

EXHIBIT B2-D

(DORSEY'S INVOICES – ASSET ANALYSIS AND RECOVERY)



SALT LAKE CITY OFFICE
801-933-7360

(Tax Identification No. 41-0223337)

STATEMENT OF ACCOUNT FOR PROFESSIONAL SERVICES

Klein & Associates, PLLC
10 Exchange Place, #502
Salt Lake City, UT 84111

May 22, 2015
Invoice No. *****

Client-Matter No.: 492728-00005
Asset Analysis and Recovery

For Legal Services Rendered Through December 31, 2014

INVOICE TOTAL

Total For Current Legal Fees	\$81,167.50
Total For Current Invoice	\$81,167.50

For your convenience, please remit payment to the address below or we offer the option of remitting payment electronically by wire transfer. If you have any questions regarding this information, please contact the lawyer you are working with on this project or Dorsey's Accounts Receivable Department at 1-800-861-0760. Thank you.

Mailing Instructions:
Dorsey & Whitney LLP
P.O. Box 1680
Minneapolis, MN 55480-1680

Wire Instructions:
U.S. Bank National Association
800 Nicollet Mall
Minneapolis, MN 55402

ABA Routing Number: 091000022
Account Number: 1602-3010-8500
Swift Code: USBKUS44IMT

Please make reference to the invoice number

Service charges are based on rates established by Dorsey & Whitney. A schedule of those rates has been provided and is available upon request. Disbursements and service charges, which either have not been received or processed, will appear on a later statement.

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01/02/14	J. Armington	2.50	650.00	Draft and revise sixth motion to approve settlement agreements and draft declaration to approve settlement agreements (2.5)
01/02/14	M. Hunt	1.40	518.00	Review and revise settlement approval motion, including review of relevant settlement agreements (1.3); correspondence with J. Armington and C. Martinez regarding same (.1)
01/03/14	J. Armington	1.90	494.00	Draft, revise, and file order approving settlement motion and coordinate service of settlement motion and declaration (1.9)
01/03/14	M. Hunt	0.20	74.00	Review final version of all documents, and proposed order on sixth motion to approve settlements, and correspondence and conference with J. Armington regarding filing and service of same (.2)
01/15/14	C. Martinez	1.30	364.00	Barclay – Prepare for and attend hearing on motion to approve settlement between Receiver and Barclay (1.3)

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01/17/14	C. Martinez	0.30	84.00	Review proposed order granting Barclay's motion to approve settlement agreement and correspond with W. Klein regarding same
01/22/14	C. Martinez	0.30	84.00	Revise proposed order granting motion to approve settlement with Barclay and correspond with opposing counsel regarding same (.3)
01/23/14	C. Martinez	0.20	56.00	Correspond with W. Klein and counsel for American West Bank regarding settlement (.2)
01/24/14	C. Martinez	0.20	56.00	Star Pointe – Correspond with W. Klein and counsel representing bank re settlement (.2)
01/30/14	C. Martinez	0.30	84.00	Revise motion for approval of settlement with American West Bank (.3)
02/04/14	C. Martinez	0.30	84.00	Review documents for the closing of court-approved agreement with Barclay and correspond with W. Klein re same (.3)
02/17/14	M. Hunt	0.50	185.00	Review and revise motion to approve settlement with American West and correspondence with C. Martinez regarding same (.5)
02/18/14	M. Hunt	0.10	37.00	Review and correspondence with W. Klein regarding Star Pointe settlement motion (.1)
02/20/14	C. Martinez	0.60	168.00	American West – Revise memorandum in support of motion to approve settlement with American West to account for W. Klein's comments and draft proposed order (.6)
03/03/14	C. Martinez	1.60	448.00	Mackey/Memmott - Draft turnover letter to J. Mackey requiring return of Receivership property improperly diverted by W. Palmer to J. Mackey (1.6)
03/03/14	M. Hunt	0.10	37.00	Conference with N. Seim regarding ABI

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				release letters (.1)
03/04/14	C. Martinez	0.40	112.00	Revise demand letter to J. Mackey, compile exhibits for same, and correspond with P. Hunt (.4)
03/04/14	M. Hunt	0.70	259.00	Review and revise demand letter to R. Mackey regarding funds transfer and instructions to staff on same (.3); review and revise notice of demand to Mackey and instructions to C. Martinez on same (.1); further correspondence with staff and C. Martinez regarding same, review final draft of letter and execute same, and email to R. Mackey (.3)
03/04/14	N. Seim	0.40	104.00	Conference with T. Lorine regarding ABI release (.2); conference with Mr. V. Rig regarding ABI (.2)
03/07/14	C. Martinez	0.20	56.00	Correspond with StarPointe's counsel and W. Klein re settlement payment and final resolution of matter (.2)
03/07/14	M. Hunt	1.00	370.00	Review settlement agreements review and revise settlement approval motion and correspondence regarding same (1.0)
03/10/14	J. Armington	1.70	442.00	Revise seventh settlement agreement motion, draft declaration and order in support of same and prepare for filing (1.7)
03/17/14	M. Hunt	0.10	37.00	Correspondence with R. Mackey regarding demand for monies paid by W. Palmer (.1)
03/18/14	C. Martinez	0.20	56.00	Correspond with W. Klein and opposing counsel concerning Hoggan's release of ABI (.2)
03/18/14	M. Hunt	0.50	185.00	Prepare for and attend conference call regarding Mackey demand letter (.4); email to W. Klein regarding same (.1)
03/26/14	T. Horrocks	0.40	96.00	Contact counsel for Stoker and Swinton regarding the tolling agreement; prepare a third amendment to the tolling agreement

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03/26/14	C. Martinez	0.30	84.00	Prepare outline of topics for deposition of C. Van Kampen regarding fraudulent transfer of National Note funds to (.3)
03/26/14	N. Seim	0.40	104.00	Obtain, review and send several ABI releases to W. Klein regarding Autumn Ridge property (.4)
03/31/14	M. Hunt	1.00	370.00	Review correspondence from W. Klein and draft email to R. Mackey regarding turn over of estate property (1.0)
04/07/14	C. Martinez	1.40	392.00	Draft document requests and deposition topics to attach to subpoena duces tecum to be served on Christopher VanCampen (1.4)
04/08/14	C. Martinez	0.10	28.00	Revise subpoena for records and deposition of C. VanCampen (.1)
04/08/14	C. Martinez	0.40	112.00	Revise subpoena to serve on Stoker & Swinton and revise and send letter to Stoker & Swinton's counsel regarding same (.4)
04/08/14	M. Hunt	0.10	37.00	Review letter from R. Mackey regarding turnover demand and email to W. Klein regarding same (.1)
04/08/14	M. Hunt	0.10	37.00	Review and comment on Stocker and Swinton document production request (.1)
04/08/14	E. Stauffer	0.70	129.50	Edit Van Campen subpoena for deposition (.2); prepare subpoena duces tecum for Stoker and Swinton (.3); finalize and file notice of intent to serve subpoena on Van Campen (.2)
04/09/14	M. Hunt	0.10	37.00	Correspondence with W. Klein regarding Mackey turnover issues (.1)
04/14/14	E. Stauffer	0.30	55.50	Finalize deposition subpoena of D. VanCampen (.1); correspond with process server re service of same (.2)
04/22/14	C. Martinez	0.90	252.00	Draft complaint against M. Turpin for return of fraudulent transfers (.9)

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04/22/14	M. Hunt	0.30	111.00	Review and comment on proposed complaint to recovery money from M. Turpin, and correspondence with C. Martinez regarding same (.3)
04/23/14	C. Martinez	0.30	84.00	Review client file documents produced by Thompson Ostler & Olsen (.3)
04/23/14	E. Stauffer	0.50	92.50	Prepare civil cover sheet, finalize complaint and correspond with court clerk re same [Turpin] (.3); file complaint and cover sheet and update matrix (.2)
05/05/14	M. Hunt	1.40	518.00	Asset Recovery draft motion for OSC regarding Mackey firm (1.4)
05/07/14	C. Martinez	0.80	224.00	Draft letter to Thompson Ostler & Olsen concerning additional documents to produce(.3); research professional liability issues (.5)
05/07/14	M. Hunt	0.10	37.00	Conference with M. Keely regarding ABI issues (.1)
05/07/14	M. Hunt	3.30	1,221.00	Draft motion for turnover and analysis of facts needed on same (1.8); finalize draft and email to W. Klein regarding same (1.5)
05/08/14	M. Hunt	0.60	222.00	Meeting with W. Klein regarding turnover issues (.1); final review of W. Klein's comments on same, make final revisions to motion, and draft email to opposing counsel on same (.5)
05/14/14	S. Goldberg	5.60	1,232.00	Research re receiver standing issues (5.6)
05/19/14	S. Goldberg	4.60	1,012.00	Draft memo re receivership standing issues (4.6)
05/22/14	M. Hunt	0.70	259.00	Review numerous correspondence on multiple settlements, meeting with Toone investor group, and court filings, conference with C. Martinez regarding same, and Toone regarding same (.7)
05/23/14	C. Martinez	0.10	28.00	Correspond with attorney representing C.

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				VanCampen regarding production of documents requested (.1)
05/27/14	C. Martinez	0.20	56.00	LDS Corp.- Draft amendment to tolling agreement (.2)
05/29/14	M. Hunt	0.10	37.00	Email to B. Moss and R. Mackey regarding turnover issues (.1)
05/30/14	J. Armington	2.90	754.00	Revise motion for turnover, correspond with P Hunt and N Seim regarding same, draft declaration in support of same, and coordinate exhibits to motion for filing (2.9)
05/30/14	M. Hunt	2.50	925.00	Correspondence with W. Klein regarding Scholle OSC issues (.1); read email from B. Moss on turnover motion and analysis of same (.1); include most recent facts in turnover motion against professionals and conference with C. Martinez regarding finalizing same (.4); review draft declaration of receiver in support of turnover, make changes to same (.5); conference with W. Klein regarding same (.1); conference with N. Seim and staff regarding filing and service of turnover papers (.2); draft argument on Toone transfer motion (.7); review amended tolling agreement with LDS Church and correspondence with M. Richards regarding same (.2) ; review W. Klein comments on declaration and motion re turnover and intrusions on incorporating same (.1)
05/30/14	N. Seim	1.50	390.00	Revising motion to turnover funds relating to Mackay Price and Mecham (.6); revising receiver declaration for same (.2); gathering all exhibits to declaration, and filing motion and declaration (.7)
06/02/14	M. Hunt	0.70	259.00	Review correspondence from T. Melton regarding ABI issues, correspondence from W. Klein regarding same (.4); conference

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				with W. Klein regarding same, revise response to T. Melton and send same (.3)
06/04/14	M. Hunt	0.10	37.00	Correspondence with M. Richards regarding LDS Tolling agreement issues (.1)
06/04/14	N. Seim	2.20	572.00	Reviewing eight settlement agreements (.4); revising eighth motion to approve settlement agreements (.8); drafting receiver declaration in support of same (.6); drafting order granting the same (.4)
06/09/14	M. Hunt	0.50	185.00	Conference with M. Richards regarding LDS avoidance action issues and tolling (.3); follow up correspondence regarding same (.2)
06/09/14	M. Hunt	1.00	370.00	Review and revise motion to approve settlement agreements and email to W. Klein regarding same (1.0)
06/09/14	N. Seim	0.60	156.00	Revise and file eighth motion to approve settlement agreements, including declaration in support of same and order granting same (.6)
06/13/14	C. Martinez	0.20	56.00	Thompson Ostler – Outline potential claims with W. Klein related to failure to conduct appropriate due diligence (.2)
06/16/14	C. Martinez	0.20	56.00	Review documents related to turnover of gold from W. Scholle and outline motion for order to show cause concerning failure to make required payments (.2)
06/16/14	N. Seim	0.40	104.00	Draft and file certificate of service for turnover motion (.3); correspondence with B. Moss and R. Mackey regarding same (.1)
06/23/14	J. Wiest	5.20	1,014.00	Research case law on initial transferee/conduit theory (5.2)
06/24/14	J. Wiest	1.70	331.50	Draft memo regarding initial transferee case law (1.7)

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06/24/14	C. Martinez	0.20	56.00	Bennett Tueller – Review research concerning conduit theory of liability and advise W. Klein concerning viability of claim against Bennett Tueller law firm for fraudulent transfer (.2)
06/24/14	C. Martinez	0.10	28.00	Correspond with W. Klein concerning default of W. Scholle in complying with Court order of turnover (.1)
06/24/14	C. Martinez	0.20	56.00	Draft revised tolling agreement for Stoker & Swinton and correspond with opposing counsel regarding same (.2)
06/24/14	C. Martinez	1.70	476.00	Van Campen – Draft motion for order to show cause why D. VanCampen should not be held in contempt for failure to respond to Receiver's subpoena (1.7)
06/24/14	M. Hunt	0.40	148.00	Review research from J. Weist regarding Bennett Tuller transfer and correspondence with C. Martinez regarding same (.2); review SEC's motion to continue SJM hearing, email to W. Klein regarding same, emails to C. Martinez regarding numerous tasks (.2)
06/25/14	J. Wiest	0.60	117.00	Research fraudulent transfer law regarding LLCs (.6)
06/25/14	M. Hunt	0.10	37.00	Read correspondence on Scholle OSC issues and correspondence with C. Martinez regarding assignment of same (.1)
06/26/14	C. Martinez	0.20	56.00	Outline motion for order to show cause why W. Scholle should not be held in contempt of court for failure to pay for gold he appropriated (.2)
06/30/14	C. Martinez	0.20	56.00	Mackey Price – Correspond with G. Price concerning motion for turnover (.2)
06/30/14	S. Goldberg	5.30	1,166.00	Draft motion for order to show cause, declaration and proposed order (5.3)

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06/30/14	N. Seim	0.30	78.00	Telephone conference with R. Mackey regarding turnover motion, and conference with C. Martinez regarding same (.3)
07/01/14	M. Hunt	3.10	1,147.00	Review motion for OSC and declaration and revise same (3.0); review proposed order, and instructions to S. Goldberg regarding same (.1)
07/01/14	N. Seim	0.50	130.00	Telephone conference with R. Mackey regarding turnover motion, and mailing documents to same (.5)
07/02/14	S. Goldberg	0.90	198.00	Finalize and file motion for order to show cause (Scholle) (.9)
07/02/14	M. Hunt	0.40	148.00	Review W. Klein's comments on the Scholle OSC motion and declaration, and instructions to S. Goldberg on finalizing and service of same (.4)
07/02/14	E. Stauffer	0.30	55.50	Receive and review document produced by Stoker and Swinton (.3)
07/03/14	C. Martinez	0.30	84.00	Bennett Tueller -- Draft demand letter to Bennett Tueller concerning \$150,000 transferred to it and correspond with P. Hunt regarding same (.3)
07/07/14	M. Hunt	0.30	111.00	Review draft letter regarding funds requested from Bennett Tuller firm, and comments on same (.1); review Scholle OSC entered by court, and instructions to S. Goldberg on same, correspondence with W. Klein regarding same (.2)
07/08/14	C. Martinez	0.20	56.00	Revise and send letter to Bennett Tueller Johnson & Deere concerning its receipt of funds from National Note (.2)
07/08/14	S. Goldberg	0.20	44.00	Serve Scholle order to show cause (.2)
07/11/14	E. Stauffer	0.20	37.00	Request reissuance of summons for Whelan and Van Campen (.2)
07/11/14	E. Stauffer	0.40	74.00	Receive and review documents produced by

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				Homeland Minerals, LLC (.4)
07/15/14	C. Martinez	0.40	112.00	Draft analysis of lawsuits involving ABIs and plan for resolving same (.4)
07/16/14	E. Stauffer	0.30	55.50	Prepare CD of Stoker and Swinton documents (.3)
07/17/14	M. Hunt	0.10	37.00	Correspondence with S. Goldberg regarding Scholle service issues (.1)
07/18/14	M. Hunt	3.30	1,221.00	Review and revise settlement agreement motion (3.3)
07/21/14	S. Goldberg	0.80	176.00	Prepare and file declaration of service for Scholle OSC (.8)
07/28/14	M. Hunt	0.80	296.00	Conference with W. Klein and C. Martinez regarding ABI strategy issues (.8)
07/29/14	C. Martinez	0.20	56.00	Correspond with W. Scholle concerning his justifications for failing to comply with court ordered payment (.2)
07/30/14	C. Martinez	0.30	84.00	Phone conference with W. Scholle re his obligation to pay the Receiver for gold he misappropriated (.3)
08/01/14	C. Martinez	0.20	56.00	Meet with W. Scholle to receive check and correspond with Court concerning pending hearing on motion for order to show cause (.2)
08/01/14	M. Hunt	0.10	37.00	Conference with G. Price regarding turnover issues (.1)
08/04/14	C. Martinez	0.20	56.00	Attend to Scholle issues (.2)
08/04/14	C. Martinez	1.10	308.00	Prepare for and attend hearing on Motion for Order to Show Cause re W. Scholle's failure to pay amount owed to Receiver and draft correspondence to W. Scholle concerning Court's direction that he appear at continued hearing (1.1)
08/04/14	C. Martinez	1.10	308.00	VanCampen -- Draft motion for order to show cause why VanCampen should not be

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				held in contempt of court for failing to respond to subpoena (1.1)
08/04/14	M. Hunt	0.10	37.00	Review stipulation regarding extension of time for McKay Price to file response and correspondence regarding same (.1)
08/04/14	M. Hunt	0.10	37.00	Conference with C. Martinez regarding Scholle hearing and information needed for continued hearing (.1)
08/06/14	M. Hunt	0.50	185.00	Conference with T. Melton regarding Stocker Swinton depositions and case status, email to C. Martinez regarding same (.2); conference with C. Martinez regarding Stocker and Swinton depositions (.1); email to T. Melton regarding coordination of depositions (.1); read email from M. Scholink regarding Stocker depositions and call to T. Melton regarding same, call to C. Martinez regarding same (.1)
08/08/14	C. Martinez	0.70	196.00	Review documents produced by Stoker & Swinton and begin outline for deposition of S. Stoker (.7)
08/08/14	M. Hunt	0.20	74.00	Conferences with C. Martinez and T. Melton regarding Stocker deposition issues (.2)
08/10/14	C. Martinez	0.30	84.00	Prepare for hearing on Order for W. Scholle To Show Cause for failing to pay the Receiver the amounts owed for taking silver from Old Glory Mint (.3)
08/11/14	M. Hunt	0.10	37.00	Conference with G. Pratt regarding MC Realty issues (.1)
08/11/14	M. Hunt	0.20	74.00	Collect documents filed by Pia and MacKey firms on turnover request, and email to W. Klein regarding same (.2)
08/12/14	C. Martinez	1.80	504.00	Prepare for and attend hearing on order to show cause why W. Scholle should not be held in contempt (1.8)

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08/12/14	C. Martinez	0.50	140.00	Review documents produced by Stoker & Swinton and prepare outline for their depositions (.5)
08/13/14	C. Martinez	0.50	140.00	Phone conference with W. Klein re strategy for depositions of W. Palmer's attorneys, and create deposition outline re same (.5)
08/13/14	M. Hunt	0.10	37.00	Correspondence with C. Martinez and T. Melton re Stocker depositions (.1)
08/14/14	C. Martinez	2.20	616.00	Draft ABI complaint and correspond with P. Hunt re same (2.2)
08/14/14	E. Stauffer	1.20	222.00	Add parties to caption of Omnibus ABI complaint (1.2)
08/15/14	M. Hunt	1.50	555.00	Revise omnibus ABI complaint (1.4); emails to W. Klein and C. Martinez regarding same (.1)
08/15/14	E. Stauffer	2.10	388.50	Continue adding parties and their locales to Omnibus ABI complaint (2.1)
08/18/14	C. Martinez	1.70	476.00	Revise ABI complaint and Exhibit A to ABI complaint and correspond with W. Klein and P. Hunt re complaint and strategies for service
08/18/14	M. Hunt	0.20	74.00	Review email from W. Klein regarding MC Realty Claims and draft email to G. Pratt with proposed settlement on same (.2)
08/18/14	M. Hunt	2.20	814.00	Review W. Klein's comments on omnibus ABI complaint, service and APS issues (.4); conferences with W. Klein and C. Martinez regarding same (.3); further revise ABI complaint (1.3); conference with C. Martinez and call to T. Melton regarding Stocker depositions (.1); review exhibit A to omnibus ABI complaint, comments on same, and conference with C. Martinez regarding same (.1)
08/19/14	C. Martinez	0.40	112.00	Revise acceptance of service for ABI complaint defendants and revise letter to

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				send to all defendants asking for release of ABI or for them to accept service (.4)
08/19/14	M. Hunt	0.80	296.00	Review and revise letter to ABI holders to accompany mail service of Omnibus ABI complaint (.8)
08/19/14	E. Stauffer	1.20	222.00	Draft form waiver of service of summons and complaint for ABI complaint (.3) prepare tracking matrix for 174 defendants in the ABI complaint (.6); draft civil cover sheet (.3)
08/20/14	C. Martinez	3.90	1,092.00	Revise ABI complaint and Exhibit A of complaint to include all defendants (3.9)
08/20/14	M. Hunt	0.70	259.00	Review amended chart for ABI complaint, revise same, and correspondence regarding filing of complaint (.3); conference with C. Martinez regarding ABI omnibus complaint (.1); final review of cover letter to accompany ABI omnibus complaint and email to W. Klein regarding same (.1); review correspondence from G. Pratt regarding MC Realty issues and forward to W. Klein (.1); correspondence regarding Stocker & Swinton depositions and J. Palmer trial issues (.1)
08/21/14	C. Martinez	0.40	112.00	Correspond with ABI holders concerning release of same (.4)
08/21/14	M. Hunt	0.10	37.00	Further review and analysis of ABI complaint (.1)
08/21/14	E. Stauffer	0.80	148.00	Update civil cover sheet with revised list of defendants in ABI complaint; update tracking matrix to update list of defendants in ABI complaint (.8)
08/21/14	E. Stauffer	0.30	55.50	Prepare notices of deposition of S. Stoker and J. Cannon (.3)
08/22/14	C. Martinez	0.10	28.00	Correspond with Bennett Tueller concerning transfer of funds to it (.1)

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08/22/14	C. Martinez	1.00	280.00	Final revisions to ABI complaint and correspond with clerk re filing of same (1.0)
08/22/14	M. Hunt	0.80	296.00	Final review of Omnibus ABI Complaint, revise same, review final Exhibit A, and conference with C. Martinez joined by W. Klein regarding same (.8)
08/22/14	N. Seim	0.20	52.00	Listen to voicemails regarding ABI letter, and conference with P. Hunt and C. Martinez regarding same (.2)
08/25/14	C. Martinez	0.90	252.00	Review response to motion for turnover of funds transferred to W. Palmer's former attorneys and outline reply memorandum re same (.9)
08/25/14	C. Martinez	1.50	420.00	Review documents and prepare deposition outline for depositions of National Note's former lawyers, Steve Stoker and John Cannon (1.5)
08/25/14	S. Goldberg	4.50	990.00	Review motion for turnover and accompanying pleadings and oppositions (2); draft motion to strike (1.0); begin drafting reply (1.5)
08/25/14	M. Hunt	0.60	222.00	Review and revise draft 9th Motion to approve settlement agreements and instructions to staff on same (.5); review redline of same and work with staff to get redline correct, further correspondence with W. Klein regarding same (.1)
08/25/14	N. Seim	0.30	78.00	Telephone conference with T. Kempley regarding ABI release (.2); conference with C. Martinez regarding issues with NNU's prior law firm (.1)
08/26/14	N. Seim	0.20	52.00	Telephone conference with R. Kempley regarding release of ABI, and correspondence with W. Klein regarding same (.2)

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08/27/14	J. Armington	1.90	494.00	Draft declaration in support of Ninth Settlement Motion and revise motion and send to P Hunt for review (1.9)
08/28/14	J. Armington	1.40	364.00	Revise and file motion and declaration in support of Ninth Settlement Motion draft and revise order regarding same (1.4)
08/28/14	S. Goldberg	3.50	770.00	Draft reply in support of motion for turnover (3.5)
08/28/14	M. Hunt	0.60	222.00	Read and revise declaration on 9th settlement motion and correspondence with J. Armington regarding same (.3); make conforming changes to motion and correspondence with W. Klein regarding same (.2); review and revise proposed order on same and correspondence with J. Armington regarding same (.1)
08/28/14	M. Hunt	1.00	370.00	Revise response to turnover motion (1.0)
08/29/14	S. Goldberg	2.50	550.00	Revise, finalize, and file opposition to motion to strike and reply in support of motion for turnover (2.5)
08/29/14	M. Hunt	1.40	518.00	Further revisions to turnover reply (.8); review and revise reply to motion to strike and email to S. Goldberg re same (.3); email from W. Klein re same and conference wiht S. Goldberg on changes to the reply (.3)
08/31/14	C. Martinez	2.20	616.00	Review documents produced by Stoker & Swinton and prepare deposition question outline (2.2)
09/02/14	M. Durrant	2.00	680.00	Review assessment documentation and appraisal for Spanish Fork properties; prepare tax valuation appeals for Spanish Fork properties; e-mail to W. Klein (2.0)
09/02/14	N. Seim	2.30	598.00	Researching potential claims against former counsel for National Note, and drafting analysis of same (2.3)

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09/03/14	K. Olsen	0.20	46.00	Conference with C. Martinez regarding receivership claims and standing issues (.2)
09/03/14	K. Olsen	0.70	161.00	Review documents for memorandum regarding standing (.7)
09/03/14	M. Hunt	0.30	111.00	Conference with C. Martinez regarding Stocker and Swinton deposition preparation, and correspondence on same (.3)
09/03/14	N. Seim	0.20	52.00	Follow-up correspondence regarding potential claims against NNU's former counsel (.2)
09/04/14	S. Goldberg	0.40	88.00	Review and summarize response to opposition to motion to strike (.4)
09/05/14	K. Olsen	1.50	345.00	Research receivership claims, elements, and standing issues for deposition with Ostler & Olsen (1.5)
09/05/14	M. Hunt	0.20	74.00	Conference with C. Martinez regarding Stocker and Swinton deposition issues (.2)
09/08/14	K. Olsen	5.60	1,288.00	Conduct research regarding potential receiver tort claims, elements, and receivership standing and draft memorandum (5.60)
09/09/14	K. Olsen	2.80	644.00	Draft memo regarding potential claims against attorneys; research receivership standing (2.8)
09/09/14	C. Martinez	6.30	1,764.00	Stoker & Swinton: Prepare exhibits and questions for deposition of S. Stoker and J. Cannon (6.3)
09/09/14	M. Hunt	0.30	111.00	Conference with C. Martinez regarding Stocker and Swinton deposition (.3)
09/10/14	M. Durrant	1.10	374.00	Prepare property tax valuation appeals for 3 Spanish Fork parcels; miscellaneous e-mail correspondence with W. Klein (1.1)
09/10/14	C. Martinez	4.40	1,232.00	Prepare for and take deposition of S. Stoker

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				(4.4)
09/10/14	C. Martinez	2.10	588.00	Prepare for deposition of James Cannon (2.1)
09/10/14	M. Hunt	0.20	74.00	Conference with C. Martinez regarding Stocker deposition (.2)
09/11/14	M. Durrant	0.70	238.00	Finalize tax valuation appeals for Spanish Fork properties; prepare transmittal letter and appraisal (.7)
09/11/14	C. Martinez	3.50	980.00	Prepare for and take deposition of J. Cannon (3.5)
09/11/14	M. Hunt	0.10	37.00	Conference with C. Martinez regarding Cannon deposition and tasks on claim recovery (.1)
09/17/14	C. Martinez	1.30	364.00	Prepare memorandum outlining possible claims against law firm of Stoker & Swinton (1.3)
09/17/14	C. Martinez	0.20	56.00	Van Campen: Revise letter concerning C. Van Campen's failure to respond to subpoena (.2)
09/17/14	C. Martinez	0.40	112.00	Prepare document request to include with subpoena duces tecum to B. Romney concerning his activities on behalf of the Old Glory Mint (.4)
09/18/14	C. Martinez	0.20	56.00	Brett Romney - Draft document subpoena and correspond with P. Hunt re same (.2)
09/19/14	C. Martinez	0.90	252.00	Brett Romney - Prepare subpoena, list of subpoena document requests and list of subpoena deposition topics re transfers made by Old Glory Mint (.9)
09/19/14	C. Martinez	1.50	420.00	Prepare order on motion to show cause why D. VanCampen should not be held in contempt, motion for same, and supporting declaration (1.5)
09/19/14	M. Hunt	0.90	333.00	Review and revise VanCampen letter to the Bar regarding failure to comply with

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				directives and email to W. Klein regarding same (.4); review and revise motion for order to show cause regarding same and email to C. Martinez regarding same (.5)
09/19/14	M. Hunt	0.60	222.00	Review and revise subpoena to B. Romney regarding Old Glory Mint issues and email to C. Martinez regarding same (.5); further revisions to same and email to C. Martinez regarding same (.1)
09/21/14	M. Hunt	0.20	74.00	Review and further revise OSC on gold issue and instructions to C. Martinez regarding same (.2)
09/22/14	C. Martinez	0.60	168.00	VanCampen - Revise and file motion for order to show cause, supporting declaration and order (.6)
09/22/14	C. Martinez	0.30	84.00	Romney - Draft deposition topics to include with B. Romney subpoena re Old Glory Mint (.3)
09/22/14	C. Martinez	0.60	168.00	Barton - Draft demand letter that Barton reconvey deed of trust on East Meadows property (.6)
09/22/14	M. Hunt	0.10	37.00	Final review of VanCampen papers and email to C. Martinez regarding same (.1)
09/23/14	C. Martinez	0.10	28.00	Romney: Correspond with process server re service of subpoena (.1)
09/23/14	C. Martinez	0.60	168.00	ABI Litigation: Draft form ABI and identify defendants to be dismissed due to release of ABI (.3); Correspond with defendants concerning release of ABI and process for dismissal of lawsuit (.3).
09/23/14	C. Martinez	0.50	140.00	Stoker & Swinton: Correspond with counsel representing Stoker & Swinton concerning amendment to tolling agreement and draft revised tolling agreement (.5)
09/23/14	C. Martinez	0.10	28.00	Barton: Revise and send demand letter to Barton re reconveyance of deed of trust on

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				East Meadows property (.1)
09/23/14	M. Hunt	0.10	37.00	Review and revise notice of issuance of subpoena on Romney (.1)
09/24/14	C. Martinez	0.20	56.00	Van Campen: Draft correspondence to D. Van Campen concerning pending motion for order to show cause (.2)
09/24/14	M. Hunt	0.10	37.00	Analysis of response proposed to Van Campen on OSC, and draft email to W. Klein regarding same (.1)
09/24/14	M. Hunt	2.00	740.00	Review and revise draft settlement motion (1.0) ; draft declatation in support (1.0)
09/29/14	C. Martinez	0.50	140.00	Correspond with D. VanCampen concerning motion for order to show cause (.5)
09/29/14	C. Martinez	0.10	28.00	Correspond with Stoker & Swinton's counsel and W. Klein concerning tolling agreement (.1)
09/30/14	M. Hunt	0.20	74.00	Draft order on Tenth Settlement Agreement Motion and email to chambers re same (.2)
10/02/14	C. Martinez	0.20	61.00	VanCampen - Correspond with D. VanCampen concerning service of Order to Show Cause (.2)
10/03/14	C. Martinez	0.10	30.50	Brett Romney - Correspond with process server re service of subpoena (.1)
10/03/14	C. Martinez	0.10	30.50	VanCampen - Correspond with process server re service of subpoena (.1)
10/06/14	C. Martinez	0.20	61.00	Correspond with D. VanCampen concerning his compliance with the order to show cause and his ongoing failure to produce the requested documents (.2)
10/07/14	M. Durrant	0.30	105.00	Review approvals from Utah County; forward approvals to W. Klein (.3)
10/08/14	C. Martinez	0.40	122.00	Multiple correspondence with D. VanCampen and his attorney concerning

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				motion for order to show cause (.3); revise and serve notice of D. VanCampen's deposition (.1)
10/08/14	A. Trujillo	1.30	240.50	Prepare and finalize the Notice of Deposition of David VanCampen; coordinate with court reporter regarding the same (1.3)
10/09/14	M. Durrant	0.30	105.00	Review correspondence from Utah County regarding property valuations; e-mail to W. Klein (.3)
10/09/14	C. Martinez	1.70	518.50	Research Receiver standing to assert claims against attorneys based on attorneys' failure to identify misrepresentations in securities offering and draft memorandum re same (1.7)
10/10/14	C. Martinez	5.80	1,769.00	Stoker & Swinton - Research causes of action Receiver has against former lawyers and other professionals for professional negligence or for aiding and abetting the Ponzi scheme and draft memorandum analysis of viability of claims against Stoker & Swinton (5.8)
10/13/14	C. Martinez	3.60	1,098.00	Research duties of attorney in PPM setting (1.7); draft memorandum outlining possible claims the Receiver may have against National Note's outside professionals (1.9)
10/14/14	C. Martinez	0.50	152.50	VanCampen: Multiple correspondence with C. Van Campen concerning the Court's Order to Show Cause and document production (.5)
10/14/14	C. Martinez	3.40	1,037.00	Stoker & Swinton: Research viability of claims against Stoker & Swinton; Draft memorandum analyzing the same (3.4)
10/14/14	M. Hunt	0.10	38.00	Conference with C. Martinez regarding Van Campen OSC issues and review email re same (.1)

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10/14/14	A. Trujillo	0.40	74.00	Coordinated with process server to get Declaration of Service of David VanCampen and filed the same with the Court (.4)
10/15/14	C. Martinez	0.20	61.00	Correspond with C. VanCampen re deposition and ongoing failure to produce documents (.2)
10/15/14	C. Martinez	5.90	1,799.50	Research regarding receiver's claims against Ponzi, lawyers draft memorandum regarding (5.9)
10/16/14	C. Martinez	0.70	213.50	Research MERS cases and outline reasons why those cases do not support S. Stoker's argument that the ABI is a valid security instrument (.7)
10/16/14	C. Martinez	4.00	1,220.00	VanCampen - Review emails and other documents produced by C. VanCampen and prepare exhibits and questions for his deposition (4.0)
10/17/14	C. Martinez	4.90	1,494.50	Prepare for and take deposition of D. VanCampen (4.9)
10/20/14	C. Martinez	2.10	640.50	Research professional liability issues (2.1)
10/20/14	C. Martinez	0.80	244.00	VanCampen - Outline fees incurred in seeking order to show cause and correspond with D. VanCampen re same; prepare for hearing on order to show cause (.8)
10/20/14	C. Martinez	0.30	91.50	Research regarding professional liability claims (.3)
10/20/14	A. Trujillo	2.80	518.00	Review documents sent via email from D. VanCampen in response to Subpoena (2.8)
10/21/14	C. Martinez	0.40	122.00	Brett Romney: Prepare for B. Romney's deposition (.4)
10/21/14	C. Martinez	1.00	305.00	VanCampen: Prepare for and attend hearing on Order to Show Cause why D. VanCampen should not be held in contempt (1.0)

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10/21/14	C. Martinez	1.00	305.00	Stoker & Swinton: Research complaint filed by receiver against attorney who represented entities involved in Stanford Ponzi scheme, motions to dismiss the same, and legal basis for the complaint and the motions to dismiss (1.0)
10/21/14	A. Trujillo	1.40	259.00	Review emails in D. VanCampen's mail.com account; sent letter to R. Wayne Klein with documents received from the October 17, 2014 deposition of D. VanCampen (1.4)
10/22/14	C. Martinez	1.90	579.50	Prepare exhibits and questions for deposition of B. Romney (1.9)
10/22/14	C. Martinez	0.80	244.00	Stoker & Swinton - Research possible claims against attorney who represented Ponzi entity and outline legal issues (.8)
10/23/14	C. Martinez	4.30	1,311.50	Brett Romney: Prepare for and take deposition of B. Romney (4.3)
10/23/14	C. Martinez	0.50	152.50	Prepare for deposition of C. Jeff Thompson (.5)
10/23/14	A. Trujillo	0.90	166.50	Prepare and mail Notice of Deposition of C. Jeff Thompson (.9)
10/24/14	C. Martinez	0.30	91.50	Thompson Ostler - Correspond with J. Olsen and A. Okinaka concerning Wednesday's deposition of Jeff Thompson (.3)
10/27/14	C. Martinez	0.50	152.50	Prepare questions and exhibits for deposition of former Wayne Palmer attorney, Jeff Thompson (.5)
10/28/14	C. Martinez	4.40	1,342.00	Thompson Ostler Olsen: Prepare questions and exhibits for deposition of Homeland Minerals' former attorney, J. Thompson (4.4)
10/28/14	C. Martinez	0.60	183.00	Research former professionals (.6)
10/29/14	C. Martinez	3.80	1,159.00	Prepare for and attend deposition of C. Jeff

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				Thompson (3.8)
10/31/14	C. Martinez	0.40	122.00	VanCampen - Prepare for hearing on D. VanCampen Order to Show Cause (.4)
10/31/14	C. Martinez	0.30	91.50	Prepare order awarding Receiver the fees incurred as a result of D. VanCampen's contempt and correspond with opposing counsel re same (.3)
11/11/14	C. Martinez	0.20	61.00	Stoker & Swinton - Correspond with W. Klein re analysis of potential claims against Stoker & Swinton (.2)
11/11/14	M. Hunt	0.50	190.00	Correspondence with C. Martinez regarding default procedures in ABI cases (.1); read memo from W. Klein on Romney issues and correspondence with C. Martinez regarding same (.4)
11/11/14	M. Hunt	1.00	380.00	Read memo on potential claims against NNU former professionals and analysis of same; email to C. Martinez regarding same (1.0)
11/13/14	C. Martinez	5.40	1,647.00	Stoker & Swinton - Research, draft, and send analysis of claims and demand letter to Stoker & Swinton (5.4)
11/13/14	M. Hunt	1.80	684.00	Review W. Klein correspondence on Stocker firm claims, discuss same with C. Martinez, and call to W. Klein regarding same (.8); review letter regarding Stocker and Swinton claims, and W. Klein's revisions and correspondence with C. Martinez regarding same (.9)
11/14/14	C. Martinez	0.50	152.50	Multiple correspondence with counsel representing Stoker & Swinton concerning Receiver's possible claims against Stoker & Swinton and concerning amendment to tolling agreement (.5)
11/19/14	C. Martinez	1.40	427.00	Draft tolling agreement with Thompson Ostler & Olsen (.3); draft and send

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				correspondence to Eric Olsen concerning deposition, claims against his lawfirm, and tolling agreement (1.1)
11/20/14	C. Martinez	1.40	427.00	Prepare complaint against Secure American Gold Exchange (1.4)
11/20/14	M. Hunt	0.50	190.00	Conference with W. Klein regarding treatment of default judgments (.3); conference with C. Martinez regarding same and email to W. Klein regarding same (.2)
11/21/14	C. Martinez	0.30	91.50	Correspond with J. Thompson re possible claims against his firm and re proposed tolling agreement (.3)
11/23/14	C. Martinez	0.10	30.50	Stoker & Swinton - Correspond with opposing counsel concerning documents introduced at S. Stoker and D. Cannon's depositions (.1)
11/24/14	C. Martinez	4.30	1,311.50	Research potential claims against Thompson Ostler & Olsen (1.8); Draft demand letter to Thompson Ostler & Olsen (2.5)
11/24/14	M. Hunt	0.20	76.00	Review correspondence and conference with C. Martinez regarding Thomson Olsler claim issues (.2)
11/25/14	C. Martinez	2.50	762.50	Draft demand letter to Thompson Ostler Olsen outlining claims against the law firm and requesting a tolling agreement and deposition of E. Olsen to further investigate claims (2.5)
11/25/14	M. Hunt	0.90	342.00	Review information on Thomson and Olsen claims and conference with C. Martinez regarding same (.5); review American Gold complaint, and W. Klein's email regarding same and complaint with C. Martinez regarding same (.4)
11/26/14	C. Martinez	0.30	91.50	Correspond with B. Ostler concerning

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				statute of limitations analysis and request for tolling agreement (.3)
12/02/14	K. Olsen	1.50	345.00	Draft notice and summary of management agreement between the receiver and HMI Management (1.5)
12/02/14	C. Martinez	0.20	61.00	Correspond with J. Anderson concerning Receiver's possible claims against Thompson Ostler & Olsen and Stoker & Swinton (.2)
12/02/14	C. Martinez	1.30	396.50	Draft analysis of Receiver's claims against Thompson Ostler & Olsen (1.3)
12/02/14	M. Hunt	0.20	76.00	Conference with J. Anderson regarding Thomson Ostler claims issues, and conference with C. Martinez regarding same (.2)
12/03/14	C. Martinez	1.10	335.50	Draft notice of Receiver's agreement with HMI concerning Homeland Minerals assets (1.1)
12/04/14	C. Martinez	0.20	61.00	Correspond with J. Anderson concerning possible claims against Thompson Ostler & Olsen (.2)
12/05/14	C. Martinez	2.10	640.50	Meet with W. Klein to discuss Homeland Minerals agreement and draft disclosure to Court regarding the same (.3); prepare for and meet with J. Anderson to discuss potential claims against Thompson Ostler & Olsen and Stoker & Swinton (1.8)
12/05/14	C. Martinez	0.20	61.00	Prepare amended tolling agreement with LDS corporation (.2)
12/05/14	M. Hunt	0.20	76.00	Correspondence regarding renewed tolling agreement on LDS Church claims (.2)
12/08/14	C. Martinez	0.10	30.50	Prepare summary of amounts owed by B. Romney (.1)
12/11/14	C. Martinez	0.50	152.50	Draft and send demand letter to B. Romney concerning amounts owed to Receiver (.5)

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12/11/14	C. Martinez	0.50	152.50	Draft document requests to include in subpoena to Jordan Credit Union for documents related to J. Palmer's account and payments made to her by National Note (.5)
12/15/14	C. Martinez	0.20	61.00	Draft notice of intent to serve subpoena on Jordan Credit Union and revise subpoena (.2)
12/18/14	M. Baker	4.40	1,012.00	Draft and revise eleventh motion to approve settlement agreements and related documents (4.40)
12/18/14	M. Hunt	0.10	38.00	Correspondence with M. Baker regarding settlement motion (.1)
12/19/14	M. Baker	0.50	115.00	Draft eleventh motion to approve settlement agreement and related pleadings (.5)
12/22/14	M. Baker	2.40	552.00	Incorporate revisions and finalize eleventh motion to approve settlement agreements and related declaration (2.4)
12/22/14	M. Hunt	1.50	570.00	Review and revise eleventh settlement motion, including correspondence with W. Klein regarding same (1.2); correspondence with W. Klein regarding same, and conference with M. Baker regarding terms of Citi agreement and further revisions to motion (.3)
12/23/14	M. Baker	0.30	69.00	Revise and incorporate comments from W. Klein into eleventh motion to approve settlement agreements and finalize documents for filing (.3)

Total Hours 284.50

Total for Legal Fees \$81,167.50

Total This Invoice \$81,167.50

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