategy and next steps.	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Calls SL re strategy and jurisdictional issues. Discussions re best procedural mechanism for potential proceedings	USD	0.70	850.00	595.00	725.00	507.50
50000764.0001	2020-05-20	White, Genevieve	Cayman Islands - General Litigation	Reviewing emails from US Counsel and SL in relation to current status of matter	USD	0.20	600.00	120.00	225.70	45.14
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL regarding issues arising in connection with Cayman Proceedings	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Calls and emails in relation to finalisation of draft documents required for Cayman proceedings	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Call with JC to discuss status of drafting documents and questions in respect of same.	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Review draft versions of documents and prepare priority for next steps.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Review draft documents and emails re same.	USD	0.70	850.00	595.00	725.00	507.50
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Further review of documents required for Cayman Proceedings	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Emails regarding revisions to relevant provisions of laws relevant to Cayman Proceedings	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Considering and advising on issues of Cayman law	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Email circulating revised versions of draft documents and comments on same.	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-20	Cecere, Rocco	Cayman Islands - General Litigation	Revisions of documents required for Cayman Proceedings	USD	0.70	850.00	595.00	725.00	507.50
50000764.0001	2020-05-20	Colegate, Jennifer	Cayman Islands - General Litigation	Discussion with RC regarding relevant case law	USD	0.30	750.00	225.00	253.93	76.18
50000764.0001	2020-05-20	Sbaiti, Farrah	Cayman Islands - General Litigation	Research and consideration of relevant issues of Cayman law	USD	1.10	675.00	742.50	244.52	268.97
50000764.0001	2020-05-20	Colegate, Jennifer	Cayman Islands - General Litigation	Reading and considering relevant case law	USD	1.00	750.00	750.00	253.93	253.93
50000764.0001	2020-05-20	Sbaiti, Farrah	Cayman Islands - General Litigation	Liaising with RC in connection with Cayman Proceedings	USD	0.30	675.00	202.50	244.53	73.36
50000764.0001	2020-05-20	Sbaiti, Farrah	Cayman Islands - General Litigation	Consideration of legislative background to laws relevant to Cayman proceedings	USD	0.40	675.00	270.00	244.53	97.81

50000764.0001	2020-05-20	Bell, Natalie	Cayman Islands - General Litigation		USD	3.30	700.00	2,310.00	244.52	806.92
50000764.0001	2020-05-20	Bell, Natalie	Cayman Islands - General Litigation	Responding to regulatory law queries		0.90				
50000764.0001	2020-05-20	Bell, Natalie	Cayman Islands - General Litigation	Checking and referencing relevant statutory provisions		0.80				
50000764.0001	2020-05-20	Bell, Natalie	Cayman Islands - General Litigation	Call with SL and RC		0.60				
50000764.0001	2020-05-20	Bell, Natalie	Cayman Islands - General Litigation	Reviewing draft documents required in Cayman Proceedings		1.00				
50000764.0001	2020-05-20	Colegate, Jennifer	Cayman Islands - General Litigation		USD	4.30	750.00	3,225.00	253.93	1,091.88
50000764.0001	2020-05-20	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting documents relevant to Cayman Proceedings		2.80				
50000764.0001	2020-05-20	Colegate, Jennifer	Cayman Islands - General Litigation	Ongoing discussions with team regarding Cayman Proceedings		0.60				
50000764.0001	2020-05-20	Colegate, Jennifer	Cayman Islands - General Litigation	Discussions with NB re operative provisions of fund documentation		0.90				
50000764.0001	2020-05-20	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	5.00	725.00	3,625.00	272.73	1,363.67
50000764.0001	2020-05-20	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal discussions re strategy and potential steps in both Cayman and US.		0.80				
50000764.0001	2020-05-20	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal discussion re preparation of further documents and revision of existing docs		0.30				
50000764.0001	2020-05-20	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of draft documents required for Cayman proceedings		0.40				
50000764.0001	2020-05-20	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal call re strategy and requirement of Cayman proceedings		1.00				
50000764.0001	2020-05-20	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal call to discuss drafting of documents		1.00				
50000764.0001	2020-05-20	Leontsinis, Stephen	Cayman Islands - General Litigation	Review and discussion of documents required for Cayman proceedings		0.80				
50000764.0001	2020-05-20	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of relevant authorities for Cayman Proceedings		0.70				
50000764.0001	2020-05-20	Leontsinis, Stephen	Cayman Islands - General Litigation	Email with Client re statutory construction point in respect of ELP law.	USD	1.00	725.00	725.00	272.70	272.70

50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Discussions with team in relation to operation and construction of constitutional documents	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-21	Sbaiti, Farrah	Cayman Islands - General Litigation	T/C with RC re directory of service providers	USD	0.10	675.00	67.50	650.00	65.00
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL to discuss approach to Receiver call, call with Chip and SL to discuss developments and impact on Cayman strategy.	USD	0.70	850.00	595.00	725.00	507.50
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Call with JC to discuss urgent questions in relation to documentation	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Review and revise memorandum of advice.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Review and revise memorandum of advice.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Drafting action plan for next steps. and discussions re same, including reviewing relevant underlying materials. Emails and revise. Email to JC with final comments	USD	1.50	850.00	1,275.00	725.00	1,087.50
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Revising and amending documents required in connection with Cayman Proceedings	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Emails re: update on English structure and impact on Cayman Proceedings	USD	0.10	850.00	85.00	725.00	72.50
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation		USD	1.65	1,000.00	1,650.00	675.00	1,113.75
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation	Assessment of TCA redemption process		1.15				
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation	Discussion with NB and RC		0.50				
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation		USD	3.75	1,000.00	3,750.00	675.00	2,531.25
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation	Consideration and drafting of issues arising under Cayman law		1.70				
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing constitutional documents of Nevada Intermediary		2.05				
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Call with Receiver to discuss strategy	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Consideration of option and strategies re Cayman Proceedings.	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Emails Harneys.	USD	0.10	850.00	85.00	725.00	72.50

50000764.0001	2020-05-21	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	2.20	725.00	1,595.00	725.00	1,595.00
50000764.0001	2020-05-21	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal discussions regarding outstanding Cayman legal issues		0.20				
50000764.0001	2020-05-21	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with Receiver re Cayman strategy		0.20				
50000764.0001	2020-05-21	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with Receiver to discuss plan in Cayman		0.40				
50000764.0001	2020-05-21	Leontsinis, Stephen	Cayman Islands - General Litigation	Meeting with EY/Harneys		0.60				
50000764.0001	2020-05-21	Leontsinis, Stephen	Cayman Islands - General Litigation	Consideration of options and Internal calls regarding Cayman strategy		0.40				
50000764.0001	2020-05-21	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with client to discuss English structure and impact on Cayman strategy		0.20				
50000764.0001	2020-05-21	Leontsinis, Stephen	Cayman Islands - General Litigation	Client call		0.20				
50000764.0001	2020-05-21	Sbaiti, Farrah	Cayman Islands - General Litigation	Internal email re documents	USD	0.10	675.00	67.50	650.00	65.00
50000764.0001	2020-05-21	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing documents on file	USD	1.50	675.00	1,012.50	650.00	975.00
50000764.0001	2020-05-21	Sbaiti, Farrah	Cayman Islands - General Litigation	Liaising with CCCS re CORIS search for all 4 TCA Cayman entities; internal emails	USD	0.20	675.00	135.00	650.00	130.00
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Emails from Receiver with a number of queries in respect to next steps.	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Emails regarding document collection process	USD	0.10	850.00	85.00	725.00	72.50
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Emails Receiver's office re: requests and approaches made.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-21	Leontsinis, Stephen	Cayman Islands - General Litigation	Considering and amending JC's email addressing relevant points of Cayman law. Emails re: update on English structure and impact in Cayman.	USD	1.00	725.00	725.00	725.00	725.00
50000764.0001	2020-05-21	White, Genevieve	Cayman Islands - General Litigation	File management of documents and folder of all TCA documents	USD	1.00	1,200.00	1,200.00	600.00	600.00
50000764.0001	2020-05-21	Cecere, Rocco	Cayman Islands - General Litigation	Further discussions with SL re legal issues and further call with Receiver's office.	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation		USD	2.75	1,500.00	4,125.00	675.00	1,856.25
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation	Doc preparation, instructing and liaising with FS and GW team update call		0.40				
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation	Revising and amending documents required in connection with Cayman Proceedings		0.40				
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation	Considering relevant decisions of Cayman law		1.30				
50000764.0001	2020-05-21	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing docs received and required list		0.65				

50000764.0001	2020-05-22	Bell, Natalie	Cayman Islands - General Litigation		USD	5.10	700.00	3,570.00	650.00	3,315.00
50000764.0001	2020-05-22	Bell, Natalie	Cayman Islands - General Litigation	Memo on issues relating to structure of TCA Fund		1.80				
50000764.0001	2020-05-22	Bell, Natalie	Cayman Islands - General Litigation	Reviewing fund contract documents		2.50				
50000764.0001	2020-05-22	Bell, Natalie	Cayman Islands - General Litigation	Preparation of advice on Cayman law		0.80				
50000764.0001	2020-05-22	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting letter of request for documents and information	USD	0.50	750.00	375.00	675.00	337.50
50000764.0001	2020-05-22	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL to discuss strategy	USD	1.20	850.00	1,020.00	725.00	870.00
50000764.0001	2020-05-22	Cecere, Rocco	Cayman Islands - General Litigation	Attendance on call with client to discuss matters including next steps to be taken to collect in assets and information and documents.	USD	1.30	850.00	1,105.00	725.00	942.50
50000764.0001	2020-05-22	Cecere, Rocco	Cayman Islands - General Litigation	Settling letters to regulator and settling letters for document collection process	USD	0.50	850.00	425.00	725.00	362.50
50000764.0001	2020-05-22	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL to discuss priorities, next steps and strategy.	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-22	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	3.00	725.00	2,175.00	725.00	2,175.00
50000764.0001	2020-05-22	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal call to discuss next steps and strategy		0.90				
50000764.0001	2020-05-22	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal discussions regarding issues of Cayman law and development of Cayman Strategy		0.40				
50000764.0001	2020-05-22	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with RC to discuss strategy and preparing post-call discussions and preparation of brief summary and email to clients		0.90				
50000764.0001	2020-05-22	Leontsinis, Stephen	Cayman Islands - General Litigation	Attendance of call with client in connection with Cayman strategy		0.80				
50000764.0001	2020-05-22	White, Genevieve	Cayman Islands - General Litigation	Working with AC and FS to filing, review documents and document transferring	USD	1.25	1,200.00	1,500.00	600.00	750.00
50000764.0001	2020-05-22	Colegate, Jennifer	Cayman Islands - General Litigation	Consideration of relevant authorities on issues of Cayman law	USD	1.30	750.00	975.00	675.00	877.50
50000764.0001	2020-05-22	Cecere, Rocco	Cayman Islands - General Litigation	Discussions with JC re issues of Cayman law	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-23	Cecere, Rocco	Cayman Islands - General Litigation	Draft email setting out next steps in relation to collection of assets and information for team prioritising urgent requests and phone attendance with JC re same.	USD	0.80	850.00	680.00	725.00	580.00
50000764.0001	2020-05-23	White, Genevieve	Cayman Islands - General Litigation	Preparing tabular action plan	USD	1.50	600.00	900.00	600.00	900.00
50000764.0001	2020-05-23	Sbaiti, Farrah	Cayman Islands - General Litigation		USD	1.40	675.00	945.00	650.00	910.00
50000764.0001	2020-05-23	Sbaiti, Farrah	Cayman Islands - General Litigation	Drafting letter of request for documents		0.90				
50000764.0001	2020-05-23	Sbaiti, Farrah	Cayman Islands - General Litigation	Drafting letter of request for documents		0.50				

50000764.0001	2020-05-23	Colegate, Jennifer	Cayman Islands - General Litigation		USD	4.50	750.00	3,375.00	675.00	3,037.50
50000764.0001	2020-05-23	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing and amending draft letters		2.20				
50000764.0001	2020-05-23	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting letter for documents		0.70				
50000764.0001	2020-05-23	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting covering email to receiver		1.60				
50000764.0001	2020-05-23	Cecere, Rocco	Cayman Islands - General Litigation	Email with CH updating.	USD	0.10	850.00	85.00	725.00	72.50
50000764.0001	2020-05-24	White, Genevieve	Cayman Islands - General Litigation	Preparation of letters for document collection process	USD	0.70	600.00	420.00	600.00	420.00
50000764.0001	2020-05-24	White, Genevieve	Cayman Islands - General Litigation	Preparation of letters for document collection process	USD	1.20	600.00	720.00	600.00	720.00
50000764.0001	2020-05-24	White, Genevieve	Cayman Islands - General Litigation	Amending letter further following comments from JC and FS	USD	0.40	600.00	240.00	600.00	240.00
50000764.0001	2020-05-24	White, Genevieve	Cayman Islands - General Litigation	Amending letter further following comments from JC and FS	USD	0.30	600.00	180.00	600.00	180.00
50000764.0001	2020-05-24	Colegate, Jennifer	Cayman Islands - General Litigation		USD	1.50	750.00	1,125.00	675.00	1,012.50
50000764.0001	2020-05-24	Colegate, Jennifer	Cayman Islands - General Litigation	Draft covering email to Receiver		0.50				
50000764.0001	2020-05-24	Colegate, Jennifer	Cayman Islands - General Litigation	Draft letter to IM		0.40				
50000764.0001	2020-05-24	Colegate, Jennifer	Cayman Islands - General Litigation	Considering revised draft to other Service providers		0.50				
50000764.0001	2020-05-24	Colegate, Jennifer	Cayman Islands - General Litigation	Sending to FS and GW to show changes and check document request references		0.10				
50000764.0001	2020-05-24	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing revised letters of request for document collection	USD	0.90	675.00	607.50	650.00	585.00
50000764.0001	2020-05-24	Colegate, Jennifer	Cayman Islands - General Litigation	Working up revisions to service provider letters.	USD	1.00	750.00	750.00	675.00	675.00
50000764.0001	2020-05-24	Colegate, Jennifer	Cayman Islands - General Litigation	Revisions to letters of request for document collection	USD	0.30	750.00	225.00	675.00	202.50
50000764.0001	2020-05-24	Cecere, Rocco	Cayman Islands - General Litigation	Reviewing and revising letters to banks and service providers. Emails and call JC re: same.	USD	0.80	850.00	680.00	725.00	580.00
50000764.0001	2020-05-24	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of action plan. Review of letters. Emails to and from JC.	USD	1.50	900.00	1,350.00	900.00	1,350.00
50000764.0001	2020-05-24	White, Genevieve	Cayman Islands - General Litigation	Amending action plan following comments from JC	USD	0.60	600.00	360.00	600.00	360.00
50000764.0001	2020-05-24	Cecere, Rocco	Cayman Islands - General Litigation	Emails IS re: website and investor communication and revise same.	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-25	Cecere, Rocco	Cayman Islands - General Litigation	Finalising letters of request for document collection. Email communications to Receiver re same.	USD	1.10	850.00	935.00	725.00	797.50

50000764.0001	2020-05-25	Sbaiti, Farrah	Cayman Islands - General Litigation	Revising letters of request for document collection per RC comments.	USD	1.20	675.00	810.00	650.00	780.00
50000764.0001	2020-05-25	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing and sending letters for document collection to SL for sign off	USD	1.00	750.00	750.00	675.00	675.00
50000764.0001	2020-05-25	Sbaiti, Farrah	Cayman Islands - General Litigation	Amending letter as per NB's email - adding two classes of docs	USD	0.10	675.00	67.50	650.00	65.00
50000764.0001	2020-05-25	Cecere, Rocco	Cayman Islands - General Litigation	Email to JC re. Call JC.	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-25	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL re: status of workstreams, note requested by receiver.	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-25	Cecere, Rocco	Cayman Islands - General Litigation	Call SL to discuss material and next steps, and impact on document collection process.	USD	0.40	850.00	340.00	725.00	290.00
50000764.0001	2020-05-25	Cecere, Rocco	Cayman Islands - General Litigation	Call with receiver re: collection of assets and documents, priorities.	USD	0.80	850.00	680.00	725.00	580.00
50000764.0001	2020-05-25	Cecere, Rocco	Cayman Islands - General Litigation	Email from Receiver's team re document and materials for review	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-25	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	4.20	900.00	3,780.00	900.00	3,780.00
50000764.0001	2020-05-25	Leontsinis, Stephen	Cayman Islands - General Litigation	Considering and amending letters to stakeholders.		0.90				
50000764.0001	2020-05-25	Leontsinis, Stephen	Cayman Islands - General Litigation	4 x calls with RC regarding various aspects of receivership in Cayman.		1.00				
50000764.0001	2020-05-25	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with Receiver's team.		1.10				
50000764.0001	2020-05-25	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with RC regarding terms of advice to receiver		1.20				
50000764.0001	2020-05-25	Cecere, Rocco	Cayman Islands - General Litigation	Email re: relevant legal authorities	USD	0.20	850.00	170.00	725.00	145.00
50000764.0001	2020-05-25	Cecere, Rocco	Cayman Islands - General Litigation	Drafting memorandum to receiver on matters related to Cayman Proceedings	USD	1.50	850.00	1,275.00	725.00	1,087.50
50000764.0001	2020-05-25	Cecere, Rocco	Cayman Islands - General Litigation	Communication from Receiver's team relating to issues related to Cayman Proceedings.	USD	0.30	850.00	255.00	725.00	217.50
50000764.0001	2020-05-26	Cecere, Rocco	Cayman Islands - General Litigation	Call with JC to discuss relevant issues of Cayman law and correspondence for document collection process.	USD	0.30	850.00	255.00	850.00	255.00
50000764.0001	2020-05-26	Colegate, Jennifer	Cayman Islands - General Litigation	Discussion with RC on current workstreams: correspondence regarding document collection. Discussion of cases on relevant points of Cayman law.	USD	0.60	750.00	450.00	675.00	405.00
50000764.0001	2020-05-26	Colegate, Jennifer	Cayman Islands - General Litigation	exchanges and instructions with AC re correspondence for document collection process.	USD	0.30	750.00	225.00	675.00	202.50
50000764.0001	2020-05-26	Cecere, Rocco	Cayman Islands - General Litigation	Email re: administrator contact.	USD	0.10	850.00	85.00	850.00	85.00
50000764.0001	2020-05-26	Cecere, Rocco	Cayman Islands - General Litigation	Settling letter to bank and emails re: same.	USD	0.30	850.00	255.00	850.00	255.00
50000764.0001	2020-05-26	Cecere, Rocco	Cayman Islands - General Litigation	Review and amendment of letters of request for documents	USD	1.80	850.00	1,530.00	850.00	1,530.00

50000764.0001	2020-05-26	Cecere, Rocco	Cayman Islands - General Litigation	Revising cover email to client.	USD	0.20	850.00	170.00	850.00	170.00
50000764.0001	2020-05-26	Cecere, Rocco	Cayman Islands - General Litigation	Call with JC re document collection process.	USD	0.30	850.00	255.00	850.00	255.00
50000764.0001	2020-05-26	Cecere, Rocco	Cayman Islands - General Litigation	Settling letters.	USD	0.50	850.00	425.00	850.00	425.00
50000764.0001	2020-05-26	Colegate, Jennifer	Cayman Islands - General Litigation	Review and issuing letters for requests for documents	USD	2.20	675.00	1,485.00	675.00	1,485.00
50000764.0001	2020-05-26	Cecere, Rocco	Cayman Islands - General Litigation	Settling email addressing issues of Cayman law	USD	1.20	850.00	1,020.00	725.00	870.00
50000764.0001	2020-05-26	Cecere, Rocco	Cayman Islands - General Litigation	Email of questions regarding matters of Cayman law	USD	0.30	850.00	255.00	850.00	255.00
50000764.0001	2020-05-26	Cecere, Rocco	Cayman Islands - General Litigation	Revision of communication to Receiver regarding issues of Cayman law.	USD	0.60	850.00	510.00	725.00	435.00
50000764.0001	2020-05-26	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	3.00	725.00	2,175.00	725.00	2,175.00
50000764.0001	2020-05-26	Leontsinis, Stephen	Cayman Islands - General Litigation	Review and amendment of advice to Receiver on relevant issues of Cayman law		1.20				
50000764.0001	2020-05-26	Leontsinis, Stephen	Cayman Islands - General Litigation	Amendment of cover letter to receiver attaching documents requests.		0.40				
50000764.0001	2020-05-26	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of correspondence		0.30				
50000764.0001	2020-05-26	Leontsinis, Stephen	Cayman Islands - General Litigation	Communications with Receiver of relevant points of Cayman law		1.10				
50000764.0001	2020-05-27	Cecere, Rocco	Cayman Islands - General Litigation	Draft email to Harneys and email to client seeking instructions.	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-05-27	Cecere, Rocco	Cayman Islands - General Litigation	Telephone attendance re priorities and next steps in relation to Cayman Islands strategy, contacting Harneys and other matters.	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-05-27	Cecere, Rocco	Cayman Islands - General Litigation	Telephone attendance on Receiver and Irina re investor communications and letters for document requests and emails with SL re same.	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-05-27	Cecere, Rocco	Cayman Islands - General Litigation	Email in Receiver re: administrator mailer.	USD	0.10	725.00	72.50	725.00	72.50

50000764.0001	2020-05-27	Cecere, Rocco	Cayman Islands - General Litigation	Further emails from Receiver regarding communications with investors	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-05-27	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL to discuss current status of various workstreams, issues and potential to broaden document request.	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	4.80	725.00	3,480.00	725.00	3,480.00
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal call re next steps		0.30				
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of draft letters of request for sign off		0.50				
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal call regarding letters of request for documents		0.40				
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation	Amendment of letter of request for documents		0.30				
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal call regarding corporate regulatory issues		0.50				
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of drafts for Cayman Proceedings		0.60				
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation	Discussion with RC re Cayman Proceedings		0.30				
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with receiver in connection with Cayman Proceedings		0.70				
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation	Considerations of legal issues		0.80				
50000764.0001	2020-05-27	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal discussions re next steps		0.40				
50000764.0001	2020-05-27	Cecere, Rocco	Cayman Islands - General Litigation	Review relevant legislative provisions and applicable case law	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-05-28	Cecere, Rocco	Cayman Islands - General Litigation	Emails client and JC re template and historical protocols.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-05-28	Cecere, Rocco	Cayman Islands - General Litigation	Email from Receiver regarding terms of document requests to service providers of the Fund.	USD	1.00	725.00	725.00	725.00	725.00
50000764.0001	2020-05-29	Cecere, Rocco	Cayman Islands - General Litigation	Matter engagement and invoicing issues. Emails to clients re: same.	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-05-29	Colegate, Jennifer	Cayman Islands - General Litigation	Correspondence with RC re Service Provider letters and protocol drafts	USD	0.30	675.00	202.50	675.00	202.50
						315.50		**242,827.50**		**151,801.25**

COLLAS·CRILL

INVOICE SUMMARY OF PROFESSIONALS

Jonathan E. Perlman, Receiver
Genovese, Joblove & Battista
100 SE 2nd Street, Suite 4400
Miami, FL 33131

Invoice Number: BNC1-0004461
Date: 30 June 2020
Matter No: 50000764.0001

Re: TCA Fund Management Group Corp
Case No. 1:20-cv-21964-CMA

For Professional Services Rendered May 29 to June 29, 2020

Professional	Initials	Position	Experience	Hours	Rate	Fees
Stephen Leontsinis	SL	Partner	17 years	40.90	$725.00	$29,652.50
Rocco Cecere	RC	Partner	17 years	82.70	$725.00	$58,725.00
Jennifer Colegate	JC	Counsel	14 years	23.10	$675.00	$15,592.50
Farrah Sbaiti	FS	Senior Associate	11 years	6.10	$650.00	$3,965.00
Rupert Stanning	RS	Senior Associate	10 years	0.80	$650.00	$520.00
Genevieve White	GW	Associate	3 years	15.10	$600.00	$9,060.00
Blended Average Hourly Rate						**$670.83**
Total Hours						**168.70**
Total Fees						**$117,515.00**

COLLAS·CRILL

Invoice

Perlman, Jonathan E.
100 S.E. Second Street, 44th Floor
Miami
FL
33131
United States

Invoice date	30/06/2020
Invoice number	BNC1-0004461
Invoice currency	USD
Our reference	50000764.0001
Your reference	

Details	Fees	Disbursements
Re: TCA Group receivership **Professional services rendered in relation to the above matter**	117,515.00	
Totals	**117,515.00**	**0.00**

Please see overleaf for payment details.

Invoice payable within 14 days.

	Total Charge
USD	**117,515.00**

With Compliments

All services detailed on our invoice have been performed outside the United States of America.

Floor 2, Willow House, Cricket Square, PO Box 709, Grand Cayman KY1-1107, Cayman Islands
T: +1 345 949 4544 F: +1 345 949 8460 E: cayman@collascrill.com
A Cayman Partnership. A list of partners is available at the above address.

COLLAS·CRILL

WIRE TRANSFER DETAILS
UNITED STATES DOLLARS

IMPORTANT

All transfers must be routed through Scotiabank (Cayman Islands) Ltd.'s account with JP Morgan Chase Bank, New York, USA, for further credit to our US$ Client Account in Grand Cayman. In order to ensure your payment is successfully routed, it is important to ensure that all information set out below is clearly stated on the wire transfer instructions you provide to your bank.

Remit to:	JP MORGAN CHASE BANK N.A. 270 PARK AVENUE NEW YORK, NEW YORK 10017
SWIFT BIC:	CHASUS33
CHIPS ABA:	0002
FEDWIRE ABA:	021000021
To credit:	SCOTIABANK & TRUST (CAYMAN) LTD. GRAND CAYMAN CAYMAN ISLANDS
SWIFT BIC:	NOSCKYKX
For further credit to:	COLLAS CRILL
ACCOUNT NUMBER:	1048112
SENDER TO RECEIVER INFO:	REF: **[ATTORNEY]/[REFERENCE # NOTED ON OUTSTANDING INVOICE]** INVOICE NOs: **[INVOICE # NOTED ON OUTSTANDING INVOICE]**

Please Note:
The sender is responsible for all (sender and receiver) bank charges incurred in wiring funds. Please add all bank processing charges in order that the net amount we receive is the exact amount indicated on our Invoice.

All invoices are payable within 14 days of presentation. Interest at a rate of 3% above the base-lending rate of the Royal Bank of Scotland plc may be charged, at our discretion, on unpaid invoices.
Thank you

Floor 2, Willow House, Cricket Square, PO Box 709, Grand Cayman KY1-1107, Cayman Islands
T: +1 345 949 4544 F: +1 345 949 8460 E: cayman@collascrill.com
A Cayman Partnership. A list of partners is available at the above address.

Matter ID	Matter date	Fee earner	SEC Activity Category	Narrative	Contract currency	Hours	Original charge rate	Original time value (contract currency)	Effective charge rate	Amount invoiced (contract currency)
50000764.0001	2020-05-29	Colegate, Jennifer	Cayman Islands - General Litigation	Finalising and issuing correspondence to thrid party service providers requesting disclosure of documents	USD	0.80	675.00	540.00	675.00	540.00
50000764.0001	2020-05-29	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver on issues of Cayman law	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-05-29	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver re requests for information	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-05-29	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	2.30	725.00	1,667.50	725.00	1,667.50
50000764.0001	2020-05-29	Leontsinis, Stephen	Cayman Islands - General Litigation	Reviewing and commenting on correspondence to third party service providers. Discussions with RC and JC re same.		0.90				
50000764.0001	2020-05-29	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of emails from Receiver.		0.60				
50000764.0001	2020-05-29	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with RC. Call with CH.		0.80				
50000764.0001	2020-05-29	Cecere, Rocco	Cayman Islands - General Litigation	Emails regarding protocols between Receiver and Feeder Ltd JOLs.	USD	0.10	0.00	0.00	725.00	72.50
50000764.0001	2020-05-29	Cecere, Rocco	Cayman Islands - General Litigation	Drafting letter to Receiver regarding invoice requirements. Internal emails regarding the same.	USD	1.20	725.00	870.00	0.00	0.00
50000764.0001	2020-05-29	Cecere, Rocco	Cayman Islands - General Litigation	Further emails with SL regarding invoicing requirements	USD	0.50	725.00	362.50	0.00	0.00
50000764.0001	2020-06-01	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	1.90	725.00	1,377.50	725.00	1,377.50
50000764.0001	2020-06-01	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with RC and CH re administrative terms with EY.		1.10				
50000764.0001	2020-06-01	Leontsinis, Stephen	Cayman Islands - General Litigation	Strategy discussions with RC in connection with document collections from third parties		0.80				
50000764.0001	2020-06-01	Colegate, Jennifer	Cayman Islands - General Litigation	Call with Campbells Attorneys in connection with documentary request issued to TCA Fund auditor	USD	0.20	675.00	135.00	675.00	135.00
50000764.0001	2020-06-01	Colegate, Jennifer	Cayman Islands - General Litigation	Attendance note email to CC TCA team.	USD	0.20	675.00	135.00	675.00	135.00
50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Communications with CH and SL and Receiver.	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Email to client updating on communications with third parties in connection with documentary requests	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Call with M Goodman of Campbells Attorneys in connection with documentary requests	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Emails correspondence with Campbells Attorneys regarding document requests issued to TCA Fund auditor.	USD	0.40	725.00	290.00	725.00	290.00

50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Chip and SL	USD	0.80	725.00	580.00	725.00	580.00
50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver and JC regarding strategy in respect of Cayman issues	USD	0.80	725.00	580.00	725.00	580.00
50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Communications with SL and JC regarding document requests to third party service providers	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL to discuss strategy and next steps	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Call with Christian LaRoda-Thomas of Maples. Follow up email to Christian and updating email regarding requests for documents.	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-01	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	1.50	725.00	1,087.50	725.00	1,087.50
50000764.0001	2020-06-01	Leontsinis, Stephen	Cayman Islands - General Litigation	Communications with RC		0.75				
50000764.0001	2020-06-01	Leontsinis, Stephen	Cayman Islands - General Litigation	Consideration of strategy		0.30				
50000764.0001	2020-06-01	Leontsinis, Stephen	Cayman Islands - General Litigation	Calls with RC regarding strategy developments in Cayman		0.45				
50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver about next steps	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-01	Cecere, Rocco	Cayman Islands - General Litigation	Drafting note to Receiver	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-01	Colegate, Jennifer	Cayman Islands - General Litigation		USD	1.50	990.00	1,485.00	675.00	1,012.50
50000764.0001	2020-06-01	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing draft protocol documents		0.90				
50000764.0001	2020-06-01	Colegate, Jennifer	Cayman Islands - General Litigation	Consideration of strategy		0.60				
50000764.0001	2020-06-02	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	3.00	725.00	2,175.00	725.00	2,175.00
50000764.0001	2020-06-02	Leontsinis, Stephen	Cayman Islands - General Litigation	Case management. Call with Rocco Cecere re strategy.		0.75				
50000764.0001	2020-06-02	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of letters to third party service providers		0.30				
50000764.0001	2020-06-02	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with JC.		0.20				
50000764.0001	2020-06-02	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of correspondence from Press' attorney.		0.30				
50000764.0001	2020-06-02	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of constitutional documents.		0.80				
50000764.0001	2020-06-02	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of correspondence received from Receiver.		0.65				

50000764.0001	2020-06-02	Cecere, Rocco	Cayman Islands - General Litigation		USD	1.10	725.00	797.50	725.00	797.50
50000764.0001	2020-06-02	Cecere, Rocco	Cayman Islands - General Litigation	Drafting letter of authorisation for provision of documents from Cayman attornets to TCA Fund		0.55				
50000764.0001	2020-06-02	Cecere, Rocco	Cayman Islands - General Litigation	Drafting related communications with Maples and Receiver		0.55				
50000764.0001	2020-06-02	Cecere, Rocco	Cayman Islands - General Litigation	Receipt of documents from TCA Fund auditor. Drafting letter to former auditors of TCA Fund regarding provision of documents.	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-02	Cecere, Rocco	Cayman Islands - General Litigation	Receipt of further documents from TCA Fund auditors.	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-02	Cecere, Rocco	Cayman Islands - General Litigation	Drafting internal emails regarding collection of documents from aduditor / former auditor to TCA Fund and email to Client re same	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-02	Cecere, Rocco	Cayman Islands - General Litigation	Correspondence to registered office of TCA Fund in connection with document collection exercise; and update to client re same	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-02	Colegate, Jennifer	Cayman Islands - General Litigation		USD	1.00	675.00	675.00	675.00	675.00
50000764.0001	2020-06-02	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing of documents received in course of document collection exercise.		0.35				
50000764.0001	2020-06-02	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting communications to third party service provider regarding requests for documents.		0.65				
50000764.0001	2020-06-02	Cecere, Rocco	Cayman Islands - General Litigation	Email with I Sadovnic regarding communications with US attorney to Mr R Press	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-03	Cecere, Rocco	Cayman Islands - General Litigation	Correspondence from third party service provider regarding provision of materials and update to Receiver.	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-03	Colegate, Jennifer	Cayman Islands - General Litigation	Consideration of strategy	USD	0.50	675.00	337.50	675.00	337.50
50000764.0001	2020-06-03	Colegate, Jennifer	Cayman Islands - General Litigation	Communications with CIMA, drafting letter and CIMA documents	USD	0.40	675.00	270.00	675.00	270.00
50000764.0001	2020-06-03	Cecere, Rocco	Cayman Islands - General Litigation	Emails correspondence regarding disclosure of documents from third party service provider	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-03	Cecere, Rocco	Cayman Islands - General Litigation	Drafting memorandum for Receiver	USD	1.00	725.00	725.00	725.00	725.00
50000764.0001	2020-06-04	Cecere, Rocco	Cayman Islands - General Litigation	Receipt of documents from third party service provider following requests for documents.	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-04	Colegate, Jennifer	Cayman Islands - General Litigation	Communications with Receiver and internal discussions regarding strategy and next steps.	USD	0.50	675.00	337.50	675.00	337.50
50000764.0001	2020-06-04	Cecere, Rocco	Cayman Islands - General Litigation	Communications with client in connection with document collection exercise and information requests issued to bank in the jurisdiction.	USD	0.20	725.00	145.00	725.00	145.00

50000764.0001	2020-06-04	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in connection with requests issued to Cayman Banks.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-04	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in connection with document collection exercise.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-04	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	1.50	725.00	1,087.50	725.00	1,087.50
50000764.0001	2020-06-04	Leontsinis, Stephen	Cayman Islands - General Litigation	Discussions with RC about strategy and memo.		1.20				
50000764.0001	2020-06-04	Leontsinis, Stephen	Cayman Islands - General Litigation	Brief review of documents in from TCA Fund registered office		0.30				
50000764.0001	2020-06-04	Cecere, Rocco	Cayman Islands - General Litigation		USD	3.10	725.00	2,247.50	725.00	2,247.50
50000764.0001	2020-06-04	Cecere, Rocco	Cayman Islands - General Litigation	Revisions to memorandum for Receiver		2.70				
50000764.0001	2020-06-04	Cecere, Rocco	Cayman Islands - General Litigation	Internal communications regarding Cayman strategy		0.40				
50000764.0001	2020-06-04	Cecere, Rocco	Cayman Islands - General Litigation	Finalising memorandum for Receiver	USD	0.80	725.00	580.00	725.00	580.00
50000764.0001	2020-06-05	Cecere, Rocco	Cayman Islands - General Litigation	Communications with client regarding TCA Group Entities and structure	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-05	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	1.50	725.00	1,087.50	725.00	1,087.50
50000764.0001	2020-06-05	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of documents		1.20				
50000764.0001	2020-06-05	Leontsinis, Stephen	Cayman Islands - General Litigation	Discussions with R Cecere.		0.30				
50000764.0001	2020-06-05	Colegate, Jennifer	Cayman Islands - General Litigation	Consideration of memorandum to Receiver	USD	0.40	675.00	270.00	675.00	270.00
50000764.0001	2020-06-07	Cecere, Rocco	Cayman Islands - General Litigation	Considering issues relating to TCA Fund structure	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-07	Cecere, Rocco	Cayman Islands - General Litigation	Emails re strategy note and revisions to the same	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-07	Cecere, Rocco	Cayman Islands - General Litigation	Emails re: call on Tuesday.	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-07	Cecere, Rocco	Cayman Islands - General Litigation	Drafting email to Receiver in relation to Feeder Ltd meeting	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-07	Cecere, Rocco	Cayman Islands - General Litigation	Further communications with Receiver, emailing further in relation to investors	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-08	Sbaiti, Farrah	Cayman Islands - General Litigation	Internal communications regarding document review process	USD	0.60	650.00	390.00	650.00	390.00
50000764.0001	2020-06-08	White, Genevieve	Cayman Islands - General Litigation	Reviewing documents received from third party service providers	USD	0.50	600.00	300.00	600.00	300.00
50000764.0001	2020-06-08	Leontsinis, Stephen	Cayman Islands - General Litigation	Review and comment on memorandum of advice to Receiver	USD	1.50	725.00	1,087.50	725.00	1,087.50
50000764.0001	2020-06-08	Colegate, Jennifer	Cayman Islands - General Litigation	Call with SL and RC re strategy in receivership	USD	0.80	675.00	540.00	675.00	540.00

50000764.0001	2020-06-08	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL and JC to discuss strategy, call with Receiver.	USD	0.80	725.00	580.00	725.00	580.00
50000764.0001	2020-06-08	Cecere, Rocco	Cayman Islands - General Litigation	Drafting agenda for tomorrow's call, emails re: same.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-08	Cecere, Rocco	Cayman Islands - General Litigation	Reviewing documents provided by third party service provider. Email to JC re workstreams including status of document review	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-06-08	Colegate, Jennifer	Cayman Islands - General Litigation	Considering authorities on relevant legal issues under Cayman law	USD	1.60	675.00	1,080.00	675.00	1,080.00
50000764.0001	2020-06-08	Cecere, Rocco	Cayman Islands - General Litigation	Carrying out Court searches in connection with proceedings in Cayman	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-09	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing documents received from third party service providers	USD	0.30	650.00	195.00	650.00	195.00
50000764.0001	2020-06-09	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	3.50	725.00	2,537.50	725.00	2,537.50
50000764.0001	2020-06-09	Leontsinis, Stephen	Cayman Islands - General Litigation	Telephone calls with RC in preparation for call with Receiver.		0.40				
50000764.0001	2020-06-09	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of correspondence and notices with EY		0.60				
50000764.0001	2020-06-09	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with Receiver and team of advisors.		1.10				
50000764.0001	2020-06-09	Leontsinis, Stephen	Cayman Islands - General Litigation	Communications with Mark Bloom in connection with draft protocol		1.40				
50000764.0001	2020-06-09	Cecere, Rocco	Cayman Islands - General Litigation	Internal communications in connection with document collection exercise	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-09	Sbaiti, Farrah	Cayman Islands - General Litigation		USD	1.10	650.00	715.00	650.00	715.00
50000764.0001	2020-06-09	Sbaiti, Farrah	Cayman Islands - General Litigation	Discussing outstanding document review with JC;		0.40				
50000764.0001	2020-06-09	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing documents received from third parties		0.35				
50000764.0001	2020-06-09	Sbaiti, Farrah	Cayman Islands - General Litigation	internal note listing what we have not yet received		0.35				
50000764.0001	2020-06-09	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing documents provided by third party service provider	USD	1.50	675.00	1,012.50	675.00	1,012.50
50000764.0001	2020-06-09	Sbaiti, Farrah	Cayman Islands - General Litigation	Internal communications in connection with document collection exercise from third parties.	USD	0.10	650.00	65.00	650.00	65.00
50000764.0001	2020-06-09	Cecere, Rocco	Cayman Islands - General Litigation		USD	2.00	725.00	1,450.00	725.00	1,450.00
50000764.0001	2020-06-09	Cecere, Rocco	Cayman Islands - General Litigation	Preparation for and attendance on strategy call		1.40				
50000764.0001	2020-06-09	Cecere, Rocco	Cayman Islands - General Litigation	Post-call discussion with SL re next steps.		0.60				

50000764.0001	2020-06-09	Cecere, Rocco	Cayman Islands - General Litigation	Calls and emails to and from Harneys re attendance at liquidation committee meeting tomorrow and reporting back to clients.	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-09	Cecere, Rocco	Cayman Islands - General Litigation	Communications with client in connection with investor communications in connection with meeting.	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-09	Cecere, Rocco	Cayman Islands - General Litigation	Communications with client in connection with document collection exercise from third party service providers	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-09	Colegate, Jennifer	Cayman Islands - General Litigation	Internal communications in connection with document collection exercise from third party service providers	USD	0.90	675.00	607.50	675.00	607.50
50000764.0001	2020-06-10	Sbaiti, Farrah	Cayman Islands - General Litigation		USD	1.80	650.00	1,170.00	650.00	1,170.00
50000764.0001	2020-06-10	Sbaiti, Farrah	Cayman Islands - General Litigation	Reviewing documents provided by third party service provider		1.20				
50000764.0001	2020-06-10	Sbaiti, Farrah	Cayman Islands - General Litigation	Managing documents received from third party service providers		0.60				
50000764.0001	2020-06-10	Colegate, Jennifer	Cayman Islands - General Litigation	Review of outstanding docs and information	USD	0.80	675.00	540.00	675.00	540.00
50000764.0001	2020-06-10	Cecere, Rocco	Cayman Islands - General Litigation	Review and revise draft protocol, discussions re: same.	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-06-10	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	2.80	725.00	2,030.00	725.00	2,030.00
50000764.0001	2020-06-10	Leontsinis, Stephen	Cayman Islands - General Litigation	Preparatory call with RC prior to creditor's meeting.		0.80				
50000764.0001	2020-06-10	Leontsinis, Stephen	Cayman Islands - General Litigation	Attendance at Creditor/contributory meeting.		2.00				
50000764.0001	2020-06-10	Cecere, Rocco	Cayman Islands - General Litigation		USD	2.40	725.00	1,740.00	725.00	1,740.00
50000764.0001	2020-06-10	Cecere, Rocco	Cayman Islands - General Litigation	Prep for first creditors meeting call		0.40				
50000764.0001	2020-06-10	Cecere, Rocco	Cayman Islands - General Litigation	Attendance at creditors meeting		2.00				
50000764.0001	2020-06-10	Cecere, Rocco	Cayman Islands - General Litigation		USD	1.80	725.00	1,305.00	725.00	1,305.00
50000764.0001	2020-06-10	Cecere, Rocco	Cayman Islands - General Litigation	Draft attendance note		1.30				
50000764.0001	2020-06-10	Cecere, Rocco	Cayman Islands - General Litigation	Email to clients summarising and setting out next steps.		0.50				
50000764.0001	2020-06-10	Cecere, Rocco	Cayman Islands - General Litigation	Preparing communications to Harneys re LC meetings, and email to SL.	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-10	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting follow up letters to third party service providers	USD	2.30	675.00	1,552.50	675.00	1,552.50
50000764.0001	2020-06-10	Colegate, Jennifer	Cayman Islands - General Litigation	Call with SL and RC re Cayman strategy	USD	0.80	675.00	540.00	675.00	540.00

50000764.0001	2020-06-10	Cecere, Rocco	Cayman Islands - General Litigation	Revising document request letters to to third party service providers of TCA Fund	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-06-10	Cecere, Rocco	Cayman Islands - General Litigation	Further emails from Receiver in connection with ongoing protocol discussions	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-11	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing documents from auditor to TCA Fund.	USD	1.50	675.00	1,012.50	675.00	1,012.50
50000764.0001	2020-06-11	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing and considering audited financial staetements and considering various issues arsiing. Call with R Cecere regarding same issues, and drafting follow up email	USD	1.30	675.00	877.50	675.00	877.50
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Review drft email from JC in connection with various issues arising from audited financial statements of the TCA Fund. Call with JC regarding same.	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Review emails received from Administrator.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Finalising letters and emails JC.	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation		USD	1.40	725.00	1,015.00	725.00	1,015.00
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Further amendments to draft protocol documents		1.10				
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Emails receiver re:draft protocol and call.		0.30				
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Emails and Harneys and email to clients.	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Call with Receiver re: protocol.	USD	3.80	725.00	2,755.00	725.00	2,755.00
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Communications regarding status of document collection exercise	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Internal discussions in relation to terms of draft protocol.	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation		USD	1.80	725.00	1,305.00	725.00	1,305.00
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Administrator and preparation of same		1.00				
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Drafting brief note of call.		0.80				
50000764.0001	2020-06-11	Cecere, Rocco	Cayman Islands - General Litigation	Further revisions to draft protocol.	USD	1.80	725.00	1,305.00	725.00	1,305.00

50000764.0001	2020-06-11	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	2.50	725.00	1,812.50	725.00	1,812.50
50000764.0001	2020-06-11	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal calls with R Cecere regarding draft protocol		0.40				
50000764.0001	2020-06-11	Leontsinis, Stephen	Cayman Islands - General Litigation	Reviewing draft protocol		1.40				
50000764.0001	2020-06-11	Leontsinis, Stephen	Cayman Islands - General Litigation	Comments and suggested amendments to same.		0.70				
50000764.0001	2020-06-11	Colegate, Jennifer	Cayman Islands - General Litigation	Call with R Cecere.	USD	0.30	675.00	202.50	675.00	202.50
50000764.0001	2020-06-11	Stanning, Rupert	Cayman Islands - General Litigation	Internal communications in relation to TCA issues	USD	0.80	650.00	520.00	650.00	520.00
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Internal communications in relation to documents from auditors to the TCA Fund.	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Settling correspondence to Receiver in connection with potential claims accruing to TCA Fund.	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Communications with US Counsel in connection with document collection process and requests issued to thir party service providers.	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation		USD	1.80	725.00	1,305.00	725.00	1,305.00
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Further revisions to draft protocol.		1.00				
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Conference call with SL to discuss same		0.40				
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Email to client providing revised draft protocol.		0.40				
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Email in from Harneys confirming Receiver attendance at adjourned contributories meeting and email updating Receiver on the same.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in relation to strategy	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-12	Sbaiti, Farrah	Cayman Islands - General Litigation	Communications with client in relation to adjourned meeting with Harneys.	USD	0.20	650.00	130.00	650.00	130.00
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Email in from Receiver in relation to invoicing itemisation issues. Consideration of same in context of invoice.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Email in from former attorneys to TCA Fund in relation to late provision of documents and emails seeking instructions on same. Email to Receiver's office updating on status of document collection exercise.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Internal communications and instructions in connection with relevant issues of Cayman law	USD	0.30	725.00	217.50	725.00	217.50

50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Revising draft correspondence to client	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-06-12	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in relation to dcocument requests from third parties	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-12	Sbaiti, Farrah	Cayman Islands - General Litigation		USD	2.00	1,040.00	2,080.00	650.00	1,300.00
50000764.0001	2020-06-12	Sbaiti, Farrah	Cayman Islands - General Litigation	Collating authorities on relevant issues of Cayman law		0.55				
50000764.0001	2020-06-12	Sbaiti, Farrah	Cayman Islands - General Litigation	Perusal of authorities on relevant issues of Cayman law		1.45				
50000764.0001	2020-06-15	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	3.40	725.00	2,465.00	725.00	2,465.00
50000764.0001	2020-06-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Preparation for call with Harneys and JOLs		1.00				
50000764.0001	2020-06-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with Harneys and JOLs regarding draft protocol		2.20				
50000764.0001	2020-06-15	Leontsinis, Stephen	Cayman Islands - General Litigation	Follow up call with RC		0.20				
50000764.0001	2020-06-15	Cecere, Rocco	Cayman Islands - General Litigation	Preparation for and attendance on call with JOLs	USD	2.20	725.00	1,595.00	725.00	1,595.00
50000764.0001	2020-06-15	Cecere, Rocco	Cayman Islands - General Litigation	Email in Receiver's office with summary of call, brief review and reply with comments on next steps.	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-15	Cecere, Rocco	Cayman Islands - General Litigation	Post-call email from Receiver's office regarding legal issues relating to distribution of assets	USD	0.80	725.00	580.00	725.00	580.00
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in relation to next steps with third party service providers	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Perusal of correspondence from Harneys and consideration of issues arising in connection with late subscribers to the TCA Fund	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Email from former auditor in respect of provision of missing documents, reply and emails with clients updating.	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Discussions with SL re workstreams, strategy and next steps including draft note	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Further correspondence to former auditor of the TCA Fund in connection with provision of documents	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Email in from former auditor to TCA Fund in response to Receiver request for documents and reply. Further reply to former auditor and emails to Receiver's office updating on correspondence with former auditor.	USD	0.20	725.00	145.00	725.00	145.00

50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Drafting email to Receiver in respect of various issues including draft protocol	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Further emails with Receiver in connection with draft protocol with JOLs of Feeder Ltd	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Consideration of correspondence from Campbells in connection with document collection exercise	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-16	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	2.50	725.00	1,812.50	725.00	1,812.50
50000764.0001	2020-06-16	Leontsinis, Stephen	Cayman Islands - General Litigation	Telephone calls with RC in preparation for call with Receiver. Review of correspondence and notices from EY.		1.00				
50000764.0001	2020-06-16	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with Receiver and team of advisors.		1.50				
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Drafting memorandum for Receiver addressing issues regarding distribution.	USD	0.90	725.00	652.50	725.00	652.50
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Continue drafting memoandum requested by Receiver in connection with issue of distributions.	USD	0.80	725.00	580.00	725.00	580.00
50000764.0001	2020-06-16	Cecere, Rocco	Cayman Islands - General Litigation	Phone attendance with Receiver and I Sadovnic discussing correspondence from Harneys in respect of late subscribers. Discussing other issues relevant to receivership including negotiation of protocol, Cayman Islands legal issues and potential cuses of action.	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-06-17	Cecere, Rocco	Cayman Islands - General Litigation	Emails Receiver's office in connection with requests for information from Banks within jurisdiction	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-17	Cecere, Rocco	Cayman Islands - General Litigation	Emails with Receiver's office in relation to Feeder Ltd.'s articles of association, for provding necessary analysis to Receiver's office in connection with distributions	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-17	Cecere, Rocco	Cayman Islands - General Litigation	Call with JC to bring up to speed with priorities and active workstreams, to discuss most efficient resourcing and various action items that need to be completed.	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Attendance on Contributories meeting call and preparation for same.	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-06-17	Colegate, Jennifer	Cayman Islands - General Litigation	document review and workstreams review	USD	0.50	675.00	337.50	675.00	337.50
50000764.0001	2020-06-17	Cecere, Rocco	Cayman Islands - General Litigation	Attendance at adjourned first contributories meeting for Feeder Ltd at which the contributory members of the LC were voted on, preparation of detailed note for benefit of Receiver.	USD	0.80	725.00	580.00	725.00	580.00

50000764.0001	2020-06-17	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	1.10	725.00	797.50	725.00	797.50
50000764.0001	2020-06-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Reviewing correspondence from Harneys		0.20				
50000764.0001	2020-06-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Call with RC.		0.50				
50000764.0001	2020-06-17	Leontsinis, Stephen	Cayman Islands - General Litigation	Amendment to draft correspondence		0.40				
50000764.0001	2020-06-17	Cecere, Rocco	Cayman Islands - General Litigation	Communications with third party service providers in connection with document collection exercise	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-17	Colegate, Jennifer	Cayman Islands - General Litigation	Catch up call and workstreams discussion with R Cecere	USD	0.40	1,350.00	540.00	675.00	270.00
50000764.0001	2020-06-17	Cecere, Rocco	Cayman Islands - General Litigation	Email in from Receiver's office in connection with draft correspondence to Harneys; making further amendments to proposed letter. Further correspondence to Receiver's office.	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Calls with RC to discuss advice and workstreams. Team call to determine workstreams.	USD	1.30	725.00	942.50	725.00	942.50
50000764.0001	2020-06-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Communications with Harneys as attorneys to the Feeder Ltd JOLs, and consideration of the same	USD	0.60	725.00	435.00	725.00	435.00
50000764.0001	2020-06-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Reviewing revised draft protocol	USD	1.70	725.00	1,232.50	725.00	1,232.50
50000764.0001	2020-06-18	Cecere, Rocco	Cayman Islands - General Litigation	Call with SL and JC to discuss status of workstreams, resourcing and priorities to ensure full and efficient delivery of work to clients.	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-18	Cecere, Rocco	Cayman Islands - General Litigation	Discussions with SL re various matters on file, including issues relating to Receiveship distributions.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-18	Cecere, Rocco	Cayman Islands - General Litigation	Finalising correspondence to Receiver regarding issues of distrbutions.	USD	2.50	725.00	1,812.50	725.00	1,812.50
50000764.0001	2020-06-18	Cecere, Rocco	Cayman Islands - General Litigation	Email correspondence from Conyers on behalf of failed subscribers to TCAFund. Telephone attendance on Conyers re same.	USD	0.60	725.00	435.00	725.00	435.00
50000764.0001	2020-06-18	Cecere, Rocco	Cayman Islands - General Litigation	Settling documents and drafting correspondence to Receiver regarding subscriptions to the TCA Fund and meeting of shareholders	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-18	Leontsinis, Stephen	Cayman Islands - General Litigation	Consideration, review and amendment of advice to Receiver	USD	2.00	725.00	1,450.00	725.00	1,450.00
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Further revisions to memordadum of advice to Receiver; phone attendance on JC re outstanding issues to be dealt with in memorandum including issues addressing terms of redemptions from the TCA Fund.	USD	0.40	725.00	290.00	725.00	290.00

50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Final revisions to draft memrandum of advice to Receiver	USD	0.60	725.00	435.00	725.00	435.00
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in relation to draft protocol with JOLs of Feeder Ltd	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Reviewing revised draft protocol	USD	0.80	725.00	580.00	725.00	580.00
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Drafting correspondence to Receiver attaching draft protocol and revisions to the same. Outlining relelvant legal issues for consideration.	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Internal communications re strategy	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Communications with JC in relation strategy	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Further communications with JC in relation to strategy	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in connection with draft protocol	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Further communications with Receiver and response	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Revise workstreams document for provision to Receiver and internal emails re same.	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Emails with Receiver's office in respect of various issues including further amends to draft protocol and memordandum of advice to Receiver	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-19	Leontsinis, Stephen	Cayman Islands - General Litigation		USD	2.90	550.00	1,595.00	725.00	2,102.50
50000764.0001	2020-06-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Internal communications in relation to amendments to draft protocol and advice to Receiver		0.70				
50000764.0001	2020-06-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Review and comments on draft protocol and advice to Receiver		1.00				
50000764.0001	2020-06-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Review of memo to receiver and suggested changes		0.70				
50000764.0001	2020-06-19	Leontsinis, Stephen	Cayman Islands - General Litigation	Further call with RC and JC to discuss amendments to memorandum to Receiver		0.50				
50000764.0001	2020-06-19	Cecere, Rocco	Cayman Islands - General Litigation	Preparing and reviewing documents	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-22	White, Genevieve	Cayman Islands - General Litigation	Internal communications in connection with document review process	USD	1.00	600.00	600.00	600.00	600.00
50000764.0001	2020-06-22	Colegate, Jennifer	Cayman Islands - General Litigation	Reviewing documents from third party service provider to evaluate potential causes of action	USD	0.50	1,350.00	675.00	675.00	337.50
50000764.0001	2020-06-22	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in connection with TCA Fund Group structure	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-06-22	Cecere, Rocco	Cayman Islands - General Litigation	Internal communications regarding issues in connection with redemptions from the Fund	USD	0.50	725.00	362.50	725.00	362.50

50000764.0001	2020-06-22	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Campbells in connection with document collection exercise	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-22	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver regarding document collection and matter administration	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-22	Cecere, Rocco	Cayman Islands - General Litigation	Review and consideration of workstreams	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-22	Colegate, Jennifer	Cayman Islands - General Litigation	Review and consideration of workstreams	USD	0.80	675.00	540.00	675.00	540.00
50000764.0001	2020-06-22	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in relation to preparation for call with third party service provider to TCA Fund	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-22	Cecere, Rocco	Cayman Islands - General Litigation	Drafting documents to Receiver in connection with matter administration	USD	0.60	725.00	435.00	725.00	435.00
50000764.0001	2020-06-22	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver regarding matter administration	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-22	Cecere, Rocco	Cayman Islands - General Litigation	Emails with Campbells in connection with requests of documents from third party service providers	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-22	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Harneys regarding status of fund subscriptions	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-23	White, Genevieve	Cayman Islands - General Litigation	Reviewing documents from third party service provider	USD	5.10	705.88	3,600.00	600.00	3,060.00
50000764.0001	2020-06-23	Cecere, Rocco	Cayman Islands - General Litigation	Email in from Receiver with information about third party documents.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-23	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver about requesting further information from third parties	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-23	Cecere, Rocco	Cayman Islands - General Litigation	Correspondence with CIMA	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-23	Cecere, Rocco	Cayman Islands - General Litigation	Perusal correspondence from Campbells and email to JC re same	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-23	Cecere, Rocco	Cayman Islands - General Litigation	Emails with Receiver's office to arrange call	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-23	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver regarding matter administration	USD	2.00	725.00	1,450.00	725.00	1,450.00
50000764.0001	2020-06-23	Cecere, Rocco	Cayman Islands - General Litigation	Perusal of correspondence from Receiver in connection with document collection from third party service providers	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-23	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver regarding matter administration	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-23	Cecere, Rocco	Cayman Islands - General Litigation	Preparation of documents regarding matter administration	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-23	Cecere, Rocco	Cayman Islands - General Litigation	Correspondence with CIMA	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-24	White, Genevieve	Cayman Islands - General Litigation	Reviewing documents and renaming and dating documents continued	USD	4.25	705.88	3,000.00	600.00	2,550.00

50000764.0001	2020-06-24	Leontsinis, Stephen	Cayman Islands - General Litigation	Preparation for attendance of call with attorneys to JOLs of Feeder Ltd	USD	2.70	725.00	1,957.50	725.00	1,957.50
50000764.0001	2020-06-24	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in relation to next steps	USD	0.10	725.00	72.50	725.00	72.50
50000764.0001	2020-06-24	Cecere, Rocco	Cayman Islands - General Litigation	Internal communications regarding call with JOLs in connection with draft protocol	USD	0.50	725.00	362.50	725.00	362.50
50000764.0001	2020-06-24	Cecere, Rocco	Cayman Islands - General Litigation	Preparation of call with Harneys in connection with draft protocol	USD	0.70	725.00	507.50	725.00	507.50
50000764.0001	2020-06-24	Cecere, Rocco	Cayman Islands - General Litigation	Attendance on call with JOLs in connection with draft protocol	USD	1.50	725.00	1,087.50	725.00	1,087.50
50000764.0001	2020-06-24	Cecere, Rocco	Cayman Islands - General Litigation	Discussion with SL to discuss next steps in terms of documents and workstreams.	USD	0.90	725.00	652.50	725.00	652.50
50000764.0001	2020-06-25	White, Genevieve	Cayman Islands - General Litigation	Reviewing documents from third service providers	USD	4.25	705.88	3,000.00	600.00	2,550.00
50000764.0001	2020-06-25	Colegate, Jennifer	Cayman Islands - General Litigation	Perusal of correspondence received in connection with document requests to third parties	USD	0.60	675.00	405.00	675.00	405.00
50000764.0001	2020-06-25	Colegate, Jennifer	Cayman Islands - General Litigation	Review of correspondence isued in connection with document collection from third parties	USD	0.40	675.00	270.00	675.00	270.00
50000764.0001	2020-06-25	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver in advance of discussions with Harneys	USD	2.10	725.00	1,522.50	725.00	1,522.50
50000764.0001	2020-06-25	Cecere, Rocco	Cayman Islands - General Litigation	Communications with Receiver regarding draft protocol	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-25	Cecere, Rocco	Cayman Islands - General Litigation	Discussions with JC re status of draft responses, priorities for today and settling workstreams.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-26	Colegate, Jennifer	Cayman Islands - General Litigation	Drafting correspondence to third party service provider	USD	0.30	675.00	202.50	675.00	202.50
50000764.0001	2020-06-26	Cecere, Rocco	Cayman Islands - General Litigation	Preparation in advance of call with Harneys	USD	1.50	725.00	1,087.50	725.00	1,087.50
50000764.0001	2020-06-26	Colegate, Jennifer	Cayman Islands - General Litigation	Correspondence requesting documents from third party service provider	USD	0.40	675.00	270.00	675.00	270.00
50000764.0001	2020-06-26	Cecere, Rocco	Cayman Islands - General Litigation	Call with JC to discuss status of protocol discussions and requests for documents from third party service providers	USD	0.40	725.00	290.00	725.00	290.00
50000764.0001	2020-06-26	Cecere, Rocco	Cayman Islands - General Litigation	Draft revisions to correspondence re document collection from third party service providers	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-26	Cecere, Rocco	Cayman Islands - General Litigation	Telephone attendance with Receiver's office in respect of various outstanding workstreams	USD	0.30	725.00	217.50	725.00	217.50
50000764.0001	2020-06-26	Cecere, Rocco	Cayman Islands - General Litigation	Attendance on call with JOLs' attorneys.	USD	1.70	725.00	1,232.50	725.00	1,232.50
50000764.0001	2020-06-29	Cecere, Rocco	Cayman Islands - General Litigation	Email in Receiver's office with summary of call with JOLs' attorneys. Review and reply with further comments.	USD	0.20	725.00	145.00	725.00	145.00
50000764.0001	2020-06-29	Colegate, Jennifer	Cayman Islands - General Litigation	Internal communications in relation to procedural matters	USD	1.90	675.00	1,282.50	675.00	1,282.50
						168.70		**121,467.50**		**117,515.00**

Exhibit 5(c)

YIP ASSOCIATES

FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

INVOICE SUMMARY OF PROFESSIONALS

Jonathan E. Perlman, Receiver
Genovese, Joblove, & Battista
100 SE 2nd Street
Suite 4400
Miami, FL 33131

Invoice Number: 30211
Date: July 7, 2020
Matter ID: 293.0000

Re: TCA Fund Management Group Corp
Case No. 1:20-cv-21964-CMA

For Professional Services Rendered May 14, 2020 to June 30, 2020

Professional	Initials	Position	Experience	Hours	Rate	Fees
Maria M. Yip, CPA, CFE, CFF, CIRA	MMY	Partner	27 Years	3.1	$ 340.00	$ 1,054.00
Shawna B. Amarnani, CPA, CFE, CIRA	SBA	Director	10 Years	64.0	$ 295.00	$ 18,880.00
Danny D. Zamorano, CPA	DDZ	Senior Associate	5 Years	10.2	$ 245.00	$ 2,499.00
Blended Average Hourly Rate					**$293.33**	
Total Fees				**77.3**		**$ 22,433.00**
Total Expenses						**$ -**
Total Amount Due						**$ 22,433.00**

YIP ASSOCIATES

FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

INVOICE DETAIL

Jonathan E. Perlman, Receiver
Genovese, Joblove, & Battista
100 SE 2nd Street
Suite 4400
Miami, FL 33131

Invoice Number: 30211
Date: July 7, 2020
Matter ID: 293.0000

Re: TCA Fund Management Group Corp
Case No. 1:20-cv-21964-CMA

For Professional Services Rendered May 14, 2020 to June 30, 2020

Date	Initials	Description	Hours	Rate	Amount
05/14/2020	MMY	Reviewed complaint and receivership order as background on matter.	0.8	$340	$ 272.00
05/21/2020	SBA	Conference call with I. Sadovnic, MMY and DDZ re: background and status on case and accounting records.	0.8	$295	$ 236.00
05/21/2020	MMY	Conference call with I. Sadovnic, DDZ and SBA re: background and status on case and accounting records.	0.8	$340	$ 272.00
05/21/2020	DDZ	Conference call with I. Sadovnic, MMY and SBA re: background and status on case and accounting records.	0.8	$245	$ 196.00
06/03/2020	DDZ	Downloaded and reviewed document production received from Receiver which contains accounting, administrative, and security and compliance records.	0.5	$245	$ 122.50
06/03/2020	SBA	Reviewed accounting document production received from Receiver.	0.9	$295	$ 265.50
06/04/2020	SBA	Continued review of voluminous accounting document production received from the Receiver in connection with forensic investigation (4.2); and identified and analyzed important financial documents (3.7).	7.9	$295	$ 2,330.50
06/05/2020	SBA	Continued review of accounting document production received from Receiver and analyzed financial records including financial statements, corporate documents and tax records (5.4); and reviewed bank records received (1.9).	7.3	$295	$ 2,153.50

YIP ASSOCIATES

FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

Invoice Number: 30211
Matter ID: 293.0000

Re: TCA Fund Management Group Corp
Case No. 1:20-cv-21964-CMA

For Professional Services Rendered May 14, 2020 to June 30, 2020

Date	Initials	Description	Hours	Rate	Amount
06/08/2020	DDZ	Discussion with MMY and SBA re: document production.	0.5	$245	$ 122.50
06/08/2020	SBA	Discussion with MMY and DDZ re: documents received from Receiver and record requests (.5); reviewed voluminous accounting folder from document production received from Receiver to identify key documents including bank records, financial statements and tax returns (1.9); and reviewed the document production administration folder to identify key financial records and reviewed bank records (4.7).	7.1	$295	$ 2,094.50
06/08/2020	MMY	Discussion with SBA and DDZ re: documents received and requests from counsel for Receiver.	0.5	$340	$ 170.00
06/09/2020	DDZ	Continued review of document production accounting folder and prepared questions for interview of former employee.	1.2	$245	$ 294.00
06/09/2020	SBA	Prepared questions for interview of accounting department former employee (.3); drafted email to I. Sadovnic regarding bank and accounting record requests (.4); analyzed financial statements identified in document production from the Receiver (2.1); and identified Receivership entity bank accounts based on document production (2.5).	5.3	$295	$ 1,563.50
06/10/2020	DDZ	Reviewed documents produced and prepared questions for interview of accounting department former employee (5.6); conference call with client regarding case update and records received (.5); and discussion with MMY and SBA re: status of documents (.5).	6.6	$245	$ 1,617.00
06/10/2020	SBA	Discussion with DDZ regarding documents received and questions for former employee interview (.2); discussion with MMY and DDZ regarding former employee interview questions and analysis of entities (.5); conference call with I. Sadovnic, MMY and DDZ regarding case update and records received (.5); and updated accounting question list for former employee interview and prepared to attend interview (.8).	2.0	$295	$ 590.00

YIP ASSOCIATES

FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

Invoice Number: 30211
Matter ID: 293.0000

Re: TCA Fund Management Group Corp
Case No. 1:20-cv-21964-CMA

For Professional Services Rendered May 14, 2020 to June 30, 2020

Date	Initials	Description	Hours	Rate	Amount
06/10/2020	MMY	Conference call with I. Sadovnic, SBA and DDZ re: status of documents.	0.5	$340	$ 170.00
06/11/2020	SBA	Discussion with DDZ regarding entity research for entity analysis (.1); downloaded and reviewed new records provided by Counsel related to entities and corporate structure. Updated entity analysis (.7); downloaded and reviewed KapilaMukamal document production related to their prior Net Asset Value analysis (.8); reviewed accounting, administration, and security and compliance document productions for records to include in entity analysis (2.7); and identified entities for entity analysis and prepared entity summaries (3.6).	7.9	$295	$ 2,330.50
06/11/2020	DDZ	Discussion with SBA regarding entity research for entity analysis.	0.1	$245	$ 24.50
06/12/2020	SBA	Communicated with I. Sadovnic regarding document sharing procedures (.2); conference call with Development Specialists, Inc. team and MMY to discuss roles and sharing of information (.5); downloaded and reviewed TCA Capital International Group QuickBooks Excel files and tended to related correspondence with I. Sadovnic (.9); downloaded and reviewed Kaufman Rossin former accountant document production received (2.4); and continued entity analysis (3.9).	7.9	$295	$ 2,330.50
06/12/2020	MMY	Conference call with Development Specialists, Inc. team and SBA re: introduction and scope of work.	0.5	$340	$ 170.00
06/15/2020	SBA	Continued review of Kaufman Rossin document production which contained tax records (.3); researched entities and identified supporting records for entity analysis (3.5); and prepared summaries for related entities in connection with the entity analysis (3.4).	7.2	$295	$ 2,124.00

YIP ASSOCIATES
FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

Invoice Number: 30211
Matter ID: 293.0000

Re: TCA Fund Management Group Corp
Case No. 1:20-cv-21964-CMA

For Professional Services Rendered May 14, 2020 to June 30, 2020

Date	Initials	Description	Hours	Rate	Amount
06/16/2020	SBA	Coordinated document sharing protocol between Yip Associates team, the Receiver and Development Specialists, Inc. (.4); identified additional receivership and related entity bank accounts based on new information received (.8); and continued entity analysis, prepared entity summaries, and researched entities (3.1).	4.3	$295	$ 1,268.50
06/17/2020	DDZ	Updated summaries of entities (.2); and discussed entity analysis with SBA (.3).	0.5	$245	$ 122.50
06/17/2020	SBA	Discussed entity analysis with DDZ.	0.3	$295	$ 88.50
06/22/2020	SBA	Downloaded and reviewed new document production of audit records received from Receiver.	0.6	$295	$ 177.00
06/23/2020	SBA	Downloaded and reviewed organizational and corporate documents received from Receiver. Updated entity analysis for additional entities identified.	2.1	$295	$ 619.50
06/24/2020	SBA	Communicated with Counsel and Yip team to schedule and plan for important deadlines and identified key dates (.4); and reviewed audit document production received from Receiver (.7).	1.1	$295	$ 324.50
06/26/2020	SBA	Continued review of production of audit files from document production received from Receiver. Identified key financial documents.	0.9	$295	$ 265.50
06/30/2020	SBA	Updated accountant interview question list and prepared to attend interview of former employee.	0.4	$295	$ 118.00
		Total Fees	**77.3**		**$ 22,433.00**
		Total Expenses			**$ -**
		Total Amount Due			**$ 22,433.00**

YIP ASSOCIATES
FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

Invoice Number: 30211
Matter ID: 293.0000

Re: TCA Fund Management Group Corp
Case No. 1:20-cv-21964-CMA

For Professional Services Rendered May 14, 2020 to June 30, 2020

Date	Initials	Description	Hours	Rate	Amount

Please remit payment by mail to:

Yip Associates
2 South Biscayne Blvd., Suite 2690
Miami, FL 33131

Or, via wire transfer to:

IBERIA BANK
200 W Congress Street
Lafayette, LA 70501
ABA Number: **265270413**

IBERIABANK Credit Account Information
IB Customer Name: **YIPCPA, LLC d/b/a YIP ASSOCIATES**
IB Account Number: **4400000149**
Amount of Wire: **$22,433.00**

For Credit to: Yip Associates
2 South Biscayne Blvd., Suite 2690
Miami, FL 33131

Exhibit 5(d)

DSI Development Specialists, Inc.

REMIT TO:
10 South LaSalle Street, Suite 3300, Chicago, IL 60603-1026
Telephone: 312.263.41 Telecopier: 312.263.1180

INVOICE SUMMARY OF PROFESSIONALS

TCA Fund Management Group Corp.
c/o Genovese Joblove & Battista
100 SE 2nd Street, Suite 4400
Miami, FL 33131

Invoice Number: 12488
Date: 7/10/2020
Matter ID: 70049.00

Re: TCA Fund Management Group Corp
Case No. 1:20-cv-21964-CMA

For Professional Services Rendered through June 30, 2020

Professional	Initials	Position	Experience	Hours	Rate	Fees
Joseph J. Luzinski	JJL	Sr. Managing Director	33	128.70	$520.00	$66,924.00
Mark T. Iammartino	MTI	Sr. Managing Director	23	85.60	$436.00	$37,321.60
				5.50	$218.00	$1,199.00
Bradley D. Sharp	BDS	President & CEO	30	10.50	$576.00	$6,048.00
Daniel J. Stermer	DJS	Managing Director	20	61.70	$388.00	$23,939.60
George E. Shoup	GES	Managing Director	26	8.30	$356.00	$2,954.80
Thomas P. Jeremiassen	TPJ	Sr. Managing Director	24	8.70	$476.00	$4,141.20
Nicholas R. Troszak	NRT	Managing Director	16	0.50	$408.00	$204.00
Thomas J. Frey	TJF	Sr. Associate	10	52.70	$280.00	$14,756.00
Blended Average Hourly Rate					**$434.81**	
Total Fees				**362.20**		**$157,488.20**
Total Expenses						**$73.95**
Total Amount Due						**$157,562.15**

TIMELY PAYMENT OF INVOICES IS ALWAYS APPRECIATED.

PAY AMOUNT ABOVE

TCA Fund Management Group Corp.
c/o Genovese Joblove & Battista
100 SE 2nd Street, Suite 4400
Miami FL 33131

07/10/2020

			HOURS	
06/11/2020	CEV	Prepare template supplement to the engagement agreement specific to CRO services.	2.40	n/c
		Retention/Engagement Matters	0.00	0.00
06/03/2020	JJL	Review and respond to correspondence regarding coordination of the initial data for the TCA Fund Management matter.	1.00	
06/04/2020	JJL	Telephone call with Jonathan Perlman, Greg Garno, Irina Sadovnic and Mark Iammartino regarding background and priorities on the TCA Funds.	1.50	
	JJL	Review initial documents provided by counsel.	2.20	
	DJS	Communications to/from/with Joseph Luzinski regarding downloading of documents from Genovese Joblove & Battista.	0.10	
	MTI	Conference call with J. Luzinski and Receiver team to discuss background of case and current situation.	1.00	
	MTI	Preliminary review of TCA provided files for background.	1.50	
	DJS	Begin downloading of document provided by Genovese Joblove & Battista.	1.80	
	DJS	Continued downloading of electronic data provided by Genovese Joblove & Battisa to DSI server.	1.60	
	DJS	Additional downloading of Genovese Joblove & Battista provided electronic data to DSI servers for extraction/use.	1.00	
	DJS	Follow-up communications with Joseph Luzinski relative to status of downloading of Genovese Joblove & Battista provided electronic data.	0.10	
06/05/2020	JJL	Review review receivership motion and order.	0.80	
	JJL	Review background information on business operations, staffing and payroll.	1.70	
	MTI	Continue to review files provided by Receiver team for background on company and portfolio.	1.80	
06/06/2020	JJL	Telephone call with Mark Iammartino, Dan Stermer and Tom Frey regarding staffing and division of labor to assess the documents provided by counsel.	0.70	
	JJL	Prepare strategy and work outline for the matter.	1.50	
	TJF	Telephone call with Dan Stermer, Mark Iammartino, and Joe Luzinski regarding the status of the information request list and priorities.	0.70	
	DJS	Communications to/from/with Joseph Luzinski/Mark Iammartino/Tom Frey relative to conference call (0.2) and participate in conference call regarding documents received, task assignment, and next steps (0.7).	0.70	
	DJS	Review communications to/from/with Joseph Luzinski/Mark Iammartino and Bill Fickling relative to data/documents/information provided.	0.30	
	MTI	Organization call with J. Luzinski, T. Frey and D.		

			HOURS
		Stermer.	0.70
	MTI	Follow-up e-mail on data requests.	0.10
06/07/2020	TJF	Review initial documents on the SharePoint site and review any financial related documents to incorporate into the cash flow forecast.	0.80
	TJF	Create the cash flow forecast template.	1.50
06/08/2020	DJS	Meeting with Joseph Luzinski to discuss documents received and next steps relative to analyzing same.	0.30
	DJS	Begin review of electronic data/documents/information related to corporate documents/SPV/employees received from Genovese Joblove & Battista and begin analysis/sorting of same.	2.20
	JJL	Review documents provided by the receiver.	1.50
	JJL	Meeting with Dan Stermer regarding review and organization of documents.	0.80
	JJL	Review and assess staffing, employees and contractors.	2.00
06/09/2020	TJF	Review e-mails and approve invoices to be paid.	0.50
	BDS	Telephone conference call with Joe Luzinski and Mark Iammartino regarding issues and discussions with respect to the Cayman proceedings.	0.50
	DJS	Communications to/from/with Joseph Luzinski relative to documents/data/information provided by GJB and status of same.	0.20
	DJS	Additional extraction, review, and sorting of electronic data/files/information relative to SPV/Employees/Corporate issues as received from Genovese Joblove & Battista.	1.70
	JJL	Review and respond to Kaufman Rossin's correspondence on QuickBooks files and Irina Sadovnic's response.	0.20
	JJL	Telephone call with Mark Iammartino regarding division of labor and staffing.	0.40
	MTI	Telephone call with B. Sharp and J. Luzinski regarding Cayman insolvency concerns.	0.40
	MTI	Telephone call with J. Luzinski to discuss division of responsibilities and staffing.	0.40
	MTI	Review whistleblower complaints and other related documentation for background on portfolio.	0.50
	DJS	Continued and further review/sorting of data/information/documents received from Genovese Joblove & Battista.	1.80
	DJS	Continue processing/review/sorting of electronic data received from Genovese Joblove & Battista and downloaded to DSI servers.	1.40
06/10/2020	BDS	Correspondence with Joe Luzinski regarding companies owned by the receivership entities.	0.10
	BDS	Telephone call with Joe Luzinski regarding potential actions need for collection.	0.30
	DJS	Additional review/sorting of Genovese Joblove & Battista provided electronic data/documents/information relative to SPV/employees/corporate related issues.	1.70
	DJS	Continued review/sorting of Genovese Joblove & Battista provided electronic data/documents/information relative to SPV/employees/corporate-related issues and complete	

			HOURS
		same.	1.90
	DJS	Prepare/send communication to Joseph Luzinski, Mark Iammartino, and Tom Frey regarding status/completion of extraction, review, and sorting of documents/data/information.	0.30
06/11/2020	TJF	Review e-mails sent and save and sort documents received for each of the entities.	0.50
	TJF	Telephone call with Mark Iammartino to discuss cash flow forecast and status of the case.	0.40
	JJL	Review employee issues and create question lists to ask employees.	1.80
	JJL	Telephone call with Nelson Lamis and Mark Iammartino regarding review of the SPV portfolio, accounting for same and operations.	1.20
	JJL	Telephone call with Mark Iammartino regarding planning and scheduling of interviews.	0.30
	MTI	Telephone call with J. Luzinski and N. Lamis regarding role and administrative functions; follow-up with J. Luzinski.	1.20
	MTI	Telephone call with T. Frey regarding cash structure and disbursements.	0.30
06/12/2020	TJF	Telephone call with Jacquelyn Gogin regarding the BB&T and Butterfield bank accounts and bank detail.	0.20
	TJF	Telephone call with Jacquelyn Gogin and Nelson Lamis to discuss current bank account structure and Butterfield bank accounts and bank detail.	0.20
	TJF	E-mail with Jacquelyn Gogin and Chad Fairchild regarding access to bank account information and transactional level financial details.	0.60
	TJF	Consolidate details received into one master cash flow template for the TCA Master Fund and TCA Management Company.	1.20
	TJF	Review new cache of files uploaded to the data room.	1.50
	DJS	Review Joseph Luzinski's communication and attachments related to SPV and portfolio details for use in review/sorting of documents/data.	0.20
	JJL	Review documents uploaded from the GJB ShareFile.	0.50
	JJL	Telephone call with Maria Yip, Shawna Amarnani, Mark Iammartino and Tom Frey regarding TCA background and coordination of efforts for the case.	0.50
	JJL	Continue to review documents related to the SPV and portfolio clients.	3.20
	JJL	Review correspondence regarding record keeper Circle Partners and initial contacts to them.	0.30
	MTI	Conference call with Yip Associates for introductory and coordination of efforts.	0.50
	MTI	Review document titles of share information from GJB.	0.50
06/15/2020	JJL	Telephone call with Alyce Schreiber and Mark Iammartino regarding the administrative functions of TCA.	0.60
	JJL	Telephone call with Miriam Cunningham, Tom Frey and Mark Iammartino regarding payroll, ADP, Trinet, employee benefits and SPV payroll matters.	0.50
	JJL	Continue review of documents downloaded from Genovese Joblove.	1.40
	DJS	Begin downloading of electronic data/information/documents from Genovese Joblove & Battista's ShareFile.	1.80

			HOURS
	TJF	Review bank account summary document and bank statements received from Jackie Gogin and create a shared folder for her to upload remaining bank statements requested.	1.50
	TJF	Telephone call with the human resource contractor Miriam Cunningham, Mark Iammartino and Joe Luzinski regarding the TCA's payroll processing through TriNet and ADP.	0.50
	TJF	Update the cash flow forecast with additional ADP and TriNet payroll information.	1.50
	DJS	Continued downloading and begin review/sorting of downloaded data/information/documents from Genovese Joblove & Battista.	1.20
	DJS	Finalize downloading and sorting of new Genovese Joblove & Battista provided electronic data/documents/information on to DSI servers for use.	1.30
06/16/2020	JJL	Review correspondence from Shawna Amarnani regarding bank accounts.	0.20
	DJS	Begin additional downloading of data/documents information from Genovese Joblove & Battista 's ShareFile and from Bill Fickling via DropBox.	1.90
	DJS	Analyze and review documents/data/information received from GJB/Flicking and provide/sort same relative to the SPV/portfolio/other categories and prepare/provide same to the DSI team.	1.30
	TJF	Telephone call with Chad Fairchild of Circle partners to schedule a conference call.	0.10
	TJF	Review banking detail provided by Jackie to get a better understanding of the cash management and outlays.	1.50
	DJS	Continued downloading of Genovese Joblove & Battista/Fickling provided electronic data/information/documents and begin sorting of same.	1.00
	DJS	Further sorting and begin analysis of Fickling/Genovese Joblove & Battista provided electronic data/information/documents.	1.40
06/17/2020	DJS	Additional downloading and sorting of Fickling/Genovese Joblove & Battista provided electronic documents/data/information.	1.90
	TJF	Read, reply, and sort e-mails received from the TCA fund management group regarding Xcell access to bank accounts and ability to send ACH and wires.	0.30
	DJS	Continued sorting and analysis of electronic data/information/documents provided by Bill Fickling/Genovese Joblove & Battista.	1.40
	DJS	Further sorting/analysis of SPV/Portfolio related data/documents/information received from Genovese Joblove & Battista/Fickling.	1.30
06/18/2020	JJL	Review correspondence regarding questions for Circle Partners on TCA documents.	0.20
	JJL	Correspondence to Alyce Schreiber, Tara Antal and Nelson Lamis regarding real properties and insurance on same.	0.30
	JJL	Telephone call with Carl Shoeppl regarding background on the TCA matter.	0.70
	DJS	Continued downloading/sorting of Bill Fickling electronic documents/data/information.	1.40

			HOURS	
	DJS	Additional review/sorting/extraction of data/documents/information relative to the SPV/portfolio received from Bill Fickling.	1.30	
	MTI	Telephone call with J. Perlman regarding pre-receivership invoices, risk/reward tolerances, accounting support and other receivership matters.	0.40	
	DJS	Further review/extraction/sorting of Fickling provided electronic data/documents/information.	1.80	
06/19/2020	JJL	Prepare list of questions and issues for Alyce Schreiber.	0.50	
	JJL	Telephone call with Alyse Schreiber regarding corporate finance, accounting and fund accounting issues.	0.70	
	JJL	Review corporate background and administration documents on background for the companies and funds.	2.20	
	JJL	Review of contractor and employee resume information, job descriptions and work histories to assess future capacity to assist the receiver.	1.50	
	MTI	Telephone call with J. Luzinski regarding prioritization of receivership needs and updates.	0.50	
06/22/2020	MTI	Meeting with J. Goggin and N. Lamis with J. Luzinski and others regarding loan portfolio.	1.50	
	TJF	Review Q&A file received from Circle partners explaining their involvement with the master fund and the management group.	0.50	
	JJL	Meeting with Jackie Goigin, Nelson Lamis, Tom Frey, Mark Iammartino, Tom Jeremiassen and Nick Stoszak regarding the portfolio review and matters.	1.50	
	JJL	Meeting with Nelson Lamis and Jackie Gogin regarding background and details on administration, corporate governance and pending accounts payable and bills.	1.40	
06/23/2020	DJS	Additional download/extraction/review of SPV/Portfolio related data/information/document.	1.50	
	DJS	Further download/extraction/review of SPV/Portfolio-related documents/data/information.	1.80	
06/24/2020	BDS	Correspondence with Joe Luzinski and Mark Iammartino regarding location of various assets.	0.10	
	MTI	Review of JOL order and TCA org chart; respond to questions from B. Sharp regarding same.	0.10	
	TJF	Telephone call with Joe Luzinski to re: update on TCA's bank accounts and draft cash forecast.	0.30	
	DJS	Additional review/analysis/sorting of SPV/Portfolio-related data/documents/information.	1.70	
	JJL	Telephone call with Brad Sharp regarding TCA's administration matters.	0.30	
	JJL	Evaluate historical banking arrangements to prepare proposal on go-forward accounting.	1.70	
	JJL	Correspondence to Brad Sharp and Mark Iammartino on corporate governance questions and control issues for assets and funds.	0.50	
	JJL	Review draft of cash inflows and budget templates.	0.50	
	DJS	Continued analysis/review/sorting of documents/data/information downloaded relative to SPV/Portfolio entities.	1.60	
06/25/2020	LEL	Convert the Butterfield Report statements from PDF to Excel per Tom Frey's request.	4.50	n/c
	BDS	Video conference call with Mark Iammartino and Joe		

			HOURS	
		Luzinski regarding location of assets and protocol issues.	0.80	
	MTI	Telephone call with T. Frey regarding cash flow statements; follow-up e-mail.	0.30	
	TJF	Conference call with Jonathan Perlman, Gregory Garno, Irina Sadovnic, Joe Luzinski, and Mark Iammartino regarding TCA update call related administrative issues and SPV Company updates.	3.00	
	TJF	Review Butterfield Bank and Ocean Bank statements for 2019 and 2020 and provide to Lauren to convert from PDF to Excel for further analysis in cash flow forecast.	2.00	
	TJF	Review additional documents for TCA Management Group and use the 2019 general ledger details as the source of cash flow forecast.	2.50	
	TJF	Update the cash flow forecast format to include each TCA entity individually and a consolidated tab incorporating all cash flows for the entities under the receiver.	1.30	
	DJS	Review/sort electronic documents/data/information received from GJB/Bill Fickling related to the SPV/portfolio entities.	2.10	
	JJL	Telephone call with Brad Sharp and Mark Iammartino regarding corporate structure and research on corporate governance and structure.	0.80	
	JJL	Telephone call with Jonathan Perlman, Greg Garno, Irina Sadnovic, Mark Iammartino and Tom Frey regarding pending open issues and updates on administration, operations and specific SPV and entities.	3.00	
	JJL	Review and respond to Tom Frey correspondence regarding property and equipment status and leases.	0.20	
06/26/2020	LEL	Continue with converting the Butterfield Report statements from PDF to Excel per Tom Frey's request and e-mail it to him.	2.50	n/c
	TJF	Update the cash flow forecast model so the model is a live document as the cash flows are updated for each vendor the individual entity forecasts are updated and the consolidated forecast seamlessly updates.	3.30	
	DJS	Discussions with Joseph Luzinski relative to download/sorting of documents/data/information related to the SPV/portfolio-related entities.	0.50	
	DJS	Continue download/sorting of Genovese Joblove & Battista/Fickling provided electronic data/information/documents related to Portfolio/SPV entities.	1.90	
	DJS	Further download/sorting/analysis of Genovese Joblove & Battista/Fickling provided electronic data/information/documents related to Portfolio/SPV entities.	1.40	
	DJS	Additional sorting/analysis of Portfolio/SPV entities data/documents/information provided Genovese Joblove & Battista/Fickling.	1.30	
06/28/2020	DJS	Additional review/sorting of documents/data/files/information received relative to the SPV/portfolio entities and prepare/send communication to Joseph Luzinski, Mark Iammartino and Tom Frey relative to same.	2.10	
	JJL	Review correspondence trail regarding the status of		

			HOURS	
		original documents at US Bank.	0.20	
	JJL	Review of Harvest Software to track consultants time and billing.	0.60	
06/29/2020	TJF	Create a list of questions for management regarding vendors from the general ledger details.	0.70	
	TJF	Compete the cash flow forecast for TCA management fund pending questions for management.	2.20	
	TJF	Clean up the Butterfield bank statements from account x2001 to use as the basis for the 2020 cash flow forecast.	2.50	
	TJF	Send a list of open items regarding the TCA master fund to Jackie Gogin and Nelson Lamis.	0.60	
	TJF	Update the cash flow forecast integrating both the forecast for TCA Management Fund and TCA Master Fund into one document.	1.50	
	DJS	Perform research on documents/data/information received and publicly available relative to Galveston, Texas, property and SPV Veridis issues and prepare/send follow-up communication to Joseph Luzinski relative to same.	2.30	
	DJS	Review the latest Bill Fickling communication and data/documents/information relative to SPV Indumate and download/extract/sort same.	1.80	
	DJS	Review communication from Mark Iammartino forwarding additional TCA Aerospace received from Bill Fickling and upload/extract/review documents/data/information received.	0.40	
06/30/2020	TJF	Update cash flow forecast template and run rate.	2.00	
	TJF	Telephone call with Joe Luzinski to discuss daily cash flash file for TCA.	0.30	
	TJF	Weekly zoom meeting with Xcell management to discuss business overview, project pipeline, and current cash situation.	0.90	
	TJF	Create a daily cash flash report for TCA funds.	1.00	
	DJS	Additional review/sorting of SPV/Portfolio data/documents/information provided by Fickling/Genovese Joblove & Battista.	1.30	
	DJS	Further review/sorting of the SPV/portfolio data/documents/images received from Bill Fickling and GJB for use by team.	1.80	
	JJL	Telephone call with Tom Frey regarding cash flow, cash management and flash reporting.	0.30	
	JJL	Review contracts for Dennis McIntosh, Oaken Solutions and Iron Oak.	0.50	
	DJS	Continue review/analysis/sorting of data/documents/information provided by Fickling/Genovese Joblove & Battista related to Portfolio/SPV entities.	1.90	
		Business Analysis	155.70	62,793.60
06/12/2020	JJL	Review and respond to correspondence regarding financial accounting records, QuickBooks and managerial tools to operate the business.	0.50	
06/18/2020	JJL	Telephone call with Eric Held regarding standardized fund accounting reports and drivers on how to organize same.	0.50	
06/25/2020	GES	Telephone conference call with Joe Luzinski on TCA Fund case background and reporting procedures to be		

			HOURS	
		put into place.	0.40	
	GES	Research receivership case docket regarding identification of receivership entities and background on operations.	1.00	
	GES	Evaluate status of cash reporting provided and prepare notes and questions on cash reporting and operations.	2.00	
	GES	Research accounting software solutions for case administration and for case reporting requirements.	0.80	
	GES	Telephone conference call with Yale Bogen on accounting software set up.	0.40	
	YSB	Telephone call with George Shoup regarding accounting set-up.	0.40	n/c
	YSB	Build test accounting and reporting system in QuickBooks; e-mail to Joe Luzinski regarding the accounting and reporting.	1.60	n/c
	YSB	Review e-mail from Joe Luzinski regarding the reporting system and forward e-mail and comments to George Shoup; review follow-up comments from George Shoup including the report template.	0.30	n/c
	JJL	Telephone call with George Shoup regarding background on the accounting function for TCA.	0.40	
06/26/2020	GES	Set up accounting software template chart of accounts and test data for functionality for reporting purposes.	3.00	
	GES	Telephone conference call with Yale Bogen on accounting software set up.	0.20	
	YSB	Telephone call with George Shoup to discuss accounting set-up.	0.20	n/c
	YSB	E-mails with George Shoup regarding reviewing the QuickBooks set up; review the set-up as done by George Shoup.	0.30	n/c
		Monthly Bktcy/Semi-Annual Rpts	9.20	3,504.80
06/08/2020	MTI	Review Indumate's response on potential officer liability in insolvency situation and evaluation of possible alternatives.	0.50	
06/09/2020	JJL	Review payroll information on various companies as managed by TCA contractor Cunningham.	0.60	
	JJL	Review and respond to administration issues for contacts to employees and and mission critical to do items for the portfolio and SPV matters.	0.80	
	MTI	Conference call with GJB, B. Fickling, and J. Luzinski to discuss portfolio issues.	1.10	
	MTI	Preliminary review of SPV list and e-mail with GJB regarding reporting updates.	0.30	
06/10/2020	JJL	Review corporate structure of entities and research on pending companies and deals.	1.30	
06/11/2020	JJL	Review various correspondence approving Pivot transactions.	0.40	
	JJL	Review portfolio information to prepare for a discussion with Jackie Gogin regarding the status of portfolio matters.	0.50	
	JJL	Telephone call with Jackie Gogin and Mark Iammartino regarding the TCA portfolio.	1.00	
	MTI	Review SPV portfolio listing for responsible party; set up meetings with TCA individuals responsible.	0.30	

			HOURS	
06/12/2020	JJL	Telephone call with Tom Jeremiassen regarding possible portfolio analysis for the TCA Funds.	0.30	
	TPJ	Telephone discussions with Joe Luzinski and Nick Troszak regarding the loan portfolio analysis.	0.30	
06/15/2020	JJL	Review portfolio of loans and prepare summary for further assessment and collection of same.	2.20	
	MTI	Review e-mail from D. McIntosh regarding litigation against Xcell.	0.30	
06/16/2020	JJL	Review memos from Schoeppl Law regarding distressed and workout matters.	1.90	
	TJF	Telephone call with the receiver Jonathan Perlman, Irina Sadovnic, Greg Garno, Mark Iammartino, and Joe Luzinski regarding TCA update and discussion on outstanding issues.	1.00	
06/17/2020	JJL	Review of real property matters of Cleland, Veridis and Lexington, NC.	0.80	
	JJL	Review real property files for legal descriptions on property.	0.80	
06/18/2020	JJL	Telephone call with Jackie Gogin regarding review of the portfolio and related meetings to discuss same.	0.50	
06/19/2020	JJL	Telephone call with Tom Jeremiasen and Nick Troszak regarding the TCA portfolio assessment and meeting on Monday.	0.30	
	TPJ	Review of the loan portfolio and recent payments analyses.	0.60	
	TPJ	Telephone discussion with Joe Luzinski and Nick Troszak regarding loan portfolio analysis.	0.30	
	NRT	Prepare for and participate in conference call with Tom Jeremiassen and Joe Luzinski regarding case status.	0.30	
06/22/2020	TPJ	Telephone discussion with Joe Luzinski, Nick Troszak, Mark Iammartino and TCA employees regarding loan portfolio.	1.00	
	JJL	Prepare list of questions and issues for the meeting to discuss the TCA portfolio.	0.50	
06/24/2020	TPJ	Review and e-mails with Joe Luzinski regarding the Margill reports for pending loans.	0.20	
		Asset Analysis and Recovery	18.10	8,822.80
06/04/2020	MTI	Conference call with J. Luzinski and Receiver team with B. Fickling to discuss situations at InduMate and Pivot.	1.00	
06/05/2020	JJL	Telephone call with Peter Wahlberg, Bill Fickling, Manual Ocaranza, Jonathan Perlman and Mark Iammartino regarding the status of InduMate.	1.00	
	JJL	Review background memos and financial information on the InduMate matter.	2.20	
	JJL	Telephone call with Mark Iammartino regarding assessment of the InduMate matter.	0.50	
	JJL	Telephone call with Irina Sadovnic and Mark Iammartino regarding XCell matters.	0.30	
	JJL	Review select information on XCell.	0.50	
	MTI	Conference call with Receiver and DSI team with InduMate CRO to discuss investment options and		

			HOURS
		immediate decision needs.	1.00
	MTI	Call with J. Luzinski regarding organization of project, staffing needs, and workstream allocations.	0.60
	MTI	Conference call with J. Luzinski and I. Sadovnic to discuss urgent payroll questions at Xcell.	0.30
06/09/2020	JJL	Telephone call with Tom Hunt and Mark Iammartino regarding Pivot Energy	0.60
	JJL	Review of underlying portfolio company issues for Pivot to assess structure and deals.	1.10
	JJL	Review correspondence and background on XCell.	0.70
	MTI	Organize TCA conference calls for Pivot and others.	0.20
	MTI	Conference call with J. Luzinski and T. Hunt of Pivot Energy to talk about background of company.	0.60
	MTI	Review e-mail from B. Fickling and associated materials regarding Pivot contract approval requests.	0.70
	MTI	Review e-mail from B. Fickling and respond regarding proposed transaction involving Zenergy; look up case in Pacer; e-mail with GJB regarding same.	0.80
	MTI	Review Xcell's payroll and disbursements requests; review the TPNI payroll request.	0.50
	MTI	Review of Pivot corporate governance documents.	0.40
	MTI	Review e-mail correspondence and director liability documents provided by P. Wahlberg of Indumate.	0.40
06/10/2020	TJF	Review Pivot Energy's smart sheet payment request file and approve payment.	0.50
	JJL	Review correspondence on Pivot history and structure of the Summit deal.	2.10
	JJL	Telephone call with Pivot Management team, Bill Fickling, Michael Klein, and Mark Iammartino regarding the Summit transactions and Pivot sale process.	1.00
	JJL	Review correspondence on the status of operations for Zenergy, TPNI and XCell.	1.80
	JJL	Coordinate computer IT support access to TCA Magill system and files.	0.30
	JJL	Telephone call with Pivot management team, Bill Fickling, Michael Klein, Manual Ocaranza and Mark Iammartino regarding weekly business status call.	0.40
	JJL	Telephone call with John Lowery Bill Fickling and Michael Klein regarding the San Diego Farmers Market, debt issues and stock offering.	0.50
	MTI	Telephone call with P. Wahlberg regarding Indumate.	0.30
	MTI	Conference call with J. Luzinski, TCA and Pivot Energy to review Kankakee Solar 2 LLC MIPA transaction with Summit Energy.	1.00
	MTI	Review weekly disbursements list from Pivot; email with T. Frey regarding same.	0.40
	MTI	Conference call with Pivot team and TCA team regarding weekly operations update.	0.40
	MTI	Telephone call with B. Fickling regarding Zenergy bankruptcy and San Diego Farmers Outlet.	0.20
	MTI	Review Pivot/Kankakee 2 deal documents and prepare e-mail to the GJB team requesting approval.	0.60
	MTI	Respond to e-mail from interested party for Manney Aerospace.	0.30
06/11/2020	TJF	Review payment request for The Pulse Network/Aristotle, Inc. accounts payalbe invoices to be paid.	0.80

			HOURS
	TJF	Telephone call with Tom Hunt of Pivot Energy to discuss accounts payalbe payments and cash forecast model.	0.30
	JJL	Telephone call with Bill Fickling, Irina Sadovnic and Mark Iammartino regarding business status issues.	0.50
	JJL	Review correspondence on various matters Pivot, Zenergy, XCell and TPNI and requests for funding.	1.00
	MTI	Conference call with the Pivotand TCA teams regarding Nautilus MIPA's proposed transaction.	0.60
	MTI	Conference call with J. Luzinski and J. Goggin regarding portfolio administration questions.	1.00
	MTI	E-mail regarding Summit approvals and documents required.	0.30
	MTI	Review vendor payments for TPNI and coordinate with T. Frey and company regarding approvals and setting up follow-up meetings.	0.40
	MTI	Telephone call with D. McIntosh on Zenergy background.	0.70
	MTI	Semi-weekly business operations call with B. Fickling and I. Sadovnic and J. Luzinski.	0.50
	MTI	Review e-mail from B. Fickling and others regarding various portfolio updates, and from Pivot regarding accounts payable run.	0.30
	MTI	Attention to Pivot Energy audit needs for legal representation letters and loan confirms.	0.30
	MTI	Respond to e-mail from J. Perlman regarding relationship with the ICAV and potential conflicts.	0.30
	MTI	Review Zenergy's model received from D. McIntosh.	1.00
06/12/2020	JJL	Review correspondence regarding Pivot Energy issues.	0.40
	MTI	Further reviewof the Zenergy model relative to the Arena term sheet.	0.70
	MTI	Review legal rep letter and forward to Pivot Energy.	0.20
	MTI	Review Pivot Energy's loan reports from Margill; recalculate interest accruals.	0.70
	MTI	Telephone call with G. Garno of GJB regarding Zenergy.	0.20
	MTI	Review and respond to e-mail from TPNI regarding business impact and vendor payables.	0.20
	MTI	E-mail with I. Sadovnic regarding employee contacts and other administrative issues.	0.30
06/15/2020	JJL	Telephone call with Heather Harmon regarding TCA payroll and related operations.	0.40
	JJL	Review payroll and historical employee documents to assess the current status of same.	1.10
	JJL	Correspondence to Miriam Cunningham regarding payroll, employee benefits and human resources functions at TCA.	0.20
	JJL	Telephone call with Carlos Sandino, Bill Fickling and Mark Iammartino regarding portfolio matters.	1.50
	MTI	Telephone call with A. Schreiber and J. Luzinski regarding organizational duties.	0.50
	MTI	Contact C. Sandino and set up portfolio review call.	0.20
	MTI	Review Nautilus' materials provided by Pivot Energy; research financier market.	0.80
	MTI	Review TPNI's cash flow model in advance of call.	0.40
	MTI	Participate in Zoom call with TPNI and T. Frey to learn about background of the company and current needs (1.5); follow-up with further research and review of provided materials relating to Series C	

			HOURS
		redemption and other financials (1.1).	2.60
	MTI	Telephone call with Miriam Cunningham and DSI regarding payroll issues.	0.50
	MTI	Telephone call with B. Fickling and C. Sandino and T. Frey regarding portfolio details.	1.50
	MTI	Review receiver's question on TCA Aerospace and respond by e-mail; review promissory note and operating agreement.	0.30
	MTI	Review indication of interest received for Indumate and respond by e-mail to P. Wahlberg.	0.40
	TJF	Telephone call with Mark Iammartino, Brian Terio, Bill Fickling, Rick Quinn and Dennis McIntosh regarding TPNI business overview and current and forecasted cash balance.	1.50
	TJF	Telephone call with Carlos Sandino and Bill Fickling of TCA, Mark Iammartino, and Joe Luzinski regarding overview of TCA's fund portfolio companies.	1.50
06/16/2020	JJL	Review of pending billings for Iron Oak, payroll administration and Dennis McIntosh and correspondence with the receiver's counsel regarding same.	0.70
	JJL	Telephone call with Bill Fickling and Mark Iammartino regarding review of portfolio companies and loans.	1.80
	JJL	Review contracts and statements of work for Circle Partners and Iron Oak Defense.	0.80
	JJL	Review insurance policy and related documents for domestic policies and also in the UK.	1.30
	JJL	Telephone call with Bill Fickling and Mark Iammartino regarding business update.	0.40
	JJL	Prepare summary of pending matters for call with the Genovese Joblove receiver team.	0.50
	JJL	Telephone call with Jonathan Perlman, Greg Garno, Irina Sadovnic, Mark Iammartino and Tom Frey regarding the status of TCA matters.	1.20
	MTI	Zoom call with TPNI company and T. Frey to discuss weekly progress and answer questions about the receivership.	1.40
	MTI	Conference call with B. Fickling and J. Luzinski to walk through the SPV portfolio by name.	1.90
	MTI	Telephone call with J. Luzinski to prepare for later call with receivership team at GJB; discuss case understanding.	0.30
	MTI	Respond to e-mails from Pivot Energy regarding legal rep letter; e-mail regarding call with Circle Partners.	0.20
	MTI	Weekly operations meetings with Xcell, along with T. Frey.	0.50
	MTI	Telephone call with B. Fickling and J. Luzinski regarding positions regarding higher maintenance, location of books and records, etc.	0.50
	MTI	Weekly receivership update call with the GJB and DSI teams.	1.20
	MTI	Telephone call with T. Frey regarding Xcell follow ups.	0.30
	MTI	Review and respond when necessary to e-mails from GJB regarding fund operations, structure, and other receivership issues.	0.50
	MTI	Review additional documentation provided to-date on portfolio deals with regards to current status and history.	0.50

			HOURS
	MTI	Review of the Transmarine payables request and approve same.	0.30
	MTI	Review and respond to e-mail from D. McIntosh regarding potential sales process for TPNI.	0.40
	MTI	Review and respond to e-mail from Scottish advisors regarding Cleland Ltd. and steps necessary to restore registration.	0.30
	MTI	Review The Pulse Network, Inc. financial statements and e-mail follow-up questions to Brian Terio.	0.30
	MTI	Further review Zenergy model and Arena term sheet; respond to e-mail from Dennis McIntosh regarding investment opportunity.	0.40
	MTI	Respond to Pivot Energy e-mail and perform a cursory review of attached M&A materials.	0.20
	TJF	Zoom meeting with the the TPNI Management team and Mark Iammartino regarding the weekly status update of the business.	1.40
	TJF	Telephone call with Bill Fickling of TCA, Mark Iammartino, and Joe Luzinski regarding an overview of the portfolio companies.	0.80
	TJF	Zoom meeting with the Xcell Management team and Mark Iammartino (partial .5) regarding the weekly status update of business.	1.10
	TJF	Review and approve Xcell's accounts payalbe and sweep request from Craig McDonald.	0.60
06/17/2020	JJL	Review portfolio matters XCell and TransMarine correspondence on meetings and funding.	0.50
	JJL	Telephone call with Pivot management team, Bill Fickling, Michael Klein and Mark Iammartino regarding status of Pivot operations.	0.20
	JJL	Review of Pivot marketing materials and presentation for possible sale prospects.	0.80
	JJL	Review IT's correspondence from Iron Oak and Teamviewer to establish a connection to Margill.	0.50
	JJL	Review insurance policy information provided by TCA.	0.40
	MTI	E-mails with Xcell and T. Frey regarding approval of payroll and payables.	0.20
	MTI	Respond to e-mail from Scottish attorneys regarding Cleland Ltd. and set-up follow-up phone call.	0.10
	MTI	Preliminary review of Cleland Ltd. documents.	0.50
	MTI	Conference call with C. Sandino, B. Fickling, and J. Luzinski to continue conversation on portfolio companies.	1.00
	MTI	Weekly status call with Pivot Energy.	0.20
	MTI	Draft questions and review those of J. Luzinski for information needed from Circle Partners.	0.30
	MTI	Review documentation from B. Fickling regarding Pivot Energy including PSAR plan.	0.60
	MTI	Review documentation from B. Fickling regarding Cleland Ltd.	0.50
	MTI	Review documentation and e-mails regarding Broward Collision.	0.50
	MTI	Draft and send e-mail to thre receiver regarding risk/reward tolerance and requesting discussion of same.	0.20
	TJF	Review the Paycheck Protection Prpgram forecasted spend and calculate the forgiveness portion of the loan.	0.50
	TJF	Telephone call with Carlos Sandino and Bill Fickling of TCA, Mark Iammartino, and Joe Luzinski regarding overview of the TCA fund portfolio companies.	1.00

			HOURS
06/18/2020	JJL	Telephone call with Irina Sadovnic regarding payroll matters.	0.20
	JJL	Review correspondence on SPV matters, Cleland Insurance, Pivot expenses, InduMate billings for PwC services, Pivot's expenses and XCell payroll.	1.50
	JJL	Review of the receivership reporting requirements and discussion with Eric Held regarding setup of same systems utilized in other matters.	0.60
	JJL	Telephone call with Tammi Belcher regarding the Margill system set up.	0.50
	JJL	Review estate operational needs and assess how to utilize current employees to minimize cost and leverage institutional knowledge.	1.70
	TPJ	Review of the loan portfolio analysis and documents, and discussion with Nick Troszak regarding same.	1.10
	MTI	Review e-mail and cash flow statements relating to Indumate and respond to P. Wahlberg.	0.40
	MTI	Skype meeting with McRoberts in Glasgow, GJB team and B. Fickling regarding Cleland Ltd.	1.00
	MTI	Review draft offers from early 2019 and early 2020 for Cleland, Ltd.	0.20
	MTI	Review litigation summary of Broward Collision.	0.20
	NRT	Review loan worksheets and conversation with Tom Jeremiassen regarding case status.	0.20
06/19/2020	JJL	Telephone call with TransMarine management team, Long Trinh, Lindsey Davidson, Angela Tenant, Mark Iammartino and Bill Fickling regarding the status of the company and TCA.	1.00
	JJL	Telephone call with Mark Iammartino regarding the status of pending administration and accounting matters.	0.50
	JJL	Telephone call with Michael Klein, Bill Flickling and Mark Iammartino regarding review of portfolio of SPV and related companies.	1.50
	JJL	Review correspondence regarding lease of an office address at Regus in Nevada.	0.20
	JJL	Review pending billings and open issues to prepare a summary to discuss with the reeiver on payment of bills and also management of accounting functions.	1.00
	MTI	Telephone call with D. McIntosh to discuss the Xcell, Zenergy, and TPNI needs.	0.50
	MTI	Introductory phone call with Transmarine management, B. Fickling and J. Luzinski.	1.00
	MTI	Telephone call with M. Klein, B. Fickling, and J. Luzinski regarding portfolio matters worked by Klein.	1.30
	MTI	Conference call with B. Fickling and M. Fasci regarding prior Cleland, Ltd. development.	0.40
	MTI	Draft and send e-mail to B. Shralberg regarding receivership position on Zenergy take-out financing.	0.10
	MTI	Review response from Circle Partners regarding information on TCA.	0.30
06/22/2020	MTI	Meeting with M. Klein and J. Luzinski regarding portfolio companies handled by M. Klein.	1.40
	MTI	Preliminary review of cash disbursement requests from Xcell and TPNI.	0.40
	TJF	Telephone call with Jackie Gogin and Nelson Lamis of TCA, Mark Iammartino, Joe Luzinski, Tom Jeremiassen (partial 1.0), and Spencer Ferrero (partial 1.0)	

			HOURS
		regarding a overview of the current loan portfolio and current status of each loan.	1.30
	TJF	Review and approve payment request from the Pulse Network Brian Terio.	0.10
	JJL	Review correspondence regarding non-receivership entities, international TCA service marks, protocols for Cayman discussions and	0.50
	JJL	Meeting with Michael Klein and Mark Iammartino regarding review of job functions and portfolio assessment on specific deals.	1.50
	JJL	Telephone call with Miriam Cunningham regarding payroll processing and HR services to be provided to TCA and subsidiary entities.	0.50
	JJL	Review and evaluate accounting and staff needs for purposes of setting the team for going forward.	1.10
	JJL	Review detailed insurance quotes for the new policy period.	0.80
	JJL	Evaluate financial accounting needs, staffing and employee needs for the portfolio and collection efforts.	1.10
	JJL	Correspondence to Karen Swanson regarding TCA insurance matters.	0.20
06/23/2020	MTI	Weekly status meeting with TPNI team and D. McIntosh; follow-up call with D. McIntosh.	1.20
	MTI	Review proposed sale process and fee structure for TPNI and respond to D. McIntosh on potential revisions.	0.30
	MTI	Telephone call with G. Garno of GJB regarding TPNI Series C cancellation issue; e-mail to attorney requesting call.	0.30
	MTI	Review marketing materials prepared by Pivot Energy on potential sale or financing transactions; research on tax equity markets.	2.50
	MTI	Semi-weekly call with B. Fickling to discuss portfolio issues with J. Luzinski.	0.80
	MTI	Review sample Pivot SAR plan for management.	0.40
	TJF	Weekly zoom meeting with Xcell Management team re: review of current budget and open items.	0.50
	JJL	Review Michelle Yap's correspondence regarding TransMarine sweep request.	0.20
	JJL	Review bill pay request for Nevada rent.	0.20
	JJL	Review Jackie Gogin correspondence regarding insurance status.	0.20
	JJL	Review pending request for payment by Iron Oak.	0.10
	JJL	Telephone call with Kimberly Swanson of Petschauer Insurance regarding the status of TCA insurance and package policy.	0.40
	JJL	Review Pivot documents relating to development fund needs and options.	0.80
	JJL	Telephone call with Bill Fickling and Mark Iammartino regarding the status of pending SPV matters, Pivot, portfolio, sale process, staffing and administration matters.	0.80
	JJL	Review portfolio reports and details to assess collections strategies.	1.70
	JJL	Review correspondence and e-mail traffic on TCA staff and employees.	1.50
06/24/2020	MTI	Telephone call with J. Luzinski regarding agenda for the receiver call tomorrow.	0.80
	MTI	Conference call with TPNI attorney and G. Garno	

			HOURS
		regarding Series C shares.; follow-up calls with G. Garno and D. McIntosh afterwards and e-mail summary to G. Garno.	0.40
	MTI	Weekly status call with Pivot Energy management team; review of cash flow materials in advance of the call.	0.60
	MTI	Conference call with J. Goggin of TCA, GJB team, and J. Luzinski to discuss Mint Assets vehicles; review of documentation relating to same and e-mail regarding VIN lookup tools.	0.70
	MTI	Review of SAI waterfall and related issues in preparation for various SAI calls and to respond to GK's questions by e-mail.	0.80
	MTI	Telephone call with B. Fickling and J. Luzinski regarding history of the development loan and PSAR for Pivot Energy.	0.50
	MTI	E-mail to GJB with further response regarding handling of successor tax issues at Xcell and Transmarine.	0.20
	MTI	E-mails with D. McIntosh regarding fee proposal for potential sale of TPNI and related TPNI considerations.	0.30
	MTI	Review open items task list and respond to J. Luzinski regarding suggestions.	0.30
	MTI	Draft agenda list for the receiver's call tomorrow.	0.20
	JJL	Telephone call with Mark Iammartino regarding status of open and pending matters for SPV, portfolio and administration.	0.80
	JJL	Telephone call with Bill Fickling and Mark Iammartino regarding Pivot and history on the relationship of Pivot to TCA.	0.50
	JJL	Telephone call with Tom Hunt, Jeff Peterson, Michael Klein, Bill Fickling and Mark Iammartino regarding weekly update on Pivot.	0.50
	JJL	Telephone call with Jackie Gogin regarding Margill reports and daily banking protocols.	0.50
	JJL	Review telephone related request for payment and assess phone needs.	0.30
	JJL	Review and respond to correspondence regarding telephone bills, messages and voicemail.	0.30
	JJL	Telephone call with Irina Sandovnic, Brett Halsey, Jackie Gogin and Mark Iammartino regarding Mint and care title issues.	0.30
	JJL	Telephone call with Tom Frey regarding status of cash flow model and reporting.	0.30
	JJL	Review the updated Pivot information.	0.50
06/25/2020	TPJ	Review and e-mails and discussion with Nick Troszak regarding loan documentation.	0.30
	MTI	Flush out agenda list for the receiver call and circulate with J. Luzinski.	0.20
	MTI	Meeting with J. Luzinski and B. Sharp regarding protocol and related issues.	0.80
	MTI	Portfolio review meeting with the DSI/GJB teams.	3.00
	MTI	Telephone call with B. Fickling and J. Luzinski regarding TCA Aerospace and additional documentation regarding same.	0.50
	MTI	Review Manney Aircraft's documents including promissory notes and security agreements.	0.50
	MTI	Draft agenda for Pivot Energy visit; e-mail to company.	0.40
	MTI	Telephone calls with B. Halsey of GJB and J.	

			HOURS
		Luzinski regarding communication protocols with Edison; e-mail follow up on same.	0.30
	MTI	Review of proposed sale terms and outline of potential sale structures for Indumate.	0.50
	GES	Review of loans and notes file and notes on collection status.	0.50
	JJL	Prepare update and agenda for the meeting with the receiver and Genovese Joblove team on open and pending operational and business issues.	2.20
	JJL	Prepare information and schedules to further define the project for bank accounting, daily reporting and periodic reporting.	0.60
	JJL	Review and respond to Michael Klein correspondence regarding meeting with Edison Learning.	0.20
	JJL	Telephone call with Bill Fickling and Mark Iammartino regarding the status of TCA Aerospace and operations.	0.50
	JJL	Telephone call with Michael Klein regarding Broward Collision.	0.20
	JJL	Correspondence to Brett Halsey regarding Broward Colission.	0.20
06/26/2020	MTI	Weekly status call with P. Wahlberg and B. Fickling regarding Indumate.	0.40
	MTI	Review the TPNI cash flow forecasts to consider ability to pay costs of sales process.	0.30
	MTI	Webinar with D. McIntosh and follow-up phone call (0.6) and research on legal entities for Xcell with regards to completion of PPP disclosure form, and follow-up e-mails to GJB.	0.90
	MTI	Review historical transaction documents relating to Xcell for prior conversion of debt to equity.	1.30
	MTI	Review historical transaction documents relating to TCA Aerospace and related security agreements, sale agreements, and other documents.	1.50
	MTI	Set up SharePoint access and identify relevant portfolio-specific folders.	0.20
	TJF	Review and approve accounts payable requests from Brian Terio at TPNI.	0.50
	JJL	Telephone call with Peter Wahlberg, Bill Fickling and Mark Iammartino regarding InduMate status.	0.40
	JJL	Telephone call with Dan Stermer regarding the TCA status of file review and organization.	0.50
06/28/2020	JJL	Review Bill Fickling's correspondence introducing Tom Friedberg of Bousetead Securiteis.	0.30
	JJL	Review TCA Microgrid accounting report draft and statements.	0.30
	JJL	Review correspondence on Xcell officers and control issues, Broward Collision, TPNI.	0.50
06/29/2020	MTI	Telephone call with I. Sadovnic and various portfolio companies and tax advisor regarding successor liability questions on payroll withholding taxes.	0.40
	MTI	Telephone call with J. Luzinski to discuss potential town hall topics; review and response to e-mail regarding same.	0.40
	MTI	Attention to Xcell PPP ownership disclosure document.	0.30
	MTI	Review Pivot Energy financial model and financial statements in preparation for visit later in the	

			HOURS
		week.	1.50
	JJL	Review Michael Klein regarding information on Broward Collision and CarStar.	0.20
	JJL	Telephone call with Irina Sadnovic regarding pending matters.	0.30
	JJL	Telephone call with Mark Iammartino regarding the town hall script and discussion points.	0.30
	JJL	Correspondence to and from Bill Fickling regarding PAC Ventures and payments from same.	0.40
	JJL	Assess communication needs for employees and prepare TCA communications update town hall meeting agenda and concepts for the receiver team.	2.60
	JJL	Review the Edison Learing file and correspondence to Tom Jeremiassen regarding same.	0.80
	JJL	Review information on the PAC Ventures matter and investment in the San Diego Farmers Market.	0.60
	TPJ	Review and e-mails with Joe Luzinski and Nick Troszak regarding review of Edison Learning financial information.	0.40
06/30/2020	MTI	Finalize Paycheck Protection Program ownership document and upload to banking website.	0.20
	MTI	Telephone call with T. Frey regarding cash flow preparation.	0.20
	MTI	Telephone call with I. Sadovnic regarding Sofame transaction; follow up by e-mail.	0.20
	MTI	Follow-up e-mail on Series C redemption for TPNI.	0.20
	TJF	Weekly zoom meeting with TPNI management to discuss business overview, project pipeline, and current cash situation.	1.00
	TJF	Telephone call with Craig McDonald of Xcell to discuss this week's sweep request.	0.20
	BDS	Telephone call with Joe Luzinski regarding fund management strategy for loan payments and processing.	0.40
	JJL	Telephone call with Bill Fickling regarding the status of payroll and employee issues.	0.40
	JJL	Review and update to-do open item listing.	0.40
	JJL	Review and respond to Miriam Cunningham's correspondence regarding the payroll processing for the second half of June 2020.	0.30
	JJL	Review correspondence regarding Sofame, Cleland and Edison Learning and Xcell.	0.80
	JJL	Review and respond to Tom Frey's correspondence regarding budget, run rate issues and costs and expenses for the receivership.	0.80
	JJL	Telephone call with Ken Forrest regarding cash planning and position for the TCA estate.	0.20
	JJL	Telephone call with Jay Bushman regarding IT needs from the TCA estate.	0.20
	JJL	Review correspondence from Jonathan Perlman regarding Pie Face and Austrialian issues.	0.30
	JJL	Telephone call with Bill Fickling regarding the update on pending matters and open issues.	0.30
	JJL	Telephone call with Brad Sharp regarding fund management strategy for loan payments and processing.	0.40
	JJL	Telephone call with Miriam Cunningham regarding payroll processing and reporting.	0.30
	JJL	Review the Receiver Motion to Pay contractors and offer comments on same.	0.70
	JJL	Review Advisor Registation information and assess	

			HOURS	
		necessity to renew or defer compliance with the Securities and Exchange Commission.	0.30	
	TPJ	Review of settlement agreement agreement with Independent Charter Academy Network and guarantors, and review of financial statements and other information for EdisonLearning, Inc.	2.80	
	TPJ	Preparation of memorandum concerning EdisonLearning's financial information, and e-mails with Joe Luzinski regarding same.	1.70	
		Managing Business Operations	158.60	73,002.40
06/07/2020	JJL	Review and respond to correspondence from Jonathan Perlman, Rocco Cecere, Brad Sharp and Paul Battista regarding Cayman issues.	0.30	
	BDS	Correspondence with Jonathan Perlman and Rocco Cecere regarding the Cayman protocols.	0.10	
06/08/2020	JJL	Coordinate call to discuss Cayman Joint Liquidator matters.	0.20	
06/09/2020	BDS	Telephone conference call with Jonathan Perlman, John Genovese, Irina Sadvnic, Joe Luzinski and Rocco Cecere regarding issues with respect to the Cayman JOL's.	1.00	
	JJL	Review correspondence and information provided on Cayman Joint Official Liquidators to prepare for call on same.	0.80	
	JJL	Telephone call with Jonathan Perlman, Paul Battista, John Genovese, Irina Sadovnic, Rocco Cecere, Stephen Leonlsnis, Brad Sharp and Mark Iammartino regarding Cayman Island matters.	1.50	
	MTI	Conference call with Cayman's counsel and the GJB/DSI teams to discuss potential protocol paths.	1.50	
06/10/2020	BDS	Review and comment with respect to the draft protocol regarding the Cayman JOL's, correspondence to Jonathan Perlman regarding same.	0.40	
	JJL	Review draft of the protocol agreement with the Cayman Island Joint Official Liquidators.	0.50	
	JJL	Telephone call with Brad Sharp regarding Cayman Island issues.	0.30	
	MTI	Review draft protocol with EY Caymans.	0.30	
06/12/2020	BDS	Telephone conference call with Jonathan Perlman, Irina Sadovnic, John Genovese and Paul Battista regarding the protocol issues.	1.40	
	BDS	Telephone call with Joe Luzinski regarding status of issues with respect to the protocol.	0.40	
	JJL	Telephone call with Brad Sharp with an update on Cayman issues, corporate structures and assessment of same.	0.30	
	JJL	Review various correspondence regarding the Cayman issues and discussions.	0.40	
06/15/2020	BDS	Telephone conference call with Jonathan Perlman with US and Cayman counsel and the Cayman JOL's with there U.S. and Cayman counsel regarding the draft protocols.	1.60	
06/19/2020	BDS	Review of draft protocols, correspondence to Jonathan Perlman and Joe Luzinski regarding same.	0.30	
	BDS	Review of update from Jonathan Perlman regarding		

			HOURS	
		results of his discussions.	0.10	
	JJL	Review the updated draft of the JOL/receiver protocols for administration.	0.30	
06/24/2020	BDS	Telephone conference call with Paul Battista, Mark Bloom, John Dodd, John Genovese, Rocco Cecere, Stephen Leontsinis, Katie Pearson and Mark Burrows regarding further discussions with respect to the protocol.	2.20	
	JJL	Review and respond to correspondence regarding fund assets and locations.	0.40	
06/25/2020	BDS	Correspondence with Paul Battista regarding comments to the protocol.	0.20	
06/30/2020	BDS	Review of status of discussions with respect to the protocol, correspondence to Paul Battista and Jonathan Perlman regarding same.	0.20	
	BDS	Review of the revisions of the draft protocol, correspondence to Joe Luzinski, Mark Iammartino and Tom Frey regarding financial terms of same.	0.40	
		Managing Foreign Operations	15.10	8,165.60
06/30/2020	MTI	Travel from Chicago, IL, to Denver, CO.	5.50	
		Travel at 1/2	5.50	1,199.00
		FOR THE FOREGOING PROFESSIONAL SERVICES RENDERED:	362.20	157,488.20

RECAPITULATION

CONSULTANT	HOURS	HOURLY RATE	TOTAL
J. J. Luzinski	128.70	$520.00	$66,924.00
M. T. Iammartino	5.50	218.00	1,199.00
M. T. Iammartino	85.60	436.00	37,321.60
B. D. Sharp	10.50	576.00	6,048.00
D. J. Stermer	61.70	388.00	23,939.60
G. E. Shoup	8.30	356.00	2,954.80
T.P. Jeremiassen	8.70	476.00	4,141.20
N.R. Troszak	0.50	408.00	204.00
T. J. Frey	52.70	280.00	14,756.00

Photocopy Charges	73.95
TOTAL DISBURSEMENTS: THRU 06/30/2020	73.95
TOTAL CURRENT WORK	157,562.15
BALANCE DUE	$157,562.15

Exhibit 5(e)

Rehmann Invoice
Fees per person by activity
TCA
Quarter ended June 30. 2020

Fees per person for **Tax** activity

Level	Years Experience	Name	Hours	Rate	Amount
Senior	5	Haley Arndt	3.5	215	$ 752.50
Staff	1	Lina Breland	3.8	150	$ 570.00
Executive	33	Michael Patterson	0.6	300	$ 180.00
Executive	37	Mitch Hall	67.8	300	$ 20,340.00
Senior	7	Sejla Kulaglic	1.1	215	$ 236.50
		SubTotal	76.8		$ 22,079.00

Fees per person for **Business Analysis** activity

Level	Years Experience	Name	Hours	Rate	Amount
Executive	22	Charles Hoebeke II	43.4	300	$ 13,020.00
Executive	37	Mitch Hall	2.4	300	$ 720.00
		SubTotal	45.8		$ 13,740.00

Fees per person **Grand Totals**

Grand Total	122.6	$ 35,819.00

Rehmann Invoice
Fees Activity Category
TCA
Quarter ended June 30. 2020

Totals for :

	Hours	Amount
Tax Issues	76.8	$22,079.00
Business Analysis	45.8	$13,740.00
Grand Total	**122.6**	**$35,819.00**

Rehmann Invoice
Time record detail
TCA
Quarter ended June 30. 2020

Date	Staff	Detail	Hours	Rate	Ext
5/13/2020	Charles Hoebeke II	company scope review	3	300	$ 900.00
5/14/2020	Charles Hoebeke II	call with SEC and receiver re cayman proceedings	0.5	300	$ 150.00
5/14/2020	Charles Hoebeke II	read and consider communication with EY liquidators, tax and reporting implications	0.5	300	$ 150.00
5/14/2020	Charles Hoebeke II	call with receiver and counsel regarding winding up petition	0.8	300	$ 240.00
5/14/2020	Charles Hoebeke II	discussion about winding up strategy with cayman counsel and receiver, consider tax impact of strategy	1.8	300	$ 540.00
5/14/2020	Charles Hoebeke II	research into Nevada entity ownership, position in structure, it's ownership interests in master fund, NV annual report, resident agent	2.1	300	$ 630.00
5/14/2020	Charles Hoebeke II	2018 audited financial statements	0.5	300	$ 150.00
5/15/2020	Charles Hoebeke II	review letter from EY and Harneys, brief emails with Cayman counsel to discuss	0.5	300	$ 150.00
5/15/2020	Charles Hoebeke II	calls with receiver regarding SEC questions	0.6	300	$ 180.00
5/15/2020	Charles Hoebeke II	Intro to traci Rollins	0.3	300	$ 90.00
5/15/2020	Charles Hoebeke II	consideration of risks relating to various strategies concerning Cayman	0.3	300	$ 90.00
5/15/2020	Charles Hoebeke II	discussions about control of Nevada entry, review motions to confirm and control, calls on same,	0.8	300	$ 240.00
5/15/2020	Charles Hoebeke II	calls and video calls regarding response from EY	0.9	300	$ 270.00
5/15/2020	Charles Hoebeke II	strategic consideration of voluntary winding up proceedings	0.8	300	$ 240.00
5/15/2020	Charles Hoebeke II	candidates for joint liquidators, respond to various questions on same from receiver	0.7	300	$ 210.00
5/15/2020	Mitch Hall	review numerous pleadings regarding cayman liquidation	2.4	300	$ 720.00
5/16/2020	Charles Hoebeke II	research into tca records for references to potential addtitional receivership entities including irish and uk entities	1.2	300	$ 360.00
5/16/2020	Charles Hoebeke II	call and zoom call with receiver regarding cayman waterfall analysis, collas crill strategy questions,	0.8	300	$ 240.00
5/16/2020	Charles Hoebeke II	cares act issues at the spv level, prelim discussion on potential litigation, review of 2018 audited fs highlights	0.8	300	$ 240.00
5/16/2020	Charles Hoebeke II	research and prep presentation regarding Cayman disbursement structure, including variables that great divergence or convergence with US waterfall.	1.1	300	$ 330.00
5/16/2020	Charles Hoebeke II	Call with Cayman counsel on same	1.2	300	$ 360.00
5/16/2020	Charles Hoebeke II	Consideration of tax legal and practical tax implications of receiver responsibility for tax info gathering and filing.	1	300	$ 300.00
5/17/2020	Charles Hoebeke II	Call with collas crill and research regarding receivers questions on comi,	0.9	300	$ 270.00
5/17/2020	Charles Hoebeke II	call with receiver regarding same and questions about jurisiction for litigation targets.	0.5	300	$ 150.00
5/17/2020	Charles Hoebeke II	emails regarding UK co interests,	0.9	300	$ 270.00
5/17/2020	Charles Hoebeke II	document requests from Cayman entities, answers to recevier's request for facts around comi	0.6	300	$ 180.00
5/18/2020	Charles Hoebeke II	Call re potential spv manager, email to receiver	0.8	300	$ 240.00
5/18/2020	Charles Hoebeke II	Research into opportunity uk fund, call with uk resource	1.5	300	$ 450.00
5/18/2020	Charles Hoebeke II	Emails to and from receiver regarding sealed motion,	1.2	300	$ 360.00
5/18/2020	Charles Hoebeke II	extended call with receiver and fund administrator re redemptions and various spreadsheets	1.8	300	$ 540.00
5/19/2020	Charles Hoebeke II	call with receiver	0.8	300	$ 240.00
5/19/2020	Charles Hoebeke II	calls and research into defensive strategies, emails on same	1.8	300	$ 540.00
5/20/2020	Charles Hoebeke II	emails and calls re UK research	0.8	300	$ 240.00
5/21/2020	Charles Hoebeke II	Call with receiver re uk structures, email regarding stanford case.	1.2	300	$ 360.00

6/1/2020	Charles Hoebeke II	Email from receiver re protocol	0.5	300	$ 150.00
6/1/2020	Charles Hoebeke II	call with cayman counsel re same	0.8	300	$ 240.00
6/1/2020	Charles Hoebeke II	draft protocol suggestions	1.5	300	$ 450.00
6/4/2020	Charles Hoebeke II	Email from receiver, brief communication with uk professionals	0.8	300	$ 240.00
6/16/2020	Charles Hoebeke II	email from receiver re uk structure and response	0.4	300	$ 120.00
		Subtotal hours and fees for "Business Analysis" Activity	39.4		$ 11,820.00
5/12/2020	Mitch Hall	correspondence with Chip; correspondence with Jonathan; review complaint and order appointing receiver.	0.9	300	$ 270.00
5/12/2020	Charles Hoebeke II	Various calls with receiver and team re scope of entities and research into reporting	2.5	300	$ 750.00
5/13/2020	Mitch Hall	phone conference with jonathan	0.4	300	$ 120.00
5/13/2020	Mitch Hall	review w-9s	0.5	300	$ 150.00
5/13/2020	Mitch Hall	review spv master list	0.5	300	$ 150.00
5/13/2020	Mitch Hall	assemble documentation	1	300	$ 300.00
5/13/2020	Mitch Hall	review complaint and order appointing receiver	3.5	300	$ 1,050.00
5/13/2020	Mitch Hall	receive and respond to emails from receiver's team.	1.4	300	$ 420.00
5/14/2020	Charles Hoebeke II	deep dive into taxable structure of entity	0.8	300	$ 240.00
5/14/2020	Charles Hoebeke II	review tax returns	1.2	300	$ 360.00
5/14/2020	Mitch Hall	receive and review numerous initial receivership documents to include tax returns for each receivership entity for the past three years	4.5	300	$ 1,350.00
5/14/2020	Mitch Hall	correspondence with chip and jonathan	1	300	$ 300.00
5/14/2020	Mitch Hall	review pleadings regarding entity organization.	2.1	300	$ 630.00
5/15/2020	Charles Hoebeke II	review various emails regarding cash seizures in various jurisdictions	0.4	300	$ 120.00
5/15/2020	Charles Hoebeke II	consideration of family first and cares act tax impacts on receviership entities and SPVs	1	300	$ 300.00
5/15/2020	Charles Hoebeke II	call regarding tax return confirmation of ownership interests	0.5	300	$ 150.00
5/15/2020	Haley Arndt	Filling out Form 56 for 6 TCA Entities, 20 minutes towards general instructions, 10 minutes towards each entity.	1.5	215	$ 322.50
5/15/2020	Mitch Hall	phone conference with chip regarding tax research	0.5	300	$ 150.00
5/15/2020	Mitch Hall	research and discuss with haley preparation of forms 56 notice concerning fiduciary relationship	1.1	300	$ 330.00
5/15/2020	Mitch Hall	research structure of various receivership entities and tca global lending corp	2.6	300	$ 780.00
5/15/2020	Mitch Hall	report to receiver	0.5	300	$ 150.00
5/15/2020	Mitch Hall	review forms 56 prepared for receivership estate	1	300	$ 300.00
5/16/2020	Haley Arndt	Form 2848, reading instructions and starting to fill out forms, email sent	0.7	215	$ 150.50
5/16/2020	Mitch Hall	receive and review correspondence from receiver	1.2	300	$ 360.00
5/16/2020	Mitch Hall	research and respond to receiver questions regarding tax returns and relationship with spv entities and other tca entities	2.3	300	$ 690.00
5/16/2020	Mitch Hall	research ownership questions regarding spv entities	2.7	300	$ 810.00
5/18/2020	Mitch Hall	review tax tca global lending tax memo	0.3	300	$ 90.00
5/18/2020	Mitch Hall	review tca global lending recapitalization agreement	0.3	300	$ 90.00
5/18/2020	Mitch Hall	review comi memo	0.3	300	$ 90.00
5/18/2020	Mitch Hall	review email regarding tca global lending	0.4	300	$ 120.00
5/18/2020	Mitch Hall	review tca global lending tax restructuring memo	0.5	300	$ 150.00
5/18/2020	Mitch Hall	review email regarding chapter 15	0.5	300	$ 150.00

5/18/2020	Mitch Hall	phone conference with chip to discuss tax records and information request from receiver	0.5	300	$ 150.00
5/18/2020	Lina Breland	Filing tax documents provided by receiver	2	150	$ 300.00
5/19/2020	Mitch Hall	phone conference with chip regarding taxes.	0.2	300	$ 60.00
5/19/2020	Lina Breland	Filing tax documents provided by receiver	0.5	150	$ 75.00
5/20/2020	Lina Breland	Filing tax documents provided by receiver	1	150	$ 150.00
5/20/2020	Mitch Hall	review and file forms 56 for receivership entities.	1.6	300	$ 480.00
5/21/2020	Haley Arndt	Research on New Horizons Fund, searching for more information on fund.	1.3	215	$ 279.50
5/21/2020	Mitch Hall	review pleadings affecting tax consulting	1	300	$ 300.00
5/21/2020	Mitch Hall	phone conference with chip regarding tax filings	0.9	300	$ 270.00
5/21/2020	Mitch Hall	file remaining forms 56 on behalf of receivership entities.	1.8	300	$ 540.00
5/29/2020	Mitch Hall	receive and review correspondence from receiver regarding spv email and irs issues.	0.6	300	$ 180.00
6/3/2020	Mitch Hall	receive and review zip drive with downloadable files.	0.5	300	$ 150.00
6/5/2020	Lina Breland	Filing tax documents provided by receiver	0.3	150	$ 45.00
6/5/2020	Mitch Hall	review and download zip files from receiver	2.3	300	$ 690.00
6/8/2020	Mitch Hall	review accounting and tax files on zip file sent by receiver.	4.4	300	$ 1,320.00
6/9/2020	Mitch Hall	review accounting and tax files on zip drive provided by receiver.	1.4	300	$ 420.00
6/15/2020	Mitch Hall	review accounting and tax files in Genovese zip file.	1.4	300	$ 420.00
6/16/2020	Mitch Hall	continue to review accounting and tax documents in Genovese zip file.	2.3	300	$ 690.00
6/22/2020	Mitch Hall	correspondence from Jonathan.	0.1	300	$ 30.00
6/22/2020	Mitch Hall	correspondence with Irina.	0.3	300	$ 90.00
6/22/2020	Mitch Hall	Receive and review additional tax documents from Receiver.	1.4	300	$ 420.00
6/23/2020	Mitch Hall	review TCA Fund Management Group Corp tax files	2.7	300	$ 810.00
6/23/2020	Mitch Hall	phone conference with chip	0.5	300	$ 150.00
6/23/2020	Mitch Hall	correspondence with Receiver.	1.3	300	$ 390.00
6/24/2020	Mitch Hall	Phone conference with Irina from Receiver's office.	0.3	300	$ 90.00
6/24/2020	Mitch Hall	correspondence with Receiver's office.	0.5	300	$ 150.00
6/24/2020	Mitch Hall	Phone conference with Sejla regarding international tax issues relating to UK entities.	0.5	300	$ 150.00
6/24/2020	Mitch Hall	Follow up phone conference with Sejla regarding international tax issues relating to UK entities.	0.5	300	$ 150.00
6/24/2020	Sejla Kulaglic	call w/ Mitch re: potential 5471 filing requirements and US tax implications of UK entity and branch - follow up emails	0.7	215	$ 150.50
6/25/2020	Sejla Kulaglic	draft summary of int'l considerations for Mitch; discuss w/ MAP - update and send to Mitch	0.4	215	$ 86.00
6/25/2020	Michael Patterson	international tax filing requirements - call with S1K	0.6	300	$ 180.00
6/25/2020	Mitch Hall	Prepare draft memo in response to Receiver's question regarding payroll tax issues relating to UK entities//	3.5	300	$ 1,050.00
6/25/2020	Mitch Hall	review international tax memo from Sejla regarding international tax issues relating to UK entities	1.3	300	$ 390.00
6/25/2020	Mitch Hall	correspondence with Chip regarding various tax issues relating to receivership entities.	0.8	300	$ 240.00
6/26/2020	Mitch Hall	Phone conference with Cindy Redmond regarding TCA entity set up in Rehmann system/phone conference with Chip re same	1.4	300	$ 420.00
6/26/2020	Mitch Hall	Review tax documents received from Irina	2	300	$ 600.00
6/26/2020	Mitch Hall	prepare draft memo to Receiver regarding status of tax returns.	1.2	300	$ 360.00
6/29/2020	Mitch Hall	phone conference with chip regarding taxes.	0.6	300	$ 180.00
		Subtotal hours and fees for "Tax" Activity	83.2		$ 23,999.00

Grand total hours and fees for all Activity Categories	$ 122.60	$ 35,819.00

Exhibit 5(f)

All funds payable to:
E-Hounds, Inc.
32815 US 19 North Suite 100
Palm Harbor, Florida 34684
www.ehounds.com (727) 726-8985

Invoice for Services

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E9618)	Terms
05/01/2020	05/31/2020	82057	$9551.50	in RE: TCA Fund et al	Due on Receipt

Invoice to:
Genovese Joblove & Battista
100 SE 2nd Street
Suite 4400
Miami, Florida 33131

Case Contact:
Genovese Joblove & Battista
Jonathan Perlman
305-349-2323

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
2.1	05/13/2020		Review, advise conf (Custodian list, credentials retrieval)	ADS	$195.00	$409.50
4.6	05/14/2020		Review credentials and source access availability	ADS	$195.00	$897.00
3.5	05/18/2020		Intake/Imaging/Litigation Hold (Cloud Data) O365 Key Custodians - Email	RTR	$195.00	$682.50
4.8	05/19/2020		Intake/Imaging/Litigation Hold (Cloud Data) O365 - Sharepoint Data Preservation	RTR	$195.00	$936.00
1.2	05/19/2020		Project Management - Data Load-in, Indexing, QC, OCR Exchange Email	DAB	$195.00	$234.00
1	05/19/2020		E-Hounds Review® Platform (incl 6 user seat) Courtesy Rate Monthly		$995.00	$995.00
4.0	05/21/2020		Intake/Imaging/Litigation Hold (Cloud Data) O365 Sharepoint Data Preservation	RTR	$195.00	$780.00
1.0	05/21/2020		Conference call J. Bushman/R. Rohr - Asset Review and Status Update	RTR	$195.00	$195.00
1.8	05/21/2020		Project Management - Data Load-in, Indexing, QC, OCR Sharepoint part 1	DAB	$195.00	$351.00
2.2	05/22/2020		Project Management - Data Load-in, Indexing, QC, OCR Sharepoint part 2	DAB	$195.00	$429.00
6.8	05/28/2020		Project Management - Data Load-in, Indexing, OCR, Conversion QC (cumulative) VMWare Images	RTR	$195.00	$1326.00
1	05/29/2020		Security audit and password changes (Employee Lockouts)	RTR	$195.00	$195.00
2.7	05/29/2020		Intake/Imaging/Litigation Hold (Cloud Data) Dropbox	RTR	$195.00	$526.50
2	05/30/2020		Project Management - Expert Consult (Cumulative) (EOM QC Review)	ADS	$300.00	$600.00

All balances are due upon receipt. Thank you!

Payments Applied	

SUBTOTAL	$9551.50
TOTAL	$9551.50
Balance Due	$9551.50

Retainer Amount Remaining

Please note: Our fees are subject to change annually. Last change: 1/2/2018

E-Hounds also accepts: AMERICAN EXPRESS MasterCard VISA DISCOVER

Statement of Limited Liability and Financial Responsibility

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.

All funds payable to:
E-Hounds, Inc.
32815 US 19 North Suite 100
Palm Harbor, Florida 34684
www.ehounds.com (727) 726-8985

Invoice for Services

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E9618)	Terms
06/01/2020	06/30/2020	82596	$15876.50	in RE: TCA Fund et al	Due on Receipt

Invoice to:
Genovese Joblove & Battista
100 SE 2nd Street
Suite 4400
Miami, Florida 33131

Case Contact:
Genovese Joblove & Battista
Jonathan Perlman
305-349-2323

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
2.2	06/02/2020		Project Management - Data Load-in, Indexing, QC, OCR TCA_Dropbox	DAB	$195.00	$429.00
1	06/03/2020		Security audit and password changes (Employee Terminations)	RTR	$195.00	$195.00
1.5	06/16/2020		Project Management - Data Load-in, Indexing, QC, OCR 20200610 SFTP upload from MValdivia	DAB	$195.00	$292.50
1	06/23/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-3 (Mac)	RTR	$225.00	$225.00
1	06/23/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-4 (Mac)	RTR	$225.00	$225.00
1	06/23/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-5 (Mac)	RTR	$225.00	$225.00
1	06/24/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-6 (Mac)	ERC	$225.00	$225.00
1	06/24/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-7 (HP)	ERC	$225.00	$225.00
1	06/24/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-8 (Dell)	ERC	$225.00	$225.00
1	06/24/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-9 (Mac)	JCS	$225.00	$225.00
1	06/24/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-10 (Mac)	JCS	$225.00	$225.00
1	06/25/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-11 (Dell)	JCS	$225.00	$225.00
1	06/25/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-12 (Mac)	JCS	$225.00	$225.00
1	06/25/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-13 (Lenovo)	JCS	$225.00	$225.00
1	06/25/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-14 (Mac)	RTR	$225.00	$225.00
1	06/25/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-15 (Dell)	RTR	$225.00	$225.00
1	06/25/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-16 (Dell)	RTR	$225.00	$225.00
1	06/25/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-17 (Dell)	RTR	$225.00	$225.00
1	06/26/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-18 (Dell)	ERC	$225.00	$225.00
1	06/26/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-19 (Seagate)	ERC	$225.00	$225.00
1	06/26/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-20 (Dell HD)	ERC	$225.00	$225.00
1	06/26/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-21 (Dell HD)	ERC	$225.00	$225.00
1	06/26/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-22 (Dell HD)	RTR	$225.00	$225.00
1	06/26/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-33 (HP)	RTR	$225.00	$225.00
1	06/26/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-34 (HP)	RTR	$225.00	$225.00
1	06/26/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-35 (HP)	RTR	$225.00	$225.00
1	06/26/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-36 (HP)	JCS	$225.00	$225.00
1	06/26/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-37 (HP)	JCS	$225.00	$225.00
1	06/29/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-38 (HP)	JCS	$225.00	$225.00
1	06/29/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-39 (Apple)	JCS	$225.00	$225.00
1	06/29/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-40 (Apple)	JCS	$225.00	$225.00
1	06/29/2020		Intake, Handling, Storage and Secure Preservation (Computer) E9618-41 (HP)	RTR	$225.00	$225.00
10	06/29/2020		Technician Hours No Data to Preserve - E9618-2, 23-31	RTR	$195.00	$1950.00
20.5	06/30/2020		Data extraction, load, index QC and verify Logical File Creation from Preserved Images	DAB	$195.00	$3997.50
6.5	06/30/2020		Technician Hours Reconstruct Server RAID (Chassis Damaged)	JCS	$195.00	$1267.50
1	06/30/2020		E-Hounds Review® Platform (incl 6 user seat) Courtesy Rate Monthly		$995.00	$995.00

E-Hounds also accepts:

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E9618)	Terms
06/01/2020	06/30/2020	82596	$15876.50	in RE: TCA Fund et al	Due on Receipt

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext

All balances are due upon receipt. Thank you!

SUBTOTAL	$15876.50
TOTAL	$15876.50
Balance Due	$15876.50

Payments Applied

Retainer Amount Remaining

Please note: Our fees are subject to change annually. Last change: 1/2/2018

E-Hounds also accepts:

Statement of Limited Liability and Financial Responsibility

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 20-CIV-21964-CMA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TCA FUND MANAGEMENT GROUP CORP., *et al.*,

Defendants.
_____/

ORDER GRANTING RECEIVER'S FIRST INTERIM OMNIBUS APPLICATION FOR ALLOWANCE AND PAYMENT OF PROFESSIONAL FEES AND REIMBURSEMENT OF EXPENSES FOR MAY 11, 2020 THROUGH JUNE 30, 2020

THIS CAUSE having come before the Court upon Jonathan E. Perlman, Esq.'s, as court-appointed Receiver (the "Receiver") over the Receivership Defendants TCA Fund Management Group Corp. ("TCA") and TCA Global Credit Fund GP, Ltd. ("GP"), and Relief Defendants TCA Global Credit Fund, LP ("Feeder Fund LP"), TCA Global Credit Fund, Ltd., TCA Global Lending Corp. ("Global Lending"), and TCA Global Credit Master Fund, LP ("Master Fund") First Interim Omnibus Application for Allowance and Payment of Professional Fees and Reimbursement of Expenses For May 11, 2020 Through June 30, 2020 (the "First Application"), filed on August 28, 2020.

The Court has considered the First Application and being otherwise fully advised in the premises, it is

ADJUDGED that the motion **is GRANTED**. The First Application is **APPROVED**.

ADJUDGED that the Receiver and Genovese Joblove & Battista, P.A.'s fees of $526,362.30 and expenses of $4,974.34 are **APPROVED**. The Receiver is authorized to pay

Genovese Joblove & Battista, P.A. the sum of $426,064.18, representing 80% of the approved fees ($526,362.30) and 100% of expenses ($4,974.34) earned during the First Application period of May 11, 2020 through June 30, 2020, with the remaining 20% of the approved fees to be paid out at the discretion of the Court as part of the final fee application submitted at the close of the receivership.

ADJUDGED that Collas Crill's fees of $242,384.62 are **APPROVED**. The Receiver is authorized to pay Collas Crill $193,907.70, representing 80% of the approved fees ($242,384.62) earned during the First Application period of May 11, 2020 through June 30, 2020, with the remaining 20% of the approved fees to be paid out at the discretion of the Court as part of the final fee application submitted at the close of the receivership.

ADJUDGED that Yip Associates' fees of $22,433.00 are **APPROVED**. The Receiver is authorized to pay Yip Associates $17,946.40, representing 80% of the approved fees ($22,433.00) earned during the First Application period of May 11, 2020 through June 30, 2020, with the remaining 20% of the approved fees to be paid out at the discretion of the Court as part of the final fee application submitted at the close of the receivership.

ADJUDGED that the Development Specialist Inc.'s fees of $147,488.20 and expenses of $73.95 are **APPROVED**. The Receiver is authorized to pay Development Specialists, Inc. the sum of $118,064.51, representing 80% of the approved fees ($147,488.20) and 100% of expenses ($73.95) earned during the First Application period of May 11, 2020 through June 30, 2020, with the remaining 20% of the approved fees to be paid out at the discretion of the Court as part of the final fee application submitted at the close of the receivership.

ADJUDGED that Rehmann's fees of $35,819.00 are **APPROVED**. The Receiver is authorized to pay Rehmann $28,655.20, representing 80% of the approved fees ($35,819.00) earned

during the First Application period of May 11, 2020 through June 30, 2020, with the remaining 20% of the approved fees to be paid out at the discretion of the Court as part of the final fee application submitted at the close of the receivership.

ADJUDGED that E-Hounds, Inc.'s fees of $25,428.00 are **APPROVED**. The Receiver is authorized to pay E-Hounds, Inc. $20,342.40, representing 80% of the approved fees ($25,428.00) earned during the First Application period of May 11, 2020 through June 30, 2020, with the remaining 20% of the approved fees to be paid out at the discretion of the Court as part of the final fee application submitted at the close of the receivership.

DONE and ORDERED in _____ at Miami, Florida this ___ day _____, 2020.

CECILIA M. ALTONAGA
UNITED STATES DISTRICT JUDGE

Copies furnished to all counsel of record