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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 SECURITIES AND EXCHANGE
COMMISSION,

12 Plaintiff,

13 vs.

14 WESTMOORE MANAGEMENT,
15 LLC; WESTMOORE INVESTMENT,
LP.; WESTMOORE CAPITAL
16 MANAGEMENT, INC.;
WESTMOORE CAPITAL, LLC; and
17 MATTHEW R. JENNINGS,

18 Defendants.
19
20

Case No. 8:10-cv-00849-AG (MLGx)

**DECLARATION OF JOHN N.
TEDFORD, IV, DAVID A. GILL IN
SUPPORT OF RECEIVER'S FINAL
REPORT AND ACCOUNT AND
MOTION FOR (1) APPROVAL OF
FINAL REPORT AND ACCOUNT,
(2) APPROVAL OF FINAL
COMPENSATION OF THE
RECEIVER AND HIS ATTORNEYS
AND ACCOUNTANTS,
(3) AUTHORITY TO DISBURSE
REMAINING FUNDS ON A PRO
RATA BASIS, (4) DISCHARGE OF
THE RECEIVER, AND
(5) EXONERATION OF THE
RECEIVER'S BOND**

Date: August 5, 2019
Time: 10:00 a.m.
Place: Courtroom 10D
411 West Fourth Street
Santa Ana, California

1 I, John N. Tedford, IV, declare as follows:

2 1. I am the principal of a professional corporation which is a partner of the
3 law firm of Danning, Gill, Diamond & Kollitz, LLP (“DGDK”), counsel for David
4 A. Gill, the Permanent Receiver (the “Receiver”) for Westmoore Management, LLC,
5 Westmoore Investment, L.P., Westmoore Capital Management, Inc., and Westmoore
6 Capital, LLC, and their subsidiaries and entities otherwise majority owned, managed
7 or controlled, directly or indirectly, by any of them (collectively the “Westmoore
8 Entities” or “Westmoore”), pursuant to the *Judgment of Permanent Injunction,*
9 *Appointment of Permanent Receiver, and Imposing Other Relief as to Defendants*
10 *Westmoore Management, LLC; Westmoore Investment, L.P.; Westmoore Capital*
11 *Management, Inc.; and Westmoore Capital, LLC* entered on or about August 12,
12 2011. I am the attorney at DGDK principally responsible for representing the
13 Receiver in this case.

14 2. I have personal knowledge of the facts in this declaration and, if called
15 as a witness, I could competently testify to these facts.

16 3. This declaration is submitted in support of the *Receiver’s Final Report*
17 *and Account and Motion for (1) Approval of Final Report and Account, (2) Approval*
18 *of Final Compensation of the Receiver and His Attorneys and Accountants,*
19 *(3) Authority to Disburse Remaining Funds on a Pro Rata Basis, (4) Discharge of*
20 *the Receiver, and (5) Exoneration of the Receiver’s Bond* (the “Final Report”).

21 4. I assisted the Receiver in preparing the Final Report. To the best of my
22 knowledge and belief, based in part upon investigations conducted by the Receiver,
23 myself, and other professionals in this case, all factual statements in the Final Report
24 and true and correct.

25 5. For services rendered by DGDK from July 27, 2011, through October
26 31, 2018, the Court has allowed fees in the amount of \$1,263,958.50. Of this
27 amount, DGDK has received \$1,165,858.47.

28

1 6. For costs advanced by DGDK from July 27, 2011, through October 31,
2 2018, the Court has allowed DGDK costs in the amount of \$28,017.52. All allowed
3 costs have been paid.

4 7. For services rendered DGDK from November 1, 2018, through the
5 present (the "Final Period"), DGDK has incurred an additional \$90,450.00 of fees
6 and advanced \$2,038.27 of costs.

7 8. To the best of my knowledge, information and belief formed after
8 reasonable inquiry, all statements made in this declaration and all fees and expenses
9 for which payment is sought by DGDK are true and accurate and comply with the
10 *Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities*
11 *and Exchange Commission* (the "Billing Instructions"), except as may be described
12 in this declaration and in the exhibits attached hereto.

13 9. All fees for which payment is requested are based on the rates listed in
14 DGDK's fee schedule attached as Exhibit "6" hereto. I believe that all such fees are
15 reasonable, necessary and commensurate with the skill and experience required for
16 the activity performed. The rate schedule identifying the rates for which DGDK is
17 seeking reimbursement of expenses also is attached as Exhibit "6" hereto.

18 10. DGDK has not included in the amount for which reimbursement is
19 sought the amortization of the cost of any investment, equipment or capital outlay,
20 except to the extent that any such amortization is included within the permitted
21 allowable amounts set forth herein for photocopies and facsimile transmissions.

22 11. To the extent that DGDK is seeking reimbursement for a service which
23 DGDK justifiably purchased or contracted for from a third party, such as copying,
24 imaging, bulk mail, messenger service, overnight courier, or title and lien searches,
25 DGDK requests reimbursement only for the amount billed to DGDK by the third-
26 party vendor and paid by DGDK to such vendor. I understand that DGDK pays a
27 monthly rate for Westlaw computerized research services, and that DGDK allocates
28 charges for reimbursement based upon actual usage of Westlaw, such as charges per

1 search or download of data. Users of Westlaw at DGDK input a client code each
2 time that they log on, thus ensuring that each client is charged only for the searches,
3 downloads, and others actions taken in connection with that client's particular case.

4 12. Attached hereto and marked as Exhibit "7" are detailed billing records
5 reflecting the services provided by DGDK to the Receiver during the Final Period,
6 including a breakdown by activity code.

7 13. Services rendered by DGDK are broken down into activity codes. By
8 activity code, a summary of the services rendered by DGDK during the Final Period
9 follows:

10 a. Asset Disposition ("AD"). Services billed to this category
11 include those relating to the Receiver's settlement with investors who claimed to
12 have security interests in Westmoore's shares of stock in Lilis Energy, Inc. f/k/a
13 Recovery Energy, Inc. After the Court granted the Receiver's motion for approval
14 of the settlement, DGDK prepared documentation needed to effectuate the transfer
15 of the shares to Jeffrey I. Golden, as chapter 7 trustee for the estate of GM Funding,
16 Inc., and wrote letters of instruction to facilitate the transfer. Services billed to this
17 category also include those relating to the Receiver's sale of his judgment against
18 Matthew Jennings.

19 b. Business Operations ("BO"). Services billed to this category
20 include those relating to the preparation and filing of the Receiver's tax returns.

21 c. Case Administration ("CA"). Services billed to this category
22 include general services that assisted the Receiver in his administration of the case.
23 This category also includes DGDK's attendance at case status conferences, and time
24 spent preparing the Final Report and its accompanying notice and declarations. This
25 category is also used as a catch-all category for services that could be assigned to
26 multiple categories, or services that did not readily belong under one of the other
27 categories.

28

1 d. Claims Administration and Objections (“CL”). Services billed to
2 this category included communications with creditors and investors.

3 e. Fee/Employment Applications (“FA”). Services billed to this
4 category relate to the interim fee applications filed by the Receiver, DGDK and the
5 Receiver’s accountants in late 2018 and early 2019, and attending the hearings on
6 those applications.

7 14. Attached hereto and marked as Exhibit “8” are detailed records of out-
8 of-pocket expenses incurred and advanced by DGDK during the Final Period.

9 15. Attached hereto and marked as Exhibit “9” are monthly summaries of
10 fees and expenses billed by DGDK during the Final Period.

11
12 I declare under penalty of perjury under the laws of the United States of
13 America that the foregoing is true and correct.

14 Executed on June 21, 2019, at Los Angeles, California.

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16
17 
18 _____
19 JOHN N. TEDFORD, IV

EXHIBIT "6"

DANNING, GILL, DIAMOND & KOLLITZ, LLP
YEAR 2018 SCHEDULE OF
RATES FOR PROFESSIONALS

<u>INITIALS</u>	<u>ATTORNEY NAME</u>	<u>HOURLY RATE</u>
DAG	David A. Gill	\$695.00
RKD	Richard K. Diamond	695.00
HK	Howard Kollitz	695.00
EPI	Eric P. Israel	670.00
JNT	John N. Tedford, IV	625.00
UOR	Uzzi O. Raanan	625.00
BDK	Brad D. Krasnoff	670.00
ZS	Zev Shechtman	470.00
GES	George E. Schulman	650.00
WKO	Walter K. Oetzell	650.00
DCW	Diane C. Weil	670.00
AED	Aaron E. de Leest	565.00
MGD	Michael G. D'Alba	510.00
SS	Sonia Singh	325.00

PARALEGALS/LEGAL ASSISTANTS/LAW CLERKS

VGR	Valerie G. Radocay (Senior Paralegal)	250.00
CAB	Cheryl Blair	210.00
DTK	Danielle Krasnoff	210.00
SP	Aracelli Panta	210.00

Exhibit 6

DANNING, GILL, DIAMOND & KOLLITZ, LLP
YEAR 2019 SCHEDULE OF
RATES FOR PROFESSIONALS

<u>INITIALS</u>	<u>ATTORNEY NAME</u>	<u>HOURLY RATE</u>
RKD	Richard K. Diamond	695.00
EPI	Eric P. Israel	670.00
JNT	John N. Tedford, IV	625.00
UOR	Uzzi O. Raanan	625.00
BDK	Brad D. Krasnoff	670.00
ZS	Zev Shechtman	495.00
GES	George E. Schulman	650.00
AED	Aaron E. de Leest	565.00
MGD	Michael G. D'Alba	510.00
SS	Sonia Singh	350.00

PARALEGALS/LEGAL ASSISTANTS/LAW CLERKS

VGR	Valerie G. Radocay (Senior Paralegal)	250.00
DTK	Danielle Krasnoff	210.00
SP	Aracelli Panta	210.00

2018 RATES FOR REIMBURSEMENT OF EXPENSES

Reprographic Expense (Photocopy, Scan, Print).....	\$.20 per page
Facsimile - Incoming	\$.20 per page
Facsimile - Outgoing.....	\$1.00 per page
Mileage	IRS Rate for Business Use (currently 0.545 per mile)
Telephone.....	Actual Cost
Postage	Actual Cost
Messengers.....	Actual Cost
Overnight Mail.....	Actual Cost
On-line Computer Research.....	Actual Cost
Filing Fees.....	Actual Cost
Deposition or Witness Fees	Actual Cost
Parking	Actual Cost

2019 RATES FOR REIMBURSEMENT OF EXPENSES

Reprographic Expense (Photocopy, Scan, Print).....	\$.20 per page
Facsimile - Incoming	\$.20 per page
Facsimile - Outgoing.....	\$1.00 per page
Mileage	IRS Rate for Business Use (currently 0.58 per mile)
Telephone.....	Actual Cost
Postage	Actual Cost
Messengers.....	Actual Cost
Overnight Mail.....	Actual Cost
On-line Computer Research.....	Actual Cost
Filing Fees.....	Actual Cost
Deposition or Witness Fees	Actual Cost
Parking	Actual Cost

EXHIBIT "7"

GILL, DAVID A., RECEIVER

ASSET DISPOSITION [AD]

11/01/18	REVIEW MEMO FROM COUNSEL FOR TWO INVESTORS RE: SETTLEMENT AGREEMENT, AND PREPARE REPLY TO ALL COUNSEL WITH EXECUTION VERSION OF THE AGREEMENT PARTNER: JOHN N. TEDFORD	0.20	125.00
11/05/18	DRAFT MOTION FOR APPROVAL OF SETTLEMENT RE: LILIS ENERGY SHARES PARTNER: JOHN N. TEDFORD	1.70	1062.50
11/05/18	DRAFT REPORT RE: NO BIDS RECEIVED FOR JENNINGS JUDGMENT PARTNER: JOHN N. TEDFORD	0.20	125.00
11/05/18	PREPARE MEMO TO G. LEUNG RE: REPORT TO BE FILED TODAY RE: NO BIDS FOR THE JENNINGS JUDGMENT PARTNER: JOHN N. TEDFORD	0.10	62.50
11/06/18	CONTINUE DRAFTING MOTION FOR APPROVAL OF SETTLEMENT RE LILIS SHARES PARTNER: JOHN N. TEDFORD	6.40	4000.00
11/07/18	DRAFT ORDER APPROVING SETTLEMENT RE: LILIS ENERGY STOCK PARTNER: JOHN N. TEDFORD	0.30	187.50
11/07/18	REVIEW MEMO FROM D. NAVIGATO RE: ANTICIPATED TIME FOR PAYMENT FROM PROCEEDS OF LILIS SHARES, AND PREPARE REPLY RE: SAME PARTNER: JOHN N. TEDFORD	0.10	62.50
11/07/18	DETAILED REVIEW OF TRUSTEE'S DRAFT MOTION FOR APPROVAL OF SETTLEMENT PARTNER: JOHN N. TEDFORD	0.30	187.50
11/07/18	CONTINUE DRAFTING MOTION FOR APPROVAL OF SETTLEMENT PARTNER: JOHN N. TEDFORD	3.40	2125.00
11/07/18	PREPARE MEMO TO P. HOLLENBECK RE: REQUEST FOR TRUE CAPITAL'S SIGNATURE ON SETTLEMENT AGREEMENT PARTNER: JOHN N. TEDFORD	0.10	62.50
11/07/18	PREPARE MEMO TO COUNSEL FOR COLEMAN AND THE HENSELS RE: PRIOR RELATIONSHIP (IF ANY) WITH WESTMOORE AND ITS FORMER EMPLOYEES PARTNER: JOHN N. TEDFORD	0.10	62.50
11/07/18	PREPARE MEMO TO TRUSTEE'S COUNSEL RE: DRAFT MOTION FOR APPROVAL OF THE SETTLEMENT PARTNER: JOHN N. TEDFORD	0.10	62.50
11/07/18	REVIEW MEMO FROM P. HOLLENBECK RE: SETTLEMENT AGREEMENT, AND PREPARE MEMO TO COUNSEL RE: FULLY EXECUTED AGREEMENT PARTNER: JOHN N. TEDFORD	0.00	NO CHARGE
11/08/18	REVIEW AND REVISE MOTION FOR APPROVAL OF SETTLEMENT RE: LILIS SHARES PARTNER: JOHN N. TEDFORD	0.70	437.50
11/08/18	DRAFT NOTICE OF MOTION FOR APPROVAL OF SETTLEMENT RE LILIS SHARES	0.20	125.00

	PARTNER: JOHN N. TEDFORD		
11/09/18	PREPARE MEMO TO COUNSEL RE: MOTIONS FILED TODAY	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
11/09/18	ATTENTION TO COMPILATION AND FILING OF MOTION FOR APPROVAL OF SETTLEMENT, AND SERVICE LIST	0.00	NO CHARGE
	PARTNER: JOHN N. TEDFORD		
11/20/18	TEL. CONF. WITH P. HOLLENBECK RE: ANTICIPATED TIMING FOR SALE OF LILIS SHARES AFTER MOTION IS GRANTED	0.40	250.00
	PARTNER: JOHN N. TEDFORD		
12/14/18	PREPARE MEMO TO SETTLING PARTIES RE: ENTRY OF ORDER BY DISTRICT COURT	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
12/18/18	APPEAR AT HEARING ON TRUSTEE'S MOTION FOR APPROVAL OF SETTLEMENT	0.30	187.50
	PARTNER: JOHN N. TEDFORD		
12/18/18	PREPARE MEMO TO SETTLING PARTIES RE: MOTION GRANTED BY BANKRUPTCY COURT	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
12/18/18	TEL. CONF. WITH T. BISCONTI RE: OUTCOME OF THIS MORNING'S HEARING	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
01/09/19	CONFERENCE WITH S. PANTA RE ORDER AUTHORIZING DESTRUCTION OF RECORDS	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
01/10/19	TEL. CONF. WITH TRANSFER AGENT RE PROCESS FOR TRANSFERRING SHARES	0.20	125.00
	PARTNER: JOHN N. TEDFORD		
01/10/19	DRAFT VERY DETAILED LETTER TO TRANSFER AGENT, REQUIRING RESEARCH RE ADDITIONAL HISTORY OF WESTMOORE'S ACQUISITION OF LILIS ENERGY SHARES	4.50	2812.50
	PARTNER: JOHN N. TEDFORD		
01/10/19	PREPARE MEMO TO TRANSFER AGENT RE WHETHER LEGEND NEEDS TO BE REMOVED PRIOR TO TRANSFER	0.80	500.00
	PARTNER: JOHN N. TEDFORD		
01/10/19	PREPARE MEMO TO GM FUNDING TRUSTEE AND HIS COUNSEL RE PROCEDURE FOR TRANSFERRING THE LILIS ENERGY STOCK	0.70	437.50
	PARTNER: JOHN N. TEDFORD		
01/10/19	PREPARE MEMO TO RECEIVER RE NEED FOR MEDALLION GUARANTEE FOR TRANSFER OF STOCK	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
01/15/19	PREPARE MEMO TO TRANSFER AGENT REQUESTING RESPONSE TO MY 1/10/19 EMAIL	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
01/15/19	PREPARE MEMO TO T. BISCONTI RE STRATEGY FOR TRANSFERRING LILIS ENERGY SHARES	0.10	62.50
	PARTNER: JOHN N. TEDFORD		

Exhibit 7

01/17/19	PREPARE MEMO TO RECEIVER AND S. PANTA RE READINESS OF DOCUMENTS FOR SIGNATURE RELATING TO TRANSFER OF LILIS ENERGY STOCK PARTNER: JOHN N. TEDFORD	0.20	125.00
01/17/19	PREPARE MEMO TO P. MORRIS RE DOCUMENTS TO BE SENT TO BANK SO THEY WILL AGREE TO PROVIDE MEDALLION SIGNATURE GUARANTEE PARTNER: JOHN N. TEDFORD	0.30	187.50
01/17/19	DRAFT STOCK POWER AND COST BASIS REPORTS, AND PREPARE MEMOS TO TRANSFER AGENT AND RECEIVER RE SAME PARTNER: JOHN N. TEDFORD	2.60	1625.00
01/18/19	REVIEW MEMO FROM TRANSFER AGENT RE DOCUMENTS TO BE SIGNED BY RECEIVER, AND PREPARE MEMO TO RECEIVER RE SAME PARTNER: JOHN N. TEDFORD	0.10	62.50
01/18/19	REVIEW MEMO FROM RECEIVER RE FINAL STORAGE AND DESTRUCTION CHARGES PARTNER: JOHN N. TEDFORD	0.10	62.50
01/31/19	REVIEW MEMO FROM M. LIPHART RE AUTHORITY TO DESTROY DOCUMENTS, AND PREPARE REPLY RE SAME PARTNER: JOHN N. TEDFORD	0.10	62.50
02/04/19	DRAFT LETTER TO GM FUNDING TRUSTEE RE DOCUMENTS NEEDED TO TRANSFER LILIS ENERGY SHARES PARTNER: JOHN N. TEDFORD	1.50	937.50
02/08/19	TEL. CONF. WITH J. GOLDEN RE: LILIS ENERGY SHARES PARTNER: JOHN N. TEDFORD	0.10	62.50
02/14/19	REVIEW MEMO FROM P. HOLLENBECK RE: STATUS OF LILIS ENERGY SHARES, AND PREPARE REPLY RE: SAME PARTNER: JOHN N. TEDFORD	0.20	125.00
04/25/19	REVIEW MEMO FROM D. NAVIGATO RE STATUS OF LIQUIDATION OF LILIS ENERGY STOCK, AND PREPARE REPLY RE SAME PARTNER: JOHN N. TEDFORD	0.10	62.50
SUBTOTAL FOR ASSET DISPOSITION [AD]		26.90	16812.50
BUSINESS OPERATIONS [BO]			
11/21/18	REVIEW NOTICES FROM THE FTB, AND PREPARE MEMO TO S. TOMLINSON RE: NOTICES AND STATUS OF NARRATIVE FOR FEE APPLICATION PARTNER: JOHN N. TEDFORD	0.20	125.00
01/04/19	REVIEW AND RESPOND TO MEMO FROM B. PANTIAGUA RE FORMS 1 AND 2 PARALEGAL: VALERIE G. RADOCA Y	0.10	25.00
01/04/19	PREPARE MEMO TO K. VALBUENA RE FORMS 1 AND 2 PARALEGAL: VALERIE G. RADOCA Y	0.10	25.00
01/08/19	REVIEW MEMO FROM K. VALBUENA RE FORMS 1 AND 2 AND PREPARE MEMO TO B. PANTIAGUA RE SAME PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00

02/05/19	PREPARE MEMO TO S. TOMLINSON RE INFORMATION NEEDED RE SALE OF LILIS ENERGY STOCK, FOR TAX RETURNS PARTNER: JOHN N. TEDFORD	0.30	187.50
03/12/19	CONFERENCE WITH S. PANTA RE PAYMENT TO BE MADE TO FTB PARTNER: JOHN N. TEDFORD	0.10	62.50
03/19/19	REVIEW AND RESPOND TO MEMO FROM BORIS PANIAGUA RE RECEIVER AND DANNING, GILL, DIAMOND & KOLLITZ'S FEES FOR FINAL TAX RETURNS PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00
03/20/19	REVIEW MEMO FROM BORIS PANIAGUA RE RECEIPT OF FEES AND COST FIGURES PARALEGAL: VALERIE G. RADOCA Y	0.10	25.00
03/21/19	PREPARE MEMO TO S. TOMLINSON RE ANTICIPATION THAT ALL FUTURE PAYMENTS WILL BE TO PROFESSIONALS (INFO NEEDED FOR TAX RETURNS) PARTNER: JOHN N. TEDFORD	0.10	62.50
05/01/19	PREPARE MEMO TO S. TOMLINSON RE STATUS OF FINAL TAX RETURNS PARTNER: JOHN N. TEDFORD	0.10	62.50
05/13/19	PREPARE MEMO TO S. TOMLINSON RE STATUS OF FINAL TAX RETURNS PARTNER: JOHN N. TEDFORD	0.10	62.50
	SUBTOTAL FOR BUSINESS OPERATIONS [BO]	1.60	737.50
	CASE ADMINISTRATION [CA]		
11/05/18	REVIEW STATUS OF VARIOUS MATTERS IN WESTMOORE PARTNER: JOHN N. TEDFORD	0.00	NO CHARGE
11/07/18	PREPARE MEMO TO RECEIVER RE: DRAFT MOTION AND UPCOMING SCHEDULE PARTNER: JOHN N. TEDFORD	0.10	62.50
11/07/18	PREPARE MEMO TO G. LEUNG RE: FUTURE SCHEDULE, AND MOTIONS TO BE FILED WITHIN NEXT FEW WEEKS PARTNER: JOHN N. TEDFORD	0.30	187.50
11/07/18	REVIEW VOLUMINOUS RETURNED MAIL AND CONFERENCE WITH J.N. TEDFORD RE SAME PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00
11/07/18	ATTENTION TO UPDATING OF SERVICE LIST RE VOLUMINOUS RETURNED MAIL PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00
11/13/18	CONFERENCE WITH RECEIVER RE: INTERIM FEE APPLICATIONS AND TASKS TO BE COMPLETED TO CLOSE THIS CASE PARTNER: JOHN N. TEDFORD	0.50	312.50
11/13/18	PREPARE RECEIPTS AND DISBURSEMENTS REPORT THROUGH 11/13/18 PARTNER: JOHN N. TEDFORD	9.10	5687.50
11/13/18	EXCHANGE EMAILS WITH RECEIVER RE: PROFESSIONALS WITH OUTSTANDING FEES	0.20	125.00

	PARTNER: JOHN N. TEDFORD		
11/14/18	PREPARE MEMO TO RECEIVER RE: ADMIN DISTRIBUTION ANALYSIS	1.10	687.50
	PARTNER: JOHN N. TEDFORD		
11/15/18	TEL. CONF. WITH RECEIVER RE: INTERIM FEE APPS AND STRATEGY GOING FORWARD	0.40	250.00
	PARTNER: JOHN N. TEDFORD		
11/15/18	PREPARE MEMO TO G. LEUNG RE: UPCOMING HEARINGS	0.40	250.00
	PARTNER: JOHN N. TEDFORD		
11/15/18	PREPARE MEMO TO COURT CLERK RE: UPCOMING HEARINGS, AND WHETHER COURT WOULD PREFER THAT WE SET NEXT WEEK'S FILINGS FOR HEARING ON A DATE OTHER THAN DECEMBER 17	0.40	250.00
	PARTNER: JOHN N. TEDFORD		
11/19/18	PREPARE MEMO RE: ITEM TO BE PUT ON WEBSITE RE: CONTINUANCE OF HEARINGS TO DECEMBER 10	0.00	NO CHARGE
	PARTNER: JOHN N. TEDFORD		
12/07/18	REVIEW ORDERS AND PREPARE MEMO TO G. LEUNG RE: CONTINUANCE OF ALL WESTMOORE MATTERS TO DECEMBER 13	0.00	NO CHARGE
	PARTNER: JOHN N. TEDFORD		
12/11/18	REVISE FOUR PROPOSED ORDERS AND PREPARE NOTICES OF LODGMENT	1.40	875.00
	PARTNER: JOHN N. TEDFORD		
12/11/18	ATTENTION TO FILING OF NOTICES OF LODGMENT	0.00	NO CHARGE
	PARTNER: JOHN N. TEDFORD		
12/12/18	ORGANIZE PAPERS FOR TOMORROW'S HEARINGS	0.80	500.00
	PARTNER: JOHN N. TEDFORD		
12/12/18	PREPARE MEMO TO G. LEUNG RE: ANTICIPATED PAYMENTS TO BE MADE BY RECEIVER	0.20	125.00
	PARTNER: JOHN N. TEDFORD		
12/12/18	TEL. CONF. WITH G. LEUNG RE: TOMORROW'S HEARINGS	0.30	187.50
	PARTNER: JOHN N. TEDFORD		
12/13/18	PREPARE FOR AND ATTEND HEARINGS ON 6 MATTERS; CONFERENCE WITH RECEIVER BEFORE AND AFTER HEARINGS	3.80	2375.00
	PARTNER: JOHN N. TEDFORD		
12/14/18	REVIEW ENTERED ORDERS	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
12/14/18	REVIEW MEMO FROM CLERK RE: PROPOSED ORDERS, AND PREPARE REPLY RE: SAME	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
01/08/19	REVIEW MEMO FROM COURT CLERK RE JANUARY 14 STATUS CONFERENCE, AND PREPARE REPLY RE SAME	0.20	125.00
	PARTNER: JOHN N. TEDFORD		
01/09/19	CONFERENCE WITH RECEIVER RE STATUS OF CASE	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
03/12/19	CONFERENCE WITH RECEIVER RE STATUS OF CASE, READINESS FOR CLOSING	0.10	62.50

	PARTNER: JOHN N. TEDFORD		
03/21/19	PREPARE MEMO TO RECEIVER RE ENTRY OF ORDER APPROVING CROWE'S FEE APPLICATION, AND CALCULATION OF AMOUNT TO BE PAID	0.50	312.50
	PARTNER: JOHN N. TEDFORD		
03/22/19	TEL. CONF. WITH M. MOORE RE HER INQUIRY CONCERNING FORMER EMPLOYEE OF WESTMOORE	0.20	125.00
	PARTNER: JOHN N. TEDFORD		
03/25/19	PREPARE MEMO TO CHAMBER RE SCOTT COOPER'S NEF EMAIL	0.00	NO CHARGE
	PARTNER: JOHN N. TEDFORD		
03/26/19	TEL. CONF. WITH COURT CLERK RE COOPER LAW FIRM	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
03/26/19	DRAFT NOTICE RE THE COOPER LAW FIRM AND SCOTT B. COOPER	1.00	625.00
	PARTNER: JOHN N. TEDFORD		
04/05/19	REVIEW VOICE MAIL MESSAGE FROM INVESTOR AND REVIEW WEBSITE RE CASE STATUS	0.10	25.00
	PARALEGAL: VALERIE G. RADOCA		
04/10/19	DRAFT FINAL REPORT AND ACCOUNT	3.00	1875.00
	PARTNER: JOHN N. TEDFORD		
04/11/19	CONTINUE DRAFTING FINAL REPORT	6.00	3750.00
	PARTNER: JOHN N. TEDFORD		
04/11/19	REVIEW V/M FROM G. LEUNG RE STATUS CONFERENCE, AND PREPARE MEMO TO G. LEUNG CONFIRMING THAT S/C WAS MOVED TO 6/24/19	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
04/12/19	CONTINUE DRAFTING FINAL REPORT	3.00	1875.00
	PARTNER: JOHN N. TEDFORD		
04/15/19	CONTINUE DRAFTING FINAL REPORT	7.40	4625.00
	PARTNER: JOHN N. TEDFORD		
04/16/19	CONTINUE DRAFTING FINAL REPORT	7.50	4687.50
	PARTNER: JOHN N. TEDFORD		
04/18/19	CONTINUE DRAFTING FINAL REPORT	7.50	4687.50
	PARTNER: JOHN N. TEDFORD		
04/22/19	CONTINUE DRAFTING FINAL REPORT	2.30	1437.50
	PARTNER: JOHN N. TEDFORD		
04/23/19	CONTINUE DRAFTING FINAL REPORT	2.20	1375.00
	PARTNER: JOHN N. TEDFORD		
04/26/19	CONTINUE DRAFTING FINAL REPORT	3.40	2125.00
	PARTNER: JOHN N. TEDFORD		
04/29/19	CONTINUE DRAFTING FINAL REPORT	3.80	2375.00
	PARTNER: JOHN N. TEDFORD		
04/30/19	REVIEW MEMO FROM ATTORNEY FOR FORMER INVESTOR RE COMMISSIONS PAID TO BROKER, RESEARCH DOCUMENTS AND PREPARE REPLY RE SAME	1.40	875.00

	PARTNER: JOHN N. TEDFORD		
05/01/19	CONTINUE DRAFTING FINAL REPORT	6.70	4187.50
	PARTNER: JOHN N. TEDFORD		
05/01/19	PREPARE MEMO TO T. PHELPS RE BALANCE DUE TO PCG FOR FIELD REPRESENTATIVE WORK	0.20	125.00
	PARTNER: JOHN N. TEDFORD		
05/02/19	EXCHANGE EMAILS WITH RECEIVER RE FINAL REPORT AND BALANCE OWED TO FIELD REPRESENTATIVE	0.20	125.00
	PARTNER: JOHN N. TEDFORD		
05/02/19	REVIEW MEMO FROM S. TOMLINSON RE TAX INFORMATION TO BE INCLUDED IN THE FINAL REPORT	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
06/14/19	REVIEW MEMO FROM S. TOMLINSON RE JUNE 24 STATUS CONFERENCE, AND PREPARE REPLY RE SAME	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
06/17/19	REVIEW MEMO FROM COURT CLERK RE NEXT WEEK'S STATUS CONFERENCE, AND PREPARE REPLY RE SAME	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
06/17/19	REVIEW AND REVISE FINAL REPORT	1.70	1062.50
	PARTNER: JOHN N. TEDFORD		
06/18/19	DRAFT STIPULATION AND ORDER TO CONTINUE STATUS CONFERENCE	0.20	125.00
	PARTNER: JOHN N. TEDFORD		
06/18/19	EXCHANGE EMAILS WITH G. LEUNG RE STIPULATION TO CONTINUE STATUS CONFERENCE, AND DATE FOR HEARING ON FINAL REPORT	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
06/18/19	EXCHANGE EMAILS WITH RECEIVER RE HEARING ON FINAL REPORT AND ACCOUNT	0.10	62.50
	PARTNER: JOHN N. TEDFORD		
06/20/19	DRAFT DECLARATION OF S. TOMLINSON IN SUPPORT OF FINAL REPORT, AND PREPARE MEMO TO S. TOMLINSON RE SAME	0.80	500.00
	PARTNER: JOHN N. TEDFORD		
06/20/19	DRAFT NOTICE OF FINAL REPORT	0.90	562.50
	PARTNER: JOHN N. TEDFORD		
06/20/19	DRAFT PROPOSED ORDER APPROVING FINAL REPORT	0.50	312.50
	PARTNER: JOHN N. TEDFORD		
06/20/19	FINAL REVISIONS TO FINAL REPORT, DECLARATIONS, NOTICE, AND PROPOSED ORDER, AND EXCHANGE EMAILS WITH RECEIVER AND S. TOMLINSON	3.00	1875.00
	PARTNER: JOHN N. TEDFORD		
	SUBTOTAL FOR CASE ADMINISTRATION [CA]	84.20	52437.50
	CLAIMS ADMINISTRATION AND OBJECTIONS [CL]		
11/06/18	PREPARE MEMO TO J.N. TEDFORD RE REQUEST FOR INVESTOR INFORMATION	0.10	25.00

	PARALEGAL: VALERIE G. RADOCA Y		
11/06/18	REVIEW MEMO FROM D. DWYER RE REQUEST FOR ADDITIONAL INFORMATION ON INVESTORS	0.10	25.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/07/18	TEL. CONF. WITH D. DWYER RE ADDITIONAL INFORMATION REQUESTED ON INVESTOR FOR SEARCH OF SAME AND REVIEW MEMO RE SAME	0.30	75.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/07/18	PREPARE MEMO TO D. DWYER RE ADDITIONAL INFORMATION ON INVESTOR FOR SEARCH OF SAME	0.20	50.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/09/18	REVIEW RECORDS AND PREPARE MEMO TO SIMON CONSULTING RE: INVESTMENTS MADE BY KENNETH AND RONALD ROMERO	1.90	1187.50
	PARTNER: JOHN N. TEDFORD		
11/09/18	REVIEW MEMO FROM D. DWYER RE STATUS OF INFORMATION REQUEST	0.10	25.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/09/18	PREPARE MEMOS TO J.N. TEDFORD RE INQUIRY FROM D. DWYER	0.20	50.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/09/18	REVIEW MEMOS FROM J.N. TEDFORD RE INQUIRY FROM D. DWYER	0.20	50.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/09/18	PREPARE MEMOS TO DWYER RE INFORMATION REQUEST	0.20	50.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/09/18	REVIEW VOICE MAIL MESSAGE RE NOTICE RECEIVED AND INFORMATION REQUEST	0.10	25.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/12/18	REVIEW MEMO FROM S. TOMLINSON RE INFORMATION REQUEST BY D. DWYER	0.10	25.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/12/18	REVIEW CALL FROM A. KENNEMAN RE INVESTOR QUON, RESEARCH RE SAME AND RETURN PHONE CALL	0.20	50.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/12/18	REVIEW UPDATED SERVICE LIST RE RETURNED MAIL THAT WAS UNDELIVERABLE	0.00	NO CHARGE
	PARALEGAL: VALERIE G. RADOCA Y		
11/13/18	REVIEW MEMO FROM S. TOMLINSON RE INFORMATION LOCATED ON INVESTORS	0.10	25.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/16/18	REVIEW AND RESPOND TO MEMO FROM D. DWYER RE DOCUMENT REQUEST	0.20	50.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/16/18	PREPARE MEMO TO J.N. TEDFORD RE DOCUMENT REQUEST AND REVIEW RESPONSE	0.10	25.00
	PARALEGAL: VALERIE G. RADOCA Y		
11/16/18	REVIEW TELEPHONE MESSAGE FROM D. DWYER RE DOCUMENT PRODUCTION	0.10	25.00

	PARALEGAL: VALERIE G. RADOCA Y		
12/13/18	REVIEW ADDITIONAL RETURNED MAIL RE INVESTORS AND INTERESTED PARTIES FOR UPDATE OF MASTER MAILING LIST AND CONFERENCE RE SAME PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00
02/19/19	PREPARE MEMO TO C. BORMANN RE WHETHER HE CAN WRITE OFF INVESTMENT IN WM INVESTMENT PARTNER: JOHN N. TEDFORD	0.30	187.50
04/11/19	REVIEW MEMO FROM R. GOLDSBORO RE INFORMATION REGARDING HIS INVESTMENT AND PREPARE MEMO TO J. N. TEDFORD RE SAME PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00
04/17/19	PREPARE MEMOS TO R. GOLDSBORO IN RESPONSE TO REQUESTED INFORMATION PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00
04/17/19	REVIEW MEMOS FROM R. GOLDSBORO RE INFORMATION REQUEST PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00
05/06/19	REVIEW MEMO FROM INVESTOR RE INFORMATION ON INVESTMENT FOR TAXES AND PREPARE MEMO TO J. N. TEDFORD RE SAME, REVIEW RESPONSE PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00
	SUBTOTAL FOR CLAIMS ADMINISTRATION AND OBJECTIONS [CL]	5.50	2200.00
	FEE/EMPLOYMENT APPLICATION [FA]		
11/01/18	REVIEW AND EDIT BILLING STATEMENTS FOR RECEIVER RE SEPTEMBER, 2018 PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00
11/01/18	REVIEW AND EDIT BILLING STATEMENTS FOR DANNING, GILL, DIAMOND & KOLLITZ RE SEPTEMBER, 2018 PARALEGAL: VALERIE G. RADOCA Y	0.20	50.00
11/09/18	DRAFT DGDK FEE APPLICATION PARTNER: JOHN N. TEDFORD	2.80	1750.00
11/12/18	PREPARE MEMO TO RECEIVER RE: DRAFT FEE APPS FOR RECEIVER AND DGDK PARTNER: JOHN N. TEDFORD	0.10	62.50
11/12/18	DRAFT DGDK FEE APPLICATION PARTNER: JOHN N. TEDFORD	6.50	4062.50
11/12/18	DRAFT RECEIVER'S FOURTH INTERIM FEE APPLICATION PARTNER: JOHN N. TEDFORD	2.90	1812.50
11/12/18	PREPARE MEMO TO J.N. TEDFORD RE INTERIM FEE APPLICATION AND REVIEW RESPONSE PARALEGAL: VALERIE G. RADOCA Y	0.10	25.00
11/12/18	PREPARE MEMO RE EDITS TO PROFORMA STATEMENTS AND REVIEW RESPONSE PARALEGAL: VALERIE G. RADOCA Y	0.10	25.00
11/13/18	REVIEW MEMO FROM J.N. TEDFORD RE INTERIM FEE APPLICATIONS	0.10	25.00

	PARALEGAL: VALERIE G. RADOCA Y		
11/14/18	REVIEW AND REVISE RECEIVER'S AND DGDK'S FEE APPLICATIONS PARTNER: JOHN N. TEDFORD	3.00	1875.00
11/14/18	REVIEW MEMO FROM M. LIPHART RE: PCG'S INVOICE FOR THE CURRENT PERIOD, AND PREPARE REPLY RE: SAME PARTNER: JOHN N. TEDFORD	0.10	62.50
11/15/18	REVIEW AND REVISE FEE APPS PARTNER: JOHN N. TEDFORD	2.70	1687.50
11/15/18	TEL. CONF. WITH S. TOMLINSON RE: STATUS OF NARRATIVE FOR CROWE'S INTERIM FEE APP PARTNER: JOHN N. TEDFORD	0.30	187.50
11/15/18	ATTENTION TO COMPILATION AND FILING OF FEE APPLICATIONS AND RELATED DOCUMENTS; REVIEW LOCAL RULES RE LODGING ORDER SEPARATELY FROM APPLICATIONS PARTNER: JOHN N. TEDFORD	0.00	NO CHARGE
11/15/18	DRAFT PROPOSED ORDER ON FEE APPLICATIONS PARTNER: JOHN N. TEDFORD	0.40	250.00
11/15/18	DRAFT NOTICE OF HEARING ON FEE APPLICATIONS PARTNER: JOHN N. TEDFORD	0.30	187.50
12/13/18	REVIEW DOCKET RE LODGED ORDER ON INTERIM FEE APPLICATIONS AND DOWNLOAD SAME PARALEGAL: VALERIE G. RADOCA Y	0.00	NO CHARGE
12/13/18	CONFERENCE WITH RECEIVER RE PROPOSED ORDER ON INTERIM FEE APPLICATIONS PARALEGAL: VALERIE G. RADOCA Y	0.10	25.00
01/02/19	DRAFT CROWE'S FEE APPLICATION PARTNER: JOHN N. TEDFORD	2.40	1500.00
01/04/19	REVIEW AND REVISE MONTHLY BILLING STATEMENT PARTNER: JOHN N. TEDFORD	0.00	NO CHARGE
02/04/19	REVIEW AND REVISE CROWE'S THIRD INTERIM FEE APP PARTNER: JOHN N. TEDFORD	2.10	1312.50
02/04/19	EXCHANGE EMAILS WITH S. TOMLINSON RE CROWE'S INTERIM FEE APP PARTNER: JOHN N. TEDFORD	0.10	62.50
02/06/19	PREPARE MEMO TO G. LEUNG RE: CROWE'S THIRD INTERIM FEE APPLICATION PARTNER: JOHN N. TEDFORD	0.10	62.50
02/06/19	REVIEW REVISED INTERIM FEE APPLICATION FOR CROWE HORWATH PARTNER: JOHN N. TEDFORD	0.10	62.50
02/14/19	PREPARE MEMO TO G. LEUNG RE STATUS OF HIS REVIEW OF CROWE'S INTERIM FEE APPLICATION PARTNER: JOHN N. TEDFORD	0.10	62.50
02/15/19	DRAFT PROPOSED ORDER GRANTING CROWE'S FEE APPLICATION, AND NOTICE OF HEARING	0.50	312.50