

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

CASE NO.: 2:09-CV-229-FTM-29SPC

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

FOUNDING PARTNERS CAPITAL MANAGEMENT,
and WILLIAM L. GUNLICKS,

Defendants,

FOUNDING PARTERS STABLE-VALUE FUND, LP,
FOUNDING PARTNERS STABLE-VALUE FUND II, LP,
FOUNDING PARTNERS GLOBAL FUND, LTD., and
FOUNDING PARTNERS HYBRID-VALUE FUND, LP,

Relief Defendants.

**RECEIVER'S FOURTH INTERIM APPLICATION FOR ALLOWANCE
AND PAYMENT OF FEES AND EXPENSES INCURRED BY THE
RECEIVER, RETAINED COUNSEL AND OTHER PROFESSIONALS**

Receiver Daniel S. Newman, not individually, but solely in his capacity as receiver ("Receiver") for Founding Partners Capital Management Company; Founding Partners Stable-Value Fund, L.P.; Founding Partners Stable-Value Fund II, L.P.; Founding Partners Global Fund, Ltd.; and Founding Partners Hybrid-Value Fund, L.P. ("Entities"), files his Fourth Application for Allowance and Payment of Expenses Incurred by the Receiver and his Retained Counsel, and requests that this Court enter an Order authorizing him to make payments for certain professional services and expenses incurred during the period of April 1, 2010 through

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

September 30, 2010. (“Application Period”)¹. This application is submitted with the approval of the United States Securities and Exchange Commission (“SEC” or “Commission”).

The Receiver respectfully requests that the Court authorize the Receiver to pay: (a) Broad and Cassel, as Receiver’s primary counsel, for reasonable attorneys’ fees and costs; (b) Berkowitz Dick Pollack & Brant, the Receiver’s accountants, for reasonable fees and costs; (c) Huron Consulting Group, the Receiver’s consultant and testifying expert, for reasonable fees; (d) Greg Whittmore, the Receiver’s Texas counsel, for reasonable fees and costs, and (e) Attride-Stirling & Woloniecki, the Receiver’s Bermuda counsel, for reasonable fees and costs.

For purposes of this Fourth Fee Affidavit, because recovery efforts are still in the early stages, both Broad and Cassel, Berkowitz, Dick Pollack & Brant and Huron Consulting Group have agreed, at the request of the U.S. Securities and Exchange Commission (“SEC”) and pursuant to discussions with the SEC, to request payment of only seventy (70%) percent of the fees accrued through September 30, 2010, as opposed to the full amount of invoiced fees.²

I. RETENTION OF RECEIVER, DISCLOSURE OF COMPENSATION, AND REQUESTED AWARD

A. The SEC’s Motion

On April 20, 2009, the SEC filed its Complaint (D.E. 1) and Emergency Motion to Appoint a Receiver (D.E. 3), which was granted by this Court on the same date. (D.E. 9) In the Complaint, the SEC sought to permanently enjoin Founding Partners and its owner and principal William L. Gunlicks from violating antifraud provisions of the federal securities laws and a December 2007 Commission cease and desist order against them. (D.E. at 1) The Commission

¹ On January 7, 2011, the Receiver filed the Receiver’s Second Report (D.E. 268), which encompasses the time period covered by this Application for Allowance and Payment of Fees and Expenses.

² The remaining thirty (30%) percent would be payable upon further Application. In addition, Broad and Cassel has agreed to write-off certain invoiced fees at the request of the Receiver.

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

also sought to protect and preserve approximately \$550 million of investor assets at risk. (*Id.*) On May 13, 2009, the SEC filed a Motion to Appoint a Replacement Receiver (D.E. 71), based on qualifications and his proposed compensation schedule and course of action. (D.E. 71 at Exh. 1).

B. The Court Appoints Daniel Newman, Esq., as Replacement Receiver

On May 20, 2009, the Court entered its Order Appointing Replacement Receiver and appointed Daniel Newman, Esq., as Receiver for the Receivership (D.E. 73, the “Receivership Order”). The Order placed the Receiver in charge of the Entities. (*Id.* at 2-3). Pursuant to the Receivership Order, the Receiver was granted “full and exclusive power, duty, and authority to: administer and manage the business affairs, funds, assets, choses in action and any other property of Founding Partners and the Founding Partners Relief Defendants; marshal and safeguard all of the assets of Founding Partners and the Founding Partners Relief Defendants; and take whatever actions are necessary for the protection of investors.” (*Id.* at 1-2) The Receivership Order required the Receiver to, among other things:

- take immediate possession of and administer the assets of the Entities;
- investigate the manner in which the affairs of the Entities were conducted;
- institute such actions and legal proceedings, for the benefit and on behalf of Entities and their investors and other creditors as the Receiver deems necessary;
- employ professionals as the Receiver deems necessary to take possession of the assets and business;
- engage persons in the Receiver’s discretion to assist the Receiver in carrying out the Receiver’s duties and responsibilities;
- defend, compromise or settle legal actions in which the Entities or the Receiver is a party;
- assume control of all of the Entities’ financial accounts, as necessary;

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

- make payments and disbursements from the funds and assets taken into control as necessary in discharging the Receiver's duties; and
- have access to and review all mail of the Entities.

(D.E. 73 at 3-6).

II. REQUEST FOR FEES AND EXPENSES

The Receiver, his counsel in Florida, Texas, and Bermuda, and his consultants have worked diligently to marshal and preserve all assets of the Entities, investigate their business operations, and investigate any claims the Entities may have, prosecute the Receiver's claims in litigation and defend claims asserted against the Entities.

The Receiver's efforts during the Application Period include but were not limited to the gathering of evidence and marshaling of assets, managing the affairs of the Receivership Entities, investigation of claims, negotiating with counsel to pursue certain claims against third parties, and investigating certain claims against third parties. During the application period, there also was extensive motion practice and briefing in connection with the action styled *Daniel S. Newman, as Receiver for Founding Partners Capital Management Company, et al. v. Sun Capital, Inc., et al.*, U.S. District Court, Middle District of Florida, Case No. 2:09-CV-445-FTM-99SPC ("Sun Litigation"). In addition, there was extensive litigation and negotiation of a potential settlement of the Sun Litigation along with initial work with the Investor Group and Sun Capital on due diligence necessary for any such settlement.

The Receiver respectfully requests an award for legal and professional fees and the reimbursement of certain expenses incurred on behalf of the Receiver for services rendered during the Application Period. These amounts total \$702,917.14 in the aggregate ("Total Award"). The Total Award is comprised of: (a) \$558,798.25 in legal fees and costs for Broad and Cassel; (b) \$128,396.00 in professional fees and costs to Berkowitz Dick Pollack & Brant,

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

the Receiver's accountants; (c) \$14,547.26 in legal fees and costs for Attride-Stirling & Woloniecki, the Receiver's Bermuda counsel; and (d) \$1,175.63 in legal fees and costs for Greg Whittmore, Esq., the Receiver's Texas counsel.

Significantly, the Receiver and many of those working with him worked at deeply discounted rates in performing their functions. Moreover, the Receiver further reduced the costs to the Receivership Estate by writing off various fees incurred for work performed.³

Further, as noted above, the Receiver at this time seeks Court permission to pay less than the Total Award at this time. Specifically, the Receiver seeks permission to pay: (a) \$393,195.40 (down from \$558,798.25) to Broad and Cassel, reflecting seventy (70%) percent of the fees invoiced by Broad and Cassel and all of the costs invoiced by Broad & Cassel; (b) \$89,897.30 (down from \$128,396.00), reflecting seventy (70%) percent of the fees invoiced by Berkowitz Dick Pollack & Brant and all of the costs invoiced by Berkowitz Dick Pollack & Brant, (c) \$14,547.26, reflecting all the fees and costs invoiced by Attride-Sterling & Woloniecki; (d) \$1,175.63, reflecting all of the fees and costs invoiced by Greg Whittmore, Esq. In total therefore, although the Total Award sought is \$702,917.14, the total requested payments at this time is \$498,815.59. The Receiver is asking for payment of the reduced amount at this time, at the request and pursuant to discussions with the SEC, because recovery efforts are still in the early stages.

This request is the Receiver's fourth application to the Court for compensation and reimbursement of expenses for services rendered on behalf of the Receiver. No understanding exists between the Receiver and any other person for the sharing of compensation sought by this

³ Many, but not all, write-offs are evident from the detailed billing records submitted with this application.

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

Receiver, except among the partners and associates of the employees of the firms retained by the Receiver.

As demonstrative of the efforts performed on behalf of the Receiver, the Receiver has attached several exhibits to its Application consisting of:

- Exhibit 1: Summaries of professional and paraprofessional time and fees;
- Exhibit 2: Individualized and detailed invoices of all services rendered, expenses, and disbursements for Broad and Cassel; Berkowitz Dick Pollack & Brant; Attride-Stirling & Woloniecki; and Greg Whittmore, Esq.

Exhibit 1 contains an aggregate summary of all hours and fees of all professionals and paraprofessionals that provided services to the Receiver during the course of the Application Period. The total amount represents the amount of time expended by each attorney, paralegal, and professional multiplied by the applicable Court-approved hourly rate.⁴ Exhibit 2 contains individualized and detailed descriptions of the daily services rendered and the hours expended by the various attorneys, paralegals, and professionals employed on behalf of the Receiver in this case during the Application Period. Exhibit 2 also contains a detailed schedule listing the expenses and disbursements for which the Receiver seeks reimbursement. Exhibit 2 is based on, among other information, the contemporaneous daily time records maintained by the Receiver's attorneys, paralegals, and professionals who rendered services in this case. These time records have also been reviewed and approved by the Receiver, and, based on the complexity of the case, the Receiver respectfully submits that the requested compensation is reasonable.

III. MEMORANDUM OF LAW

Under governing law, following a determination that services were rendered and costs expended in furtherance of the Receivership, the Court may award compensation for those fees

⁴ All rates were previously approved by the Court except that of Gregory A. Whitmore.

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

and costs. When determining an award of attorneys' fees incurred during a receivership, the Court should give consideration to the factors for compensation that the Eleventh Circuit articulated in *In re Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988): (1) the time and labor required; (2) the novelty and difficulty of the question involved; (3) the skill requisite to perform the legal service properly; (4) the likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer; (5) the fee customarily charged in the locality for similar legal services; (6) whether the fee is fixed or contingent; (7) the time limitations imposed by the client or by the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the lawyer or lawyers performing the services; (10) the "undesirability" of the case; (11) the nature and length of the professional relationship with the client; and (12) any awards in similar cases. *See also Securities and Exchange Commission v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992). The Receiver respectfully suggests that his request for fees for payment of his attorneys and other professionals meets the criteria for this interim compensation.

In this case, the Court's Receivership Order requires the Receiver to "administer such assets as is required in order to comply with the directions contained in this Order, and to hold all other assets pending further order of this Court." (D.E. 73 at 3). The Receivership Order allows the Receiver to appoint "one or more special agents, employ legal counsel, actuaries, accountants, clerks, consultants and assistants as the Receiver deems necessary and to fix and pay their reasonable compensation and reasonable expenses, as well as all reasonable expenses of taking possession of the assets and business...." (D.E. 73 at 4-5). The Court further authorized payment of these professionals from the funds held by the Receivership. (D.E. 73 at

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

6). Pursuant to this provision, the Court authorized the retention of counsel for the Receiver. *See, e.g.,* D.E. 78.

The Receiver's attorneys, paralegals, and accountants and experts have incurred reasonable fees and costs consistent the Court's Orders, and payment is appropriate and warranted in consideration of the 11th Circuit multi-factor test, as follows:

Factor 1⁵

The Receiver and the Receiver's attorneys and accountants expended a considerable amount of time and effort in order to perform the extensive work necessary to perform the tasks set forth in this Court's Receivership Order, including, among other things, the following:

Sun Litigation

Before the Application Period, the Sun Parties had responded to the Receiver's Memorandum in Opposition to Defendants' Motion for Preliminary Injunction regarding Receiver's control over lockboxes that fund the Sun hospitals. The Sun Parties' reply brief contained entirely new arguments, effectively disregarding the affidavits on which their original motion was based, and relying instead on four new declarations. The Receiver, working with Michael Kennelly of Huron Consulting Group, analyzed the reply brief's new arguments and the four new declarations, including documents attached thereto. The Receiver filed a Motion to Strike Reply Declarations and a separate Motion for Leave to File a Sur-Reply to Defendants' Reply Memorandum. Defendants' Motion for Preliminary Injunction and the Receiver's Motion to Strike the declarations submitted in reply are subject to the stay of the Sun litigation.

Also before the Application Period, the Receiver sought leave to amend the Complaint because the expedited discovery revealed that Defendants engaged in improper, large-scale transfers

⁵ Because this Application is limited to the Application Period, the Receiver is solely discussing events that occurred during that period.

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

of funds to related parties. The proposed amended complaint sought to add claims against existing defendants and also to add, as new defendants, the recipients of unlawful transfers of investor funds. The Magistrate Judge issued a Report and Recommendation allowing for additional claims against existing Defendants but denying the Receiver's request to add new defendants. After the Court adopted the Magistrate Judge's Report and Recommendation, and during the Application Period, the Receiver filed an Amended Complaint including new claims.

As referenced above, the Receiver believes that the Sun Capital entities improperly transferred substantial amounts of investor funds to companies under their control, including affiliated hospitals. Because the Court did not permit the addition of new defendants, the Receiver prepared a draft complaint for use in filing a new action against recipients of unlawful transfers. However, in light of the Court's Order staying litigation – and to ensure that Defendants could devote themselves to providing needed due diligence materials – counsel for the Receiver agreed to enter into a tolling agreement with the hospitals and other fraudulent transferees.

During the Application Period, Sun filed an Emergency Motion to Stay Proceedings during Settlement Negotiations. The Receiver opposed the stay, arguing that he was not opposed to a commercial resolution of the dispute, but that without information relating to settlement discussion, he could not make an informed judgment. After the Court stayed certain deadlines for a period of sixty (60) days, the Receiver and his counsel met in Washington, D.C. with the Investor Group's legal and financial advisory professionals involved in settlement negotiations with Defendants.

The Receiver and his retained professionals then engaged in significant due diligence and efforts toward a settlement of the Sun litigation that would essentially transfer ownership of assets for the benefit of the investors consisting principally of the hospitals and associated real estate that was purchased by the Sun principals with loan proceeds from Founding Partners. The Receiver and

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

Sun Parties also negotiated a uniform confidentiality agreement for use by the Receiver and investors seeking access to confidential information held by the Sun Parties.

Cayman

As previously reported, in April 2009, several investors in the Founding Partners Global Fund, Inc. (“Global Fund”) instituted an action in the Grand Court of Cayman to appoint Joint Provisional Liquidators (JPLs) over the Global Fund. The Cayman court appointed JPLs, who subsequently instituted a proceeding in Bermuda to release certain funds held in the name of Global Fund. During the Application Period, the Receiver simultaneously defended the action in Bermuda and negotiated with the JPLs in an effort to resolve the matter while still preserving the receivership’s resources. After exhaustive discussions, the Receiver and JPLs arrived at an agreed-upon Protocol, the details of which were previously reported.⁶ Months after this Court approved the Protocol, the Receiver was advised by the JPLs that they were no longer amenable to the Protocol because certain investors in the Global Fund had withdrawn their support. This reversal precipitated a new round of detailed discussions with the JPLs aimed at salvaging the agreement.⁷

Ernst & Young and Mayer Brown

On August 9, 2010, the Receiver asked the Court for permission to retain litigation counsel to pursue Ernst & Young (“E&Y”) and Mayer Brown for breaches of their legal duties to Founding Partners entities. The Receiver conducted extensive due diligence for use in selecting appropriate counsel to prosecute the case against E&Y and Mayer Brown. The Court granted the Receiver’s

⁶ The Protocol provided for a transfer of \$3.5 million to the Receivership, with \$650,000.00 remaining with the JPL. The Protocol permitted the Receiver to pursue further litigation in Bermuda aimed at recovering the remainder of the assets in Bermuda.

⁷ Despite the Receiver’s efforts, the parties could not reach a negotiated agreement. The issues were fully briefed and oral arguments were held in the Supreme Court of Bermuda, Commercial Court (“Bermuda Court”), which ruled in favor of the JPLs. The Bermuda Court ordered that the funds be released to the JPLs, but its order was without prejudice. Receiver may still bring a claim over these funds in Cayman.

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

request to retain litigation counsel, and two law firms were selected. Together, the Receiver and his counsel completed a diligent investigation of E&Y and Mayer Brown and began work on a draft Complaint.

Other Matters

There were numerous other tasks performed during the Application Period, including: (a) service of subpoenas to banking institutions to gather records necessary to complete the forensic analysis of fund transfers in and out of the Founding Partners entities, including but not limited to transfers to Defendant Gunlicks and his children; (b) identification of target payees of the Receivership Entities to determine the circumstances surrounding these transfers, including service of subpoenas to certain of these payees to further assess the validity of the transfers; (c) correspondence with investors to confirm that records related to their investments are accurate (d) responding to an SEC subpoena regarding Founding Partners entities' investments in SSR Capital Partners, LP.

Factors 2, 3, 9

The Receiver respectfully submits that this Receivership is unusually difficult and challenging by virtue of the fact that so much of the investor funds were given to the Sun Entities, who have argued that Stable-Value waived Sun's non-compliance with the applicable loan agreements and that they have a legal right to the funds. Initially, the Receiver had limited ability to dispute their testimony because Mr. Gunlicks had, as of that time, refused to cooperate, and because Sun refused to provide answers to the Receiver's questions and the information provided raised red flags. Nevertheless, when the Court-Ordered depositions finally took place, and Sun witnesses were exposed to cross-examination, they provided admissions that the Receiver believes undermined their defenses.

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

Another example of the novelty and level of difficulty is the work being performed by Broad and Cassel, Attride-Stirling & Woloniecki and the Berkowitz Dick Pollack & Brant in connection with Cayman Joint Provisional Liquidators (JPLs). The actions taken by the JPLs, and by the investor group's assertion of proprietary claims over significant portions of the Bermuda funds, raised complex and novel cross-border issues that required the work of specialists in Bermuda and the Cayman Islands, expensive legal markets. Painstaking negotiations with the JPLs, which eventually led to an agreed-upon Protocol, were followed by similarly laborious efforts to deal with complex issues raised by the JPLs abruptly backing out of the agreement.

Other Factors

In view of the numerous, varied, and time-sensitive demands on the Receiver and his professionals, they could not accept similar or more profitable employment as a result of the work on this Receivership. (Factor 4).

The fees are reasonable in the relevant locality for similar services. Indeed, most of the professionals further reduced their fees for this matter. (Factor 5).

The fees are fixed, but at mostly at a discounted rate. (Factor 6).

The results obtained have been significant, given the nature of the expedited proceedings in the Sun litigation and the numerous other demands on the Receiver and his professionals. (Factors 7, 8). The Receiver and his retained counsel gathered a great deal of information about the Defendants' financial assets and liabilities, assisted in marshalling assets and worked to recover funds in offshore accounts. Moreover, the Receiver and his counsel engaged in significant complex briefing in the Sun litigation while continuing diligent efforts to reach a viable settlement with the Sun defendants. Settlement discussions are ongoing. Even if, however, a settlement is not reached,

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

the settlement process has proven to be exceedingly productive insofar as the Receiver and his counsel have benefited from the diligence.

In view of these circumstances, this request for fees and expenses, which are the result of discounted and reduced rates is appropriate and warranted (Factor 12).

WHEREFORE, the Receiver, Daniel S. Newman, respectfully requests that this Court enter an Order authorizing the payment of \$498,815.59, consisting of (a) \$393,195.40 to Broad and Cassel, reflecting seventy (70%) percent of the fees invoiced by Broad and Cassel and all of the costs invoiced by Broad & Cassel; (b) \$89,897.30 reflecting seventy (70%) percent of the fees invoiced by Berkowitz Dick Pollack & Brant and all of the costs invoiced by Berkowitz Dick Pollack & Brant, (c) \$14,547.26, reflecting all the fees and costs invoiced by Attride-Sterling & Woloniecki; and (d) \$1,175.63, reflecting all of the fees and costs invoiced by Greg Whittmore, Esq.

Dated: June 20, 2011

Respectfully Submitted,

BROAD AND CASSEL

One Biscayne Tower, 21st Floor
2 S. Biscayne Boulevard
Miami, FL 33131
Telephone: (305) 373-9400
Facsimile: (305) 995-9443

By: /s/ Jonathan Etra
Jonathan Etra, Esq.
Florida Bar No. 0686905
Counsel for Receiver

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Jonathan Etra

Jonathan Etra, Esq.

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

SERVICE LIST

**U.S. Securities and Exchange Commission v. Founding Partners Capital
Management, Inc., et al**

Case No. 2:09-CV-229-FTM-29SPC

United States District Court, Middle District of Florida

Christopher Ian Anderson, Esq.
U.S. Securities and Exchange Commission
801 Brickell Avenue
Suite 1800
Miami, FL 33131
305-982-6317
305-536-4154 (fax)
andersonci@sec.gov
Counsel for U.S. Securities and Exchange Commission
Service via CM/ECF

Gabrielle Lyn D'Alemberte, Esq.
Law Offices of Robert L. Parks, P.L.
2121 Ponce de Leon Blvd.
Suite 505
Coral Gables, FL 33134
305-445-4430
305-445-4431 (fax)
Gabrielle@rlplegal.com
Counsel for William & Pamela Gunlicks
Service via CM/ECF

4829-6681-2681.1
43125/0001 SK
06/20/2011

BROAD and CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

EXHIBIT 1

**SUMMARY OF INVOICES FOR SERVICES
PROVIDED TO THE RECEIVERSHIP¹**

¹ The detailed invoices supporting all services by the Receiver and his professionals are attached as Exhibit 2 hereto. Those invoices have been redacted in certain places to avoid disclosure of attorney-client and work-product privileged materials, investor names and other information deemed confidential as to third-parties for litigation purposes.

The following is an aggregate tabular summary of fees and expenses for the Receiver and the Receiver's counsel, Broad and Cassel, who presently handles the receivership day-to-day matters under the Receiver's supervision for the months of April 1, 2010 through September 30, 2010:

<u>Attorney</u>	<u>Number Of Hours</u>	<u>Bill Amount</u>
Daniel S. Newman, P.A.	165.80	52,227.00
Rhett Traband, P.A.	133.00	41,895.00
Jonathan Etra	206.40	65,016.00
Michelle T. Visiedo-Hidalgo	257.80	81,207.00
Jeffrey Geldens	117.30	29,325.00
Chalon Allen	25.40	6,350.00
Michael Shafir	30.30	7,575.00
Frederick Segal	310.90	62,180.00
Roy S. Kobert	4.90	1,543.50
Gene E. Crick	53.30	16,789.50
Kenneth G. Mather	4.10	1,291.50
Nicolette Vilmos	2.50	625.00
<u>Paralegal/Other Professionals</u>		
Patricia Anzalone	.40	60.00
Matthew Jaffe	.50	37.50
Junelle Rodriguez	14.70	2,205.00
Patricia Blackman	11.60	1,740.00
Gisela Fasco	27.60	4,140.00
Adriana Vanegas	863.30	64,747.50
Georgianne Sims	747.30	56,047.50
Bilal Faruqui	722.50	54,187.50
Melissa Vander Weide	12.40	1,860.00
Stephanie Astrin	.80	120.00
Omar Pelea	5.60	840.00
Total Fees of Receiver and Receiver's Counsel:		\$552,009.50
Total Expenses of Receiver and Receiver's Counsel:		\$6,788.75
Total Fees and Expenses For Receiver And Receiver's Counsel:		<u>\$558,798.25</u>

The following is an aggregate tabular summary of fees and expenses for the Receiver's forensic accountants, Berkowitz Dick Pollack & Brant for the months of April 1, 2010 through September 30, 2010:

<u>Accountant</u>	<u>Number Of Hours</u>	<u>Bill Amount</u>
Adam Lang	159.80	39,950.00
David Siegel	101.00	30,300.00
Martin Prinsloo	29.90	7,475.00
Rachel Merritt	148.40	22,260.00
Gary Rosenthal	7.30	2,190.00
Marie Torossian	28.50	2,707.00
Sharon Foote	47.40	9,377.50
Shea Smith	39.00	9,750.00
Jennyfer Urbina	42.20	4,009.00
Richard Pollack	1.00	310.00
Total Fees of Receiver's Forensic Accountants:		\$128,329.00
Total Expenses of Receiver's Forensic Accountants:		\$67.00
Total Fees and Expenses For Receiver's Forensic Accountants:		<u>\$128,396.00</u>

The following is an aggregate tabular summary of fees and expenses for the Receiver's Bermuda counsel, Attride-Stirling & Woloniecki for the months of April 1, 2010 through September 30, 2010:

<u>Attorney</u>	<u>Number Of Hours</u>	<u>Bill Amount</u>
Kehinde A.L. George	10.7	6,955.00
Susie Wakefield	14.9	7,450.00
Total Fees of Attride-Stirling & Woloniecki:		\$14,405.00
Total Expenses of Attride-Stirling & Woloniecki:		\$142.26
Total Fees and Expenses of Attride-Stirling & Woloniecki:		<u>\$14,547.26</u>

The following is an aggregate tabular summary of fees and expenses for the Receiver's Texas counsel, Gregory A. Whittmore for the months of April 1, 2010 through September 30, 2010:

<u>Attorney</u>	<u>Number Of Hours</u>	<u>Bill Amount</u>
Gregory A. Whittmore	4.6	1,150.00
Total Fees of Gregory A. Whittmore:		\$1,150.00
Total Expenses of Gregory A. Whittmore:		\$ 25.63
Total Fees and Expenses of Gregory A. Whittmore:		<u>\$1,175.63</u>

EXHIBIT 2

BROAD AND CASSEL



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9400
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

October 29, 2010
Invoice No.: 808773

STATEMENT OF ACCOUNT

Matter Name: SEC v. Founding Partners Capital
Managemnt Co., et al.
Client/Matter No: 43125.0001
Billing Attorney: Daniel S. Newman, PA

Previous Balance		\$623,530.35
Payments Received		(388,075.21)
Subtotal of Previous Balance		<hr/> \$235,455.14
Professional Charges (detail attached)	\$111,605.50	
Expenses (detail attached)	<hr/> 756.88	
Subtotal of Current Charges		<hr/> \$112,362.38
TOTAL BALANCE DUE (Previous and current balance)		\$347,817.52

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR
PAYMENT

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 3

ITEMIZED PROFESSIONAL CHARGES

04/01/2010	DSN	FOUR - Review invoices from accounting firm in connection with fee application and redact same (1.0)(no charge).	1.00	\$0.00
04/01/2010	G-F	FOUR-Compile, review and log incoming mail.	1.50	\$225.00
04/01/2010	J-G	ONE-Prepare additions and confer with the Receiver regarding the motion to approve settlement with JPL in Bermuda.	0.80	\$200.00
04/02/2010	DSN	ONE - Review correspondence from investor B.L. (.1); draft correspondence to investor B.L. (.1).	0.20	\$63.00
04/02/2010	G-F	FOUR-Telephone conference and email correspondence with Ashley Smith at CorpDirect Agents, Inc. regarding Delaware franchise taxes due and corporate status of receivership entities.	0.50	\$75.00
04/02/2010	J-E	ONE - Reviewed order on motion to intervene and re freeze order (.1). Attention to query from hospital (.2).	0.30	\$94.50
04/05/2010	G-F	FOUR-Review email correspondence from and telephone conference with CorpDirect Agents, Inc. regarding corporate status and annual franchise taxes due in Delaware by each of Founding Partners Stable-Value Fund, LP, Founding Partners Stable-Value Fund II, L.P. and Founding Partners Hybrid Value Fund, L.P.; (.7)Begin drafting Certificate of Revival for Founding Partners Stable Value Fund, L.P. and change of registered agent for each of Founding Partners Stable-Value Fund II, L.P. and Founding Partners Hybrid Value Fund, L.P. (.8); Conference with Ms. Fradera regarding corporate documents of same to determine name of general partner of each L.P.(.3).	1.80	\$270.00
04/05/2010	J-E	ONE - call with Trustee (.3).	0.30	\$94.50
04/06/2010	DSN	FOUR - Review correspondence from Moeckler and Associates pertaining to auction (.1); office conferences with Michelle Visiedo Hidalgo regarding same and motion (.3); draft correspondence to various individuals regarding E&Y and review correspondence relating to same (.2).	0.60	\$189.00
04/06/2010	G-F	FOUR-Draft Certificate of Revival of Founding Partners Stable-Value Fund, L.P. to be filed in Delaware (-.5); Draft Change of Registered Agent	2.30	\$345.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 4

		for each of Founding Partners Stable-Value Fund II, L.P. and Founding Partners Hybrid-Value Fund, L.P. a(.6); Exchange email correspondence with Ms. Fradera regarding Order appointing Mr. Newman as Receiver (.1); Discuss appointment of Receiver and execution of documents by Mr. Newman as Receiver (.1); Attend to filing Certificate of Revival and Change of Registered Agent with the Delaware Secretary of State (.6); Telephone conference with CorpDirect Agents, Inc. regarding same and their service as registered agent in Delaware(.4).		
04/06/2010	MTV	ONE-Review proposal relating to [REDACTED] [REDACTED] (.5); discuss same with [REDACTED]; conference call with counsel to evaluate reasonableness of estimate (.4); discussion with [REDACTED] and draft correspondence to same requested [REDACTED] (.5); review receivership order and receiver's first report in preparation to attend to pleadings relating to [REDACTED] (.6)(No Charge)	1.40	\$441.00
04/06/2010	R-T	ONE: Review additional [REDACTED] emails (2.1), confer with Receiver (.2)	2.30	\$724.50
04/07/2010	DSN	ONE - Draft correspondence to David Siegel (.1); telephone conference with David Siegel regarding E&Y (.1); review correspondence from David Siegel regarding [REDACTED] (.1); draft correspondence to receiver's counsel regarding [REDACTED] (.1); review correspondence from David Siegel (.1); office conference with Michelle Visiedo Hidalgo regarding [REDACTED] (.4); office conferences with MichelleVisiedo Hidalgo regarding Founding Partners' [REDACTED] and [REDACTED] of same (.4); review correspondence from Gisela Fasco regarding Founding Partners' entities and respond to same (.1).	1.40	\$441.00
04/07/2010	DSN	Review correspondence from Ian Anderson; draft correspondence to Ian Anderson.	0.20	\$63.00
04/07/2010	G-F	FOUR-Compile, review and log incoming mail.	2.80	\$420.00
04/07/2010	J-E	ONE - Work on recovery issues.	0.30	\$94.50
04/07/2010	MTV	ONE-Review correspondence from [REDACTED] re: proposal for [REDACTED] (.3); draft correspondence to DSN re: same (.2); begin draft of motion for [REDACTED] [REDACTED] (.1.4); conference with DSN relating to [REDACTED]	2.60	\$819.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 5

		██████████ (.4); research applicability of ██████████ ██████████ (.9) (No Charge); discuss same with ██████████ ██████████ (.3); review SEC Complaint (.6)(No Charge); review opposition to Sun Defendants' motion for preliminary injunction(1.7)(No Charge)		
04/07/2010	R-T	ONE: Review ██████████ emails (3.2); Confer with Receiver regarding strategy (.2)	3.40	\$1,071.00
04/08/2010	DSN	FOUR - Review correspondence relating to ██████████ (.1); draft correspondence regarding response to same (.1); review correspondence from David Siegel regarding same (.1).	0.30	\$94.50
04/08/2010	J-G	ONE: Review SEC's email confirming their position regarding Cayman motion on funds, and Receiver's follow-up communication regarding further steps to be taken.	0.10	\$25.00
04/08/2010	MTV	ONE-Conference with Moecker Auctions re: inventory (.4); discuss ██████████ with BF (.3); draft correspondence to auctioneer(.4); shepardize case law (.8); review ██████████ et seq. re: ██████████ (.8); review receiver's memorandum in opposition to motion for preliminary injunction and order appointing receiver(.8)(No Charge).	2.70	\$850.50
04/08/2010	R-T	ONE: Review emails and accounting documents (2.7)	2.70	\$850.50
04/09/2010	J-G	ONE: Update receiver regarding motion to ██████████	0.10	\$25.00
04/09/2010	MTV	ONE-Review pleadings relevant to ██████████ defense(1.3); conference with Moecker Auctions (.3); draft correspondence to DSN re: same (.3); conference with DSN re: ██████████ and ██████████ theory(.6).	2.50	\$787.50
04/09/2010	R-T	ONE: review Founding Partners financial statements (1.6); research potential claims (.5)	2.10	\$661.50
04/12/2010	G-F	FOUR-Compile, review, organize and log incoming mail; Receipt and review of invoice associated with change of registered agent in Delaware and filing annual franchise tax report for receivership entities; Conference with CorpDirect Agents, Inc. regarding same.	2.90	\$435.00
04/12/2010	J-G	ONE-Review order from the Magistrate regarding motion to amend (.3); analyze issues ██████████ ██████████ (.5); research regarding ██████████ and authority cited by ██████████ in support of its position, in connection with possible ██████████ ██████████ (1.8).	2.60	\$650.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 6

04/12/2010	P-B	FOUR-Redacting in preparation of filing Fee Application (2.5)(No Charge)	2.50	\$0.00
04/13/2010	DSN	ONE - Office conference with counsel relating to research and correspondence drafted relating to [REDACTED] (.2); draft correspondence to and receive correspondence from Rhett Traband regarding [REDACTED] (.1).	0.30	\$94.50
04/13/2010	J-E	ONE - Work on motion for approval of settlement with Cayman liquidators (.2). Reviewed letter from Proskauer on secured lending issue and attention to same (.5).	0.70	\$220.50
04/13/2010	J-G	ONE: Various tasks relevant to finalizing the motion to approve Cayman settlement, including conferences with the Receiver and Etra and conformity with redaction requirements.	0.40	\$100.00
04/13/2010	MTV	ONE-Meeting with JE and DSN re: various pending matters (.6); review of motion to amend complaint, opposition thereto and report and recommendation in preparation [REDACTED] (1.7); draft proposed order granting [REDACTED] (1.9) attend to various pending matters; conference with [REDACTED] regarding further reduction of fees and costs(.4).	4.60	\$1,449.00
04/13/2010	R-T	ONE: research [REDACTED]	1.70	\$535.50
04/14/2010	J-E	ONE - Work on various issues relating to [REDACTED] and conferred with SEC (.3).	0.30	\$94.50
04/14/2010	MTV	ONE-Review and revise motion to strike declarations; discuss motion with team; discuss response to [REDACTED]; review pleadings underlying [REDACTED]	3.80	\$1,197.00
04/14/2010	R-T	ONE: Review [REDACTED] documents (3.2), research [REDACTED] (1.1).	4.30	\$1,354.50
04/15/2010	DSN	FOUR - Review correspondence from SEC and draft correspondence to SEC (.1); review correspondence from Steve Manor (.1); draft correspondence to Steve Manor (.1).	0.30	\$94.50
04/15/2010	J-G	ONE-Research regarding [REDACTED], in light of the [REDACTED] (3.0); conference with J. Etra regarding research and various issues raised by [REDACTED] (.8).	3.80	\$950.00
04/15/2010	MTV	ONE-Begin draft of objection to magistrate's R&R; meeting with RE and JG re: [REDACTED]; mtg with JE re: [REDACTED]; attend to same including [REDACTED]	11.50	\$3,622.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 7

		multiple calls and emails to [REDACTED] and plaintiffs' counsel; research and draft [REDACTED] [REDACTED]; conference call with DSN and JE regarding same		
04/15/2010	R-T	ONE: Review recent filings and confer regarding response (.6); Review documents for use in litigation (2.1)	2.70	\$850.50
04/16/2010	MTV	ONE-Meetings with JE and DSN re: [REDACTED] [REDACTED]; research case law; revise and finalize motion; gather exhibits	6.00	\$1,890.00
04/16/2010	R-T	ONE: Review [REDACTED] [REDACTED] and other documents (2.7), research [REDACTED] (1.4), Conferences with Receiver (.4)	4.50	\$1,417.50
04/17/2010	R-T	ONE: review [REDACTED] and [REDACTED] [REDACTED] (2.1), draft [REDACTED] (1.1)	3.20	\$1,008.00
04/18/2010	MTV	ONE-Continue to draft [REDACTED] to [REDACTED]; review notes from meeting and organize argument; review underlying pleadings	1.20	\$378.00
04/18/2010	R-T	ONE: Review [REDACTED] to prepare for meeting	3.60	\$1,134.00
04/19/2010	DSN	ONE - Review correspondence from counsel for investors and draft correspondence to counsel for investors regarding [REDACTED] (.1); telephone conference with investor B.L. regarding status of receivership and factual issues (.2).	0.30	\$94.50
04/19/2010	J-E	ONE-Call with counsel for group of investors (.2). Identify filings to be put on website (.1). Reviewed Mr. Gunlicks's motion for fees and costs and analysis re same and drafted response to same (.5). Conferences with counsel for SEC and counsel for Mr. Gulicks on various issues involving Mr. Gunlicks (.4). Reviewed orders regarding disposition of Mr. Gunlicks's property (.2).	1.40	\$441.00
04/19/2010	MTV	ONE-Attend to matters re: [REDACTED] [REDACTED] (1.2); discuss same with JE(.4); discuss response to [REDACTED] (.4); discuss upcoming meetings with [REDACTED] (.2); discuss research with JG (.4); continue to draft objections to magistrate's R&R (2.5); meeting with JE and DSN re: strategy going forward [REDACTED] [REDACTED] (.4).	5.50	\$1,732.50
04/20/2010	DSN	ONE - Meet with counsel for various investors regarding numerous issues and investor claims	1.30	\$409.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 8

		(1.0); telephone conference with counsel regarding [REDACTED] (.1); review draft response to Gunlick's motion for leave to freeze and provide comments to same (.2).		
04/20/2010	J-E	ONE - Meeting with counsel for investors (.7). Work on claims against third parties (.3). Work on Mr. Gunlick's issues (.5). Call from entity concerning one of the hospitals (.3).	1.80	\$567.00
04/20/2010	J-G	TWO: Confer with J. Etra regarding issues relevant to case management and representation of the Receiver (.1); review and analyze various [REDACTED] and confer with J. Etra regarding analysis and strategy as a result (.3).	0.40	\$100.00
04/20/2010	MTV	ONE-Continue draft of objection to R&R (2.9); discuss relevant facts with JE(.6).	4.10	\$1,291.50
04/20/2010	R-T	ONE: Review additional [REDACTED] emails and documents (.6); Attend meeting with Stuart Singer and Receiver (.5)	1.10	\$346.50
04/21/2010	DSN	ONE - Telephone conference with [REDACTED] who contacted receiver regarding [REDACTED] (.1); review correspondence from [REDACTED] (.1).	0.20	\$63.00
04/21/2010	J-E	ONE-Call with [REDACTED] and conference with Receiver (.4).	0.40	\$126.00
04/21/2010	J-G	TWO: follow-up conference with J. Etra regarding possible [REDACTED] motion, and review of Receiver's update on [REDACTED]	0.10	\$25.00
04/21/2010	MTV	ONE-Continue draft of objection; review relevant case law and distinctions drawn	3.90	\$1,228.50
04/21/2010	R-T	ONE: review [REDACTED] emails (.5); Teleconference with [REDACTED] (.1)	0.60	\$189.00
04/22/2010	MTV	ONE-Draft of objections (2.1); conferences with JE re: same(1.1); conference with JG re: same; attend to emails (.5); review case law(2.1).	5.80	\$1,827.00
04/23/2010	DSN	ONE - Telephone conference with potential counsel regarding third party claim.	0.30	\$94.50
04/23/2010	DSN	ONE - Draft correspondence to David Siegel and review correspondence from David Siegel regarding third party action and factual issues (.2).	0.20	\$63.00
04/23/2010	MTV	ONE-Continue draft of objection to Magistrate R&R (3.5); research interpretation of [REDACTED] and [REDACTED] in context of receivership (1.9); discuss case	5.90	\$1,858.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 9

		law with JE, DSN, JG(.5).		
04/23/2010	R-T	ONE: teleconference with [REDACTED] and Receiver (.2), Confer with Receiver regarding [REDACTED] (.2); review additional [REDACTED] documents (1.4)	1.80	\$567.00
04/25/2010	J-G	ONE: Review and analyze papers filed on motion to expand receivership.	0.40	\$100.00
04/25/2010	MTV	ONE-Continue draft of objection to R&R (3.3); review underlying pleadings(2.5) (No Charge); review and incorporate revisions(2.0).	5.30	\$1,669.50
04/26/2010	G-F	FOUR-Compile and organize incoming mail.	1.10	\$165.00
04/26/2010	J-E	ONE - Conferred with SEC on matters raised by Mr. Gunlicks's counsel and e-mail to Mr. Gunlicks' counsel on same (.3). Conferred with Mr. Gunlicks's counsel on meetings with Mr. Gunlicks (.1). Revised and finalized response to Mr. Gunlicks's motion to fees from frozen assets (.6).	1.00	\$315.00
04/26/2010	MTV	ONE-Draft and finalize objection(3.1); conferences with [REDACTED] (1.0); review and incorporate revisions (1.8); finalize for filing(1.1).	7.00	\$2,205.00
04/26/2010	R-T	ONE: draft email to Fern Bomchil (.1); Confer with Receiver concerning [REDACTED] (.2); research [REDACTED] (.4); Review [REDACTED] emails (1.2)	1.90	\$598.50
04/27/2010	DSN	ONE - Meet with Receiver's counsel and professionals to map out strategy for various on-going matters (1.0); meet with counsel to review various issues regarding third party litigation (.4).	1.40	\$441.00
04/27/2010	J-E	ONE - work on subpoenas (.5). Reviewed [REDACTED] and correspondence with [REDACTED] on extension (.2). Work on [REDACTED] issues (.3). Work on Gunlicks meeting (.2).	1.20	\$378.00
04/27/2010	J-G	ONE: research regarding issues raised by possible [REDACTED] and conferences with the Receiver and J. Etra regarding such issues (.7); follow-up analysis regarding set-off issue (.1).	0.80	\$200.00
04/27/2010	MTV	ONE-Attend team meeting on next steps (1.0); review order(.3); discuss strategy with DSN and JG(.4).	1.70	\$535.50
04/27/2010	R-T	ONE: Conferences with Receiver concerning [REDACTED], research (.5); Research potential lawyers for specialized action (1.3); Review [REDACTED] emails concerning [REDACTED]	4.20	\$1,323.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 10

		and report to Receiver (.5); research claims (1.3); Review (.6)		
04/28/2010	DSN	ONE - Review correspondence from David Siegel relating to discovery related issues (.2); review correspondence from Fred Segal regarding discovery related issues (.1); revise motion to approve auction and conferences with counsel relating to same (.7); FOUR - review correspondence from investor regarding address change and draft correspondence to investor regarding same (.1)	1.10	\$346.50
04/28/2010	J-E	ONE - Work on setting up next interview with Mr. Gunlicks (.1). Work on extension of (.1). work on subpoenas (.1)	0.30	\$94.50
04/28/2010	MTV	ONE-Review pleadings re: claims against Sun and relevant orders (1.5) (No Charge); discuss same with JG (.2); conference with A. Lang re: recovery analysis (.4); review schedules relevant to recovery issue (1.1); research state of (1.5).	3.20	\$1,008.00
04/28/2010	R-T	ONE: confer regarding claims against (.4)	0.40	\$126.00
04/29/2010	DSN	ONE - Conference with Jonathan Etra regarding and review (.3); review various diligence materials (2.0).	2.30	\$724.50
04/29/2010	J-E	ONE - correspondence with on (1). Follow up ensure preparation of extension to signed by Receiver. (.1). Sent same to (.1)	0.30	\$94.50
04/29/2010	MTV	ONE-Review and revise motion for (.4); correspond with re: same (.1); draft second amendment to (.5); discuss with DSN(.2).	1.20	\$378.00
04/29/2010	R-T	ONE: research candidates for special counsel and confer with Receiver regarding candidates (1.4)	1.40	\$441.00
04/30/2010	J-E	ONE-Internal correspondence on timing of Mr. Gunlicks's check. (.1). E-mail to his counsel on same and follow up on resolution of matter and review of order. (.2)	0.30	\$94.50
04/30/2010	MTV	ONE-Review pleadings (1.8) (No Charge); begin draft of form (1.4),	1.40	\$441.00
04/30/2010	R-T	ONE: review	0.60	\$189.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 11

05/02/2010	MTV	ONE-Research [REDACTED] law as applied, if at all, in context of [REDACTED] (.8); review pleadings regarding [REDACTED] and begin draft of [REDACTED] letter(.4).	1.20	\$378.00
05/03/2010	DSN	FOUR - Review correspondence from counsel for investor and draft correspondence to counsel for investor (.1); review correspondence relating to status of document review (.1); ONE - Review correspondence from counsel relating to [REDACTED] (.1); draft correspondence to counsel regarding [REDACTED] (.1); telephone conferences with counsel relating to [REDACTED] claim and related issues (.6); conference with counsel relating to Tolling Agreement and correspondence with counsel regarding same (.2); review Tolling Agreement (.1).	1.30	\$409.50
05/03/2010	J-E	ONE-Followed up and obtained extension of tolling agreement with Ernst & Young.	0.20	\$63.00
05/03/2010	MTV	ONE-[REDACTED] with DSN; conference with JE re: [REDACTED]; conference with NV re: [REDACTED]; conference with D. Siegel re: [REDACTED]; conference with [REDACTED] counsel and DSN re: [REDACTED]; review memo in opposition to motion to strike; correspond with opposing counsel re: motion for approval of [REDACTED]; review [REDACTED] analysis and memos on file regarding same	3.80	\$1,197.00
05/03/2010	R-T	ONE: Draft email to Fern Bomchil (.1); review [REDACTED] (.8)	0.90	\$283.50
05/04/2010	DSN	FOUR - Revise draft subpoenas (.5); ONE - draft correspondence to Michelle Visiedo Hidalgo and review correspondence from Michelle Visiedo Hidalgo regarding [REDACTED] (.2).	0.70	\$220.50
05/04/2010	J-E	ONE - work on [REDACTED] (.2).	0.20	\$63.00
05/04/2010	MTV	ONE-Attend to litigation filed by AmEx (.3); revise letter to counsel for AmEx regarding receivership and notice of filing in AmEx litigation (.4); review [REDACTED] in TX (.2), discuss same with Receiver and correspond with counsel for Sun regarding same(.1).	1.00	\$315.00
05/05/2010	G-F	FOUR-Conference with Ms. Fradera regarding important mail and invoices received by Receivership.	0.10	\$15.00
05/06/2010	J-G	ONE-Review correspondence from the Receiver regarding [REDACTED].	0.10	\$25.00
05/06/2010	R-T	ONE: teleconference with Fern Bomchil (.3); draft and exchange emails with Receiver (.2);	1.10	\$346.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 12

		review additional documents (.6)		
05/07/2010	MTV	ONE-Review correspondences relating to status conference (.3); review relevant pleadings (.4); draft motion (2.1); correspond with opposing counsel re: motion for approval of auction(.3).	3.10	\$976.50
05/10/2010	DSN	FOUR - Meet with investor T.J. and attorney Mr. Friedman regarding receivership matters and various related issues (1.0); ONE - Meet with Receiver's counsel regarding various tasks to be performed including discovery related issues and motions to be filed with court (.5); draft correspondence and various telephone conferences with Adam Lang relating to [REDACTED] (.3); review documents relating to [REDACTED] and [REDACTED] (.2); review draft talking points memo from David Siegel (.3); review various documents relating to Founding Partners' relationship with [REDACTED] (.3).	2.60	\$819.00
05/10/2010	J-E	ONE-Work on motion for status conference and meet and confers on same (.5). Work on [REDACTED] issues (.5). Meeting with counsel for [REDACTED] fund investors. (.8) Work on discovery issues and motion for transparency on collateral (.5). Work on [REDACTED] (.2). Work on additional strategies (.3). Work on E and Y issues (.2).	3.00	\$945.00
05/10/2010	MTV	ONE-Discuss revisions to motion for status conference (.5); meeting with D. Newman and J. Etra regarding strategy moving forward (.5); conference with J. Geldens regarding in pari delicto issue (.3); begin draft of motion to enforce order/compel disclosure(1.5).	2.80	\$882.00
05/10/2010	R-T	ONE: teleconference with Receiver (.1); review [REDACTED] emails (1.6)	1.70	\$535.50
05/11/2010	DSN	FOUR - Telephone conference with Ian Anderson and Bob Levenson regarding fee application (.2) (no charge).	0.20	\$0.00
05/11/2010	DSN	FOUR - Review correspondence from counsel for investor regarding meeting (.1).	0.10	\$31.50
05/11/2010	G-F	FOUR-Compile and review incoming mail.	1.10	\$165.00
05/11/2010	J-E	ONE-Meeting and conferring on motion for status conference and revised and finalized (.4). Work on subpoenas (.1).	0.50	\$157.50
05/11/2010	MTV	ONE-Review underlying pleadings, review draft subpoena (.5); draft document request in preparation to serve subpoenas (1.8); conference	2.50	\$787.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 13

		with F. Segal regarding subpoenas and document requests (.2); begin draft of motion for disclosure (2.1) (No Charge); review reporting requirements per loan agreements(.7) (No Charge).		
05/12/2010	DSN	ONE - Office conferences with counsel regarding status of various issues (.1).	0.10	\$31.50
05/12/2010	G-F	FOUR-Compile, review and log incoming mail; Confirm payment of Delaware franchise taxes for receivership entities.	4.50	\$675.00
05/12/2010	J-E	ONE - Conferred with Ms. Visiedo on discovery and non-disclosure from Sun (.2). Conferred with Mr. Kennelly over disclosure and hospital issues. (.2).	0.40	\$126.00
05/12/2010	MTV	ONE-Draft motion to enforce receivership order/for disclosure (4.9); discuss past discovery requests and subpoenas; review same (.2).	5.10	\$1,606.50
05/13/2010	J-E	ONE - Worked on [REDACTED] discovery issues (.2). Worked on motion for disclosure for reporting purposes (.2).	0.40	\$126.00
05/13/2010	MTV	ONE-Draft motion to compel disclosure (No Charge).	3.80	\$0.00
05/14/2010	DSN	ONE - Review correspondence between counsel for William Gunlicks regarding various issues (.2).	0.20	\$63.00
05/14/2010	DSN	FOUR - Conference with counsel regarding fee application (.3) (no charge).	0.30	\$0.00
05/14/2010	J-E	ONE - Work on Mayer Brown issues (.3). Work on meeting with Mr. Gunlicks (.3). Work on consultant for investments (.2).	0.80	\$252.00
05/14/2010	MTV	ONE-Review and revise exhibit to subpoena; review previous subpoena request and discuss same with F. Segal; conference call with Huron	2.90	\$913.50
05/14/2010	R-T	ONE: Draft and exchange emails with Fern Bomchill (.5), teleconference with Receiver (.2)	0.70	\$220.50
05/15/2010	J-E	ONE - Work on Gunlicks meeting (.2). Work on consultant for investments (.2)	0.40	\$126.00
05/16/2010	J-E	ONE - work on [REDACTED] issues.	0.50	\$157.50
05/16/2010	R-T	ONE- Review [REDACTED] documents (1.7); teleconference with Receiver concerning strategy, scheduling, staffing (.5); Draft Complaint (2.1)	4.30	\$1,354.50
05/17/2010	C-A	ONE-Conference to discuss research needed in connection with preparation of action against [REDACTED]; research whether existence of [REDACTED]	5.50	\$1,375.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 14

		[REDACTED]; research elements of [REDACTED] in [REDACTED] and statute of limitations regarding same; research [REDACTED] law on [REDACTED] defense; research theory of [REDACTED] under [REDACTED] and [REDACTED] law; research whether breach of [REDACTED] claim is sustainable against [REDACTED] under [REDACTED] law.		
05/17/2010	DSN	ONE - Office conference with counsel regarding various issues including suit filed by Amex and response to same (.2); review order of court regarding William Gunlicks' motion for attorneys' fees (.1).	0.30	\$94.50
05/17/2010	J-E	ONE - call with potential witness and follow up with same (.5). Work on issues involving Mr. Gunlicks (.3).	0.80	\$252.00
05/17/2010	MTV	ONE-Discuss document request (.2); review and discuss orders by court (.2); draft correspondence to counsel for AmEx regarding dismissal/stay of litigation against FP(.8).	1.00	\$315.00
05/17/2010	R-T	ONE: review [REDACTED] documents (2.1), confer regarding research (.2), revise Complaint (.8)	3.10	\$976.50
05/18/2010	C-A	ONE-Conference to discuss status of research projects and division of remaining projects; research to determine existence of [REDACTED] cases for failure to [REDACTED] with adequate [REDACTED]; research to determine what duties are owed by [REDACTED]; [REDACTED]; research to determine whether doctrine of [REDACTED] can only be invoked by a [REDACTED]	3.50	\$875.00
05/18/2010	DSN	FOUR - Telephone conference with Andreea Cioara regarding tax issue (.1); review correspondence from Andreea Cioara regarding same (.1); office conference with Brenda Fradera regarding tax issue (.1).	0.30	\$94.50
05/18/2010	J-E	ONE - Work on [REDACTED] issues (.5).	0.50	\$157.50
05/18/2010	R-T	ONE: Review [REDACTED] emails and documents (1.6), draft and exchange emails concerning strategy, complaint (.4), Confer regarding targeted searches (.3), Draft Complaint (1.4)	3.70	\$1,165.50
05/19/2010	C-A	ONE-Additional research to determine confirm [REDACTED] in [REDACTED] and [REDACTED] and to determine [REDACTED] period for [REDACTED] claims in [REDACTED]	2.60	\$650.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 15

		[REDACTED]; conference to discuss status of remaining research projects and path forward with respect to same; email to R. Traband advising of results of [REDACTED] research.		
05/19/2010	DSN	ONE - Telephone conference with individuals from [REDACTED] regarding [REDACTED] (.7); FOUR- telephone conference with Andreea Cioara regarding Founding Partners tax issues (.2); meet with counsel relating to various Founding Partners matters and status of same (1.0); FOUR- review correspondence from Greg Friedman (.1); FOUR-office conference with Jonathan Etra regarding response to Greg Friedman (.1); FOUR- telephone conference with [REDACTED] regarding various issues (.4); FOUR- review correspondence from investor relating to status of receivership (.1); ONE- office conference with counsel regarding various issues relating to potential claims (.4).	3.00	\$945.00
05/19/2010	J-E	ONE - Conference call with witness in health care industry (.4). Work on outstanding items and disclosure issues (1.0). Correspondence with Gunlicks' counsel on issues (.2)..	1.60	\$504.00
05/19/2010	MTV	ONE-Review correspondences regarding order and inventory; meeting regarding discovery and pending motion; revise discovery; revise pending motion.	2.80	\$882.00
05/19/2010	R-T	ONE: Draft Complaint (1.2); review emails, research and documents (2.1); Confer regarding projects, research and searches (.4).	3.70	\$1,165.50
05/20/2010	DSN	ONE - Telephone conferences with Rhett Traband regarding various issues, review draft claim document and conference with counsel relating to same (1.5); FOUR - Review correspondence from investors and draft correspondence to investors regarding same (.2); ONE - Telephone conference with Mike Kennelly, Jonathan Etra and Michelle Visiedo regarding subpoenas and related issues (.3).	2.00	\$630.00
05/20/2010	J-E	ONE - obtained information requested by counsel for investors and responded to queries (.5). Work on discovery and disclosure motions (1.0). Work on [REDACTED] issues (.2). Worked on meet and confer issues on investor groups motion for leave to file amended complaint that will remain stayed and communications re same (.3).	2.00	\$630.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 16

05/20/2010	MTV	ONE-Review subpoenas and document requests previously issued (.5)(No Charge); revise/draft exhibit A to subpoenas to be issued; revise motion (1.1); attend teleconference with Huron Consulting regarding document requests(.4).	1.50	\$472.50
05/20/2010	R-T	ONE: Draft Complaint (2.6); review [REDACTED] and [REDACTED] documents (2.2)	4.80	\$1,512.00
05/21/2010	DSN	ONE - Review and analyze draft complaint (.5).	0.50	\$157.50
05/21/2010	J-E	ONE - Obtained information to respond to investor counsel; questions and responded to same (.6). Work on Mr. Gunlicks issue (.2). Call with investor counsel and obtained documents (.4).	1.20	\$378.00
05/21/2010	R-T	ONE: review and revise Complaint (1.1); Draft and exchange emails concerning Complaint, open items (.3); Draft questions for [REDACTED] (1.2)	2.60	\$819.00
05/24/2010	C-A	ONE-Research to determine the elements of [REDACTED] a [REDACTED] under [REDACTED] law.	0.50	\$125.00
05/24/2010	DSN	ONE - Telephone conference with various individuals relating to Founding Partners collateral related issues (.3).	0.30	\$94.50
05/24/2010	J-E	ONE - Reviewed draft [REDACTED] complaint (.4).	0.40	\$126.00
05/24/2010	MTV	FOUR-Review correspondence from Huron and incorporate categories of documents relating to same	0.80	\$252.00
05/24/2010	R-T	ONE: Review Founding Partners records, [REDACTED] invoices and other documents (.8); review and revise Complaint (1.2); confer with Receiver (.2).	2.20	\$693.00
05/25/2010	J-E	ONE - Call with Receiver and reschedule call with investor (.2).	0.20	\$63.00
05/25/2010	MTV	ONE-Review declaration of Jill Frew; revise exhibits a to downstream entities and Sun entities; begin review and revisions to subpoena to Cain Bros/Frew; attend call from Huron Consulting	4.20	\$1,323.00
05/25/2010	R-T	ONE: Review [REDACTED] documents.	0.30	\$94.50
05/26/2010	DSN	ONE - Review various subpoenas pertaining to status of collateral (.3); conference with Michelle Visiedo Hidalgo regarding same (.1); office conference with Michelle Visiedo Hidalgo regarding William Gunlicks check (.1); review correspondence from Jonathan Etra regarding investor related litigation (.2); telephone	0.80	\$252.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 17

		conference with David Smith (.1).		
05/26/2010	J-G	ONE-Follow-up with the Receiver regarding protocol motion.	0.30	\$75.00
05/26/2010	MTV	ONE-Attend to calls relating to motion for [REDACTED] (.4); conferences with counsel for Gunlicks (.3); review and revise subpoena exhibits (.5); discuss same with Receiver(.3)	1.50	\$472.50
05/27/2010	G-F	FOUR-Compile, review and log incoming mail; Discuss invoice received from CT Corporation for registered agent services with Receiver; Review Delaware Secretary of State's database to determine who serves as registered agent.	1.50	\$225.00
05/27/2010	J-G	ONE-Confer with F. Siegel and M. Visiedo regarding [REDACTED] issue.	0.10	\$25.00
05/27/2010	MTV	ONE-Conference regarding issuance of subpoena; review and respond to correspondence regarding office inventory; draft coverletters relating to subpoenas/requests for production	4.70	\$1,480.50
05/27/2010	R-T	ONE: review and revise Complaint, list of questions for [REDACTED] (.8); review documents for use in complaint (.5)	1.30	\$409.50
05/28/2010	DSN	ONE - Telephone conference with individuals at Butterfield Bank regarding status of receivership and various related issues (.4); prepare check to William Gunlicks for monthly payment (.1); office conference with Michelle Visiedo-Hidalgo regarding motion to approve auction and William Gunlicks' personal items (.2).	0.70	\$220.50
05/28/2010	J-E	ONE - Call from non-us investors (.4). Internal conferences on discovery and other issues (.4).	0.80	\$252.00
05/28/2010	MTV	ONE-Draft coverletters to subpoenas; organize exhibits; discuss issuance of same	1.50	\$472.50
05/29/2010	P-B	ONE-Prepare subpoenas in SEC case.	0.80	\$120.00
06/01/2010	DSN	ONE - Review and revise draft letter relating to [REDACTED] of items found at Founding Partners offices (.2); office conferences with Michelle Visiedo Hidalgo regarding issuance of subpoenas (.3); FOUR - Draft correspondence to Samuel Ulman regarding tax counsel issue (.1); review correspondence from and draft correspondence to investor B.L. regarding telephone conference (.1);	0.70	\$220.50
06/01/2010	J-E	ONE-Work on subpoenas (.3). Call with Mr. Anderson on mortgage issue relating to Gunlicks property (.2)	0.50	\$157.50
06/01/2010	MTV	ONE-Attend to issues related to issuance of	2.10	\$661.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 18

		subpoenas; revise correspondences to opposing counsel regarding inventory; draft correspondences to opposing counsel relating to subpoenas; review notice of issuance, subpoenas, and exhibits thereto prior to issuance		
06/02/2010	DSN	FOUR - Telephone conference with Jonathan Etra and investors regarding status of receivership (.5); ONE - Revise Motion for Retention of Tax Counsel and draft correspondence to accountants regarding same (.5); telephone conference with Samuel Ulman regarding retention as tax counsel (.2); review correspondence from accountants regarding Motion to Retain Tax Counsel (.1).	1.30	\$409.50
06/02/2010	DSN	FOUR - Revise time entries in connection with fee application (1.5) (no charge).	1.50	\$0.00
06/02/2010	J-E	ONE - Call with investor group (.5). Meet and confer on motion to retain counsel (.2).	0.70	\$220.50
06/02/2010	P-B	ONE-Prepare subpoenas for Request for Production (1.8); Prepare Notice of Issuing Subpoenas (.50).	2.30	\$345.00
06/03/2010	DSN	ONE -Review correspondence from David Siegel regarding talking points and draft correspondence relating to documents to be provided (.4); draft correspondence to Leo B. regarding documents to be provided (.2); review correspondence from Michelle Visiedo Hidalgo to Marissel Descalzo regarding auction issue (.1).	0.70	\$220.50
06/04/2010	DSN	ONE - Review correspondence from David Siegel regarding documents to be provided (.2).	0.20	\$63.00
06/04/2010	P-B	FOUR-Receive and review email from SEC regarding retention of tax counsel.	0.10	\$15.00
06/04/2010	R-T	ONE: Research defenses applicable to claim against [REDACTED] (1.2); review [REDACTED] documents and confer with Receiver (1.4)	2.60	\$819.00
06/06/2010	R-T	ONE: Review research on issues relating to [REDACTED] (1.1); Draft Statement of Claim (1.4); review [REDACTED] transcript and other [REDACTED] related documents (1.0)	3.50	\$1,102.50
06/07/2010	DSN	ONE - Review correspondence from accountants regarding issues to be raised regarding potential claim (.3); office conference with Rhett Traband regarding same (.1); FOUR - Draft correspondence to Sam Ulman (.1); review correspondence from Sam Ulman (.1).	0.60	\$189.00
06/07/2010	J-E	ONE - Conference call with SEC and counsel for North Shore Bank and follow up call with SEC	0.50	\$157.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 19

		(.5).		
06/07/2010	R-T	ONE: Draft Statement of Claim (1.1); review materials from accountants (.4); Confer regarding strategy, scheduling (.2)	1.70	\$535.50
06/08/2010	J-E	ONE - work on [REDACTED] issues (.3). Work on Mr. Gunlicks issues (.3).	0.60	\$189.00
06/08/2010	R-T	ONE: Review Limited Partnership Agreements (.4), research in [REDACTED] (.8), review and revise letter to Leo Beus (.4), confer regarding [REDACTED], structure, strategy (.2)	1.80	\$567.00
06/09/2010	J-E	ONE-Worked on [REDACTED] issues (.2).	0.20	\$63.00
06/09/2010	R-T	ONE: Review Founding Partners corporate structure documents (.2); Confer regarding law applicable to claims against third parties and research same issue (1.0)	1.20	\$378.00
06/10/2010	DSN	ONE - Draft correspondence to attorney L.B. regarding documents and revise same (.2); review correspondence from Marissel Descalzo regarding William Gunlicks (.1); office conference with Frederick Segal regarding letter to attorney L.B. and correspondence relating to same (.1); review correspondence from Sam Ulman (.1); draft correspondence to Sam Ulman regarding same as well as office conference relating to same (.2).	0.70	\$220.50
06/10/2010	J-G	ONE-Prepare additions to motion to employ tax counsel (.4); make changes to motion regarding protocol and confer with the Receiver regarding such changes (.5).	0.90	\$225.00
06/10/2010	M-J	FOUR-Research/ pulling documents for Rhett on Westlaw and PACER.	0.50	\$37.50
06/10/2010	R-T	ONE: Revise Complaint (.9)	0.90	\$283.50
06/11/2010	DSN	ONE - Meet with counsel regarding potential third party claim and discuss various issues relating to same. (1.5)	1.50	\$472.50
06/11/2010	G-F	FOUR-Conference with Ms. Vanegas regarding corporate documents of Receivership entities (.6); Telephone conference with CorpDirect Agents, Inc. regarding documents available in Delaware for Receivership entities (.2); Exchange email correspondence with CorpDirect Agents, Inc. regarding same (.2); Exchange email correspondence with Receiver regarding same (.2)	1.20	\$180.00
06/14/2010	DSN	FOUR - Review correspondence from Sam Ullman regarding Motion to Retain Tax Counsel (.1); Review correspondence from L.B. regarding	0.30	\$94.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 20

		potential claims (.2).		
06/14/2010	G-F	FOUR-Receipt and review of corporate documents on file with the Delaware Secretary of State for each of Founding Partners Hybrid Value Fund LP, Founding Partners Stable-Value Fund LP and Founding Partners Stable-Value Fund II, LP.	0.30	\$45.00
06/14/2010	R-T	ONE: Review ██████████ selected emails (1.3); Review Sun Motion (.2).	1.50	\$472.50
06/15/2010	DSN	ONE - Review draft complaint and conference with counsel relating to same. (1.9); meet with counsel relating to various tasks to be completed and other related issues (.5). Telephone conference with Ian Anderson (.2).	2.60	\$819.00
06/15/2010	J-E	ONE - Work on ██████████ (1.0). Work on Lancelot. (.2).	1.20	\$378.00
06/15/2010	J-G	ONE: Review correspondence from S. Ullman, confer with the Receiver, and prepare revised motion to approve counsel for tax matters (.4); ONE: confer with the Receiver and Cayman counsel regarding Bermuda protocol (.1)	0.50	\$125.00
06/15/2010	R-T	ONE: Confer regarding strategy, Complaint (1.8); Review ██████████ documents (.6)	2.40	\$756.00
06/16/2010	DSN	ONE - Review correspondence pertaining to tax related issues and conference with David Siegel and Jeffrey Geldens regarding same (.5); conference with Jeff Geldens regarding Motion to Retain Sam Ullman. (.3)	0.80	\$252.00
06/16/2010	J-E	ONE - Work on legal issues re additional claims (.1). Review of documents and e-mail re same (.2).	0.30	\$94.50
06/16/2010	J-G	ONE: confer with the Receiver regarding status, review draft, and prepare correspondence to proposed tax counsel regarding motion (.1).	0.10	\$25.00
06/16/2010	R-T	ONE: Draft Claim (1.0); Review accounting documents and related research (2.7); Revise Complaint (1.2).	4.90	\$1,543.50
06/17/2010	DSN	ONE - Draft correspondence to L.B. relating to potential representation. (.3)	0.30	\$94.50
06/17/2010	J-G	FOUR: Follow-up relevant to motion to appoint tax counsel, including additions and analysis from J. Etra.	0.50	\$125.00
06/18/2010	J-E	FOUR-Work on motion to employ tax counsel (.8).	0.80	\$252.00
06/18/2010	J-G	FOUR-Follow-up on issues regarding tax counsel	0.40	\$100.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 21

		motion.		
06/18/2010	MTV	ONE-Revise complaint against related entities; review stay order	3.80	\$1,197.00
06/19/2010	J-E	ONE - worked on motion to employ tax counsel (.2).	0.20	\$63.00
06/21/2010	DSN	FOUR-Review Motion to Retain Sam Ullman and finalize same (.3); telephone conference with Kevin regarding potential services to be performed (.2)	0.50	\$157.50
06/21/2010	J-E	ONE - Final review of motion for approval to retain tax counsel (.1).	0.10	\$31.50
06/21/2010	R-T	ONE: Review and revise Claim and Complaint (1.8); review [REDACTED] records (1.3)	3.10	\$976.50
06/22/2010	DSN	ONE - Regarding in action, review court order denying motion to retain tax counsel and office conference with counsel relating to same. (.3); Emails with tax accountants relating to court order and strategy in light of court denial of request to retain tax attorney (.2); FOUR - Review correspondence from investor relating to Form K-1 (.1); draft correspondence to investor regarding Form K-1 (.1); review correspondence from accountant to investor regarding Form K-1 (.1). FOUR - Draft correspondence to L.B. regarding potential representation and conferences with L.B. and counsel regarding same (.3). ONE - Attend interview with [REDACTED] (1.5).	2.60	\$819.00
06/22/2010	MTV	ONE-Attend interview of [REDACTED]	2.60	\$819.00
06/22/2010	R-T	ONE: Prepare for and attend teleconference with [REDACTED] and his counsel (2.6); review and revise Complaint (.4); review Ernst & Young records and Rothstein Kass records (1.0)	4.00	\$1,260.00
06/23/2010	DSN	FOUR-Review orders on fee motions and motion for status conference (.2); Conferences with counsel regarding orders (.1).	0.30	\$94.50
06/23/2010	R-T	ONE: Revise claim (.7), review accounting documents and research (.5), teleconference with Receiver (.2); Review Orders entered by Court (.2)	1.60	\$504.00
06/24/2010	DSN	ONE - Conferences with accountants and counsel and email for immediate and various tasks to be performed and issues relating to tax returns (.6).	0.60	\$189.00
06/24/2010	J-E	ONE-Reviewed motion by Mr. Gunlicks on deposit of funds and order on same: (.2).	0.20	\$63.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 22

06/24/2010	MTV	ONE-Attend interview of [REDACTED]	1.50	\$472.50
06/24/2010	R-T	ONE: Teleconference with [REDACTED] and Marissel Discalzo regarding [REDACTED] and [REDACTED] (2.3), Review accounting documents (1.1)	3.40	\$1,071.00
06/25/2010	DSN	ONE - Telephone conference with investors regarding Motion for Stay (.3) and other issues (.3). Redact invoices in connection with fee application (.4 - No Charge)	0.60	\$189.00
06/25/2010	J-G	FOUR-Confer with Receiver, review, and prepare materials relevant to request for fees (No Charge).	1.00	\$0.00
06/25/2010	P-B	ONE-Compile documentation for Third Fee Application (No Charge)	1.00	\$0.00
06/25/2010	R-T	ONE: Revise Claim (2.6); Review accounting workpapers (.8); confer regarding [REDACTED] law (.2)	3.60	\$1,134.00
06/26/2010	DSN	ONE-Review various documents relating to claims case and strategy. (.5)	0.50	\$157.50
06/28/2010	DSN	ONE - Telephone conference with Rhett Treband and Leo Beuss regarding potential claims and representation (1.3); office conference with Rhett Treband regarding [REDACTED] claims (.2). Meet with Kevin G. regarding Hybrid Value Fund (.5). Review correspondence from Richard B. and draft correspondence to Richard B. (.1)	2.10	\$661.50
06/28/2010	DSN	FOUR - Review various invoices for purposes of filing fee application (1.0)	1.00	\$315.00
06/28/2010	P-B	FOUR-Compile and calculate financial invoices from accountants.	3.50	\$525.00
06/28/2010	R-T	ONE: Teleconference with Leo Beus (1.3); Confer with Receiver regarding retention (.2); Review and revise [REDACTED] Complaint to accord with information gleaned from interviews (1.1); Review and revise Complaint vs. [REDACTED] (1.4).	4.00	\$1,260.00
06/29/2010	DSN	FOUR-Meet with accountants relating to the status of projects and projects to be performed and budgetary issues with follow up emails regarding same. (1.5)	1.50	\$472.50
06/29/2010	G-F	FOUR-Compile, review and log incoming mail.	1.50	\$225.00
06/29/2010	J-E	ONE - meetings with Receiver and accounting firm on numerous issues (1.3).	1.30	\$409.50
06/29/2010	J-G	ONE-Review materials regarding litigation counsel to be retained, and confer with the Receiver regarding motion to retain (.6);FOUR-	0.60	\$150.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 23

		confer with the Receiver regarding fee application additions (.1)(No Charge).		
06/29/2010	R-T	ONE: Review and revise Complaints (.8); review proposed fee agreement (.2)	1.00	\$315.00
06/30/2010	DSN	ONE - Review various materials forwarded by Leo Beuss and analyze same; Review correspondnece from counsel relating to same. (1.0)	1.00	\$315.00
06/30/2010	J-E	ONE - work on [REDACTED] issues (.2).	0.20	\$63.00
06/30/2010	J-G	ONE-Prepare motion to employ counsel as to potential [REDACTED] defendants, and confer with the Receiver regarding the motion (.7); prepare additions to motion to approve payment of fees to retained professionals, and confer with the Receiver regarding the motion (.4).	1.10	\$275.00
06/30/2010	P-B	FOUR-Redacting final invoices for submission to SEC (3.0) (No Charge).	3.00	\$0.00
06/30/2010	R-T	ONE: Confer regarding Complaints, Leo Beus, strategy (.4)	0.40	\$126.00

TOTAL PROFESSIONAL CHARGES \$111,605.50

TIMEKEEPER SUMMARY

DSN	Daniel S. Newman, PA	43.70	hrs @	\$315.00	per hour	\$13,765.50
R-T	Rhett Traband, PA	114.50	hrs @	\$315.00	per hour	\$36,067.50
J-E	Jonathan Etra	29.30	hrs @	\$315.00	per hour	\$9,229.50
MTV	Michelle T. Visiedo-Hidalgo	131.70	hrs @	\$315.00	per hour	\$41,485.50
J-G	Jeffery Geldens	14.10	hrs @	\$250.00	per hour	\$3,525.00
C-A	Chalon Allen	12.10	hrs @	\$250.00	per hour	\$3,025.00
M-J	Matthew Jaffe	.50	hrs @	\$75.00	per hour	\$37.50
G-F	Gisela Fasco	23.10	hrs @	\$150.00	per hour	\$3,465.00
P-B	Patricia Blackman	6.70	hrs @	\$150.00	per hour	\$1,005.00

TIMEKEEPER TOTAL \$111,605.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 24

ITEMIZED EXPENSES

10/21/2009	Reversal from Void Check Number: 53816 Bank ID: M004 Voucher ID: 423090 Vendor: William V. Gunlicks	-\$44.40
04/05/2010	Conference Call Service, Invoice no.1740156616 - VENDOR:InterCall	\$6.20
04/09/2010	Travel, Mileage	\$12.06
04/15/2010	Messenger Service, From: B&C To: SEC 801 Brickell Avenue, #1800 Miami, FL., Invoice no.32879 - VENDOR:Arrow Express Messenger Service	\$6.00
05/21/2010	Messenger Service, Invoice no.33082- VENDOR:Arrow Express Messenger Service	\$20.00
06/02/2010	Messenger Service, From: B&C To: Carlton 100 SE 2 Street, #4000, Miami, Fl., Invoice no.33199 - VENDOR:Arrow Express Messenger Service	\$6.00
06/02/2010	Messenger Service, From: B&C To: US Security, Invoice no.33199 - VENDOR:Arrow Express Messenger Service	\$6.00
06/10/2010	FedEx Tracking # 793626536979 Leo Beus Beus Gilbert, PLLC 4800 N SCOTTSDALE RD STE 6000 SCOTTSDALE AZ 85251	\$20.37
06/22/2010	Conference Call Service, Invoice no.1740253460 - VENDOR:InterCall	\$23.21
06/24/2010	Conference Call Service, Invoice no.1740253460 - VENDOR:InterCall	\$12.23
	Parking	\$15.00
	Long Distance Telephone	\$109.32
	Postage	\$10.08
	Telecopy Charges	\$13.50
	Online Research	\$122.00
	Photocopies	\$419.31
	Total Expenses	<u>\$756.88</u>



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9400
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

February 24, 2011
Invoice No.: 819525

STATEMENT OF ACCOUNT

Matter Name: SEC v. Founding Partners Capital
Managemnt Co., et al.
Client/Matter No: 43125.0001
Billing Attorney: Daniel S. Newman, PA

Previous Balance		\$347,817.52
Payments Received		
Subtotal of Previous Balance		<u>\$347,817.52</u>
Professional Charges (detail attached)	\$90,499.50	
Expenses (detail attached)	<u>3,424.01</u>	
Subtotal of Current Charges		<u>\$93,923.51</u>
TOTAL BALANCE DUE (Previous and current balance)		\$441,741.03

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR
PAYMENT

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 3

ITEMIZED PROFESSIONAL CHARGES

07/01/2010	J-G	ONE-Prepare motion to employ counsel and third fee application.	2.10	\$525.00
07/01/2010	R-T	ONE: Review [REDACTED] documents (.6); review fee agreement and confer with Receiver (.5).	1.10	\$346.50
07/02/2010	DSN	ONE - Review various correspondence to accountants regarding tasks to be performed, documents to be obtained for receiver and regarding prior week's meeting and respond to same. (.4); ONE - Draft correspondence to [REDACTED] [REDACTED] (.1); FOUR - Review correspondence from investor and respond to same (.1). FOUR-Draft correspondence to [REDACTED] and prepare check for transmission pursuant to Court order (.1); FOUR-Telephone conference with [REDACTED] (.1).	0.80	\$252.00
07/06/2010	DSN	FOUR-Telephone conference with [REDACTED] [REDACTED] (.5) Review correspondence from Fred Segal regarding document review issues and review correspondence from document review regarding status of document review and various documents reviewed. (.3).	0.80	\$252.00
07/06/2010	GEC	FOUR-Review case regarding [REDACTED] (.4); Review e-mail from Andreea Cioara regarding further research for this issue (.4); Telephone conference with Andreea Cioara regarding same(.4).	1.20	\$378.00
07/06/2010	J-E	ONE - worked on [REDACTED] (.8). Reviewed letter from [REDACTED] [REDACTED] (.3).	1.10	\$346.50
07/07/2010	DSN	ONE - Office conferences with Jonathan Etra and Michelle Visiedo regarding [REDACTED] [REDACTED]	0.40	\$126.00
07/07/2010	J-E	ONE - Call with lawyer from [REDACTED] [REDACTED] (.5)	0.50	\$157.50
07/08/2010	DSN	ONE - Review correspondence from Kevin Gordon and draft correspondence to Kevin Gordon regarding Hybrid Value (.2); Review correspondence from Jerry S. (.1);	0.30	\$94.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 4

07/08/2010	GEC	FOUR-Research whether 2009 and 2008 interest [REDACTED]	1.70	\$535.50
07/08/2010	P-B	FOUR-Receipt, review, and distribute HVF Investments for Jan. '10 - June '10.(No Charge)	0.30	\$0.00
07/09/2010	DSN	ONE - Review draft letter from Kevin Gordon and make proposed revisions to same (.5); Draft correspondence to Kevin Gordon regarding same and review correspondence from Kevin Gordon (.1)	0.60	\$189.00
07/09/2010	P-A	ONE-Review Defendants' Emergency Motion to Stay Proceedings Pending Settlement Negotiations, Receiver's Notice of Intent of Filing Memo Opposing Emergency Motion, and Court's Order Temporarily Granting Same; Post all filings on website.	0.40	\$60.00
07/09/2010	P-B	FOUR-Receive and distribute Bank Atlantic Monthly Statements.(No Charge)	0.20	\$0.00
07/12/2010	DSN	ONE - Telephone conference with [REDACTED] [REDACTED] (.4). FOUR - Review RCP information relating to investments. Review correspondence from Adam Lang regarding Hybrid Value Investment. (.3); Meet regarding administrative matters (.2). Draft correspondence to [REDACTED] regarding status of payment (.1). Draft correspondence to [REDACTED].	1.00	\$315.00
07/12/2010	G-F	FOUR-Receipt of Delaware L.P. Tax Notice for Founding Partners Stable-Value Fund, L.P., Telephone conference with CorpDirect Agents, Inc. regarding same (.4); Review and log incoming mail (.6).	1.00	\$150.00
07/12/2010	GEC	FOUR-Telephone conference with Andreea Cioara [REDACTED]	0.30	\$94.50
07/13/2010	GEC	FOUR-Further research regarding [REDACTED]	1.40	\$441.00
07/13/2010	J-E	ONE-Reviewed proposed engagement letter re investments and conferred with Receiver re same (.7)	0.70	\$220.50
07/13/2010	P-B	FOUR-Telephone conversation with investor regarding updated information and website (.2).	0.20	\$30.00
07/13/2010	P-B	FOUR-Receive and review letter from Property Tax office (.1); Property Search of same (.3); Telephone call to clerk's office of the Tax	0.70	\$105.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 5

		Collector's office regarding letter (.3).		
07/14/2010	GEC	FOUR-Review [REDACTED]; voice mail to Dan Newman to discuss questions	1.30	\$409.50
07/15/2010	DSN	ONE-Telephone conference with [REDACTED] [REDACTED]. (.3) FOUR - Telephone conference with Gene Crick regarding [REDACTED]. (.3).	0.60	\$189.00
07/15/2010	GEC	FOUR-Conference call regarding whether [REDACTED]	0.60	\$189.00
07/16/2010	DSN	ONE - Review correspondence [REDACTED] [REDACTED]	0.40	\$126.00
07/19/2010	DSN	FOUR - Office conference with Jon Etra responding to email from third party [REDACTED] [REDACTED] (.1); Review correspondence from Rachel M. [REDACTED] [REDACTED] (.1); Review correspondence from Equistone regarding Forms K-1 (.3) ONE - Telephone conference and draft correspondence to [REDACTED] [REDACTED] (.5); [REDACTED] [REDACTED] (.6).	1.60	\$504.00
07/19/2010	G-F	FOUR-Review and log incoming mail.	0.40	\$60.00
07/19/2010	J-E	ONE - call with SEC (.2).	0.20	\$63.00
07/20/2010	DSN	ONE - Review correspondence from Kevin Gordon (.1); Telephone conference with [REDACTED] [REDACTED] (.7). FOUR - Review correspondence from Jonathan Etra to Christian Lawrence regarding email sent to Receiver (.1). Review correspondence from Pat Blackman to accounts regarding IRS notice regarding taxes.	0.90	\$283.50
07/20/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.0).	2.00	\$400.00
07/20/2010	GEC	FOUR-Telephone conference with Andreea Cioara regarding [REDACTED] [REDACTED]; Further research regarding same	6.90	\$2,173.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 6

07/20/2010	J-E	ONE -Call with counsel for [REDACTED] (.3).	0.30	\$94.50
07/20/2010	MTV	ONE- Attend to correspondences relating to auction (.5); conference with A. Lang regarding same and prepare documentation for transmittal and comment (.3); correspond with M. Dezaalso regarding letter; review documentation therein(.2).	1.00	\$315.00
07/21/2010	A-V	ONE: Run searches of documents. Review and classify documents to be sent to accountant for corporate formality project (No Charge)	5.80	\$0.00
07/21/2010	DSN	ONE - Draft correspondence to accountants and to Scott Sterling regarding meeting in preparation for same. (.2); Review correspondence from Kevin Gordon (.1); Draft correspondence to Kevin Gordon (.1)	0.40	\$126.00
07/21/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (1.5).	1.50	\$300.00
07/21/2010	MTV	ONE-Conference with A. Lang regarding documents produced by counsel for Gunlicks regarding items in storage	0.10	\$31.50
07/22/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (4.6)	4.60	\$345.00
07/22/2010	DSN	ONE - Telephone conference with Ian Anderson regarding Sandardized Fund Accounting Reports (.1) ; Review correspondence from accountants regarding various reporting and other related issues (.2); Review correspondence relating to request from counsel for Gunlicks requesting to deposit funds and response to same (.2), office conference with counsel relating to meeting with Leo Beus attorneys. (.2).	0.70	\$220.50
07/22/2010	GEC	FOUR-Draft Memorandum for [REDACTED]; Review documents regarding same	3.00	\$945.00
07/22/2010	J-E	ONE - meetings regarding [REDACTED] (2.0).	2.00	\$630.00
07/22/2010	MTV	ONE-Conference with A. Lang regarding source of funds into NSC Bank and SunTrust accounts	0.30	\$94.50
07/22/2010	R-T	ONE: Confer with Scot Stirling and Bob Mills and later David Siegel concerning [REDACTED] (3.1); review and assemble relevant documents	4.40	\$1,386.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 7

		for their review (1.3).		
07/23/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (5.6)	5.60	\$420.00
07/23/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (3.6)	3.60	\$720.00
07/23/2010	GEC	FOUR-Further research of case law and draft memorandum regarding [REDACTED]	5.10	\$1,606.50
07/23/2010	R-T	ONE: Confer with Scott Stirling and Bob Mills concerning review of [REDACTED] documents, [REDACTED] (1.2); review Order approving confidentiality (.1).	1.30	\$409.50
07/24/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.0)	2.00	\$150.00
07/25/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.2)	2.20	\$165.00
07/26/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (4.2)	4.20	\$315.00
07/26/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (1.8).	1.80	\$360.00
07/26/2010	GEC	FOUR-Draft memorandum regarding [REDACTED] Research regarding same	5.60	\$1,764.00
07/26/2010	J-R	FOUR: Prepared correspondence and package to Beus Gilbert of documents requested (.4)	0.40	\$60.00
07/26/2010	R-T	ONE: Review and revise engagement agreement and confer with Receiver regarding retention issues (.7); review Founding Partners documents relating to [REDACTED] (.6).	1.30	\$409.50
07/27/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (5.8)(No Charge)	5.80	\$0.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 8

07/27/2010	DSN	ONE - Review and revise proposed retainer letter with Leo Beus' office; conferences with Jon Etra regarding same as well as correspondence to Leo Beus' office regarding same.	0.50	\$157.50
07/27/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (No Charge).	2.60	\$520.00
07/28/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (No Charge)	4.50	\$0.00
07/28/2010	DSN	ONE - Review and analyze documents associated with settlement and strategize regarding same.	1.50	\$472.50
07/28/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.1).	2.10	\$420.00
07/28/2010	G-F	FOUR-Review Delaware Secretary of State's database to determine if Founding Partners Stable Income Fund LP was previously named Founding Partners Stable Value Fund, LP.	0.20	\$30.00
07/29/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project	3.20	\$240.00
07/29/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.5).	2.50	\$500.00
07/30/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project.	4.50	\$337.50
07/30/2010	DSN	ONE - Review and analyze in conference with counsel regarding [REDACTED] (.7).	0.70	\$220.50
07/30/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.3).	2.30	\$460.00
07/30/2010	G-F	FOUR-Update mail log.	0.10	\$15.00
07/30/2010	J-G	ONE: review proposed retention agreement for local counsel in connection with [REDACTED], and analyze issues raised by counsel's comments.	1.30	\$325.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 9

07/31/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project	4.10	\$307.50
08/01/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project	2.00	\$150.00
08/02/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project.	3.50	\$262.50
08/02/2010	DSN	ONE-Work on retainer letter for Leo Beus (.2); Review correspondence from Andreea C. regarding memorandum pertaining to [REDACTED] (.4); Draft correspondence to Andreea C. regarding meeting telephonically to discuss [REDACTED] (.2). ONE - Telephone conference with [REDACTED] (.2).	1.00	\$315.00
08/02/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.6).	2.60	\$520.00
08/02/2010	J-E	ONE - Worked on [REDACTED] and [REDACTED] matters (.3).	0.30	\$94.50
08/02/2010	J-G	ONE: prepare motion for litigation counsel.	0.40	\$100.00
08/03/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project .	2.00	\$150.00
08/03/2010	DSN	ONE - Telephone conference with Ian Anderson regarding Gunlicks.	0.20	\$63.00
08/03/2010	F-S	ONE; Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.4).	2.40	\$480.00
08/04/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project.	4.30	\$322.50
08/04/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.3).	2.30	\$460.00
08/04/2010	J-G	ONE: Review correspondence regarding the	0.10	\$25.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 10

		Cayman protocol.		
08/05/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project .	3.70	\$277.50
08/05/2010	DSN	ONE - [REDACTED] (.2); Draft correspondence to [REDACTED] (.1); Revise motion to retain litigation counsel (.3).	0.60	\$189.00
08/05/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.7).	2.70	\$540.00
08/05/2010	J-G	ONE: confer with J. Etra and the Receiver regarding Cayman issues.	0.10	\$25.00
08/05/2010	MTV	ONE-Review tolling agreement and propose changes; discuss same with J. Etra	0.60	\$189.00
08/06/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project	5.50	\$412.50
08/06/2010	DSN	FOUR - Draft memorandum regarding status (.5). ONE - Draft correspondence to Scott Sterling and review correspondence from Scott Sterling (.2); Draft correspondence to counsel [REDACTED] [REDACTED] [REDACTED] (.5); draft correspondence to Scott [REDACTED] (.2); draft correspondence to SEC regarding retention of litigation counsel to determine position (.1).	1.50	\$472.50
08/06/2010	J-E	ONE - worked on motion to appoint counsel and meet and confer on same (1.4).	1.40	\$441.00
08/06/2010	J-G	ONE: Prepare additions to motion to employ litigation counsel.	0.80	\$200.00
08/06/2010	MTV	ONE-Review and revise tolling agreement	0.50	\$157.50
08/07/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project .	6.10	\$457.50
08/08/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project	3.50	\$262.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 11

08/08/2010	DSN	ONE-Draft correspondence to counsel and review counsel from counsel regarding emergency motion to retain litigation counsel	0.80	\$252.00
08/08/2010	J-E	ONE - Correspondence with the Receiver and with law firm on motion to retain litigation counsel (.2).	0.20	\$63.00
08/09/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project	3.00	\$225.00
08/09/2010	DSN	ONE - Review and analyze proposed order regarding emergency motion to retain litigation counsel and correspondence with counsel regarding same (.3).	0.30	\$94.50
08/09/2010	GEC	FOUR-Review materials and research regarding [REDACTED]	4.00	\$1,260.00
08/09/2010	J-E	ONE - Worked on motion to employ litigation counsel and proposed order and filed same and follow up e-mail to Court enclosing word version of order (1.0). Meet and confer with SEC on motion to extend stay in SEC action (.1)	1.10	\$346.50
08/09/2010	MTV	ONE-Review and revise tolling agreement; attend to revisions of same; review order as it relates to powers of Receiver, if any, to initiate his own claims or only power to assert claims on behalf of entities	0.60	\$189.00
08/10/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project .	3.00	\$225.00
08/10/2010	C-A	ONE-Conference to discuss [REDACTED] [REDACTED] review and analyze previous filings and materials in connection with same.	2.00	\$500.00
08/10/2010	DSN	ONE - Review order denying motion to retain counsel and conference with counsel regarding same, as well as strategy and motion for reconsideration (1.1). Telephone conference with [REDACTED] [REDACTED] (.4).	1.50	\$472.50
08/10/2010	J-E	ONE - Conferences with SEC on various matters, including Gunlicks issues and [REDACTED] [REDACTED] (.3). Correspondence with [REDACTED] (.1). Reviewed Judge's order	2.90	\$913.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 12

		denying motion to appoint litigation counsel and internal conferences re same and calls with potential counsel re same (2.0). Reviewed Judge's order on fee applications and internal discussions [REDACTED] (.5).		
08/10/2010	MTV	ONE-Review court orders; attend conferences regarding same and prepare draft of motion for reconsideration; review prior filing relating to retention of Beus firm and propose fee agreement	5.50	\$1,732.50
08/10/2010	R-T	ONE: Review Orders entered by Court (.2), teleconferences with Receiver, [REDACTED] (.4)	0.60	\$189.00
08/11/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project	3.90	\$292.50
08/11/2010	C-A	ONE-Conference to discuss research and tasks to be performed in connection with renewed motion for authorization to retain litigation counsel; [REDACTED] [REDACTED]; review and analyze additional information [REDACTED] [REDACTED]; research parameters of [REDACTED]	3.50	\$875.00
08/11/2010	DSN	ONE - Review draft motion for reconsideration and telephone conference with Jonathan Etra regarding same (.3); Telephone conference with Jonathan Etra, Rhett Treband and Paul Huck regarding strategy and related issues (1.0); Review correspondence from [REDACTED] regarding comments to revised motion (.4); Revise emergency motion for reconsideration to retain litigation counsel (1.1); Draft correspondence to counsel regarding revised emergency motion to retain litigation counsel along with revisions(.2).	3.00	\$945.00
08/11/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (1.8).	1.80	\$360.00
08/11/2010	GEC	FOUR-Draft [REDACTED]; Research regarding same	3.30	\$1,039.50
08/11/2010	J-E	ONE-Calls and conferences with [REDACTED] and with receiver and internal team. (1.0) Worked on draft amended motion to retain litigation counsel and distributed same	5.20	\$1,638.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 13

		(3.5). Conference with SEC on recent orders and on North Shore bank's draft motion. (.3) Reviewed North Shore bank's draft motion and formulated proposed response (.2) Address [REDACTED] (.2).		
08/11/2010	MTV	ONE-Review proposed changes to tolling agreement and comment regarding same	0.30	\$94.50
08/11/2010	R-T	ONE: teleconference with Receiver and Paul Huck, Jr (.8), draft and exchange emails concerning ruling (.2), draft Declaration (.6)	1.60	\$504.00
08/12/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project	5.00	\$375.00
08/12/2010	C-A	ONE-Revise Amended Emergency Motion to Retain Counsel; conference to discuss additional revisions to same and path forward; review and analyze [REDACTED]	4.50	\$1,125.00
08/12/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (No Charge).	1.70	\$340.00
08/12/2010	GEC	FOUR-Draft memorandum for [REDACTED]; Research regarding same; Telephone conference and e-mails to Andreea Cioara regarding facts for research	5.50	\$1,732.50
08/12/2010	J-E	ONE - Call with counsel for investor on numerous matters (.3). Re-reviewed [REDACTED] [REDACTED] [REDACTED] (1.0). Conferences with [REDACTED] worked on amended motion to retain litigation counsel (2.0). Conferences with Receiver regarding numerous issues (.3).	3.60	\$1,134.00
08/12/2010	R-T	ONE: Review and revise Motion to Approve Retention and confer regarding same (1.0); [REDACTED] (.3)	1.30	\$409.50
08/13/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for	1.50	\$112.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 14

		corporate formality project		
08/13/2010	C-A	ONE-Review, revise and finalize amended/renewed motion to retain litigation counsel.	3.30	\$825.00
08/13/2010	J-E	ONE - Revisions to amended motion to retain litigation counsel and finalized same (2.0). Calls and correspondence with SEC counsel and counsel for [REDACTED] (.8). Reviewed order on gunlicks notice of depositing checks, reviewed notice, and correspondence with counsel to Gunlicks and counsel to SEC (.4). [REDACTED] (.3).	3.50	\$1,102.50
08/15/2010	MTV	ONE-Attend to emails regarding Gunlicks' notice	0.10	\$31.50
08/16/2010	DSN	ONE - Review correspondence from Adam Lang regarding cash distributions (.1); Draft correspondence to the accountants regarding summary information (.1); Review correspondence from investor regarding investment and conference with counsel relating to same (.3); Review correspondence from forensic accountant and draft correspondence to forensic accountant to follow up on status of various projects; Review over status of various projects before planning (2.0); Office conference regarding Collier County issue (.1); Review correspondence to counsel for Gunlicks and conference with counsel regarding same (.2).	2.80	\$882.00
08/16/2010	GEC	FOUR-Draft memorandum issue addressing [REDACTED]	1.50	\$472.50
08/16/2010	J-E	ONE - Reviewed motion filed by North Shore and conferred with SEC counsel (.2). Reviewed Gunlicks's Notice of Disclosure and prior filing by Gunlicks that lead to \$3,000 per month payment, call with SEC in advance of call with Gunlicks' counsel, call with Gunlicks's counsel, and follow up conferences with SEC and Receiver (1.0). Drafted e-mail to Gunlicks counsel on position and drafted proposed Receiver's and SEC's joint filing with the Court on position and revised same (1.0). Follow up on [REDACTED] issues (.1). Follow up on investor calls (.1).	2.40	\$756.00
08/16/2010	MTV	ONE-Teleconference with counsel for [REDACTED] relating to receivership and	0.30	\$94.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 15

		present stay.		
08/16/2010	MTV	ONE-Attend to gathering and transmitting signatures	0.20	\$63.00
08/17/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project	7.00	\$525.00
08/17/2010	DSN	ONE - meet with [REDACTED] regarding representation of receiver in connection with investments (.5); Telephone conference with [REDACTED] regarding [REDACTED] (1.5); Telephone conference with Joey Smith regarding Hybrid Value Fund (.3); Review proposed filing in response to Mr. Gunlicks Notice of Deposit and comment on same (.3).	2.60	\$819.00
08/17/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (No Charge).	2.80	\$560.00
08/17/2010	J-E	ONE - conferences and revisions to draft joint filing on Gunlicks's Notice of Disclosure and finalized and served same and e-mail to Gunlicks's counsel (1.5). Call with [REDACTED] (4).	1.90	\$598.50
08/17/2010	KGM	ONE-Review of pleadings from the [REDACTED]; Conference call with D.Newman.	1.20	\$378.00
08/18/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (No Charge)	4.20	\$0.00
08/18/2010	DSN	ONE - met with Joey Smith regarding potential retention concerning Hybrid Fund (.8); Conference with counsel relating status of emergency Motion for Reconsideration (.2); Telephone conference with [REDACTED] and [REDACTED] regarding status of motion and potential tolling agreement (.2); Review potential revised tolling agreement and conference with Michelle Visiedo regarding same (.3); Review correspondence from [REDACTED] Mills regarding the potential tolling agreement (.1); Office conferences with Michelle Visiedo, Jon Etra and Rhett Treband regarding tolling	2.50	\$787.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Management Co., et al.
43125.0001

Page 16

		agreement (.2); Review proposed tolling agreement (.2); Review correspondence relating to proposed tolling agreement (.2). FOUR - Review correspondence from Andrea C. regarding [REDACTED] correspondence to Andrea C. regarding same (.1); review correspondence from Adam lang regarding status of various accounts and draft correspondence to Adam Lang regarding same (.2).		
08/18/2010	J-E	ONE - Internal conferences on [REDACTED] [REDACTED] (.5). Correspondence with potential counsel (.2). Worked on tolling agreement [REDACTED] (.8)	1.50	\$472.50
08/18/2010	MTV	ONE-Teleconferences regarding Third Amendment to Tolling Agreement. Draft, discuss and finalize with Receiver [REDACTED]	0.70	\$220.50
08/18/2010	R-T	ONE: Review and revise [REDACTED] (1.2); teleconferences regarding court order (.4); confer regarding claims (.4)	2.00	\$630.00
08/19/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (No Charge)	5.40	\$0.00
08/19/2010	DSN	ONE - Telephone conference with Joey Smith regarding proposed retention and tasks to be performed (.4). Telephone conference with Adam Lang regarding various issues relating to Hybrid Fund (.2)	0.60	\$189.00
08/19/2010	MTV	ONE-Attend to finalization of tolling agreement. Attend to emails relating to execution of same.	0.50	\$157.50
08/19/2010	R-T	ONE: Review and revise [REDACTED] (2.4); teleconference with Receiver (.2).	2.60	\$819.00
08/20/2010	DSN	ONE-Meet with accountant to discuss the status of various projects and budget issues (1.2); Review correspondence and draft correspondence to [REDACTED] regarding [REDACTED] (.2); Additional correspondence from [REDACTED] regarding tolling agreement and related issues (.1).	1.50	\$472.50
08/20/2010	J-E	ONE - Conferences with Receiver and Berkowitz Dick firm re numerous matters. (1.5). Follow up with Berkowitz Dick and with Mr. Gunlicks's counsel on his [REDACTED] (.2). Correspondence with counsel for Receiver in Texas (.1).	1.80	\$567.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 17

08/20/2010	MTV	ONE-Meeting with accountants(1.2); draft task list based thereon(.4 No Charge)	1.20	\$378.00
08/20/2010	RSK	ONE-Provide instructions regarding claims issues, demand for proceeds and intervention	0.40	\$126.00
08/20/2010	RSK	ONE-Conference regarding related bankruptcy matters to main case (No Charge)	0.60	\$0.00
08/21/2010	DSN	ONE - Review and analyze draft complaint to be filed against [REDACTED] prepared by the [REDACTED] law firm.	2.10	\$661.50
08/23/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (1.7)	1.70	\$127.50
08/23/2010	DSN	FOUR - Review correspondence from Andrea C. regarding [REDACTED] (.3); Draft correspondence to Andrea C. regarding [REDACTED] (.1). ONE - Office conference with counsel regarding draft complaint against [REDACTED] (.2).	0.60	\$189.00
08/23/2010	J-E	ONE-Initial review and comments on draft [REDACTED] complaint and conferences re certain issues.	1.00	\$315.00
08/24/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.0)	2.00	\$150.00
08/24/2010	A-V	ONE-Meeting with Michelle Visiedo and Patricia Blackman to discuss strategy for accountant's document request and SEC SSR subpoena (1.0)	1.00	\$75.00
08/24/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.5).	2.50	\$500.00
08/24/2010	MTV	ONE-Meeting with P. Blackman and A. Vinegas regarding gathering of tax documents and documents responsive to SEC subpoena. Begin draft of motion for enlargement regarding discovery cut-off.	2.30	\$724.50
08/25/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P.	2.40	\$180.00
08/25/2010	DSN	ONE - Review correspondence form Joey Smith regarding catalyst (.1); Office conference with Michelle V. regarding meeting with Adam Lang regarding various FP transfers (.3); Draft	0.60	\$189.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 18

		correspondence to Andrea C. regarding Global Fund (.2).		
08/25/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.3).	2.30	\$460.00
08/25/2010	GEC	FOUR-Telephone conference with Andreea Cioara regarding [REDACTED]; Research regarding same	1.10	\$346.50
08/25/2010	KGM	ONE-Review of files, pleadings and other items to prepare for call	1.30	\$409.50
08/25/2010	MTV	ONE-Conference with SEC counsel regarding extension of time to respond to subpoena. Discuss response to same with A. Vineagas; Meeting with A. Lang and discuss same with Receiver.	1.60	\$504.00
08/26/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P. (6.5)	6.50	\$487.50
08/26/2010	DSN	ONE - Review correspondence from Adam Lang regarding Gunlicks related issues (.2); Draft correspondence to JPL regarding telephonic meeting with creditors and correspondence with local counsel regarding same (.2); Conference call with Jon Etra and Ken Mathers regarding status of [REDACTED] and related issues (.4); Review correspondence from local counsel regarding JPL conference (.1).	0.90	\$283.50
08/26/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (2.0).	2.00	\$400.00
08/26/2010	J-E	ONE - call with Ms. Descalzo on deposit of dental checks (.2). Call with accountants on open issues from review of documents on Mr. Gunlicks' deposit of checks (.3). Call with bankruptcy counsel on status of bankruptcy related matters and follow up (.3).	0.80	\$252.00
08/26/2010	KGM	ONE-Conference call with D.Newman and J.Etra concerning [REDACTED]; Review of docket sheets, pleadings and documents on [REDACTED] Telephone conference with counsel for the Debtor in the [REDACTED] Telephone conference with [REDACTED]	1.60	\$504.00
08/26/2010	MTV	ONE-Attend to emails from accountants	0.10	\$31.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 19

		regarding pending items.		
08/27/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P.	3.50	\$262.50
08/27/2010	DSN	ONE - Prepare retainer agreement regarding Catalyst (.8); Review correspondence regarding investor contact and conference with counsel regarding same (.1).	0.90	\$283.50
08/27/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (1.5).	1.50	\$300.00
08/27/2010	GEC	FOUR-Review and draft e-mail to Andreea Cioara regarding [REDACTED]; review memorandum to finalize same	1.30	\$409.50
08/27/2010	J-E	ONE - Reviewed prior filing an de-mail to Ms. Descalzo clarifying and confirming position on the dental checks (.2).	0.20	\$63.00
08/28/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P. (4.5)	4.50	\$337.50
08/29/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P.	5.50	\$412.50
08/29/2010	DSN	ONE - Review correspondence from Joey Smith (.2).	0.20	\$63.00
08/30/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P. (No Charge)	5.60	\$0.00
08/30/2010	DSN	ONE - Review correspondence from Ian Stokoe and conference with Jon Etra regarding same (.1).	0.10	\$31.50
08/30/2010	G-F	FOUR-Compile, review and log incoming mail.	0.40	\$60.00
08/30/2010	GEC	FOUR-Finalize memorandum and add conclusion	0.90	\$283.50
08/30/2010	MTV	ONE-Review docket to determine applicable deadlines in SEC Action and Sun Litigation.	0.30	\$94.50
08/31/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P. (No Charge)	5.40	\$0.00
08/31/2010	DSN	ONE - Meet with counsel to discuss various tasks that need to be performed, including but not	2.20	\$693.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 20

		limited to, Receiver's report, Fee Application, and other conferences with special litigation counsel and various analysis (1.0); Review and analyze proposed tax disclosure (.5); Draft correspondence to Andrea C. at Berkowitz Dick regarding same (.5); [REDACTED] (.1); Review correspondence from [REDACTED] and draft correspondence to Andreea C. regarding same (.1).		
08/31/2010	G-F	FOUR-Receipt of incoming mail; Log same.	0.20	\$30.00
08/31/2010	GEC	FOUR-Revise memorandum and e-mail memorandum for comments	0.80	\$252.00
09/01/2010	A-V	ONE-Print, organize, categorize documents for the Corporate Formality project (3.0)	3.00	\$225.00
09/01/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P. (1.0)	1.00	\$75.00
09/01/2010	DSN	ONE - Office conference with counsel regarding [REDACTED] (.3);	0.30	\$94.50
09/01/2010	MTV	ONE-Conference with Receiver to review spreadsheet of target payees and transfers by W. Gunlicks; prepare correspondence to accountants regarding analyses of same; review applicable schedules	1.30	\$409.50
09/02/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P.	2.50	\$187.50
09/02/2010	DSN	ONE - Telephone conference with Jon Etra regarding tax related issues (.2); Review and revise confirmation to be sent to investors (.2).	0.40	\$126.00
09/02/2010	J-E	ONE - Worked on draft [REDACTED] (1.0). Reviewed tax analysis, and call from investor re tax returns (.6)	1.60	\$504.00
09/02/2010	MTV	ONE-Draft exhibit A to subpoenas for bank records and discuss same with A. Lang; attend to revisions of confirmation letter.	0.60	\$189.00
09/03/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P.	2.10	\$157.50
09/03/2010	DSN	FOUR- Telephone conference with [REDACTED] (.3)	0.30	\$94.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 21

09/03/2010	G-F	FOUR-Draft email correspondence to Ms. Vanegas regarding Founding Partners Stable-Income Fund, L.P.	0.10	\$15.00
09/03/2010	GEC	FOUR-Telephone conference with Jonathan Etra and Dan Newman regarding expanding analysis on first issue in the memorandum	0.30	\$94.50
09/03/2010	J-E	ONE-Forwarded comments of [REDACTED] to special litigation counsel and follow up correspondence (.2).	0.20	\$63.00
09/04/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P.	9.00	\$675.00
09/04/2010	DSN	ONE - Draft correspondence to Michelle Visiedo regarding upcoming tasks to be performed including report (.1); Review correspondence relating invoices (.1).	0.20	\$63.00
09/05/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P. (6.7)	6.70	\$502.50
09/05/2010	DSN	ONE - Review draft of update for investors to be posted to website and draft correspondence to counsel regarding same (.2); Review and revise joint notice concerning settlement negotiations and correspondence with counsel relating to same (.7).	0.90	\$283.50
09/06/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P.	4.80	\$360.00
09/06/2010	DSN	ONE - Review correspondence from Dean G. (.1); Conference with counsel regarding joint notice (.1); Telephone conference with Dean G. (.2); Review Proskauer's revisions to joint notice (.2).	0.60	\$189.00
09/07/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P.	4.80	\$360.00
09/07/2010	DSN	ONE - Review correspondence from Scott Sterling, special counsel (.1); office conference with Jonathan Etra regarding [REDACTED] and telephone conference with [REDACTED] and [REDACTED] (.2); telephone conference with [REDACTED] regarding strategy	0.70	\$220.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 22

		(.3); review correspondence from [REDACTED] (.1).		
09/07/2010	G-F	ONE-Exchange email correspondence and meeting with with Ms. Vanegas regarding Founding Partners Stable-Income Fund, L.P.	0.30	\$45.00
09/07/2010	J-E	ONE - Correspondence with special litigation counsel (.1).	0.10	\$31.50
09/07/2010	J-R	FOUR: Correspondence with A. Vanegas and M. Visiedo regarding upcoming production of SSR documents to SEC (.2)	0.20	\$30.00
09/08/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P	2.50	\$187.50
09/08/2010	DSN	FOUR - Office conference with Andreea Cioara regarding [REDACTED] [REDACTED] (.5); review various investor correspondence relating to tax returns (.4); ONE - conference call with counsel from [REDACTED] office regarding [REDACTED] and strategy relating to various [REDACTED] (1.1).	2.00	\$630.00
09/08/2010	J-E	ONE - Conference call with special litigation counsel, Receiver, and Mr. Traband on [REDACTED] (1.5). Conferred with Receiver's accountant and provided information to investor re same (.2).	1.70	\$535.50
09/08/2010	MTV	ONE-Conference with C. Short regarding auction and attend to email regarding same.	0.40	\$126.00
09/08/2010	R-T	ONE: teleconference with Receiver and Bob Mills concerning [REDACTED]	1.60	\$504.00
09/09/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (4.9)	4.90	\$367.50
09/09/2010	GEC	FOUR-Telephone conference with Andreea Cioara regarding tax issues and respond to investors	0.80	\$252.00
09/10/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SIR Capital Partners, L.P	8.00	\$600.00
09/10/2010	DSN	ONE-Review correspondence from accountants regarding financial related information (.1); Draft correspondence to accountants regarding same	0.20	\$63.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 23

		(.1).		
09/10/2010	G-F	FOUR-Receipt, review and log incoming mail.	1.00	\$150.00
09/11/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (7.6)	7.60	\$570.00
09/12/2010	A-V	ONE-Conduct targeted search for relevant documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (6.7)	6.70	\$502.50
09/13/2010	J-E	ONE - Reviewed court order granting North Shore Bank's motion and forwarded same (.1). Correspondence with special litigation counsel (.2).	0.30	\$94.50
09/13/2010	J-R	FOUR: Coordinated with vendor regarding preparing production of responsive documents to SSR subpoena by SEC (.2); Correspondence with M. Visiedo and A. Vanegas regarding SSR production (.2);Telephone conference with C. Floyd of SEC regarding upcoming production and requesting an extension of 2 weeks to produce additional materials responsive to subpoena (.2)	0.60	\$90.00
09/13/2010	MTV	ONE-Attend conference call with investor committee (2.0). Attend to production responsive to SEC subpoena regarding SSR(.5).	2.50	\$787.50
09/14/2010	A-V	ONE-Run searches of electronic documents. Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (3.0)	3.00	\$225.00
09/14/2010	DSN	ONE - Telephone conference with special counsel regarding litation strategy (.3); FOUR - review correspondence from various investors regarding Forms K-1 and respond to same and draft correspondence to accountants regarding same (.4).	0.70	\$220.50
09/14/2010	GEC	FOUR-Research regarding [REDACTED] [REDACTED]	1.00	\$315.00
09/14/2010	J-E	ONE - confirmed conference call with special litigation counsel and attended call (.4). Follow up internal meeting and e-mail to special counsel (.3).	0.70	\$220.50
09/14/2010	J-R	FOUR:Correspondence with vendor regarding creation of FTP site to produce documents to SEC (.3); Correspondence and telephone conference with C. Floyd of SEC regarding production and	0.70	\$105.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 24

		FTP site (.2); Prepared package to C. Floyd of production (.2)		
09/15/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (No Charge)	7.70	\$0.00
09/15/2010	DSN	ONE - Telephone conference with local counsel (.3).	0.30	\$94.50
09/15/2010	G-F	FOUR-Compile, review and log incoming mail.	0.30	\$45.00
09/15/2010	J-E	ONE - Conferred with Ms. Visiedo on responding to counsel for Gunlicks on deposit of check issue (.2).	0.20	\$63.00
09/16/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (2.4)	2.40	\$180.00
09/16/2010	G-F	FOUR-Compile, review and log incoming mail.	0.50	\$75.00
09/16/2010	GEC	FOUR-Review file for conference call with investor and accountants; attend conference call	2.00	\$630.00
09/16/2010	J-E	ONE - revised and marked up draft agreement between Beus firm and Colson Hicks firm (.3).	0.30	\$94.50
09/17/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (7.0)	7.00	\$525.00
09/19/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (No Charge)	3.50	\$0.00
09/19/2010	MTV	ONE-Review draft engagement letter from financial advisor and revise same.	0.50	\$157.50
09/20/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (4.5)	4.50	\$337.50
09/20/2010	J-E	ONE - call with investor on tax issues and e-mail with with tax advisor re same (.2). Call with tax advisors [REDACTED] (.4).	0.60	\$189.00
09/21/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (3.5)	3.50	\$262.50
09/21/2010	J-E	ONE - call with investor and follow up with same re tax issues (.2).	0.20	\$63.00
09/22/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (No Charge)	2.00	\$0.00
09/22/2010	GEC	FOUR-Telephone conference with Andreea Cioara regarding investor concerns and facts of	1.00	\$315.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 25

		the case.		
09/22/2010	R-T	ONE: [REDACTED] [REDACTED]	0.70	\$220.50
09/23/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (3.7)	3.70	\$277.50
09/23/2010	GEC	FOUR-Telephone conference with investor [REDACTED] [REDACTED]; Telephone conference with Jonathan Etra regarding [REDACTED] [REDACTED]	1.10	\$346.50
09/23/2010	J-E	ONE - Correspondence with investor on tax issues (.2). Call with tax counsel and follow up on same (1.0). Reviewed original retainer agreement with Bues Firm and distributed same and comments to addendum for local and co- counsel (.2). [REDACTED] [REDACTED] (.8).	2.20	\$693.00
09/24/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (2.5)	2.50	\$187.50
09/24/2010	DSN	ONE - Draft correspondence to Leo Beus regarding meeting and review correspondence from Leo Beus regarding meeting (.1); prepare for and attend meet with [REDACTED] [REDACTED] (2.1).	2.20	\$693.00
09/24/2010	GEC	FOUR-Draft e-mail to Dan Newman to indicate facts learned .	1.60	\$504.00
09/24/2010	J-E	ONE - Confer with Ms. Visiedo on various matters (.3). Correspondence with tax counsel on tax issues (.4). Meeting with investors on tax issues (.5). Follow up correspondence with tax accountant (.2).	1.40	\$441.00
09/25/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (5.0)	5.00	\$375.00
09/26/2010	A-V	ONE-Review and classify electronic documents in response to SEC subpoena Re: SSR Capital Partners, L.P (5.6)	5.60	\$420.00
09/27/2010	A-V	ONE-Review and classify electronic documents and records in response to SEC subpoena. Re: SSR Capital Partners (9.5)	9.50	\$712.50
09/27/2010	DSN	ONE - Review correspondence from Bill Leavitt (.1); review correspondence from investor regarding tax issue (.1).	0.20	\$63.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 26

09/27/2010	J-R	FOUR: Several emails coordinating with vendor and A. Vanegas the next installment of production of SSR documents responsive to SEC subpoena (.5)	0.50	\$75.00
09/27/2010	MTV	ONE-Conference with A. Lang. Revise subpoenas. Conference with AV and JR regarding SSR subpoena. Conference with D. Newman regarding production in response to SSR subpoena.	1.50	\$472.50
09/28/2010	A-O	ONE-Draft subpoenas for banks; research and confirm bank information(No Charge)	0.90	\$0.00
09/28/2010	A-V	ONE-Make phone calls and write emails to [REDACTED] [REDACTED] [REDACTED] (1.0)	1.00	\$75.00
09/28/2010	DSN	ONE - Telephone conference with Joey Smith regarding services to be provided to receivership (.2); review correspondence from investor and draft correspondence to investor (.1) (no charge).	0.20	\$63.00
09/28/2010	J-R	FOUR: Correspondence with SEC regarding continuing production pursuant to SSR subpoena and requesting another extension (.2); Correspondence with vendor regarding status of production of SSR responsive documents (.2); Conference and correspondence with vendor regarding payment of outstanding invoices (.4)	0.80	\$120.00

TOTAL PROFESSIONAL CHARGES \$90,499.50

TIMEKEEPER SUMMARY

RSK	Roy S. Kobert	.40 hrs @	\$315.00	per hour	\$126.00
GEC	Gene E. Crick	53.30 hrs @	\$315.00	per hour	\$16,789.50
DSN	Daniel S. Newman, PA	46.90 hrs @	\$315.00	per hour	\$14,773.50
R-T	Rhett Traband, PA	18.50 hrs @	\$315.00	per hour	\$5,827.50
J-E	Jonathan Etra	42.10 hrs @	\$315.00	per hour	\$13,261.50
KGM	Kenneth G. Mather	4.10 hrs @	\$315.00	per hour	\$1,291.50
MTV	Michelle T. Visiedo-Hidalgo	23.00 hrs @	\$315.00	per hour	\$7,245.00
J-G	Jeffery Geldens	4.80 hrs @	\$250.00	per hour	\$1,200.00
F-S	Frederick Segal	43.00 hrs @	\$200.00	per hour	\$8,600.00
C-A	Chalon Allen	13.30 hrs @	\$250.00	per hour	\$3,325.00
A-V	Adriana Vanegas	222.80 hrs @	\$75.00	per hour	\$16,710.00

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 27

P-A	Patricia Anzalone	.40 hrs @	\$150.00	per hour	\$60.00
G-F	Gisela Fasco	4.50 hrs @	\$150.00	per hour	\$675.00
J-R	Junelle Rodriguez	3.20 hrs @	\$150.00	per hour	\$480.00
P-B	Patricia Blackman	.90 hrs @	\$150.00	per hour	\$135.00

TIMEKEEPER TOTAL \$90,499.50

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 28

ITEMIZED EXPENSES

07/20/2010	Lexis-Outside of Contract USER DEFINED 1: GWQ3KNK USER DEFINED 2: CRICK, GENE	\$51.56
07/21/2010	Travel - VENDOR: Daniel Newman Airfare from FLL to DCA on 07/22/2010 and From DCA to FLL on 07/23/2010	\$456.16
07/22/2010	Travel - VENDOR: Daniel Newman Cab Fare	\$21.00
07/23/2010	Photocopies (Outside Services), DVD Copying (2), Invoice no.128259 - VENDOR:Speed Print One, Inc.	\$34.13
07/23/2010	Travel - VENDOR: Daniel Newman Hotel, Arrival 07/22/2010 Departure 07/23/2010	\$193.51
07/23/2010	Travel - VENDOR: Daniel Newman Shuttle Service	\$40.00
07/23/2010	Other Costs - VENDOR: Daniel Newman Meals	\$50.08
07/30/2010	FedEx Tracking # 793779186497 Larry H. Ray, Tax Collector Courthouse - Bldg. C-1 NAPLES FL 34112	\$45.36
08/02/2010	Messenger Service, From: B&C To: Carr. Field, 100 SE 2nd Street Miami, FL., Invoice no.33761 - VENDOR:Arrow Express Messenger Service	\$6.00
08/16/2010	Conference Call Service - VENDOR: InterCall Invoice no.1740305302	\$1.40
08/26/2010	FedEx Tracking # 793856705399 Leo R. Beus, Esq. Beus Gilbert, PLLC 4800 N SCOTTSDALE RD STE 6000 SCOTTSDALE AZ 85251	\$12.93
08/31/2010	FedEx Tracking # 796203635571 Catherine Floyd, Esq. U.S. Securities and Exchange C 801 CHERRY ST UNIT 19 FORT WORTH TX 76102	\$54.18
09/14/2010	FedEx Tracking # 793913234895 Catherine Floyd Securities and Exchange Commis 801 CHERRY ST UNIT 19 FORT WORTH TX 76102	\$11.89
09/14/2010	Conference Call Service - VENDOR: InterCall Invoice no.1740361279	\$1.20
09/22/2010	FedEx Tracking # 796269778960 Gregory A. Whittmore 5910 N CENTRAL EXPY STE 1010 DALLAS TX 75206	\$11.35
09/28/2010	FedEx Tracking # 793957936668 Catherine Floyd Securities and Exchange Conimis 801 CHERRY ST UNIT 19 FORT WORTH TX 76102	\$11.35
	Parking	\$27.00
	Long Distance Telephone	\$102.94
	Postage	\$164.75

Re: Daniel S. Newman, Receiver
SEC v. Founding Partners Capital
Managemnt Co., et al.
43125.0001

Page 29

Telecopy Charges	\$55.00
Online Research	\$206.64
Photocopies	\$1,865.58
Total Expenses	<u>\$3,424.01</u>



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9400
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

October 29, 2010
Invoice No.: 808774

STATEMENT OF ACCOUNT

Matter Name: Sun Capital Litigation
Client/Matter No: 43125.0002
Billing Attorney: Daniel S. Newman, PA

Previous Balance		\$1,238,300.04
Payments Received		(571,392.64)
Subtotal of Previous Balance		<u>\$666,907.40</u>
Professional Charges (detail attached)	\$256,545.50	
Expenses (detail attached)	<u>1,418.20</u>	
Subtotal of Current Charges		<u>\$257,963.70</u>
TOTAL BALANCE DUE (Previous and current balance)		\$924,871.10

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR
PAYMENT

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 3

ITEMIZED PROFESSIONAL CHARGES

04/01/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.00	\$600.00
04/01/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.5)	8.50	\$637.50
04/01/2010	F-S	ONE: Continue review caselaw in preparation of drafting motion to strike surreply.	4.50	\$900.00
04/01/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo.	9.00	\$675.00
04/01/2010	M-S	ONE: Research and prepare motion for leave to file surreply; review and revise motion to strike affidavit.	3.90	\$975.00
04/02/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	5.50	\$412.50
04/02/2010	BAF	ONE: Reviewed and analyzed pleadings, motions, affidavits and depositions in order to cite check and edit Motion to Strike Sun's Reply (1.5); Reviewed, analyzed and categorized documents in order to prepare for document production (6.4)	7.90	\$592.50
04/02/2010	DSN	ONE: Office conferences with Jonathan Etra regarding strategy, outstanding motions and responses thereto and tasks to be performed (.4); telephone conference with individual regarding Sun Capital and Sun Capital Hospital (.4).	0.40	\$126.00
04/02/2010	F-S	ONE: Continue review caselaw in preparation of drafting motion to strike reply.	3.50	\$700.00
04/02/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo.	7.20	\$540.00
04/02/2010	J-E	ONE: work on motion to strike (1.0). Work on motion for permission for surreply (.2). Work on research re surreply (.8). Analysis of Sun's memo in opposition to motion for leave to file amended complaint (.3).	2.30	\$724.50
04/02/2010	J-G	ONE: Research regarding: [REDACTED], validity of [REDACTED], and effects of Rule [REDACTED].	1.70	\$425.00
04/02/2010	M-S	ONE: Continued preparation of motion for leave to file sur-reply.	3.80	\$950.00
04/03/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (1.2)	1.20	\$90.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 4

04/03/2010	F-S	ONE: Continue review caselaw in preparation of drafting motion to strike reply (3.5).	3.50	\$700.00
04/03/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo.	7.80	\$585.00
04/03/2010	J-E	ONE: worked on draft filings (.3).	0.30	\$94.50
04/04/2010	F-S	ONE: Continue review caselaw in preparation of drafting motion to strike reply (4.0).	4.00	\$800.00
04/04/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo.	8.30	\$622.50
04/04/2010	J-E	ONE: Worked on legal research on sur-reply (.8). Edited motion to strike (1.2).	2.00	\$630.00
04/04/2010	J-G	ONE: Research and analysis relevant to issues raised by reply brief, including research of authority outside the Eleventh Circuit.	1.80	\$450.00
04/05/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.10	\$607.50
04/05/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production.	7.90	\$592.50
04/05/2010	DSN	ONE: Telephone conference with [REDACTED], [REDACTED] and Jonathan Etra regarding various factual issues.	0.50	\$157.50
04/05/2010	F-S	ONE: Continue research caselaw for sur-reply to Sun's motion to strike (3.0).	3.00	\$600.00
04/05/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo.	8.50	\$637.50
04/05/2010	J-E	ONE: work on motion to strike (4.3)	4.30	\$1,354.50
04/05/2010	J-G	ONE: Review and analyze authority, and prepare written analysis regarding issues raised by reply brief on scope of reply, [REDACTED], and use of [REDACTED] to overcome [REDACTED].	2.70	\$675.00
04/06/2010	A-V	ONE: Review citations in Receiver's Motion to Strike (2.0)	2.00	\$150.00
04/06/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.5)	7.50	\$562.50
04/06/2010	BAF	ONE: Reviewed and analyzed pleadings, motions, affidavits and depositions in order to cite check and edit Motion to Strike Sun's Reply (3.5); Reviewed, analyzed and categorized documents in order to prepare for document production(4.8).	8.30	\$622.50
04/06/2010	DSN	ONE: Telephone conference relating to [REDACTED]	0.30	\$94.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 5

		[REDACTED] and review correspondence relating to same.		
04/06/2010	F-S	ONE: Continue research caselaw for sur-reply to Sun Capital's motion to strike.	2.00	\$400.00
04/06/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo.	8.90	\$667.50
04/06/2010	J-G	ONE: Research and analysis in support of motion to strike reply affidavits	0.90	\$225.00
04/06/2010	J-R	ONE: Reviewed file for [REDACTED] documents produced, particularly work papers (.2)	0.20	\$30.00
04/06/2010	M-S	ONE: review and revise motion to strike reply papers	1.80	\$450.00
04/07/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request.	7.90	\$592.50
04/07/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.9)	8.90	\$667.50
04/07/2010	DSN	ONE: Telephone conference with [REDACTED], [REDACTED] (.4); telephone conference with Roy Kobert and Steve Friedman regarding [REDACTED] (.2).	0.60	\$189.00
04/07/2010	F-S	ONE: Continue research caselaw for sur-reply to Motion to Strike .	1.50	\$300.00
04/07/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo.	8.10	\$607.50
04/07/2010	J-G	ONE: Research regarding use of [REDACTED] privilege as a [REDACTED] under [REDACTED] and [REDACTED] law, and review of authority gathered thus far in furtherance of motion to strike reply briefs.	2.40	\$600.00
04/07/2010	J-R	ONE: Telephone conference and correspondence with accountants regarding request for documents needed for review and analysis (.4); Coordinated with Xact obtaining documents requested by accountants (.2)	0.60	\$90.00
04/07/2010	RSK	ONE: Conference regarding related [REDACTED] in California; Provide instructions regarding [REDACTED] pleadings, [REDACTED] [REDACTED] [REDACTED]	0.90	\$283.50
04/08/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request:	8.40	\$630.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 6

04/08/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.4)	8.40	\$630.00
04/08/2010	F-S	ONE: Continue research caselaw for sur-reply to Motion to Strike (3.0).	3.00	\$600.00
04/08/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo.	9.00	\$675.00
04/08/2010	J-G	ONE: Research and analysis relevant to motion to strike reply affidavits.	0.70	\$175.00
04/08/2010	J-R	ONE: Telephone conferences and email correspondence with David Siegle regarding requested documents for review and analysis (.6); Email correspondence with Xact regarding documents requested (.2)	0.80	\$120.00
04/09/2010	A-V	ONE: Review pleadings, witnesses's affidavits and depositions in preparations for Receiver's Motion to Strike (1.0)	1.00	\$75.00
04/09/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.20	\$615.00
04/09/2010	BAF	ONE: Reviewed and analyzed pleadings, motions, affidavits and depositions in order to cite check and edit Motion to Strike Sun's Reply (6.0); Reviewed, analyzed and categorized documents in order to prepare for document production (3.1).	9.10	\$682.50
04/09/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo.	8.30	\$622.50
04/09/2010	J-E	ONE - Work on motion to strike/surreply (2.0).	2.00	\$630.00
04/09/2010	J-G	ONE: Additional research relevant to motion to strike, and preparation of additions to draft to include the further authority.	3.80	\$950.00
04/09/2010	J-R	ONE: Correspondence with accountants and Xact regarding documents requested (.2); Coordinated getting deposition exhibits from SEC for attorney and accountant review (.1)	0.30	\$45.00
04/09/2010	M-S	ONE -- Continued revision of motion to strike reply.	0.90	\$225.00
04/09/2010	MTV	ONE: Review complaint against Sun defendants and motion to dismiss same	1.30	\$409.50
04/09/2010	NCV	ONE: Review pleadings and Strategy regarding [REDACTED]	0.90	\$225.00
04/09/2010	P-B	ONE: Organize pleading index of cases ; Create and organize discovery binders.(No Charge)	5.00	\$0.00
04/10/2010	A-V	ONE: Review/ Analyze /Categorize electronic	3.40	\$255.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 7

		records and documents for discovery request (3.4)		
04/10/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo.	2.00	\$150.00
04/11/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (4.0)	4.00	\$300.00
04/11/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo	4.80	\$360.00
04/11/2010	M-S	ONE -- Continued revision of motion to strike reply declarations.	2.70	\$675.00
04/12/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.9)	8.90	\$667.50
04/12/2010	BAF	ONE: Reviewed and analyzed pleadings, motions, affidavits and depositions in order to cite check and edit Motion to Strike Sun's Reply (1.5); Reviewed, analyzed and categorized documents in order to prepare for document production (8.0)	9.50	\$712.50
04/12/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (1.0); Continue research caselaw for Motion to Strike sur-reply (3.5).	4.50	\$900.00
04/12/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo	9.70	\$727.50
04/12/2010	J-E	ONE - Reviewed order on motion to amend and analysis of same and options (1.0). Work on reply, strike, sur-reply (5.0).	6.00	\$1,890.00
04/12/2010	J-R	ONE: Telephone conferences with accountants and Xact regarding documents requested (.4); Reviewed all outstanding and open invoices (.6)	1.00	\$150.00
04/12/2010	M-S	ONE: Continued revision of motion to strike reply declarations.	3.80	\$950.00
04/13/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.80	\$660.00
04/13/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.10	\$607.50
04/13/2010	DSN	ONE: Office conference with counsel regarding strategy in connection with [REDACTED] magistrate order relating to motion for leave to amend and related issues.	0.40	\$126.00
04/13/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (1.0); Continue research caselaw for sur-reply to motion to strike	3.80	\$760.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 8

		(2.8).		
04/13/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo	5.30	\$397.50
04/13/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
04/13/2010	J-E	ONE: work on reply/strike motions and issues (6.0). Work on amendment of complaint issues (.5).	6.50	\$2,047.50
04/13/2010	J-G	ONE: Review and analyze specific allegations in the proposed amended complaint, the Order denying amendment, and authority relevant to the standard for amendment (2.3); confer with J. Etra regarding progress and strategy (.1).	2.40	\$600.00
04/13/2010	P-B	ONE: Continued Redaction in preparation for filing of Fee Application (1.50)	1.50	\$225.00
04/14/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.80	\$660.00
04/14/2010	BAF	ONE: Reviewed and analyzed pleadings, motions, affidavits and depositions in order to cite check and edit Motion to Strike Sun's Reply (1.0); Reviewed, analyzed and categorized documents in order to prepare for document production (7.5)	8.50	\$637.50
04/14/2010	DSN	ONE: Review and analyze draft motion to strike (1.0); provide [REDACTED] and conference with counsel relating to strategy for response (.3); review correspondence from Vince Paparo regarding funding issue(.3); office conference with Jonathan Etra regarding [REDACTED] (.2).	1.80	\$567.00
04/14/2010	F-S	ONE: Continue research caselaw for sur-reply to Motion to Strike .	1.80	\$360.00
04/14/2010	G-S	ONE: Reviewed and compared affidavit and deposition testimony in preparation for response to Defendant's reply memo	5.20	\$390.00
04/14/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.00	\$525.00
04/14/2010	J-E	ONE: Work on motion to strike (2.0). Work on objection to R&R on motion to amend (.5). Meet and confer on motion to strike and motion for surreply (.2). Conferred with accounting firm and experts on due diligence needed on Sun's request for approval of secured financing for construction loan, drafted letter to Sun's counsel re same (1.0).	3.70	\$1,165.50
04/14/2010	J-G	ONE: Research regarding [REDACTED]	2.10	\$525.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 9

04/14/2010	M-S	ONE: Revise and finalize motion to strike reply declarations; revise and finalize motion for leave to surreply.	5.10	\$1,275.00
04/15/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.50	\$637.50
04/15/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.30	\$622.50
04/15/2010	DSN	ONE: Draft proposed revisions to letter to Vince Paparo (.3); review revised motion to strike and office conferences with Jonathan Etra regarding [REDACTED] (1.0).	1.30	\$409.50
04/15/2010	F-S	ONE: Continue research caselaw for sur-reply to Motion to Strike .	1.80	\$360.00
04/15/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.10	\$607.50
04/15/2010	J-E	ONE: Revised and finalized letter to Sun counsel on funding of Villages issues and sent same (1.0). Analysis of R&R denying motion to amend, applicable law, and relevant facts and factors (1.0). Work on motion to strike (.3). Work on motion for leave to file surreply (1.5).	3.80	\$1,197.00
04/15/2010	J-R	ONE: Meeting with Xact regarding all open invoices (No Charge)	1.00	\$0.00
04/15/2010	M-S	ONE: Revise motion to strike & motion for leave to surreply.	3.90	\$975.00
04/16/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request.	8.00	\$600.00
04/16/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.9)	8.90	\$667.50
04/16/2010	DSN	ONE: Review and [REDACTED] to motion to strike and office conferences with counsel regarding same (1.0) (No Charge); review and [REDACTED] to motion to file sur-reply and conferences with counsel regarding same (1.0); office conferences with counsel regarding [REDACTED] (1.0).	2.00	\$630.00
04/16/2010	F-S	ONE: Continue Research for Motion to Strike Sur-reply	2.90	\$580.00
04/16/2010	G-S	ONE: Continued review of documents related to	8.50	\$637.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 10

		litigation and receivership		
04/16/2010	J-E	ONE: Finalize motion to strike and motion for surreply. (.5). Work on [REDACTED] issues (.2).	0.70	\$220.50
04/16/2010	J-G	ONE: Analyze authority and issues relevant to joinder issue raised by Magistrate's Order on amending the complaint.	0.30	\$75.00
04/16/2010	M-S	ONE: Finalize & file motion for leave to surreply and motion to strike reply declarations, including redaction of same; prepare motion to file under seal.	4.20	\$1,050.00
04/16/2010	SKA	ONE: Meet with attorney regarding case; Telephone conference with attorneys regarding strategy	0.80	\$120.00
04/17/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (1.8)	1.80	\$135.00
04/17/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.60	\$570.00
04/17/2010	J-E	ONE: Follow up e-mail to Sun's counsel seeking documents and information about proposed financing (.1)	0.10	\$31.50
04/18/2010	F-S	ONE: Continue research caselaw for sur-reply to Motion to Strike .	2.10	\$420.00
04/19/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.10	\$607.50
04/19/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production.	8.90	\$667.50
04/19/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (2.5); Continue research caselaw to looking for arguments in opposition to Sun's reply to our Motion in Opposition to Preliminary Injunction (2.7).	5.20	\$1,040.00
04/19/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.50	\$637.50
04/19/2010	J-E	ONE: Reviewed Judge Steele's order, conferences with and memo to team on same (.3). Conferences with Receiver on strategy (.3). Work on amendment issues (.7).	1.30	\$409.50
04/19/2010	J-G	ONE: Analyze issues relevant to joinder raised by the Magistrate's order (.1); review and analyze Order from the Judge regarding the motion to surreply and the motion to strike affidavits (.1).	0.20	\$50.00
04/20/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (9.6)	9.60	\$720.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 11

04/20/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.9)	8.90	\$667.50
04/20/2010	DSN	ONE: Strategize with Jonathan Etra regarding various actions in relation to Sun litigation.	0.30	\$94.50
04/20/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation.	4.20	\$840.00
04/20/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.60	\$645.00
04/20/2010	J-E	ONE: litigation strategy conferences with Receiver (1.0). Confer with Ms. Visideo on objection to R&R on amendments (.2). Attention to Villages financing issue. (.1).	1.30	\$409.50
04/20/2010	J-G	ONE: Research regarding issues raised by Magistrate's report and recommendation.	1.70	\$425.00
04/21/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (9.5)	9.50	\$712.50
04/21/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (10.9)	10.90	\$817.50
04/21/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (7.2).	7.20	\$1,440.00
04/21/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
04/21/2010	J-E	ONE: Review of documents (.2). Conferred on objections to R&R (.3).	0.50	\$157.50
04/21/2010	J-G	ONE: Additional research regarding issues raised by the Magistrate's order on amendment and preparation of summary of that research.	3.90	\$975.00
04/21/2010	J-R	ONE: Email correspondence and telephone conference with Xact regarding payment of outstanding invoice for electronic discovery (.2)	0.20	\$30.00
04/22/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.2)	8.20	\$615.00
04/22/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.10	\$607.50
04/22/2010	DSN	ONE: Review correspondence relating to Sun motion pertaining to page limit issue and draft correspondence to counsel regarding DSN	0.20	\$63.00
04/22/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (4.5)	4.50	\$900.00
04/22/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 12

04/22/2010	J-E	ONE: Work on objections to R&R and timing of same (.8).	0.80	\$252.00
04/22/2010	J-G	ONE: Analyze issues relevant to objections to Magistrate's order on amendment, including research of [REDACTED] and conferences with J. Etra and the Receiver.	3.60	\$900.00
04/23/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request.	8.60	\$645.00
04/23/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (6.0)	6.00	\$450.00
04/23/2010	DSN	ONE: Review report and recommendation and draft regarding objection to Magistrate report and recommendation.	1.10	\$346.50
04/23/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (5.0).	5.00	\$1,000.00
04/23/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.70	\$577.50
04/23/2010	J-E	ONE: Meet and confer correspondence on Sun's motion regarding the striking of the last 12 pages of its reply and conferences on same (.2).	0.20	\$63.00
04/23/2010	J-G	ONE: Research authority cited by Sun regarding [REDACTED]	2.60	\$650.00
04/24/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (4.5)	4.50	\$337.50
04/25/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation.	3.40	\$680.00
04/25/2010	J-E	ONE: Work on objection to report and recommendation on motion to amend (1.2). Reviewed Sun's motion regarding the striking of the last 12 pages of its reply brief (.1).	1.30	\$409.50
04/25/2010	J-G	ONE: Review and summarize authority regarding prejudice and futility in amendment.	1.40	\$350.00
04/26/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.70	\$652.50
04/26/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.90	\$667.50
04/26/2010	DSN	ONE: [REDACTED] objection to Magistrate report and recommendation, review case law cited in response and make proposed revisions to same, meet with counsel regarding [REDACTED] report and recommendation.	4.10	\$1,291.50
04/26/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (1.0).	1.00	\$200.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 13

04/26/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
04/26/2010	J-E	ONE: Review of relevant pleading, motion to amend, and proposed amendments and worked on objection to magistrate's report and recommendation (5.0)	5.00	\$1,575.00
04/26/2010	RSK	ONE: Conference regarding collateral bankruptcy cases; Removal issues	0.80	\$252.00
04/27/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.4)	8.40	\$630.00
04/27/2010	A-V	ONE: Meeting with Jonathan Etra, Daniel Newman and other attorneys to discuss litigation strategy and progress of document review (1.4)	1.40	\$105.00
04/27/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.50	\$637.50
04/27/2010	DSN	ONE: Review various documents relating to [REDACTED] (.5); numerous conferences with counsel regarding same and strategy and tasks (1.2)(No Charge).	0.50	\$157.50
04/27/2010	F-S	ONE: Continue review , analyze, and categorize documents pertaining to litigation (3.0); Meeting with partners to discuss upcoming projects (1.3); Draft discovery subpoenas to numerous parties involved in the litigation (2.7).	7.00	\$1,400.00
04/27/2010	G-S	ONE: Meeting regarding status of document review	1.00	\$75.00
04/27/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
04/27/2010	J-E	ONE: Work on replacement objection to R&R (.3). Reviewed relevant materials in preparation for 11th Circuit initial mediation assessment and attended same (1.0). Work on document production and document review (.5). Conferences on status and strategy (1.0).	2.80	\$882.00
04/27/2010	J-G	ONE: Analyze issues relevant to [REDACTED] Receivership issue, amended complaint, and additional discovery, including analysis of previous filings and order (1.9); meeting with the Receiver regarding pending tasks and strategy (.4); ONE- Bermuda lit follow-up analysis relevant to new protocol motion in light of Cayman ruling (.4).	2.70	\$675.00
04/27/2010	J-R	ONE: Attend meeting regarding status, upcoming deadlines, and assignments (.4); Email correspondence with Xact regarding instructions	0.80	\$120.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 14

		for next installment of production (.2); Correspondence with Xact regarding Global funds documents (.2)		
04/28/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.20	\$615.00
04/28/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production.	8.60	\$645.00
04/28/2010	F-S	ONE: Draft discovery subpoenas to numerous parties involved in the litigation (3.0).	3.00	\$600.00
04/28/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.20	\$615.00
04/28/2010	J-G	ONE: Various conferences with F. Seagal regarding discovery requests and facts to be gather ,and an lysis of such issues (.7); analyze issues relevant to in [REDACTED] and [REDACTED] issue (.1).	0.80	\$200.00
04/28/2010	J-R	ONE: Telephone conference with Xact regarding latest installment of production (.1)	0.10	\$15.00
04/29/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.0)	8.00	\$600.00
04/29/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.4)	8.40	\$630.00
04/29/2010	DSN	ONE: Review various documents identified through document review process and analyze same (.8).	0.80	\$252.00
04/29/2010	F-S	ONE: Legal research of [REDACTED] and [REDACTED] state and federal cases of [REDACTED] as relates to [REDACTED] (1.0); Continue draft subpoenas (2.0).	3.00	\$600.00
04/29/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.80	\$585.00
04/29/2010	G-S	ONE: Research on deepening insolvency and in pari delicto (accounting malpractice)	3.70	\$277.50
04/29/2010	J-E	ONE: Review of documents and correspondence on same (.2).	0.20	\$63.00
04/29/2010	J-G	ONE: Follow-up conference with F. Seagl regarding discovery requests.	0.10	\$25.00
04/29/2010	J-R	ONE: Drafted correspondence and prepared package to opposing counsel regarding next installment of discovery (.3)	0.30	\$45.00
04/30/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.9)	8.90	\$667.50
04/30/2010	BAF	ONE: Reviewed, analyzed and categorized	6.50	\$487.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 15

		documents in order to prepare for document production (6.5)		
04/30/2010	F-S	ONE: Continue draft subpoenas (6.0)	6.00	\$1,200.00
04/30/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.70	\$577.50
05/01/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (2.7)	2.70	\$202.50
05/02/2010	F-S	ONE: Continue draft Subpoenas to Promise and Success Affiliates and other related companies.	1.50	\$300.00
05/03/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.80	\$660.00
05/03/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.80	\$660.00
05/03/2010	F-S	ONE: Draft Subpoenas to Promise and Success Affiliates and other related companies (2.7) Conference with Dan Newman regarding [REDACTED] (.8); Continue review, analyze and categorize documents pertaining to litigation (1.0).	4.50	\$900.00
05/03/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.80	\$585.00
05/03/2010	MVW	ONE: Conference re [REDACTED] strategy; Review Symbio bankruptcy case docket; Prepare Proof of Claim in Symbio Solutions bankruptcy case	1.80	\$270.00
05/03/2010	NCV	ONE: Conference regarding [REDACTED] [REDACTED]; reviewing bankruptcy schedules; reviewing state court pleadings	1.60	\$400.00
05/03/2010	RSK	ONE: Conference regarding filing in Dallas and notification to Defense counsel	0.30	\$94.50
05/03/2010	RSK	ONE: Conference with Texas [REDACTED] counsel regarding [REDACTED] for receiver, [REDACTED]	1.40	\$441.00
05/03/2010	RSK	ONE: Conference regarding [REDACTED] in [REDACTED] [REDACTED]	0.80	\$252.00
05/04/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (9.0)	9.00	\$675.00
05/04/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production.	8.90	\$667.50
05/04/2010	F-S	ONE: Continue draft Subpoenas to Promise and	5.00	\$1,000.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 16

		Success Affiliates and other related companies. (3.0); Continue review, analyze, and categorize documents pertaining to litigation (2.0).		
05/04/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.70	\$652.50
05/04/2010	MVW	ONE: Research Pacer; download and review bankruptcy docket and review bankruptcy schedules and various pleadings in ██████████ bankruptcy case	1.00	\$150.00
05/04/2010	RSK	ONE: Provide instructions regarding service on related parties and related bankruptcy cases	0.30	\$94.50
05/05/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (9.3)	9.30	\$697.50
05/05/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production.	8.50	\$637.50
05/05/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
05/05/2010	MVW	ONE: Research Pacer; download and review Proof of Claim filed by ██████████ in Symbio bankruptcy case	0.30	\$45.00
05/06/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (10.4)	10.40	\$780.00
05/06/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (10.0)	10.00	\$750.00
05/06/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (3.5).	3.50	\$700.00
05/06/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.30	\$547.50
05/06/2010	MVW	ONE: Research Pacer; download and review docket and various pleadings in Symbio bankruptcy case	0.70	\$105.00
05/07/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.50	\$637.50
05/07/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (9.4)	9.40	\$705.00
05/07/2010	F-S	ONE: Continue review, analyze, and cetagorize documents pertaining to litigation. (3.0).	3.00	\$600.00
05/07/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
05/07/2010	MVW	ONE: Review and analyze bankruptcy pleadings ██████████	0.50	\$75.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 17

05/08/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (1.5)	1.50	\$112.50
05/08/2010	G-S	ONE: Continued review of documents related to litigation and receivership	1.50	\$112.50
05/09/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (2.0).	2.00	\$400.00
05/09/2010	G-S	ONE: Continued review of documents related to litigation and receivership	2.70	\$202.50
05/10/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (9.5)	9.50	\$712.50
05/10/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (9.9)	9.90	\$742.50
05/10/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (3.9).	3.90	\$780.00
05/10/2010	J-G	ONE: Follow-up conference with M. Visiedo regarding [REDACTED] research results and relevant analysis.	0.10	\$25.00
05/10/2010	J-R	ONE: Correspondence with vendor regarding documents for upcoming production (.1)	0.10	\$15.00
05/10/2010	MVW	ONE: Continue review and analysis of pleadings filed in Pacifica bankruptcy case re Sun Capital	1.30	\$195.00
05/11/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (9.0)	9.00	\$675.00
05/11/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.50	\$637.50
05/11/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (1.5); Continue draft Subpoenas for various Sun and Promise related entities in [REDACTED] (2.9).	4.40	\$880.00
05/11/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.80	\$660.00
05/11/2010	J-R	ONE: Correspondence with vendor coordinating next collection of production (.2); Correspondence with document reviewer regarding next collection of discovery (.1)	0.30	\$45.00
05/11/2010	MVW	ONE: Continue review and analysis of pleadings in Pacifica bankruptcy	1.00	\$150.00
05/12/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.4)	8.40	\$630.00
05/12/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production.	9.10	\$682.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 18

05/12/2010	F-S	ONE: Continue draft subpoenas for documents to various entities [REDACTED] (6.0).	6.00	\$1,200.00
05/12/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
05/12/2010	J-R	ONE: Prepared correspondence and package to opposing counsel regarding transmittal of next installment of production (.2)	0.20	\$30.00
05/13/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	9.80	\$735.00
05/13/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (9.0)	9.00	\$675.00
05/13/2010	F-S	ONE: Continue draft subpoenas for documents to various entities [REDACTED] (4.0); Continue review, analyze, and categorize documents pertaining to litigation (1.8).	5.80	\$1,160.00
05/13/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.80	\$585.00
05/13/2010	J-G	ONE: Review Sun's memorandum regarding amendment issue.	0.10	\$25.00
05/13/2010	M-S	ONE: Receive and review opposition to Receiver's objection to report & recommendation on amendment of complaint.	0.20	\$50.00
05/14/2010	A-V	ONE: Review documents, deposition transcripts and pleadings in preparation for meeting with Mr. Gunlicks (1.8)	1.80	\$135.00
05/14/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (9.0)	9.00	\$675.00
05/14/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.90	\$667.50
05/14/2010	F-S	ONE: Continue draft subpoenas for documents to various entities [REDACTED] Conference with Michelle Visiedo regarding the Subpoenas (4.7).	4.70	\$940.00
05/14/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
05/15/2010	A-V	ONE: Review documents, deposition transcripts and pleadings in preparation for meeting with Mr. [REDACTED] (1.9)	1.90	\$142.50
05/15/2010	G-S	ONE: Continued review of documents related to litigation and receivership	4.00	\$300.00
05/15/2010	G-S	ONE: Reviewed Leder depositions for testimony	2.00	\$150.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 19

		regarding Gunlicks's request for [REDACTED]		
05/16/2010	F-S	ONE: Continue draft subpoenas for documents to various entities in conjunction with complaint against Sun Capital (3.0).	3.00	\$600.00
05/16/2010	G-S	ONE: Reviewed depositions for [REDACTED] regarding [REDACTED] requests for [REDACTED]	2.60	\$195.00
05/17/2010	A-V	ONE: Review documents, deposition transcripts and pleadings in preparation for meeting with Mr. Gunlicks (1.8)	1.80	\$135.00
05/17/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.1)	7.10	\$532.50
05/17/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (10.5)	10.50	\$787.50
05/17/2010	DSN	ONE: Review order of court regarding motion for leave to amend (.2); telephone conference regarding [REDACTED] (.2).	0.40	\$126.00
05/17/2010	F-S	ONE: Continue draft subpoenas for documents to various entities [REDACTED] (3.4); Continue review, analyze, and categorize documents pertaining to litigation (1.0).	4.40	\$880.00
05/17/2010	G-S	ONE: Reviewed depositions for testimony regarding Gunlicks's requests for collateral status.	3.30	\$247.50
05/17/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.30	\$622.50
05/17/2010	J-E	ONE: Work on motion for real time disclosure and reporting (.2). Reviewed order affirming R&R and analysis of options to pursue claims (.5).	0.70	\$220.50
05/17/2010	J-G	ONE: Review recent filings and analyze issues raised by those filings, as they relate to amendment and further strategy in the lawsuit.	0.40	\$100.00
05/18/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (1.0)	1.00	\$75.00
05/18/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (10.9)	10.90	\$817.50
05/18/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation.	1.50	\$300.00
05/18/2010	G-S	ONE: Review of [REDACTED] /Founding Partners engagement documents	2.00	\$150.00
05/18/2010	G-S	ONE: Reviewed [REDACTED] depositions for testimony regarding [REDACTED] requests for collateral status	2.00	\$150.00
05/18/2010	G-S	ONE: Continued review of documents related to	6.70	\$502.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 20

		litigation and receivership		
05/18/2010	MVW	ONE: Review and analyze various bankruptcy pleadings in Symbio bankruptcy case	0.50	\$75.00
05/19/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.9)	8.90	\$667.50
05/19/2010	F-S	ONE: Meeting regarding Subpoenas to various different parties in Litigation (1.0); Continue review, analyze, and categorize documents pertaining to litigation (2.5).	3.50	\$700.00
05/19/2010	G-S	ONE: Review of documents regarding Founding Partners/Ernst & Young engagement	8.70	\$652.50
05/19/2010	MVW	ONE: Continue review and analysis of Symbio bankruptcy pleadings; Research Pacer; download and review updated bankruptcy court docket in Symbio case	1.30	\$195.00
05/20/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (1.0)	1.00	\$75.00
05/20/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.00	\$600.00
05/20/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (2.3); Continue draft subpoenas to various entities and persons for litigation. (2.8).	5.10	\$1,020.00
05/20/2010	G-S	ONE: Review of documents regarding Founding Partners/Ernst & Young engagement	8.00	\$600.00
05/21/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (3.5)	3.50	\$262.50
05/21/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (9.4)	9.40	\$705.00
05/21/2010	F-S	ONE: Meeting regarding Subpoenas to various different parties in Litigation (1.7); Continue review, analyze, and categorize documents pertaining to litigation (2.5).	4.20	\$840.00
05/21/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.50	\$637.50
05/22/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (2.0)	2.00	\$150.00
05/23/2010	F-S	ONE: Continue draft subpoenas to serve to various parties for the litigation (3.1)	3.10	\$620.00
05/24/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.8)	8.80	\$660.00
05/24/2010	BAF	ONE: Reviewed; analyzed and categorized	8.00	\$600.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 21

		documents in order to prepare for document production .		
05/24/2010	F-S	ONE: Continue draft subpoenas to serve to various parties for the litigation (2.0); Continue review, analyze, and categorize documents pertaining to litigation (1.0).	3.00	\$600.00
05/24/2010	G-S	ONE: Continued review of documents related to litigation and receivership	9.30	\$697.50
05/24/2010	P-B	ONE: Research numerous corporations for filing of subpoenas.(No Charge).	4.00	\$0.00
05/25/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (9.0)	9.00	\$675.00
05/25/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.50	\$637.50
05/25/2010	F-S	ONE: Continue draft subpoenas to serve to various parties for the litigation (2.1); Continue review, analyze, and categorize documents pertaining to litigation (1.4).	3.50	\$700.00
05/25/2010	G-S	ONE: Continued review of documents related to litigation and receivership	4.50	\$337.50
05/25/2010	J-G	ONE: Review protocol motion, confer with the Receiver and Cayman counsel, and follow-up relevant to preparing additions regarding the issues raised by the JPLs' changes.	1.20	\$300.00
05/26/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (3.0)	3.00	\$225.00
05/26/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production.	8.00	\$600.00
05/26/2010	DSN	ONE: Review various subpoenas related to Sun litigation and revise same.	0.40	\$126.00
05/26/2010	F-S	ONE: Continue draft subpoenas to serve to various parties for the litigation (2.1); Continue review, analyze, and categorize documents pertaining to litigation (1.3).	3.40	\$680.00
05/26/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
05/27/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (4.5)	4.50	\$337.50
05/27/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.4)	8.40	\$630.00
05/27/2010	DSN	ONE: Office conference with Michelle Visiedo-	0.60	\$189.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 22

		Hidalgo regarding status and timing regarding [REDACTED]		
05/27/2010	F-S	ONE: Continue draft subpoenas to serve to various parties for the litigation (3.7); Continue review, analyze, and categorize documents pertaining to litigation (1.2).	4.90	\$980.00
05/27/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
05/28/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (7.0)	7.00	\$525.00
05/28/2010	DSN	ONE: Office conferences with Jonathan Etra and Michelle Visiedo-Hidalgo regarding subpoenas and filing of same; review proposed correspondence to accompany new subpoenas.	0.50	\$157.50
05/28/2010	F-S	ONE: Continue draft Subpoena to Rachlin Cohen, hired as accountants by Promise and Sun (4.9)	4.90	\$980.00
05/28/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.00	\$525.00
05/31/2010	G-S	ONE: Continued review of documents related to litigation and receivership	4.00	\$300.00
06/01/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (2.0)	2.00	\$150.00
06/01/2010	DSN	ONE: Office conference with Michelle Visiedo Hidalgo regarding issuance of subpoenas (.1).	0.10	\$31.50
06/01/2010	F-S	ONE: Continue draft subpoena's for [REDACTED] and [REDACTED] and meeting with Michelle Visiedo-Hidalgo re regarding same (1.2); Continue review, analyze, and categorize documents pertaining to litigation (1.9).	3.10	\$620.00
06/01/2010	G-S	ONE: Continued review of documents related to litigation and receivership	9.10	\$682.50
06/01/2010	MVW	ONE: Research Pacer; download and review updated bankruptcy dockets in Symbio and Pacifica cases; Prepare memorandum summarizing events in case	4.00	\$600.00
06/01/2010	P-B	ONE: Draft and prepare subpoenas of [REDACTED] entities for Request for Production (1.0); Prepare Notice of Issuing Subpoenas (1.5) (No Charge).	2.50	\$0.00
06/01/2010	P-B	ONE: Researched each new entity for business location for service of subpoena (No Charge).	1.00	\$0.00
06/02/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (9.0)	9.00	\$675.00
06/02/2010	BAF	ONE: Reviewed, analyzed and categorized	10.50	\$787.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 23

		documents in order to prepare for document production (10.5)		
06/02/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (1.1); Continue draft subpoenas to serve to various parties for the litigation (1.3)	2.40	\$480.00
06/02/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.20	\$615.00
06/03/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.5)	8.50	\$637.50
06/03/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production.	10.90	\$817.50
06/03/2010	F-S	ONE: Continue review, analyze, and categorize documents related to litigation (4.0)	4.00	\$800.00
06/03/2010	G-S	ONE: Continued review of documents related to litigation and receivership	6.00	\$450.00
06/04/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.5)	8.50	\$637.50
06/04/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (11.4)	11.40	\$855.00
06/04/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (1.8).	1.80	\$360.00
06/04/2010	J-R	ONE: Correspondence with Xact Data and conference with D. Newman regarding payment of invoices (.6); Email correspondence to Xact Data regarding document reviewer activity on website (.1)	0.70	\$105.00
06/04/2010	MTV	ONE: Review docket regarding deadline to file amended complaint and discuss preparation of same	0.30	\$94.50
06/05/2010	A-V	ONE: Review documents, deposition transcripts and pleadings in preparation for meeting with Mr. Gunlicks (2.7)	2.70	\$202.50
06/05/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (7.5)	7.50	\$562.50
06/05/2010	G-S	ONE: Continued review of documents related to litigation and receivership	5.00	\$375.00
06/06/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (4.0)	4.00	\$300.00
06/07/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.0)	7.00	\$525.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 24

06/07/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (7.9)	7.90	\$592.50
06/07/2010	DSN	ONE: Office conferences with counsel regarding preparation for filing of Amended Complaint.	0.50	\$157.50
06/07/2010	F-S	ONE: Organize documents to send to [REDACTED], to assist us with [REDACTED]. (1.9) ONE: Continue review, analyze, and categorize documents pertaining to litigation (1.0).	2.90	\$580.00
06/07/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/07/2010	J-E	ONE: Worked on amended complaint. (.8).	0.80	\$252.00
06/07/2010	J-G	ONE: Review relevant Federal rules, analyze issues relevant to jury trial demand, and prepare draft jury trial demand language in conjunction with the Receiver.	0.30	\$75.00
06/07/2010	J-R	ONE: Conference and correspondence with D. Newman regarding document reviewers (.2); Revised amended complaint to include language demanding jury trial (.4); Revised and prepared exhibits to amended complaint for filing (1.7); Electronically filed via CM/ECF amended complaint and exhibits (.7)	3.00	\$450.00
06/07/2010	MTV	ONE: Draft amended complaint	5.60	\$1,764.00
06/07/2010	P-B	ONE: Compilation and organization of exhibits to Second Amended Complaint	2.00	\$300.00
06/08/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.9)	7.90	\$592.50
06/08/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (6.9)	6.90	\$517.50
06/08/2010	F-S	ONE: Organize documents for Letter to [REDACTED] to assist us with [REDACTED]. Prepare memorandum to [REDACTED]. (2.1); Continue review, analyze, and categorize documents pertaining to litigation (1.2)	3.30	\$660.00
06/08/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/08/2010	J-E	ONE: Correspondence with Proskauer on scheduling of its requested meeting (.2). Reviewed agreed motion by Texas investors to extend briefing schedule for appeal and distributed same (.1).	0.30	\$94.50
06/09/2010	A-V	ONE: Research on Founding Partners various entities and funds including the review of	8.00	\$600.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 25

		documents and running searches of electronic records (8.0)		
06/09/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (6.9)	6.90	\$517.50
06/09/2010	F-S	ONE: Organize documents for Letter to [REDACTED], to assist us with [REDACTED]; Prepare memorandum to [REDACTED] (0.5); Continue review, analyze, and categorize documents pertaining to litigation (3.7)	4.20	\$840.00
06/09/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/10/2010	A-V	ONE: Research on Founding Partners various entities and funds including the review of documents and running searches of electronic records (7.9)	7.90	\$592.50
06/10/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (7.0)	7.00	\$525.00
06/10/2010	F-S	ONE: Continue organize documents for Letter to Leo Beus; Prepare memorandum to [REDACTED]; Finalize revisions made for memorandum to [REDACTED] (1.1); Continue review, analyze, and categorize documents pertaining to litigation (2.7)	3.80	\$760.00
06/10/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/11/2010	A-V	ONE: Research on Founding Partners various entities and funds including the review of documents and running searches of electronic records (6.9)	6.90	\$517.50
06/11/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (1.0)	1.00	\$75.00
06/11/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (7.0)	7.00	\$525.00
06/11/2010	DSN	ONE: Meet with Vince Paparo and Sarah Gold regarding request for Motion to Stay and proposed settlement with investors and subsequent conferences with counsel regarding same and tasks to be performed (1.1); telephone conference with various individuals regarding conference (.2).	1.30	\$409.50
06/11/2010	F-S	ONE: Continue review, analyze and categorize documents pertaining to litigation (2.3).	2.30	\$460.00
06/11/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 26

06/11/2010	J-E	ONE - Meeting with Sun's counsel and follow internal discussions (1.5).	1.50	\$472.50
06/11/2010	MTV	ONE: Attend meeting with counsel for Sun; discuss strategy regarding same	1.50	\$472.50
06/12/2010	A-V	ONE: Research on Founding Partners various entities and funds including the review of documents and running searches of electronic records (1.0)	1.00	\$75.00
06/13/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (.6).	0.60	\$120.00
06/13/2010	J-E	ONE - Reviewed motion to stay and affidavits (.5).	0.50	\$157.50
06/14/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.9)	7.90	\$592.50
06/14/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.4)	8.40	\$630.00
06/14/2010	DSN	ONE - Review and analyze motion to stay litigation (1.0); review and analyze proposed response and conference with counsel regarding appropriate response (.5); telephone conferences with various investors and counsel (1.5); various communications with counsel relating to response, additional communication with counsel relating to response to motion to stay and tasks to be performed (1.0). Review correspondence between John Etra and Jim Chadwick (.2).	4.20	\$1,323.00
06/14/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (2.9)	2.90	\$580.00
06/14/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/14/2010	J-E	ONE - Drafted, revised, and and filed notice of intent to file memorandum in opposition to Motion to Stay (1.0). Conferences on responses to Motion to Stay and information needed to provide responsive brief and relevant research issues (2.0). Calls with counsel for various investors. (.5). Preparation for and participation in call with Mr. Jim Chadwick and Mr. Dean Graham and follow up conferences (1.5). Began drafting letter to Mr. Chadwick (1.0). E-mail correspondence with Mr. Chadwick and Mr. Addison on meeting having been contacted directly by their clients and whether meeting would be authorized (1.0).	7.00	\$2,205.00
06/14/2010	J-G	ONE: Review and analyze motion stay, review briefing order from the Court, and research issues relevant to preparing a response.	6.20	\$1,550.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 27

06/14/2010	MTV	ONE: Attend to issues relating to emergency motion including strategy regarding response; review motion; conferences relating to strategy regarding response and investors; begin draft of substantive response	6.30	\$1,984.50
06/14/2010	P-B	ONE: Edit and e-file Notice of Intent to File Opposition on Motion to Stay (No Charge).	0.30	\$0.00
06/15/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.0)	8.00	\$600.00
06/15/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.4)	8.40	\$630.00
06/15/2010	DSN	ONE: Meet with MV and John Etra regarding strategy and other issues (.3) Meet with investor C.D. (.8)	1.10	\$346.50
06/15/2010	F-S	ONE: Continue review analyze, and categorize, and search for specific documents pertaining to litigation (2.3).	2.30	\$460.00
06/15/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/15/2010	J-E	ONE - E-mail correspondence with Mr. Chadwick, Mr. Addison confirming permission to meet with their clients and correspondence with Receiver and investor-client on time of meeting (.3). Meeting with investor (.8). Conferences with Receiver and with other on Motion to Stay and claims against [REDACTED] and affiliates (.5). Call with counsel for investor on Motion to Stay (.3). Call with Joint Provisional Liquidator on various issues, including Motion to Stay (.3). Conferences with Ms. Visiedo on claims against [REDACTED] and affiliates (.3). Drafted and revised letter to Jim Chadwick on Motion to Stay and settlement discussions (4.0).	6.50	\$2,047.50
06/15/2010	J-G	ONE: Research and analyze issues raised by motion to stay (5.2).	5.20	\$1,300.00
06/15/2010	MTV	ONE: Conference regarding strategy going forward; review limited stay order; begin draft of complaint and discuss same with J. Etra.	1.20	\$378.00
06/16/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.9)	7.90	\$592.50
06/16/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.4)	8.40	\$630.00
06/16/2010	F-S	ONE: Continue review, analyze, categorize, and look for specific documents pertaining to	2.20	\$440.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 28

		litigation (2.2)		
06/16/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/16/2010	J-E	ONE - Revisions to draft letter to Mr. Chadwick (1.0). Conferences with Receiver and Ms. Visideo re same (.5). Review of research issues in connection with Sun's Motion to Stay (.2). Calls with consultants (.3).	2.00	\$630.00
06/16/2010	J-G	ONE: Research and analysis relevant to issues raised by Defendants' motion to stay.	2.90	\$725.00
06/16/2010	MTV	ONE: Review proposed correspondence; continue draft of response; discuss draft correspondence and revise same	2.10	\$661.50
06/17/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.0)	8.00	\$600.00
06/17/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (7.0)	7.00	\$525.00
06/17/2010	DSN	ONE: Revise letter relating to information requested by receiver to evaluate stay (.3)	0.30	\$94.50
06/17/2010	F-S	ONE: Continue review, analyze, categorize and look for specific documents regarding litigation (2.8).	2.80	\$560.00
06/17/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/17/2010	J-E	ONE - Revisions to letter to Mr. Chadwick and finalized and sent same (1.0). Draft letter to Proskauer (.2).	1.20	\$378.00
06/17/2010	J-G	ONE: Research regarding causes of action available for improper sale of the collateral.	2.80	\$700.00
06/17/2010	MTV	ONE: Review revised draft of letter; attend to emails regarding scheduling meeting with Mr. Gunlicks; continue revisions to new complaint against downstream entities	2.10	\$661.50
06/18/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.9)	7.90	\$592.50
06/18/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (7.4)	7.40	\$555.00
06/18/2010	F-S	ONE: Continue review, analyze, categorize and look for specific documents regarding litigation (2.4).	2.40	\$480.00
06/18/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.50	\$562.50
06/18/2010	J-E	ONE - Calls with Mr. Chadwell regarding	1.60	\$504.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 29

		settlement discussions and Sun's Motion to Stay and [REDACTED] same (.8). Call from investor on settlement discussions and Sun's Motion to Stay (.3). Conference with Ms. Visiedo re new complaints (.5).		
06/18/2010	J-E	ONE - Review and revisions to draft letter to Proskauer on Motion to Stay (.3).	0.30	\$94.50
06/18/2010	J-G	ONE: Research relevant to issues raised by motion to stay.	0.30	\$75.00
06/19/2010	J-E	ONE - Worked on letter to Proskauer (.2).	0.20	\$63.00
06/21/2010	A-V	ONE: Research on Founding Partners various entities and Funds including review of documents and running searches of electronic records (2.0)	2.00	\$150.00
06/21/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request. Run searches for documents (2.5)	2.50	\$187.50
06/21/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.00	\$600.00
06/21/2010	DSN	ONE: Revise letter to Vince Paparo relating to information requested from receiver. (.3)	0.30	\$94.50
06/21/2010	F-S	ONE: Continue review, analyze, categorize and look for specific documents pertaining to litigation (2.5).	2.50	\$500.00
06/21/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/21/2010	J-E	ONE: Call with counsel for investor group on Sun's Motion to Stay (.3).	0.30	\$94.50
06/21/2010	J-G	ONE: Research regarding issues raised by motion to stay.	1.90	\$475.00
06/22/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.0)	8.00	\$600.00
06/22/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.00	\$600.00
06/22/2010	DSN	ONE: Office conference with Michelle Visiedo regarding response to Motion for Stay (.2); Review correspondence to investor regarding Motion to Stay (.1); Review correspondence from investor relating to Motion to Stay (.1)	0.40	\$126.00
06/22/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (2.1).	2.10	\$420.00
06/22/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/22/2010	J-E	ONE - Call with counsel of investor on Sun's	0.70	\$220.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 30

		Motion to Stay (.2). Internal conferences (.3). Call with Chadwick (.2)		
06/22/2010	J-G	ONE: Review and analyze authority, and perform additional research, regarding issues raised by motion to stay.	1.80	\$450.00
06/22/2010	MTV	ONE: Draft response to emergency motion for stay	5.40	\$1,701.00
06/23/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.8)	7.80	\$585.00
06/23/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.0)	8.00	\$600.00
06/23/2010	DSN	ONE: Conference with counsel relating to strategy in connection with response to Motion to Stay. (.5)	0.50	\$157.50
06/23/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (1.9).	1.90	\$380.00
06/23/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/23/2010	J-E	ONE - Internal conferences (.3) Attempted correspondence with Mr. Chadwick (.1).	0.40	\$126.00
06/23/2010	J-G	ONE: Research and analysis of authority, including preparation of summary of cases cited by Defendant, in connection with opposing motion for stay.	1.50	\$375.00
06/23/2010	MTV	ONE: Draft response; conference with investor; review case law; review declarations.	7.60	\$2,394.00
06/24/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.00	\$600.00
06/24/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (7.0)	7.00	\$525.00
06/24/2010	DSN	ONE: Meeting with John Etra regarding strategy concerning response (.4); Review and analyze Sun Motion to Stay (.6); Review initial draft of response to Motion to Stay; Telephone conference with investors regarding factual issues. (.5)	1.50	\$472.50
06/24/2010	F-S	ONE: Continue review, analyze and categorize documents pertaining to litigation (2.1).	2.10	\$420.00
06/24/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/24/2010	J-E	ONE - work on motion to stay, including e-mails and calls with Mr. Chadwick and e-mail to Proskauer. (1.5).	1.50	\$472.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 31

06/24/2010	J-G	ONE: Analyze issues relevant to opposing motion for stay.	0.20	\$50.00
06/24/2010	MTV	ONE: Draft response to motion for stay; draft declarations	3.80	\$1,197.00
06/25/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request .	8.00	\$600.00
06/25/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (6.9)	6.90	\$517.50
06/25/2010	DSN	ONE: Revise response	4.50	\$1,417.50
06/25/2010	F-S	ONE: Continue review, analyze and categorize documents pertaining to litigation (2.5).	2.50	\$500.00
06/25/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/25/2010	J-G	ONE: Research and analysis regarding issue of [REDACTED] and [REDACTED] in connection with opposition to stay motion.	2.60	\$650.00
06/25/2010	MTV	ONE: Attend to issues relating to response to motion to stay; review prior correspondences; revise same and discuss necessary research	8.10	\$2,551.50
06/26/2010	A-V	ONE: Research on Founding Partners various entities and Funds including review of documents and running searches of electronic records(2.0)	2.00	\$150.00
06/26/2010	DSN	ONE: Review correspondence from Michelle Viseado (.1) Office conference with Jon Etra regarding correspondence from Sarah Gold (.2). Review correspondence from Sarah Gold (.1); strategize regarding response (.2) Review and revise documents related to case. (.6).	1.20	\$378.00
06/26/2010	J-E	ONE - Worked on submission in response to motion to stay (.5).	0.50	\$157.50
06/26/2010	MTV	ONE: Review case law cited in motion; draft section distinguishing same; finalize revisions to draft	3.40	\$1,071.00
06/27/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (3)	3.00	\$225.00
06/27/2010	DSN	ONE: Review and analyze correspondence from Jon Etra regarding response to Motion to Stay and proposed correspondence to be sent relating the same as well as conferences with Jon Etra relating to same.	0.30	\$94.50
06/27/2010	J-E	ONE - Work on response to motion for stay and response to Proskauer's letter refusing to provide settlement in principle or any other information	0.60	\$189.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 32

		(.6)		
06/27/2010	MTV	ONE: Attend to emails relating to correspondences with counsel for Sun	0.30	\$94.50
06/28/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.9)	7.90	\$592.50
06/28/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.00	\$600.00
06/28/2010	DSN	ONE: Review correspondence from Proskauer (.1); Office conference with counsel regarding correspondence from Proskauer (.1); Revise response to Motion to Stay and conferences with counsel regarding same (4.5)	4.70	\$1,480.50
06/28/2010	F-S	ONE: Continue review, analyze, categorize, and search for specific documents pertaining to litigation (2.2).	2.20	\$440.00
06/28/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
06/28/2010	J-E	ONE - Correspondence with Proskauer and Mr. Chadwick on settlement issues and Sun's Motion for Stay (.2). Worked on response to Sun's Motion to Stay and finalized same (2.0).	2.20	\$693.00
06/28/2010	J-G	ONE: Research regarding issues to be addressed in opposition brief regarding stay, including issues of [REDACTED] addressed by [REDACTED] in various jurisdictions (5.1); review materials, analyze arguments, and assist in filing and preparation of response brief regarding stay (6.1); confer with receiver regarding [REDACTED] (.1).	11.30	\$2,825.00
06/28/2010	MTV	ONE: Finalize response to motion to stay; meetings regarding same; assemble exhibits; attend to correspondences regarding motion to stay; finalize for filing and attend to filing	11.50	\$3,622.50
06/28/2010	P-B	ONE: Compilation of exhibits to Motion to Stay (3.70); prepare and e-file same with court (.30).(No Charge)	4.00	\$0.00
06/29/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.9)	7.90	\$592.50
06/29/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production .	8.00	\$600.00
06/29/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (2.3).	2.30	\$460.00
06/29/2010	G-S	ONE: Continued review of documents related to	8.00	\$600.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 33

		litigation and receivership		
06/29/2010	J-E	ONE - Reviewed Order striking submission by Archdiocese (.1). Call from investor on motion to stay (.2). Work on additional claims and on confidentiality issues on settlement discussions (.4).	0.70	\$220.50
06/30/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (7.9)	7.90	\$592.50
06/30/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (7.9)	7.90	\$592.50
06/30/2010	DSN	ONE: Office conference with counsel regarding various tasks to be performed including [REDACTED] and response thereto as well as other matters related to litigation.	0.50	\$157.50
06/30/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00

TOTAL PROFESSIONAL CHARGES \$256,545.50

TIMEKEEPER SUMMARY

RSK	Roy S. Kobert	4.50 hrs @	\$315.00	per hour	\$1,417.50
DSN	Daniel S. Newman, PA	37.60 hrs @	\$315.00	per hour	\$11,844.00
J-E	Jonathan Etra	74.60 hrs @	\$315.00	per hour	\$23,499.00
M-S	Michael Shafir	30.30 hrs @	\$250.00	per hour	\$7,575.00
MTV	Michelle T. Visiedo-Hidalgo	60.50 hrs @	\$315.00	per hour	\$19,057.50
NCV	Nicolette Vilmos	2.50 hrs @	\$250.00	per hour	\$625.00
J-G	Jeffery Geldens	74.60 hrs @	\$250.00	per hour	\$18,650.00
F-S	Frederick Segal	236.80 hrs @	\$200.00	per hour	\$47,360.00
A-V	Adriana Vanegas	507.00 hrs @	\$75.00	per hour	\$38,025.00
G-S	Georgianne Sims	571.80 hrs @	\$75.00	per hour	\$42,885.00
BAF	Bilal A. Faruqui	557.50 hrs @	\$75.00	per hour	\$41,812.50
MVW	Melissa Vander Weide	12.40 hrs @	\$150.00	per hour	\$1,860.00
SKA	Stephanie Astrin	.80 hrs @	\$150.00	per hour	\$120.00
J-R	Junelle Rodriguez	8.60 hrs @	\$150.00	per hour	\$1,290.00
P-B	Patricia Blackman	3.50 hrs @	\$150.00	per hour	\$525.00

TIMEKEEPER TOTAL \$256,545.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 34

ITEMIZED EXPENSES

04/16/2010	FedEx Tracking # 793456646502 Clerk, U.S. District Court U.S. Courthouse 401 W CENTRAL BLVD STE 1-200 ORLANDO FL 32801	\$55.80
04/26/2010	Travel, Cab Fare	\$60.00
04/29/2010	FedEx Tracking # 793494803995 Karen E. Clarke Proskauer Rose, LLP 1585 BROADWAY NEW YORK CITY NY 10036	\$11.35
05/12/2010	FedEx Tracking # 793536613431 Karen E. Clarke Proskauer Rose, LLP 1585 BROADWAY NEW YORK CITY NY 10036	\$11.51
06/02/2010	FedEx Tracking # 793596221868 Jonathan Galler, Esq. Proskauer Rose, LLP 2255 GLADES RD STE 340 BOCA RATON FL 33431	\$10.94
06/02/2010	FedEx Tracking # 793596728373 Jonathan Galler, Esq. Proskauer Rose, LLP 2255 GLADES RD STE 340 BOCA RATON FL 33431	\$7.40
06/02/2010	FedEx Tracking # 798718885813 Karen E. Clarke, Esq. Proskauer Rose, LLP 1585 BROADWAY NEW YORK CITY NY 10036	\$93.20
06/02/2010	FedEx Tracking # 798719342618 Karen E. Clarke, Esq. Proskauer Rose, LLP 1585 BROADWAY NEW YORK CITY NY 10036	\$54.68
06/02/2010	Other Costs - VENDOR: Staples Business Advantage	\$107.96
	Long Distance Telephone	\$7.14
	Online Research	\$261.44
	Photocopies	\$736.78
	Total Expenses	<u>\$1,418.20</u>



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9400
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

February 24, 2011
Invoice No.: 819526

STATEMENT OF ACCOUNT

Matter Name: Sun Capital Litigation
Client/Matter No: 43125.0002
Billing Attorney: Daniel S. Newman, PA

Previous Balance		\$924,871.10
Payments Received		
Subtotal of Previous Balance		<u>\$924,871.10</u>
Professional Charges (detail attached)	\$78,262.00	
Expenses (detail attached)	<u>1,189.38</u>	
Subtotal of Current Charges		<u>\$79,451.38</u>
TOTAL BALANCE DUE (Previous and current balance)		\$1,004,322.48

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR
PAYMENT

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 3

ITEMIZED PROFESSIONAL CHARGES

07/01/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (5.5)	5.50	\$412.50
07/01/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (7.9)	7.90	\$592.50
07/01/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (1.0)	1.00	\$200.00
07/01/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.50	\$562.50
07/02/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (5.5)	5.50	\$412.50
07/02/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (3.0)	3.00	\$225.00
07/02/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (2.5).	2.50	\$500.00
07/02/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/03/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (5.0)	5.00	\$375.00
07/05/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (4.0)	4.00	\$300.00
07/05/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/06/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (8.0)	8.00	\$600.00
07/06/2010	A-V	ONE: Running searches of electronic records and documents for [REDACTED] [REDACTED] (2.3)	2.30	\$172.50
07/06/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.0)	8.00	\$600.00
07/06/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation.	3.00	\$600.00
07/06/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/06/2010	J-E	ONE - worked on complaint against [REDACTED] [REDACTED] (.5).	0.50	\$157.50
07/06/2010	MTV	ONE: Conference with [REDACTED] [REDACTED] draft	0.30	\$94.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 4

		summary of conversation for DSN and JE; [REDACTED]; attend to emails with accountants regarding necessary analysis		
07/07/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (5.0)	5.00	\$375.00
07/07/2010	A-V	ONE: Review and classify documents to be sent to accountants for Corporate Formality project. Writing emails to Adam Lang. Telephone conversation with Adam Lang (1.3)	1.30	\$97.50
07/07/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.0)	8.00	\$600.00
07/07/2010	F-S	ONE: Continue review, analyze, and categorize specific documents pertaining to litigation (2.9).	2.90	\$580.00
07/07/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/07/2010	J-E	ONE - Work on [REDACTED] [REDACTED] (1.5)	1.50	\$472.50
07/07/2010	J-G	ONE: Research regarding [REDACTED] [REDACTED]	1.30	\$325.00
07/07/2010	MTV	ONE-Draft [REDACTED] [REDACTED]; discuss same with Receiver	5.30	\$1,669.50
07/08/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (5.4)	5.40	\$405.00
07/08/2010	BAF	ONE: Reviewed, analyzed and categorized documents in order to prepare for document production (8.0)	8.00	\$600.00
07/08/2010	DSN	ONE: Review various documents and conferences with counsel regarding analysis of claim (1.0). Review, draft correspondence to [REDACTED] (.2); review and analyze and conference with counsel regarding proposed confidentiality agreement (.4); Review correspondence from Jon Etra regarding various news articles pertaining to Sun (.3); Additional review of confidentiality agreement and conference with counsel (.3); Review allegations drafted counsel and conference with counsel regarding same (.3)	2.50	\$787.50
07/08/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (2.9).	2.90	\$580.00
07/08/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/08/2010	J-E	ONE - Work on claims [REDACTED] [REDACTED] (.3). Reviewed Order on Motion to Stay and conferences re same (.8).	1.60	\$504.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 5

		Worked on letter to Proskauer regarding Order (.5).		
07/08/2010	J-G	ONE: [REDACTED] (2.9); review Order from the Court regarding stay motion and analyze issues in conjunction with the Receiver and co counsel (.90).	3.80	\$950.00
07/08/2010	MTV	ONE: [REDACTED] review research and conduct additional research regarding concepts [REDACTED] [REDACTED] review court order and confer with team regarding same	5.10	\$1,606.50
07/08/2010	P-B	ONE: Several corporate searches. (No Charge)	1.00	\$0.00
07/08/2010	P-B	ONE: Research on Success Healthcare entities (No Charge).	1.20	\$0.00
07/09/2010	A-V	ONE: Review and classify documents to be sent to accountants for Corporate Formality project. Meeting with Daniel Newman to discuss document searches for corporate Formality(1.0)	1.00	\$75.00
07/09/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (3.2)	3.20	\$240.00
07/09/2010	BAF	ONE: Reviewed, analyzed and categorized documents (7.4).	7.40	\$555.00
07/09/2010	DSN	ONE: Review and analyze pleadings relating to Sun entities and conference with counsel relating to same (1.0). ONE - Revise proposed correspondence and conference with Jonathan Etra regarding same. (.2)	1.20	\$378.00
07/09/2010	F-S	ONE: Continue review, analyze, and categorize documents pertaining to litigation (1.8).	1.80	\$360.00
07/09/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/09/2010	J-E	ONE - Revised, finalized, and sent letter to Sun's counsel on need for information and participation in settlement process and on confidentiality issues (1.5). Conferred with consultant re same (.3).	1.80	\$567.00
07/09/2010	J-G	ONE: [REDACTED]	2.30	\$575.00
07/09/2010	MTV	ONE-Review letter to S. Gold per court order and revise same	0.20	\$63.00
07/09/2010	P-B	ONE: Final corporate searches of downstream entities.	0.50	\$75.00
07/10/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (4.3)	4.30	\$322.50
07/11/2010	BAF	ONE: Reviewed, analyzed and categorized documents (4.0).	4.00	\$300.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 6

07/12/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (4.8)	4.80	\$360.00
07/12/2010	BAF	ONE: Reviewed, analyzed and categorized documents (7.9).	7.90	\$592.50
07/12/2010	F-S	ONE: Search for specific documents for purposes of litigation (1.0)	1.00	\$200.00
07/12/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/12/2010	J-E	ONE - Attempted correspondence with Mr. Chadwick, counsel to investor group (No Charge).	0.20	\$0.00
07/12/2010	J-G	ONE: [REDACTED]	0.20	\$50.00
07/12/2010	J-R	ONE: Telephone conference and correspondence with Xact Data regarding examining activity on review platform (.2)	0.20	\$30.00
07/12/2010	MTV	ONE-Review draft correspondence; draft notice of related action and motion for enlargement for defendants to file answer to complaint	2.10	\$661.50
07/13/2010	A-V	ONE: Run searches of documents. Review and classify documents to be sent to accountant for corporate formality project (2.0)	2.00	\$150.00
07/13/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (4.0)	4.00	\$300.00
07/13/2010	BAF	ONE: Reviewed, analyzed and categorized documents (6.4).	6.40	\$480.00
07/13/2010	DSN	ONE: Office conference with counsel regarding [REDACTED] (.4)	0.40	\$126.00
07/13/2010	F-S	ONE: Continue to look for specific documents in document system for Dan Newman (.7); Conference regarding certain document review project regarding finding documents relating to [REDACTED] Review correspondence from accountants regarding same (.9).	1.60	\$320.00
07/13/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/13/2010	J-E	ONE: Work on [REDACTED] (.5). E-mail to Mr. Chadwick seeking response (.2). Calls with lawyer for investors on stay and settlement issues. (.3). Call with Chadwick. (.2). Reviewed versions	1.70	\$535.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 7

		of revised proposed confidentiality agreements provided by Sun and conferred internally re same (.5).		
07/13/2010	J-G	ONE: Review and analyze local rules relating to filing of a related ancillary action.	0.10	\$25.00
07/13/2010	J-R	ONE: Telephone conferences and email correspondence with Xact Data regarding user activity on the review platform program (.2); Conference and correspondence with F. Segal regarding FYI user activity (.3)	0.50	\$75.00
07/13/2010	MTV	ONE: Review and provide comments on email from J. Chadwick; review and provide comments on proposed revised settlement provided by S. Gold	0.40	\$126.00
07/13/2010	MTV	ONE-Review and revise notice of related action; review local rules and discuss logistics of appropriate filing with J. Geldens	0.20	\$63.00
07/13/2010	P-B	ONE: Prepare exhibits for Complaint (No Charge).	1.50	\$0.00
07/14/2010	A-V	ONE: Review/ Analyze /Categorize electronic records and documents for discovery request (4.0)	4.00	\$300.00
07/14/2010	BAF	ONE: Reviewed, analyzed and categorized documents (7.9).	7.90	\$592.50
07/14/2010	DSN	ONE - Meet with counsel regarding claim against new parties (.5); Revise proposed confidentiality agreement to be sent to Sun in connection with settlement discussions. TWO Review correspondence from Leo-Deus' office (.2)	0.70	\$220.50
07/14/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.30	\$547.50
07/14/2010	J-E	ONE: [REDACTED] (1.0). Worked on confidentiality issues in response to Sun's demand and drafted, revised confidentiality agreement and sent to Sun's counsel (1.5). Call with Mr. Chadwick on confidentiality and meeting (.1). Internal conferences on settlement (.2)	2.80	\$882.00
07/14/2010	J-G	ONE: [REDACTED] (3.1); confer with J. Etra, M. Visiedo and the Receiver regarding the research and its analysis (.1).	3.20	\$800.00
07/14/2010	J-R	ONE: Reviewed on-line court docket (.1)	0.10	\$15.00
07/14/2010	MTV	ONE: [REDACTED]	3.50	\$1,102.50

Page 8

BOCA RATON • FT. LAUDERDALE • MIAMI • ORLANDO • TALLAHASSEE • TAMPA • WEST PALM BEACH

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 9

07/16/2010	MTV	ONE-Finalize notice of related action per conference; review revisions to confidentiality agreement; conference with counsel [REDACTED] [REDACTED]	1.20	\$378.00
07/17/2010	A-V	ONE: Run searches of documents. Review and classify documents to be sent to accountant for corporate formality project (4.5)	4.50	\$337.50
07/17/2010	G-S	ONE: Continued review of documents related to litigation and receivership	1.50	\$112.50
07/18/2010	BAF	ONE: Reviewed, analyzed and categorized documents (4.0).	4.00	\$300.00
07/18/2010	G-S	ONE: Continued review of documents related to litigation and receivership	2.00	\$150.00
07/19/2010	A-V	ONE: Run searches of documents. Review and classify documents to be sent to accountant for corporate formality project (4.5)	4.50	\$337.50
07/19/2010	BAF	ONE:Reviewed, analyzed and categorized documents (7.9).	7.90	\$592.50
07/19/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/19/2010	J-E	ONE: Correspondence with Sun's counsel on status of confidentiality agreement, reviewed and analyzed their latest proposal (1.5). Calls with SEC (.3). Correspondence with counsel for investors (.1).	1.90	\$598.50
07/19/2010	MTV	ONE-Conference regarding draft of confidentiality agreement; [REDACTED] [REDACTED]; conference with SEC; conferences with Receiver regarding draft of confidentiality agreement.	2.50	\$787.50
07/20/2010	A-V	ONE: Run searches of documents. Review and classify documents to be sent to accountant for corporate formality project (2.0)	2.00	\$150.00
07/20/2010	BAF	ONE: Reviewed, analyzed and categorized documents (7.9).	7.90	\$592.50
07/20/2010	DSN	ONE: Numerous office conferences with Jon Etra and review and analyze proposed confidentiality in connection with finalization of confidentiality agreement and strategy (.3).	0.30	\$94.50
07/20/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.00	\$525.00
07/20/2010	J-E	ONE: Worked on confidentiality agreement, including revisions and negotiations with Sun's counsel (1.0). Call with investor's counsel on	1.80	\$567.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 10

		settlement issues and conferred with Receiver re same (.5). Correspondence with Mr. Chadwick and worked on logistics of travel for meeting (.3).		
07/21/2010	BAF	ONE: Reviewed, analyzed and categorized documents (7.9).	7.90	\$592.50
07/21/2010	DSN	ONE: Office conference with Jon Etra regarding confidentiality agreement, motion to approve same, and meetings with Jim Chadwick (.4).	0.40	\$126.00
07/21/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/21/2010	J-E	ONE: Work on, finalize confidentiality agreement with Proskauer counsel (1.0). Work on trip to DC and materials to provide to Mr. Chadwick (.4).	1.40	\$441.00
07/21/2010	MTV	ONE: Draft motion for approval of settlement agreement and revise same to be submitted on an emergency basis	1.90	\$598.50
07/22/2010	BAF	ONE: Reviewed, analyzed and categorized documents (7.9).	7.90	\$592.50
07/22/2010	DSN	ONE: Prepare for meeting relating to potential settlement of Sun Litigation and review documents relating to same (.5).	0.50	\$157.50
07/22/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.00	\$525.00
07/22/2010	J-E	ONE: Preparation for meeting with investor representatives re settlement.	1.00	\$315.00
07/22/2010	MTV	ONE: Conference with J. Etra regarding motion for approval and revise same; finalize proposed order accordingly	1.00	\$315.00
07/23/2010	BAF	ONE: Reviewed, analyzed and categorized documents (4.0).	4.00	\$300.00
07/23/2010	DSN	ONE: Meet with counsel for investors and consultants in D.C. in connection with settlement negotiations to be had with Sun and numerous conferences with Jon Etra (5.0).	5.00	\$1,575.00
07/23/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.00	\$525.00
07/23/2010	J-E	ONE: Meetings with Receiver and with representatives of investor group re settlement in D.C. (5.0). Preparation for same (1.0). Internal discussion regarding meeting and reviewed materials from meeting (1.0)	7.00	\$2,205.00
07/24/2010	G-S	ONE: Continued review of documents related to litigation and receivership	1.00	\$75.00
07/25/2010	BAF	ONE: Reviewed, analyzed and categorized documents (8.0).	8.00	\$600.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 11

07/25/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.00	\$525.00
07/25/2010	P-B	ONE: Document management	3.00	\$0.00
07/26/2010	BAF	ONE: Reviewed, analyzed and categorized documents (8.0).	8.00	\$600.00
07/26/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/26/2010	J-E	ONE: Calls with counsel for different investor groups about confidentiality agreement requirements regarding settlement discussions (.5).	0.50	\$157.50
07/27/2010	BAF	ONE: Reviewed, analyzed and categorized documents (7.9).	7.90	\$592.50
07/27/2010	DSN	ONE: Conference with counsel regarding various tasks to be performed including but not limited to filing [REDACTED]	0.50	\$157.50
07/27/2010	G-S	ONE: Continued review of documents related to litigation and receivership	8.00	\$600.00
07/27/2010	J-E	ONE: Work on [REDACTED] (.4). Conference regarding settlement issues (.3). Call with Mr. Chadwick (.1).	0.80	\$252.00
07/27/2010	J-G	ONE: Confer with M. Visiedo regarding issues relating to location and requirements for filing amended complaint.	0.10	\$25.00
07/27/2010	MTV	ONE-Conference regarding initiation of lawsuit against downstream entities	0.30	\$94.50
07/28/2010	BAF	ONE: Reviewed, analyzed and categorized documents (7.9).	7.90	\$592.50
07/28/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.00	\$525.00
07/28/2010	P-B	ONE: Prepare summons for filing of new complaint (No Charge).	1.00	\$0.00
07/29/2010	BAF	ONE: Reviewed, analyzed and categorized documents (3.9).	3.90	\$292.50
07/29/2010	G-S	ONE: Continued review of documents related to litigation and receivership	7.70	\$577.50
07/30/2010	BAF	ONE: Reviewed, analyzed and categorized documents (3.9).	3.90	\$292.50
07/30/2010	G-S	ONE: Continued review of documents related to litigation and receivership	2.30	\$172.50
08/02/2010	J-E	ONE - conferred with receiver on settlement issues (.1).	0.10	\$31.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 12

08/03/2010	DSN	ONE - Telephone conference with Jon Etra and Jim Chadwick regarding status of settlement negotiations and related issues. (.5). Review correspondence from Karen Clark to Jon Etra regarding tolling agreement and office conferences with counsel relating to same. (.2)	0.70	\$220.50
08/03/2010	J-E	ONE - call with Mr. Chadwick regarding settlement issues and further intental discussions (.3). Call from investor counsel on settlement (.1). Call with Sun counsel on filing of new action against Sun principals and affiliate entities without affecting stay and settlement, confirming e-mail, and correspondence on possibility of tolling agreement (.5)	0.90	\$283.50
08/04/2010	DSN	ONE - Review correspondence between Jon Etra and investor relating to request to be include in Sun Confidentiality Agreement and confer with counsel regarding same.	0.20	\$63.00
08/05/2010	DSN	ONE - Telephone conference with Jim Chadwick and Jon Etra regarding status of settlement and related issues (.5); Office conference with Jon Etra and Mike Segal relating to Sun settlement and related issues (.2); Review correspondence from Karen Clark regarding tolling agreement (.2).	0.90	\$283.50
08/05/2010	J-E	ONE - Call with consultant on settlement/negotiation issues (.5). Meeting with Receiver and call with Mr. Chadwick regarding settlement issues (1.0). Worked on tolling agreement (.3).	1.80	\$567.00
08/06/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (No Charge).	2.80	\$0.00
08/06/2010	J-E	ONE - Correspondence with Proskauer on form confidentiality agreement for investors (.2).. Worked on tolling agreement (.3).	0.50	\$157.50
08/09/2010	J-E	ONE - worked on tolling agreement re Sun Principals and downstream entities (.2).	0.20	\$63.00
08/10/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (No Charge).	1.90	\$0.00
08/10/2010	J-E	ONE - Call with Mr. Chadwick on confidentiality agreement and e-mail to Sun's counsel re same (.3). Work on tolling agreement regarding claims against Sun Principals and downstream entities	0.50	\$157.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 13

		(.2).		
08/10/2010	MTV	ONE: Review and revise tolling agreement; transmit same to Proskauer	0.50	\$157.50
08/11/2010	J-E	ONE - Reviewed Ms. Clarke's proposed changes to tolling agreement and conferred with Ms. Visiedo. (.2)	0.20	\$63.00
08/12/2010	DSN	ONE - Review correspondence for tolling agreement, comment and review and analyze potential tolling agreement and communications with counsel regarding tolling agreement (.3).	0.30	\$94.50
08/12/2010	J-E	ONE - [REDACTED] [REDACTED] (.5). Revised form of investor confidentiality agreement based on prior correspondence and sent to Mr. Chadwick and Proskauer to confirm agreement (.3). Distributed agreed to form of confidentiality agreement to investors who asked for same, and follow up correspondence with Proskauer and others (.5).	1.30	\$409.50
08/12/2010	MTV	ONE-Review revisions to tolling agreement; attend to correspondences and conference with J. Etra regarding same; reject changes and draft cover email to K. Clarke regarding changes and need to file action; conference with P. Blackman regarding filing; respond to email from K. Clarke regarding anticipated response; conference with K. Clarke; confer with J. Etra and Receiver via email regarding agreement and problem gathering signatures	1.40	\$441.00
08/13/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (1.9).	1.90	\$380.00
08/13/2010	J-E	ONE - Conferences with Ms. Visiedo re tolling agreement negotiations (.3). Work on discovery issues (.2).	0.50	\$157.50
08/14/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project .	6.20	\$465.00
08/16/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (No Charge)	11.30	\$847.50
08/16/2010	DSN	ONE: Conference with counsel regarding discovery related issues in Sun Litigation (.2).	0.20	\$63.00
08/16/2010	F-S	ONE: Conduct targeted search for relevant	2.20	\$0.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 14

		documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (No Charge).		
08/17/2010	DSN	ONE - Office conference with J Etra regarding status of settlement negotiations (.2).	0.20	\$63.00
08/17/2010	J-E	ONE - correspondence with Mr. Chadwick, attempted conference call, brief call and plan for conference call the next day (.3).	0.30	\$94.50
08/17/2010	J-R	ONE: Telephone conference and correspondence with Xact regarding outstanding invoices (.2)	0.20	\$30.00
08/18/2010	DSN	ONE - Review correspondence to [REDACTED] regarding [REDACTED] (.1); Telephone conference with J. Etra and J. Chadwick regarding status of settlement negotiations (.5);	0.60	\$189.00
08/18/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (3.1).	3.10	\$620.00
08/18/2010	J-E	ONE - Conference call with Mr. Chadwick (.2). Additional calls with Receiver (.2).	0.40	\$126.00
08/19/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (3.3).	3.30	\$660.00
08/20/2010	DSN	ONE - Telephone conference with Dean Graham and Jim Chadwick regarding status of settlement negotiations and report to court to be filed (.9); Review correspondence and communication with counsel regarding motions to be filed in Sun Litigation regarding to extensions of discovery deadline in light of settlement negotiations (.2).	1.10	\$346.50
08/20/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (3.1).	3.10	\$620.00
08/20/2010	J-E	ONE - Conference call with Mr. Chadwick and Mr. Graham on settlement and due diligence issues and internal conferences with Receiver. (1.0).	1.00	\$315.00
08/21/2010	A-V	ONE-Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project	3.20	\$240.00
08/23/2010	DSN	ONE: Office conference with counsel regarding strategy with regard to discovery issues in light of	0.20	\$63.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 15

		stay (.2).		
08/23/2010	F-S	ONE: Conduct targeted search for relevant documents. Review, classify, print and organize relevant documents to be sent to accountant for corporate formality project (3.0).	3.00	\$600.00
08/26/2010	MAW	ONE-Research and obtain dockets for Lancelot; Symbio and Pacifica bankruptcy matters (No Charge)	0.80	\$0.00
08/27/2010	J-E	ONE - Call with counsel for investors on procedure re sharing information, on typo in confidentiality agreementl, and on remedy re same (.2).	0.20	\$63.00
08/27/2010	J-R	ONE: Telephone conference with Xact Data regarding reducing database size (.2)	0.20	\$30.00
08/27/2010	MTV	ONE-Draft motion to extend deadlines	1.50	\$472.50
08/31/2010	DSN	ONE: Conference with counsel regarding submission to be made to Court and review correspondence to and from opposing counsel regarding conference call to discuss same (.2).	0.20	\$63.00
08/31/2010	J-E	ONE - Conference with Receiver and Ms. Visiedo on various matters (1.0). Call from Mr. Chadwick and Mr. Graham on due diligence and the joint report (.3). Correspondence with Proskauer on joint report (.2).	1.50	\$472.50
08/31/2010	MTV	ONE-Attend meeting regarding pending items. Review docket and review case management report. Discuss deadlines with Receiver. Discuss production in response to subpoena re: SSR. Draft correspondence to SEC confirming extension of time to respond to subpoena.	1.50	\$472.50
09/01/2010	DSN	ONE: Telephone conference with counsel for Sun regarding joint report to be submitted to court and conference with counsel regarding same (.4); Review correspondence from accountants regarding letter to be sent to investors (.2); Review correspondence regarding investor counsel discussions regarding settlement (.1); Review correspondence from Karen Clarke and review draft correspondence from Michelle Visiedo to counsel for Sun and conference with Michelle Visiedo regarding same (.1).	0.80	\$252.00
09/01/2010	J-E	ONE - Teleconferences with Proskauer and Mr. Chadwick on settlement issues and joint report, and conferences with Receiver re same (1.0). Correspondence with Proskauer regarding the manner of their communications with investors (.1).	1.10	\$346.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 16

09/01/2010	MTV	ONE: Conference call with S. Gold and K. Clarke regarding joint report. Draft confirmatory correspondence to Sun's counsel regarding case management order and existing discovery deadline.	0.60	\$189.00
09/02/2010	DSN	ONE: Review correspondence from Karen Clark regarding status of settlement negotiations (.2)	0.20	\$63.00
09/02/2010	J-E	ONE - Reviewed report from Investor Group's financial advisor and call with counsel for same (.7). Reviewed Proskauer's draft joint report on settlement/stay status and conferred on same (.3)	1.00	\$315.00
09/02/2010	MTV	ONE: Review draft joint notice. Revise same.	1.00	\$315.00
09/03/2010	DSN	ONE: Telephone conference with Dean G. and counsel relating to status of settlement negotiations and items to be performed (.5); Review and revise proposed disclosure documents to be sent to court (.5).	1.00	\$315.00
09/03/2010	J-E	ONE: Correspondence and conferences with Mr. Chadwick and Mr. Graham (.4). Worked on joint report on status of settlement and stay (.8). Conferred with health care counsel on settlement issues (.2).	1.40	\$441.00
09/03/2010	MTV	ONE: Attend to emails and revisions to proposed joint notice; attend to correspondences from investors; attend teleconference with investor group's consultant regarding status; meeting with Receiver regarding Joint Notice per update from investor group's consultant.	5.40	\$1,701.00
09/05/2010	MTV	ONE: Draft brief update to post on receivership website.	0.80	\$252.00
09/06/2010	J-E	ONE - E-mail correspondence and call with Mr. Graham and reported on same to Receiver and other counsel (.4). Reviewed Sun's proposed changes to joint report and provided comments (.2).	0.60	\$189.00
09/06/2010	MTV	ONE: Review Proskauer's proposed changes. Revise same. Attend to emails relating to settlement.	2.10	\$661.50
09/07/2010	DSN	ONE: Review, revise and conference with counsel regarding Sun and Receiver joint settlement disclosure.	0.30	\$94.50
09/07/2010	J-E	ONE - Work on response to latest comments from Sun's counsel on draft joint notice and negotiations with Sun (1.5).	1.50	\$472.50
09/07/2010	J-R	ONE: Electronically filed via CM/ECF the Parties' Joint Notice Concerning Settlement Status	0.40	\$60.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 17

		(.4)		
09/07/2010	MTV	ONE: Attend to negotiation and finalization of joint notice	3.10	\$976.50
09/08/2010	J-E	ONE - E-mail to and call with investor regarding settlement issues (.3). Sent a copy of the parties joint report on settlement to Mr. Chadwick on correspondence with same. (.2). Call from counsel for rejected Texas interveners on moving to abate appeal due to settlement discussions, consented to same, and review of filed motion to that effect (.3).	0.80	\$252.00
09/08/2010	J-R	ONE: Correspondence with accountants regarding FYI review program (.2); Discussion with J. Etra regarding documents requested by attorneys (.2)	0.40	\$60.00
09/09/2010	J-R	ONE: Discussion with A. Vanegas regarding Gunlicks documents and investor reports (.2)	0.20	\$30.00
09/10/2010	J-E	ONE - reviewed Judge Steele's Order on extending stay and sent same to Mr. Chadwick (.2).	0.20	\$63.00
09/14/2010	J-E	ONE - Review of due diligence data room (.2) Reviewed Focus management agreement re due diligence (.2). Work on addendum to agreement (.3)	0.70	\$220.50
09/15/2010	J-E	ONE Call with Mr. Chadwick on numerous issues and e-mail to file on same (.6). [REDACTED] (.3).	0.90	\$283.50
09/16/2010	DSN	ONE: Review correspondence from Jonathan Etra regarding settlement and conversations with Jonathan Etra regarding same and strategy.	0.30	\$94.50
09/16/2010	J-R	ONE: Correspondence to J. Chadwick regarding requested documents (.1)	0.10	\$15.00
09/16/2010	MTV	ONE-Review joint notice and draft email to C. Short regarding same.	0.30	\$94.50
09/17/2010	O-P	ONE: Pulled and printed due diligence material from the Sun data room (3.8).	3.80	\$570.00
09/20/2010	O-P	ONE: Upload documents pulled from Sun Data Room and prepare NetBinder of same; grant access to NetBinder for numerous users.	1.80	\$270.00
09/24/2010	J-E	ONE - Meeting with investors on settlement status issues, preparation for same and follow up internal conferences (2.0).	2.00	\$630.00

TOTAL PROFESSIONAL CHARGES \$78,262.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 18

TIMEKEEPER SUMMARY

DSN	Daniel S. Newman, PA	20.70	hrs @	\$315.00	per hour	\$6,520.50
J-E	Jonathan Etra	47.50	hrs @	\$315.00	per hour	\$14,962.50
MTV	Michelle T. Visiedo-Hidalgo	42.60	hrs @	\$315.00	per hour	\$13,419.00
J-G	Jeffery Geldens	11.10	hrs @	\$250.00	per hour	\$2,775.00
F-S	Frederick Segal	31.10	hrs @	\$200.00	per hour	\$6,220.00
A-V	Adriana Vanegas	100.90	hrs @	\$75.00	per hour	\$7,567.50
G-S	Georgianne Sims	175.50	hrs @	\$75.00	per hour	\$13,162.50
BAF	Bilal A. Faruqui	165.00	hrs @	\$75.00	per hour	\$12,375.00
O-P	Omar Pelea	5.60	hrs @	\$150.00	per hour	\$840.00
J-R	Junelle Rodriguez	2.30	hrs @	\$150.00	per hour	\$345.00
P-B	Patricia Blackman	.50	hrs @	\$150.00	per hour	\$75.00

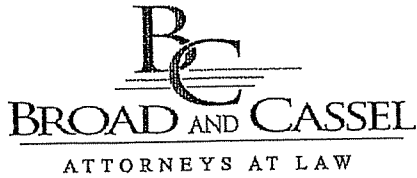
TIMEKEEPER TOTAL \$78,262.00

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

Page 19

ITEMIZED EXPENSES

07/22/2010	Travel, Airfare from DCA to MIA on 07/22/2010 - VENDOR:Jonathan Etra	\$641.40
07/23/2010	Travel, Cab Fare - VENDOR:Jonathan Etra	\$30.00
07/23/2010	Other Costs, Meals - VENDOR:Jonathan Etra	\$40.10
07/23/2010	Other Costs, Meals - VENDOR:Jonathan Etra	\$56.20
07/23/2010	Other Costs, Meals - VENDOR:Jonathan Etra	\$5.13
07/24/2010	Travel, Hotel Arrival Date: 07/22/2010 Departure Date: 07/23/2010 - VENDOR:Jonathan Etra	\$233.61
07/26/2010	FedEx Tracking # 798885167837 Scot C. Stirling Beus Gilbert 4800 N SCOTTSDALE RD STE 6000 SCOTTSDALE AZ 85251	\$18.07
	Parking	\$19.00
	Long Distance Telephone	\$10.36
	Online Research	\$58.16
	Photocopies	\$77.35
	Total Expenses	<u>\$1,189.38</u>



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9400
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

October 29, 2010
Invoice No.: 808775

STATEMENT OF ACCOUNT

Matter Name: Texas Litigation
Client/Matter No: 43125.0003
Billing Attorney: Daniel S. Newman, PA

Previous Balance		\$25,205.81
Payments Received		(17,306.71)
Subtotal of Previous Balance		\$7,899.10
Professional Charges (detail attached)	\$2,236.50	
Expenses (detail attached)	0.28	
Subtotal of Current Charges		\$2,236.78
TOTAL BALANCE DUE (Previous and current balance)		\$10,135.88

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR
PAYMENT

BOCA RATON • FT. LAUDERDALE • MIAMI • ORLANDO • TALLAHASSEE • TAMPA • WEST PALM BEACH

Re: Daniel S. Newman, Receiver
Texas Litigation
43125.0003

Page 3

ITEMIZED PROFESSIONAL CHARGES

04/14/2010	J-E	ONE - Correspondence with local counsel and meet and confer with Plaintiff's counsel on need for stay order.	0.20	\$63.00
04/15/2010	DSN	Office conference with Jonathan Etra and Michelle Visiedo Hidalgo regarding strategy in light of [REDACTED].	0.50	\$157.50
04/15/2010	J-E	ONE - correspondence with local counsel and attempted correspondence with counsel for Texas plaintiffs on ensuring that the trial was stayed or continued (.3). Internal discussions re same and work on motion to enforce non-suit order (1.0).	1.30	\$409.50
04/16/2010	J-E	ONE - work on motion to for contempt and sanctions to be filed in Federal Court and local counsel's motion and efforts to continue trial (4.1). Follow up withdrawal of notice of motion and resolution of matter and calls with Texas counsel (.5).	4.60	\$1,449.00
04/20/2010	DSN	Review correspondence from local Texas counsel regarding Order (.1); review correspondence from Receiver's counsel regarding same (.1).	0.20	\$63.00
04/20/2010	J-E	ONE - Reviewed order staying action and forwarded to Mr. Gulicks's counsel.	0.10	\$31.50
05/14/2010	J-E	ONE - Correspondence with local counsel on Sun appeal issue (.2).	0.20	\$63.00

TOTAL PROFESSIONAL CHARGES **\$2,236.50**

TIMEKEEPER SUMMARY

DSN	Daniel S. Newman, PA	.70 hrs @	\$315.00	per hour	\$220.50
J-E	Jonathan Etra	6.40 hrs @	\$315.00	per hour	<u>\$2,016.00</u>

TIMEKEEPER TOTAL **\$2,236.50**

BROAD AND CASSEL
ATTORNEYS AT LAW

Re: Daniel S. Newman, Receiver
Texas Litigation
43125.0003

Page 4

ITEMIZED EXPENSES

06/30/2010	Long Distance Telephone	<u>\$0.28</u>
Total Expenses		<u>\$0.28</u>



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9400
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

October 29, 2010
Invoice No.: 808776

STATEMENT OF ACCOUNT

Matter Name: Bermuda Litigation
Client/Matter No: 43125.0004
Billing Attorney: Daniel S. Newman, PA

Previous Balance		\$34,583.45
Payments Received		(22,026.60)
Subtotal of Previous Balance		<u>\$12,556.85</u>
Professional Charges (detail attached)	\$5,454.50	
Expenses (detail attached)	<u>0.00</u>	
Subtotal of Current Charges		<u>\$5,454.50</u>
TOTAL BALANCE DUE (Previous and current balance)		\$18,011.35

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR
PAYMENT

BOCA RATON • FT. LAUDERDALE • MIAMI • ORLANDO • TALLAHASSEE • TAMPA • WEST PALM BEACH

Re: Daniel S. Newman, Receiver
Bermuda Litigation
43125.0004

Page 3

ITEMIZED PROFESSIONAL CHARGES

04/01/2010	DSN	ONE-Draft correspondence to Bermuda counsel regarding [REDACTED] (.1); draft correspondence to Ian Stokoe regarding Bermuda account balance (.1); review correspondence from Ian Stokoe regarding same (.1).	0.30	\$94.50
04/05/2010	DSN	ONE-Review correspondence from Susie Wakefield (.1); draft correspondence to Jeff Geldens regarding same and conversation with Jeff Geldens regarding contact to Susie Wakefield (.1).	0.20	\$63.00
04/06/2010	DSN	ONE-Telephone conference with Susie Wakefield and review [REDACTED] from Susie Wakefield (.3); office conference with Jeff Geldens regarding same (.1); draft correspondence relating to motion to approve protocol (.1); draft correspondence to Ian Stokoe relating to motion to approve protocol (.1); review correspondence from Ian Stokoe regarding same (.1).	0.70	\$220.50
04/06/2010	J-G	ONE Review and analyze additions, and prepare additions, to motion to approve protocol, including review of bank statements and various conferences with the Receiver and Cayman counsel regarding the protocol by phone and email.	1.50	\$375.00
04/14/2010	DSN	ONE-Review correspondence from Ian Stokoe regarding protocol (.2); draft correspondence to Ian Stokoe regarding protocol (.1); review correspondence from Susie Wakefield regarding [REDACTED] (.1); draft correspondence to Susie Wakefield regarding [REDACTED] and [REDACTED] (.1); review response emails from Ian Stokoe relating to protocol (.2).	0.70	\$220.50
04/14/2010	J-E	ONE - Reviewed correspondence from counsel for JPLs on protocol and conferred with Receiver (.2).	0.20	\$63.00
04/15/2010	DSN	ONE-Draft correspondence to Ian Stokoe and Bermuda counsel regarding communications pertaining to protocol.	0.20	\$63.00
04/20/2010	DSN	ONE-Review correspondence from Ian Stokoe regarding protocol (.1); draft correspondence to Ian Stokoe regarding protocol (.1).	0.20	\$63.00
04/21/2010	DSN	ONE-Telephone conference with Bermuda counsel regarding [REDACTED] correspondence pertaining to [REDACTED] (.2); telephone conference	0.60	\$189.00

Re: Daniel S. Newman, Receiver
Bermuda Litigation
43125.0004

Page 4

		with Ian Stoke regarding obtaining hearing on protocol and proposed agreement relating to investor claim for alleged redemption based on suspension (.2); office conference with Jonathan Etra regarding [REDACTED] (.1); review order regarding protocol and correspondence relating to same (.1).		
04/22/2010	DSN	ONE-Review correspondence from Ian Stokoe regarding Cayman court hearing.	0.20	\$63.00
04/23/2010	DSN	ONE-Telephone conference with Ian Stokoe regarding Cayman court action.	0.30	\$94.50
04/27/2010	DSN	ONE-Conference with counsel regarding filing of court relating to [REDACTED] (.2).	0.20	\$63.00
04/28/2010	DSN	ONE-Draft correspondence to Ian Stokoe regarding sealed order from Cayman court and review correspondence from Ian Stokoe regarding same (.3); review correspondence from Bermuda counsel regarding [REDACTED] (.1); draft correspondence to Bermuda counsel regarding [REDACTED] (.1).	0.50	\$157.50
04/28/2010	J-G	ONE: Analyze the Cayman protocol and confer with the Receiver regarding the changes to be provided to the Court (1.6); prepare additions to protocol motion relevant to changes (.6).	2.20	\$550.00
04/29/2010	DSN	ONE-Draft correspondence to Ian Stokoe regarding Cayman court order (.2); review correspondence from Ian Stokoe (.1).	0.30	\$94.50
05/10/2010	J-G	ONE-Follow-up with the Receiver and make additions to draft motion to approve Cayman protocol (.5).	0.50	\$125.00
05/13/2010	DSN	ONE-Review correspondence from Susie Wakefield regarding [REDACTED] and [REDACTED].	0.10	\$31.50
05/14/2010	DSN	ONE-Review correspondence relating to Sun appeal; review correspondence between Jonathan Etra and Gregory Whittmore, Texas counsel.	0.20	\$63.00
05/17/2010	DSN	ONE-Review correspondence from Susie Wakefield regarding [REDACTED] and draft correspondence to Susie Wakefield regarding same (.1).	0.10	\$31.50
05/20/2010	DSN	ONE-Revise supplement to [REDACTED] motion (.8); conferences with Jeff Geldens regarding same (.2).	1.00	\$315.00
05/20/2010	J-G	ONE-Review documents and confer with the Receiver regarding the [REDACTED].	0.70	\$175.00
05/21/2010	J-G	ONE-Review materials and prepare relevant	1.90	\$475.00

BROAD AND CASSEL
ATTORNEYS AT LAW

Re: Daniel S. Newman, Receiver
Bermuda Litigation
43125.0004

Page 5

		additions to protocol motion.		
05/24/2010	DSN	ONE-Revise motion to adopt new protocol and conferences with Jeff Geldens regarding same (.7); review correspondence from Ian Stokoe (.1).	0.80	\$252.00
05/24/2010	J-G	ONE-Review protocol and prepare additions for filing with the Court.	2.30	\$575.00
05/25/2010	DSN	ONE-Conference with Jeff Geldens regarding amendment to [REDACTED] motion and review proposed amendment to [REDACTED] motion.	0.40	\$126.00
05/26/2010	DSN	ONE-Telephone conference with Susie Wakefield regarding revised protocol (.3); review comments from Susie Wakefield regarding motion to court for [REDACTED] (.1); review correspondence from Simon Dickson (.1).	0.50	\$157.50
05/27/2010	DSN	ONE-Draft correspondence to Simon Dickson.	0.10	\$31.50
06/09/2010	J-G	ONE-Review additions suggested by Cayman counsel and prepare additional elements of motion to approve protocol.	0.90	\$225.00
06/10/2010	DSN	ONE-Draft correspondence to Simon Dickson regarding protocol (.2); office conference with Jeff Geldens regarding [REDACTED] protocol (.2).	0.40	\$126.00
06/14/2010	DSN	ONE-Review correspondence from Ian Stokoe and draft correspondence to Ian Stokoe (.1)	0.10	\$31.50
06/15/2010	DSN	ONE-Telephone conference with John Etra and Ian Stokoe regarding various facts related issues and Defendant's Motion to Stay litigation. (.5)	0.50	\$157.50
06/16/2010	DSN	ONE-Office conference with Jeffrey Gelden regarding issues pertaining to the Bermuda litigation and strategy relating to same. (.2)	0.20	\$63.00
06/16/2010	J-G	ONE: Follow-up with Cayman counsel and the Receiver regarding [REDACTED] issue (.1).	0.10	\$25.00
06/21/2010	DSN	ONE-Draft correspondence to Simon Dickson (.1)	0.10	\$31.50
06/23/2010	DSN	ONE-Conference with Kehinde George regarding strategy (.2)	0.20	\$63.00

TOTAL PROFESSIONAL CHARGES \$5,454.50

TIMEKEEPER SUMMARY

DSN	Daniel S. Newman, PA	9.10	hrs @	\$315.00	per hour	\$2,866.50
J-E	Jonathan Etra	.20	hrs @	\$315.00	per hour	\$63.00
J-G	Jeffery Geldens	10.10	hrs @	\$250.00	per hour	\$2,525.00

BROAD AND CASSEL
ATTORNEYS AT LAW

Re: Daniel S. Newman, Receiver
Bermuda Litigation
43125.0004

Page 6

TIMEKEEPER TOTAL \$5,454.50

Totals	19.40 hrs @	per hour	<u>\$5,454.50</u>
--------	-------------	----------	-------------------



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9400
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

February 24, 2011
Invoice No.: 819528

STATEMENT OF ACCOUNT

Matter Name: Bermuda Litigation
Client/Matter No: 43125.0004
Billing Attorney: Daniel S. Newman, PA

Previous Balance		\$18,011.35
Payments Received		
Previous Balance Adjustments		(157.50)
Subtotal of Previous Balance		<u>\$17,853.85</u>
Professional Charges (detail attached)	\$4,961.00	
Expenses (detail attached)	<u>0.00</u>	
Subtotal of Current Charges		<u>\$4,961.00</u>
TOTAL BALANCE DUE (Previous and current balance)		\$22,814.85

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR
PAYMENT

BOCA RATON • FT. LAUDERDALE • MIAMI • ORLANDO • TALLAHASSEE • TAMPA • WEST PALM BEACH

Re: Daniel S. Newman, Receiver
Bermuda Litigation
43125.0004

Page 3

ITEMIZED PROFESSIONAL CHARGES

07/06/2010	J-G	ONE-Update the Receiver regarding counsel motion and protocol (.1); review and revise counsel motion and protocol document (.1).	0.20	\$50.00
07/08/2010	DSN	ONE-Draft correspondence to Simon D. regarding protocol.	0.10	\$31.50
07/09/2010	DSN	ONE - Review correspondence from Simon Dixon and office conference with Jeffrey Geldens [REDACTED]	0.40	\$126.00
07/09/2010	J-G	ONE-Follow-up with S. Dickson regarding protocol, confer with the Receiver, and analyze issues raised by new draft protocol.	0.50	\$125.00
07/12/2010	J-E	ONE -Work on agreement with JPL's (.3)	0.30	\$94.50
07/12/2010	J-G	ONE-Follow-up in connection with protocol motion, including review and analysis of new draft and issues relating to Court approval, as well as conferences with the Receiver and attempts to contact opposing counsel in connection with the protocol motion.	0.50	\$125.00
07/13/2010	DSN	ONE-Conference with counsel regarding protocol (.1)	0.10	\$31.50
07/13/2010	J-G	ONE: Follow-up on issues relating to Cayman protocol.	0.10	\$25.00
07/14/2010	DSN	ONE-Telephone conference with Simon D. regarding status (.1); Office conference with Jeffrey Geldens regarding actions to be taken (.2).	0.30	\$94.50
07/14/2010	J-G	ONE: Follow-up with S. Dickson regarding the protocol.	0.10	\$25.00
07/15/2010	DSN	ONE - Telephone conference with Simon D. regarding protocol (.2); Draft correspondence to Simon Dixon regarding protocol (.1). Office conferences with Jeffrey Geldens regarding Motion to Approve Revised Protocol (.2).	0.50	\$157.50
07/16/2010	J-G	ONE-Confer with S. Diskson and the Receiver, and prepare new draft of motion to approve the protocol.	0.90	\$225.00
07/19/2010	DSN	ONE-Review correspondence from Ian Stokoe regarding status of protocol related issues (.1)	0.10	\$31.50
07/19/2010	J-G	ONE-Follow-up with S. Dickson regarding protocol (.1); review correspondence from Cayman JPLs regarding protocol (.1).	0.20	\$50.00
07/22/2010	J-R	FOUR: Correspondence to R. Mills and S. Stirling regarding log-ins and passwords for FYI Concordance program (.2); Prepared materials	0.60	\$90.00

Re: Daniel S. Newman, Receiver
Bermuda Litigation
43125.0004

Page 4

		needed by R. Mills and S. Stirling (.2); Telephone conference with hotel regarding hotel reservations (.1); Correspondence to J. Etra and D. Newman regarding hotel accommodations (.1)(No Charge)		
07/26/2010	DSN	ONE-Review Standardized Fund Accounting and forward same to Ian Anderson (.3)	0.30	\$94.50
07/26/2010	DSN	FOUR - Review memorandum from Gene Crick and draft correspondence to Gene C. regarding same (.4); Office conferences with counsel regarding various issues to be performed in connection with settlement discussions(.3); Review correspondence from Carlton Fields, counsel for William Gunlicks regarding payments; Review applicable Motion and Order; office conferences regarding payment regarding deposit related issue (.4). Forward prior quarters of Standardized Fund Accounting Reports to Ian Anderson and draft correspondence to Ian Anderson regarding same (.1).	1.20	\$378.00
07/27/2010	J-G	ONE: Follow-up with J. Etra and the Receiver regarding Cayman Protocol.	0.10	\$25.00
08/10/2010	DSN	ONE-Draft correspondence to Ian Stokoe regarding status of protocol.	0.40	\$126.00
08/10/2010	J-E	ONE - Conferred with Receiver and call with Bermuda counsel (.2).	0.20	\$63.00
08/11/2010	DSN	ONE-Review correspondence from Ian Stokoe and draft correspondence to Ian Stokoe regarding meeting (.1).	0.10	\$31.50
08/12/2010	J-E	ONE - correspondence to set up conference call with JPLs and arranged for call for tomorrow morning (.3).	0.30	\$94.50
08/13/2010	J-E	ONE-Conference call with JPL and counsel (.5). Call with Receiver re same (.2). Follow up correspondence attempting to schedule call with greater participation (.2).	0.90	\$283.50
08/17/2010	DSN	ONE-Telephone conference with Kehide George regarding strategy in connection with Bermuda action (.3); Office conference with J Etra in connection with strategy for proceeding with Bermuda and for protocol. (.2).	0.50	\$157.50
08/17/2010	J-E	ONE - Internal conferences and call with Bermuda counsel (.8)	0.80	\$252.00
08/18/2010	J-E	ONE - Conferences with Receiver (.1).	0.10	\$31.50
08/19/2010	DSN	ONE-Telephone conference with Ian Stokoe regarding protocol and related issues (.3)	0.30	\$94.50
09/02/2010	DSN	ONE-Draft correspondence to Ian S. regarding	0.20	\$63.00

Re: Daniel S. Newman, Receiver
Bermuda Litigation
43125.0004

Page 5

		meeting with creditors committee (.1); Review correspondence from Ian S. regarding same (.1).		
09/07/2010	DSN	ONE-Review correspondence from JPL.	0.10	\$31.50
09/12/2010	J-E	ONE - Call with Receiver and prepared for conference with Global fund steering committee. (.5).	0.50	\$157.50
09/13/2010	DSN	ONE - Prepare for and attend conference call regarding Global Fund (2.5).	2.50	\$787.50
09/13/2010	J-E	ONE - Reviewed relevant filings in connection with the Joint Provisional Liquidators and protocol (.3). Conferred with Receiver in advance on conference call with Joint Provisional Liquidators and his Creditors Committee (.4). Conference call with Joint Provisional Liquidators and Creditors Committee (2.0). Follow up review with Receiver. (.3).	3.00	\$945.00
09/22/2010	J-E	ONE - call with Bermuda counsel and follow up (.2).	0.20	\$63.00
TOTAL PROFESSIONAL CHARGES				<u>\$4,961.00</u>

TIMEKEEPER SUMMARY

DSN	Daniel S. Newman, PA	7.10	hrs @	\$315.00	per hour	\$2,236.50
J-E	Jonathan Etra	6.30	hrs @	\$315.00	per hour	\$1,984.50
J-G	Jeffery Geldens	2.60	hrs @	\$250.00	per hour	\$650.00
J-R	Junelle Rodriguez	.60	hrs @	\$150.00	per hour	\$90.00
TIMEKEEPER TOTAL						<u>\$4,961.00</u>



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9400
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

October 29, 2010
Invoice No.: 808777

STATEMENT OF ACCOUNT

Matter Name: Mayer Brown, LLP
Client/Matter No: 43125.0005
Billing Attorney: Daniel S. Newman, PA

Previous Balance		\$0.00
Payments Received		
Subtotal of Previous Balance		<u>\$0.00</u>
Professional Charges (detail attached)	\$2,445.00	
Expenses (detail attached)	<u>0.00</u>	
Subtotal of Current Charges		<u>\$2,445.00</u>
TOTAL BALANCE DUE (Previous and current balance)		\$2,445.00

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR
PAYMENT

BOCA RATON • FT. LAUDERDALE • MIAMI • ORLANDO • TALLAHASSEE • TAMPA • WEST PALM BEACH

Re: Daniel S. Newman, Receiver
Mayer Brown, LLP
43125.0005

Page 3

ITEMIZED PROFESSIONAL CHARGES

05/18/2010	A-V	ONE-Research in preparation for [REDACTED] complaint (7.6)	7.60	\$570.00
05/19/2010	A-V	ONE-Research in preparation for [REDACTED] complaint (8.6)	8.60	\$645.00
05/20/2010	A-V	ONE-Research in preparation for [REDACTED] complaint (8.0)	8.00	\$600.00
05/21/2010	A-V	ONE-Research in preparation for [REDACTED] complaint (5.0)	5.00	\$375.00
05/26/2010	A-V	ONE-Review documents and email communications for [REDACTED] lawsuit (3.4)	3.40	\$255.00

TOTAL PROFESSIONAL CHARGES \$2,445.00

TIMEKEEPER SUMMARY

A-V	Adriana Vanegas	32.60 hrs @	\$75.00	per hour	<u>\$2,445.00</u>
-----	-----------------	-------------	---------	----------	-------------------

TIMEKEEPER TOTAL \$2,445.00

BERKOWITZ DICK POLLACK & BRANT

Founding Partners Receivership
Detailed Time Description

WC	Staff Name	Date	Time Description	Hours	Rate	Amount
6035000-Tax Issues	Adam Lang	4/1/10	Analysis of K-1 received for 2009 tax return; analysis of SunTrust bank statements for tax return purposes	0.40	250.00	\$ 100.00
6010000-Asset Analysis and Recovery	Adam Lang	4/2/10	Investigation of investor contribution in SVFI; respond to investor requests for information	0.30	250.00	75.00
6035000-Tax Issues	Adam Lang	4/6/10	Analysis and calculation of SCHI loan principal and accrued interest based on principal repayments in 2008	3.20	250.00	800.00
6035000-Tax Issues	David Siegel	4/6/10	Analysis of cash receipts from Sun Capital and preparation of schedule.	0.90	300.00	270.00
6010000-Asset Analysis and Recovery	David Siegel	4/7/10	Conference call with Receiver, analysis of documents, preparation of email.	0.50	300.00	150.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/7/10	Review and analysis of email database	0.90	150.00	135.00
6032000-Preparation and Review of Report	Adam Lang	4/8/10	Assistance with write up for 1st quarter 2010 for preparation of Receiver's report	0.40	250.00	100.00
6010000-Asset Analysis and Recovery	David Siegel	4/8/10	[REDACTED]. Conference calls with Receiver's paralegal.	1.10	300.00	330.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/8/10	Analysis of lock box accounts and preparation of detailed work papers	3.80	150.00	570.00
6032000-Preparation and Review of Report	Sharon Foote	4/8/10	Preparation of quarterly receivership report.	0.90	195.00	175.50
6010000-Asset Analysis and Recovery	Adam Lang	4/9/10	[REDACTED] correspondence with counsel	0.20	250.00	50.00
6010000-Asset Analysis and Recovery	David Siegel	4/9/10	[REDACTED]	0.90	300.00	270.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/9/10	Review and analysis of email database and work papers.	1.20	150.00	180.00
6010000-Asset Analysis and Recovery	David Siegel	4/12/10	[REDACTED]	1.90	300.00	570.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/12/10	Analysis of HVF investment in Dodge Oil and Gas. Review of SunTrust Lock Box Weekly Deposit Reports.	1.60	150.00	240.00
6032000-Preparation and Review of Report	Sharon Foote	4/12/10	Preparation of quarterly receivership report.	5.60	195.00	1,092.00
6010000-Asset Analysis and Recovery	David Siegel	4/13/10	Review of documents, conference call with Receiver's Counsel.	0.40	300.00	120.00
6010000-Asset Analysis and Recovery	Marie Torossian	4/13/10	Organized hard copy files into binders. Data entry into excel.	7.40	95.00	703.00
6010000-Asset Analysis and Recovery	Martin Prinsloo	4/13/10	[REDACTED] Reviewed binder contents to determine organization and structure.	7.40	250.00	1,850.00
6010000-Asset Analysis and Recovery	Gary Rosenthal	4/14/10	Review letter from Vince regarding request of receiver to allow construction borrowing on new long-term facility and follow up with Jonathan Etra	0.30	300.00	90.00
6010000-Asset Analysis and Recovery	Marie Torossian	4/14/10	Preparation of document index.	8.10	95.00	769.50
6010000-Asset Analysis and Recovery	Martin Prinsloo	4/14/10	Supervise and review [REDACTED] organization and indexing.	2.30	250.00	575.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/14/10	Updating SunTrust Lock Box database.	0.90	150.00	135.00
6010000-Asset Analysis and Recovery	Adam Lang	4/15/10	Review of 1st quarter 2010 receiver's report	0.90	250.00	225.00
6010000-Asset Analysis and Recovery	Marie Torossian	4/15/10	Preparation of document index, organize documents.	6.70	95.00	636.50
6010000-Asset Analysis and Recovery	Martin Prinsloo	4/15/10	Supervise and review [REDACTED] organization and indexing.	3.70	250.00	925.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/16/10	Reviewing and updating SVF, SVFI, and HVF investor information.	0.70	150.00	105.00
6010000-Asset Analysis and Recovery	Marie Torossian	4/19/10	Preparation of document index, organize documents.	6.30	95.00	598.50
6010000-Asset Analysis and Recovery	Martin Prinsloo	4/19/10	Supervise and review [REDACTED] organization and indexing.	1.80	250.00	450.00
6010000-Asset Analysis and Recovery	Sharon Foote	4/19/10	Review of [REDACTED] production, preparation of work papers.	7.40	195.00	1,443.00
6010000-Asset Analysis and Recovery	David Siegel	4/22/10	Analysis of [REDACTED] papers.	1.90	300.00	570.00
6010000-Asset Analysis and Recovery	Martin Prinsloo	4/22/10	Discussed indexed [REDACTED] Reviewed selected work papers related to investments.	2.20	250.00	550.00
6010000-Asset Analysis and Recovery	Martin Prinsloo	4/22/10	Update index of [REDACTED] based on discussion and review of binder organization bates ranges and format.	1.50	250.00	375.00
6010000-Asset Analysis and Recovery	Gary Rosenthal	4/23/10	Discuss potential [REDACTED]	0.90	300.00	270.00
6010000-Asset Analysis and Recovery	Sharon Foote	4/23/10	Review of [REDACTED] preparation of work papers.	6.60	195.00	1,287.00
6010000-Asset Analysis and Recovery	Shea Smith	4/23/10	Analysis of [REDACTED] identification of audit issues.	1.20	250.00	300.00
6010000-Asset Analysis and Recovery	Shea Smith	4/24/10	Analysis of [REDACTED] Identification of audit issues.	1.30	250.00	325.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/26/10	Analysis of lock box accounts and preparation of detailed work papers	2.80	150.00	420.00
6010000-Asset Analysis and Recovery	David Siegel	4/27/10	Analysis of [REDACTED] papers.	1.10	300.00	330.00
6010000-Asset Analysis and Recovery	Gary Rosenthal	4/27/10	Review [REDACTED] for issues relating to Sun Healthcare valuations and related audit issues on Founding Partners	1.10	300.00	330.00
6010000-Asset Analysis and Recovery	Martin Prinsloo	4/27/10	Discussed indexed [REDACTED] Reviewed index and selected work papers. Update index in preparation for further analysis.	2.80	250.00	700.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/27/10	Preparation and production of investor work papers per Broad and Cassel request	0.40	150.00	60.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/27/10	RCP tax analysis	0.50	150.00	75.00

Founding Partners Receivership
Detailed Time Description

WC	Staff Name	Date	Time Description	Hours	Rate	Amount
6010000-Asset Analysis and Recovery	Shea Smith	4/27/10	Analysis of [REDACTED] identification of audit issues.	7.40	250.00	1,850.00
6010000-Asset Analysis and Recovery	Adam Lang	4/28/10	Analysis of investor clawbacks; correspondence with counsel	1.20	250.00	300.00
6010000-Asset Analysis and Recovery	David Siegel	4/28/10	Analysis of work papers and financial statements. Conference call with Receiver, preparation of work plans.	1.90	300.00	570.00
6010000-Asset Analysis and Recovery	David Siegel	4/28/10	Preparation of document request.	2.10	300.00	630.00
6010000-Asset Analysis and Recovery	Shea Smith	4/28/10	Analysis of [REDACTED] identification of audit issues.	8.10	250.00	2,025.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/29/10	Review and analysis of email database and preparation of work papers	0.80	150.00	120.00
6010000-Asset Analysis and Recovery	Shea Smith	4/29/10	Analysis of [REDACTED] identification of audit issues.	6.70	250.00	1,675.00
6010000-Asset Analysis and Recovery	David Siegel	4/30/10	Analysis of [REDACTED], AUP report and financial	4.10	300.00	1,230.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/30/10	Review and analysis of investor information, updating work papers, providing investor letters per Broad and Cassel request	0.90	150.00	135.00
6010000-Asset Analysis and Recovery	Rachel Merritt	4/30/10	Review of recent production, e.g. provided information for 2010 tax return preparation	0.80	150.00	120.00
6010000-Asset Analysis and Recovery	Shea Smith	4/30/10	Analysis of [REDACTED] identification of audit issues, document findings	6.30	250.00	1,575.00
April Totals				142.70		\$ 29,555.00

Founding Partners Receivership
Detailed Time Description

WC	Staff Name	Date	Time Description	Hours	Rate	Amount
6010000-Asset Analysis and Recovery	Adam Lang	5/3/10	Analysis of clawback and [REDACTED]	0.20	250.00	50.00
6010000-Asset Analysis and Recovery	David Siegel	5/3/10	Analysis of Investor transactions and claw back analysis.	1.10	300.00	330.00
6010000-Asset Analysis and Recovery	David Siegel	5/3/10	Analysis of Sun's accounting information related to [REDACTED] claim, preparation of exhibits.	1.20	300.00	360.00
6010000-Asset Analysis and Recovery	Rachel Merritt	5/3/10	Updating Address Report	0.40	150.00	60.00
6010000-Asset Analysis and Recovery	Shea Smith	5/3/10	Analysis of [REDACTED] Identification of audit issues, document findings	2.10	250.00	525.00
6010000-Asset Analysis and Recovery	David Siegel	5/4/10	Analysis of [REDACTED] and preparation of memo.	4.90	300.00	1,470.00
6010000-Asset Analysis and Recovery	Shea Smith	5/4/10	Analysis of [REDACTED] Identification of audit issues, document findings	2.40	250.00	600.00
6010000-Asset Analysis and Recovery	David Siegel	5/5/10	Analysis of [REDACTED] for FP SVF. Analysis of [REDACTED] statements. Analysis of Sun Capital 2006 financial statements. Analysis of Sun Capital 2006 financial statements. Preparation of "talking points" memorandum.	8.20	300.00	2,460.00
6010000-Asset Analysis and Recovery	David Siegel	5/7/10	Analysis of [REDACTED] and preparation of talking points memo.	8.30	300.00	2,490.00
6010000-Asset Analysis and Recovery	Gary Rosenthal	5/7/10	Review talking points on potential audit deficiencies and discuss with David Siegel	1.60	300.00	480.00
6010000-Asset Analysis and Recovery	Adam Lang	5/10/10	Analysis of investments by the HVF, SVF and Global Fund into each other	1.70	250.00	425.00
6010000-Asset Analysis and Recovery	David Siegel	5/10/10	Analysis of [REDACTED] Founding Partners and Sun Capital financial Statements and loan documents; preparation of work papers and memo.	4.30	300.00	1,290.00
6010000-Asset Analysis and Recovery	Gary Rosenthal	5/10/10	Review of talking points for attorneys regarding [REDACTED] deficiencies	0.80	300.00	240.00
6010000-Asset Analysis and Recovery	Gary Rosenthal	5/10/10	Review of [REDACTED]	2.60	300.00	780.00
6010000-Asset Analysis and Recovery	Shea Smith	5/10/10	Analysis of [REDACTED] Identification of audit issues, document findings	2.20	250.00	550.00
6010000-Asset Analysis and Recovery	David Siegel	5/12/10	Analysis of [REDACTED] and preparation of work papers.	1.40	300.00	420.00
6010000-Asset Analysis and Recovery	Shea Smith	5/12/10	Analysis of [REDACTED] identification of audit issues, document findings	1.30	250.00	325.00
6010000-Asset Analysis and Recovery	Rachel Merritt	5/13/10	Review of subpoena production and analysis of bank statements	2.00	150.00	300.00
6010000-Asset Analysis and Recovery	Rachel Merritt	5/17/10	Analysis of lock box sweep account transfers	1.60	150.00	240.00
6010000-Asset Analysis and Recovery	Rachel Merritt	5/18/10	Review and analysis of email database	0.40	150.00	60.00
6035000-Tax Issues	Adam Lang	5/19/10	Assist tax department with preparing 2009 returns- write up of missing bank statements	0.70	250.00	175.00
6010000-Asset Analysis and Recovery	Adam Lang	5/21/10	Analysis of SCHI and SCI loans from SVF; analysis of investor subscriptions to SVF and SVFI for investor request	1.90	250.00	475.00
6010000-Asset Analysis and Recovery	Rachel Merritt	5/21/10	Analysis of documents to be subpoenaed	0.30	150.00	45.00
6010000-Asset Analysis and Recovery	Rachel Merritt	5/21/10	Review and analysis of bank statement support for QuickBooks	0.80	150.00	120.00
6010000-Asset Analysis and Recovery	Rachel Merritt	5/21/10	Review and analysis of SVF and SVF II investor records and subscription information	1.90	150.00	285.00
6010000-Asset Analysis and Recovery	David Siegel	5/27/10	Analysis of lockbox information and preparation of work files.	0.90	300.00	270.00
May Totals:				55.20		\$14,825.00

Founding Partners Receivership
Detailed Time Record for the Month Ended June 30, 2010

Work Code	Staff Name	Date	Time Description	Hours	Rate	Amount
Asset Analysis and Recovery	Adam Lang	6/1/10	Analysis of claw-back issues; internal project meeting re: outstanding projects	1.40	250.00	350.00
Asset Analysis and Recovery	David Siegel	6/1/10	Attend Founding Partners project status meeting to review projects and prepare work plans.	1.10	300.00	330.00
Asset Analysis and Recovery	Rachel Merritt	6/1/10	Review of projects, internal meeting (including preparation)	1.50	150.00	225.00
Tax Issues	Adam Lang	6/1/10	Analysis of 2009 tax issues	0.40	250.00	100.00
Tax Issues	David Siegel	6/1/10	Analysis of documents and tax issues.	0.90	300.00	270.00
Asset Analysis and Recovery	David Siegel	6/2/10	Analysis of audit work papers.	1.10	300.00	330.00
Asset Analysis and Recovery	Adam Lang	6/3/10	Update and reference talking points memo for [REDACTED] analysis	4.30	250.00	1,075.00
Asset Analysis and Recovery	David Siegel	6/3/10	Analysis of [REDACTED] and exhibits.	1.60	300.00	480.00
Asset Analysis and Recovery	Adam Lang	6/4/10	Analysis of [REDACTED] and support.	2.60	250.00	650.00
Asset Analysis and Recovery	David Siegel	6/4/10	Analysis of [REDACTED] preparation of memo.	0.90	300.00	270.00
Asset Analysis and Recovery	Rachel Merritt	6/4/10	Review and Analysis of projects and emails, preparation of open items list and pending projects list	1.20	150.00	180.00
Asset Analysis and Recovery	Adam Lang	6/10/10	Analysis of SVF contributions and redemptions per Financial statements; update cash flow analysis for all funds; analysis of Gunlicks missing bank statements; analysis of public or private status for HVF investments; review of correspondence received from Receiver's counsel	5.40	250.00	1,350.00
Asset Analysis and Recovery	Adam Lang	6/11/10	Analysis of SVF financial statements for 1997-1998; update subscription and redemption analysis	2.10	250.00	525.00
Asset Analysis and Recovery	Rachel Merritt	6/11/10	Review of production and bank statements	0.60	150.00	90.00
Asset Analysis and Recovery	Adam Lang	6/14/10	Review of emergency motion and analysis of tax issues	1.20	250.00	300.00
Asset Analysis and Recovery	David Siegel	6/14/10	Conference call with Receiver, analysis of legal pleading.	1.90	300.00	570.00
Asset Analysis and Recovery	Adam Lang	6/15/10	Participate on conference call for Lancelot; follow up regarding investment valuation for SVF investment in Lancelot	1.60	250.00	400.00
Asset Analysis and Recovery	David Siegel	6/15/10	Analysis of investments.	1.00	300.00	300.00
Case Administration	Adam Lang	6/15/10	Analysis of all time from inception through June 2010; analysis of budgeted projects	3.70	250.00	925.00
Asset Analysis and Recovery	Adam Lang	6/16/10	Assist Receiver with review of Jim Chadwick letter in response to Sun's motion for a 120 day stay of litigation	0.60	250.00	150.00
Asset Analysis and Recovery	David Siegel	6/16/10	Conference call with Receiver and Receiver's Counsel, review of legal correspondence, preparation of suggested changes.	1.60	300.00	480.00
Asset Analysis and Recovery	Rachel Merritt	6/16/10	Preparation of work papers re: financial statements and concordance search results. Review of [REDACTED] file and support.	1.10	150.00	165.00
Asset Analysis and Recovery	David Siegel	6/17/10	Analysis of audit work papers.	4.20	300.00	1,260.00
Asset Analysis and Recovery	Rachel Merritt	6/17/10	Review of founding partners time from inception to present narrative	0.20	150.00	30.00
Case Administration	Adam Lang	6/17/10	Analysis of remaining projects and budget; update list of projects completed to date	2.80	250.00	700.00
Asset Analysis and Recovery	Richard Pollack	6/18/10	Review of documents	1.00	310.00	310.00
Asset Analysis and Recovery	Adam Lang	6/21/10	Assist tax department with project to reconstruct receivership books and records for March and April 2009	0.60	250.00	150.00
Case Administration	Adam Lang	6/22/10	Update budget in preparation for meeting with Receiver	1.20	250.00	300.00
Case Administration	David Siegel	6/22/10	Preparation of Budget.	1.40	300.00	420.00

Founding Partners Receivership
Detailed Time Record for the Month Ended June 30, 2010

Workcode	Staff Name	Date	Time Description	Hours	Rate	Amount
Tax Issues	Adam Lang	6/22/10	Assist tax department with preparation of 2009 returns; correspondence with Receiver's counsel re: 1099's and K-1s	0.80	250.00	200.00
Asset Analysis and Recovery	Adam Lang	6/24/10	Analysis of documents for SVF and HVF Investments	0.30	250.00	75.00
Asset Analysis and Recovery	Rachel Merritt	6/25/10	Preparation of SVF and HVF documents per Receiver's request, review and analysis of email database, review of projects to be approved by B&C	2.30	150.00	345.00
Tax Issues	David Siegel	6/25/10	Analysis of tax issues.	0.90	300.00	270.00
Asset Analysis and Recovery	Adam Lang	6/28/10	Analysis of investments in SVFII by Alan Arnold	0.40	250.00	100.00
Asset Analysis and Recovery	Rachel Merritt	6/28/10	Review and analysis of emails and work papers	0.30	150.00	45.00
Case Administration	Adam Lang	6/28/10	Update agenda and materials for status meeting; prepare for status meeting with receiver	2.20	250.00	550.00
Tax Issues	David Siegel	6/28/10	Analysis of tax issues and preparation of agenda and supporting materials.	1.90	300.00	570.00
Asset Analysis and Recovery	David Siegel	6/29/10	Meeting with Receiver and Receiver's Counsel to discuss tax issues and case management.	1.60	300.00	480.00
Asset Analysis and Recovery	Rachel Merritt	6/29/10	Analysis of Sun Trust Lock Box Activity	4.60	150.00	690.00
Asset Analysis and Recovery	Rachel Merritt	6/29/10	Analysis of correspondence and work papers	0.90	150.00	135.00
Case Administration	Adam Lang	6/29/10	Meeting at Receivers' office re: case status and updates; follow up with Receiver re: corporate formality analysis, payee analysis, tax items, HVF investment and Global fund administrator request for documents	3.20	250.00	800.00
Asset Analysis and Recovery	Adam Lang	6/30/10	Analysis of payee database and preparation of target schedule for receipts over \$10K.	4.70	250.00	1,175.00
Asset Analysis and Recovery	Adam Lang	6/30/10	Update and analysis of outstanding projects; correspondence with counsel re: Global fund agreement and documents	0.80	250.00	200.00
Asset Analysis and Recovery	Rachel Merritt	6/30/10	Analysis of SunTrust Lock Box receipts, updating database, preparation of March - June 2010 summary schedules	3.60	150.00	540.00
Asset Analysis and Recovery	Rachel Merritt	6/30/10	Analysis of Merrill Lynch documents, follow up with case projects and review of corporate formality findings	0.80	150.00	120.00
Client Totals:				78.50		\$ 18,960.00

Founding Partners Receivership
Detailed Time Record - For the Month Ended July 31, 2010

Work Code	Staff Name	Date	Time Description	Hours	Rate	Amount
Asset Analysis and Recovery	Rachel Merritt	7/1/10	Review and analysis of bank statements, supports, and missing items	3.30	150.00	\$ 495.00
Asset Analysis and Recovery	Adam Lang	7/2/10	Correspondence with Receiver re: analysis of targets	0.20	250.00	50.00
Asset Analysis and Recovery	Rachel Merritt	7/6/10	Review and analysis of lock box database and summary schedules	0.90	150.00	135.00
Asset Analysis and Recovery	Rachel Merritt	7/6/10	Review of FPCMC finders fees and management fees; review of sun capital production	0.60	150.00	90.00
Asset Analysis and Recovery	Adam Lang	7/6/10	Update target/payee analysis; prepare analysis of cash flows and search for underlying documents on Concordance; update accrued interest calculation for SCHI and SCI through 6/30/10	3.60	250.00	900.00
Asset Analysis and Recovery	Martin Prinsloo	7/6/10	Update Lockbox analysis transaction database. Update summary schedules.	3.20	250.00	800.00
Tax Issues	Adam Lang	7/6/10	Assist tax department with SCHI and SCI interest calculations; provide documents needed	0.80	250.00	200.00
Tax Issues	David Siegel	7/6/10	Analysis of loan documents, interest billings and tax issues.	2.40	300.00	720.00
Asset Analysis and Recovery	Adam Lang	7/7/10	Analysis and phone call re: Interfund/corporate formality project	1.40	250.00	350.00
Asset Analysis and Recovery	Adam Lang	7/7/10	Update analysis of target payees; correspondence with Receiver re: target payee analysis	2.60	250.00	650.00
Asset Analysis and Recovery	Rachel Merritt	7/7/10	Preparation of Lock Box Summary Report	0.60	150.00	90.00
Asset Analysis and Recovery	Martin Prinsloo	7/7/10	Update Lockbox analysis transaction database. Update summary schedules.	1.20	250.00	300.00
Asset Analysis and Recovery	Rachel Merritt	7/8/10	Review of lock box sweep account transactions	1.30	150.00	195.00
Asset Analysis and Recovery	Adam Lang	7/8/10	Assist with updates to lock box database	0.30	250.00	75.00
Asset Analysis and Recovery	Adam Lang	7/8/10	Analysis of interfund transfers amongst all funds for corporate formality project	1.90	250.00	475.00
Asset Analysis and Recovery	David Siegel	7/8/10	Analysis of lockbox receipts	0.50	300.00	150.00
Asset Analysis and Recovery	Martin Prinsloo	7/8/10	Reviewed updated Lockbox summary schedules.	0.80	250.00	200.00
Asset Analysis and Recovery	Martin Prinsloo	7/9/10	Update Lockbox receipt summary schedules.	1.40	250.00	350.00
Asset Analysis and Recovery	Rachel Merritt	7/12/10	June lock box analysis; hybrid value fund investment analysis	2.10	150.00	315.00
Asset Analysis and Recovery	Martin Prinsloo	7/12/10	Update Lockbox transaction database.	1.60	250.00	400.00
Tax Issues	Adam Lang	7/12/10	Assist tax department with analysis of HVF investments	0.30	250.00	75.00

Founding Partners Receivership
Detailed Time Record - For the Month Ended July 31, 2010

Work Code	Staff Name	Date	Time Description	Hours	Rate	Amount
Tax Issues	David Siegel	7/12/10	Analysis of tax issues and financial statements, conference call with Andreea, preparation of exhibits in support of [REDACTED]	1.60	300.00	480.00
Asset Analysis and Recovery	Adam Lang	7/13/10	Analysis of corporate formality documents received from Receiver's counsel	0.70	250.00	175.00
Asset Analysis and Recovery	David Siegel	7/13/10	Analysis of lockbox data.	1.10	300.00	330.00
Asset Analysis and Recovery	Adam Lang	7/14/10	Analysis of documents received for Corporate formality project	0.80	250.00	200.00
Asset Analysis and Recovery	Rachel Merritt	7/14/10	Analysis of financial statements and emails	0.20	150.00	30.00
Tax Issues	Adam Lang	7/14/10	Assist tax department with preparation of 2009 tax returns- provide documents	0.20	250.00	50.00
Tax Issues	David Siegel	7/14/10	Analysis of tax issues.	0.90	300.00	270.00
Asset Analysis and Recovery	Rachel Merritt	7/15/10	Review of shareholder information and follow up with RCP (HVF investment) for tax department	0.20	150.00	30.00
Tax Issues	Adam Lang	7/15/10	Assist tax department re: [REDACTED]	1.40	250.00	350.00
Tax Issues	David Siegel	7/15/10	Conference calls with Andreea and Jeff Mutnick to discuss tax issues related to Sun Capital loans.	1.20	300.00	360.00
Asset Analysis and Recovery	Adam Lang	7/16/10	Analysis of SVF loans to Sun entities as of 12/31/08 & 12/31/09	0.60	250.00	150.00
Tax Issues	David Siegel	7/16/10	Analysis of loans, financial statements and liquidation issues related to tax treatment of loan default.	2.30	300.00	690.00
Asset Analysis and Recovery	Rachel Merritt	7/19/10	Review and analysis of email database and hybrid value fund investment information	0.60	150.00	90.00
Asset Analysis and Recovery	Adam Lang	7/20/10	Analysis of Gunlicks personal bank accounts and potential payments for items to be sold at auction	0.60	250.00	150.00
Asset Analysis and Recovery	David Siegel	7/21/10	Analysis of [REDACTED] issues.	0.80	300.00	240.00
Asset Analysis and Recovery	Rachel Merritt	7/21/10	Analysis of July lock box activity	3.80	150.00	570.00
Asset Analysis and Recovery	Rachel Merritt	7/21/10	Review and analysis of email database	0.60	150.00	90.00
Asset Analysis and Recovery	Rachel Merritt	7/21/10	Analysis of Gunlicks personal bank accounts and credit cards	2.10	150.00	315.00
Asset Analysis and Recovery	Adam Lang	7/21/10	Analysis of William Gunlicks personal bank statements; analysis of payments from Founding Partners entities to William Gunlicks	1.10	250.00	275.00
Asset Analysis and Recovery	Adam Lang	7/22/10	Analysis of Will Gunlicks personal accounts re: auction activity; phone call with Receiver's counsel	0.70	250.00	175.00

Founding Partners Receivership
Detailed Time Record - For the Month Ended July 31, 2010

Work Code	Staff Name	Date	Time Description	Hours	Rate	Amount
Asset Analysis and Recovery	Rachel Merritt	7/22/10	Analysis of Gunlicks' SunTrust and North Shore Statements; analysis of FP distributions; review and analysis of work papers and file management	2.30	150.00	345.00
Asset Analysis and Recovery	David Siegel	7/22/10	Meeting with Receiver's Counsel, Scot Stirling and Robert Mills. Analysis of [REDACTED] and financial statements.	2.80	300.00	840.00
Preparation and Review of Reports	Adam Lang	7/22/10	Review of 2nd quarter receivership report	0.80	250.00	200.00
Asset Analysis and Recovery	Rachel Merritt	7/23/10	Work on quarterly receivership report; analysis of support and HVF investment	1.10	150.00	165.00
Preparation and Review of Reports	Sharon Foote	7/23/10	Preparation of quarterly financial report.	3.90	200.00	780.00
Tax Issues	David Siegel	7/23/10	Analysis of tax documents.	0.40	300.00	120.00
Preparation and Review of Reports	David Siegel	7/26/10	Analysis of draft accounting report and preparation of updates for final report.	0.50	300.00	150.00
Preparation and Review of Reports	Sharon Foote	7/26/10	Preparation and review of quarterly report.	4.10	200.00	820.00
Preparation and Review of Reports	Sharon Foote	7/27/10	Review of quarterly financial report.	2.90	200.00	580.00
Asset Analysis and Recovery	Adam Lang	7/30/10	Respond to emails from Receiver	0.40	250.00	100.00
Preparation and Review of Reports	Adam Lang	7/30/10	Review and update 2nd quarter receiver's financial report	0.40	250.00	100.00
Client Totals:				72.10		\$ 16,235.00

Founding Partners Receivership
Detailed Time Record for the Month Ended August 31, 2010

Activity Category	Staff Name	Date	Time Description	Hours	Rate	Amount
Asset Analysis and Recovery	Adam Lang	8/6/10	Review and analysis of HVF investment positions and correspondence received	0.40	250.00	100.00
Asset Analysis and Recovery	Rachel Merritt	8/10/10	Review of [REDACTED] documents; review of Gunlicks personal banking information; review of case voicemails and emails	1.90	150.00	285.00
Tax Issues	Adam Lang	8/10/10	Assist tax department with HVF investments	0.20	250.00	50.00
Asset Analysis and Recovery	Adam Lang	8/11/10	Analysis of investor letter; provide Receivership cash balance as of 6/30/10 to Receiver's counsel; correspondence with Receiver's counsel re: Lancer investment and claim status	1.80	250.00	450.00
Asset Analysis and Recovery	Rachel Merritt	8/11/10	Follow up on HVF tax open items; review of Equastone correspondence; review of Schwab Investments; review of RCP K-1s, review and analysis of email database	4.10	150.00	615.00
Preparation and Review of Reports	Sharon Foote	8/11/10	Update process for preparation of quarterly reports.	0.90	200.00	180.00
Preparation and Review of Reports	Adam Lang	8/11/10	Assist with preparation of 3rd quarter receivership report	0.20	250.00	50.00
Asset Analysis and Recovery	Rachel Merritt	8/12/10	Review and analysis of email database; preparation for meeting; updating work papers; review and analysis of July and partial August Lock Box Activity	6.40	150.00	960.00
Asset Analysis and Recovery	Adam Lang	8/12/10	Correspondence with Receiver re: investor letter	0.20	250.00	50.00
Asset Analysis and Recovery	Rachel Merritt	8/13/10	Analysis of lock box accounts	0.40	150.00	60.00
Preparation and Review of Reports	Sharon Foote	8/13/10	Set up procedures for quarterly reporting; obtain July bank statements and documentation.	2.90	200.00	580.00
Tax Issues	Adam Lang	8/13/10	Assist tax department with SVF and GF transactions	0.70	250.00	175.00
Tax Issues	David Siegel	8/13/10	Analysis of accounting and tax issues.	0.50	300.00	150.00
Asset Analysis and Recovery	Adam Lang	8/16/10	Project meeting; follow up on claw back analysis; corporate formality project; various project status updates	3.10	250.00	775.00
Asset Analysis and Recovery	David Siegel	8/16/10	Review of documents, project management meeting.	1.40	300.00	420.00
Asset Analysis and Recovery	Rachel Merritt	8/16/10	Project meeting, assisting tax department with tax open items re: Charles Schwab and Merrill Lynch	1.80	150.00	270.00
Preparation and Review of Reports	Sharon Foote	8/16/10	Correspondence re: quarterly report information.	0.50	200.00	100.00
Tax Issues	Adam Lang	8/16/10	Assist tax department with open items re: preparation of 2009 returns	0.20	250.00	50.00

Founding Partners Receivership
Detailed Time Record for the Month Ended August 31, 2010

Activity Category	Staff Name	Date	Time Description	Hours	Rate	Amount
Asset Analysis and Recovery	Adam Lang	8/17/10	Analysis of Gunlicks payments received from all Funds in 2009; analysis of Gunlicks personal bank statements; analysis of Gunlicks payments, including payment to Promise and large cash withdrawals	3.60	250.00	900.00
Asset Analysis and Recovery	David Siegel	8/17/10	Analysis of Gunlicks documents.	0.40	300.00	120.00
Asset Analysis and Recovery	Rachel Merritt	8/17/10	Review and analysis of case documents and emails.	0.20	150.00	30.00
Tax Issues	Adam Lang	8/17/10	Assist tax department with 2009 tax returns; review of write-up for stub period; analyze and investigate payees and classifications for uncategorized payments in 2009	1.90	250.00	475.00
Asset Analysis and Recovery	Rachel Merritt	8/18/10	Lock box analysis, Gunlicks discussion, planning discussion	2.00	150.00	300.00
Asset Analysis and Recovery	Adam Lang	8/18/10	Analysis of documents re: Realty Capital Partners; analysis of Gunlicks personal bank statements; update budgets and list of pending projects to prepare for meeting; correspondence with Receiver and Receiver's counsel	2.60	250.00	650.00
Tax Issues	Adam Lang	8/18/10	Assist tax department with preparation of 2009 tax returns	0.20	250.00	50.00
Asset Analysis and Recovery	Adam Lang	8/19/10	Analysis of outstanding projects; prepare budget and agenda for meeting	1.70	250.00	425.00
Tax Issues	Adam Lang	8/19/10	Analysis and search for support for 2009 miscellaneous transactions- tax payment and moving expense payment; assist tax department with preparation of 2009 tax returns	2.30	250.00	575.00
Asset Analysis and Recovery	Rachel Merritt	8/20/10	Review and analysis of email database, case documents, and tax department requests	0.30	150.00	45.00
Asset Analysis and Recovery	Adam Lang	8/20/10	Prepare for and attend project status meeting at Receiver's office; analysis of Gunlicks production; follow up related to status meeting	3.40	250.00	850.00
Asset Analysis and Recovery	David Siegel	8/20/10	Meeting with Receiver and Receiver's Counsel, review of documents.	2.20	300.00	660.00
Tax Issues	Adam Lang	8/20/10	Assist tax department with open items and tax questions for 2009 tax returns	1.10	250.00	275.00
Asset Analysis and Recovery	Rachel Merritt	8/23/10	August Lock Box Analysis - SCI and SCHI	1.90	150.00	285.00
Asset Analysis and Recovery	Adam Lang	8/23/10	Analysis of Gunlicks personal bank accounts and suspicious payments from SunTrust and North Shore bank	4.10	250.00	1,025.00

Founding Partners Receivership
Detailed Time Record for the Month Ended August 31, 2010

Activity Category	Staff Name	Date	Time Description	Hours	Rate	Amount
Tax Issues	Adam Lang	8/23/10	Assist tax department with questions re; Natl Advisors FPCMC investment; Global fund ownership	1.70	250.00	425.00
Asset Analysis and Recovery	Rachel Merritt	8/24/10	Analysis of email database	0.20	150.00	30.00
Asset Analysis and Recovery	Adam Lang	8/24/10	Analysis of Gunlicks distributions received and payment from SunTrust account; analysis of management fees paid by all FP funds to FPCMC	6.20	250.00	1,550.00
Asset Analysis and Recovery	Adam Lang	8/25/10	Analysis of Gunlicks payments and receipts from FPCMC; analysis of management fees paid by HVF, SVF, SVFII & Global Fund to FPCMC; analysis of target payee schedules; meeting with Receiver's counsel to review target payees and Gunlicks information; follow up with Receiver's counsel- prepare FPCMC payee analysis by cash flow category	5.40	250.00	1,350.00
Asset Analysis and Recovery	Adam Lang	8/25/10	Review of Gunlicks support pursuant to request for backup for tax refund	0.20	250.00	50.00
Asset Analysis and Recovery	Rachel Merritt	8/25/10	Review and analysis of open HVF investments for tax return preparation; preparation of work papers	2.40	150.00	360.00
Asset Analysis and Recovery	David Siegel	8/25/10	Review of schedules and tax disclosure.	0.90	300.00	270.00
Asset Analysis and Recovery	Adam Lang	8/26/10	Analysis of Gunlicks deposits- tax return and insurance; review of RCP project analysis; prepare investor confirmation schedule/letter	2.70	250.00	675.00
Asset Analysis and Recovery	Rachel Merritt	8/26/10	Review of RCP Investment update reports; preparation of RCP significant events summary per receiver's request	5.80	150.00	870.00
Asset Analysis and Recovery	David Siegel	8/26/10	Analysis of documents and preparation of schedules.	2.60	300.00	780.00
Asset Analysis and Recovery	Adam Lang	8/27/10	Analysis of RCP investments and review of RCP memo; search of Concordance for RCP materials; analysis of investor balances for investor confirmation letters	3.60	250.00	900.00
Asset Analysis and Recovery	Rachel Merritt	8/27/10	RCP Investment project review; discussion re: HVF investments; review of cash flow analysis to assist with preparation of tax returns	1.30	150.00	195.00
Tax Issues	Adam Lang	8/27/10	Search for investor address information and K-1 information to assist tax department; correspondence with Receiver's counsel re: K-1's	1.60	250.00	400.00
Asset Analysis and Recovery	Adam Lang	8/30/10	Preparation of confirmation letter for investors	0.90	250.00	225.00

Founding Partners Receivership
Detailed Time Record for the Month Ended August 31, 2010

Activity Category	Staff Name	Date	Time Description	Hours	Rate	Amount
Asset Analysis and Recovery	Rachel Merritt	8/30/10	Review and analysis of HVF general ledger information re: RCP, Hartline, and Schwab transactions; review of RCP agreements; analysis of Schwab Institutional account statements; preparation of work papers.	4.30	150.00	645.00
Asset Analysis and Recovery	David Siegel	8/30/10	Analysis of investment reports and preparation of schedule.	0.90	300.00	270.00
Tax Issues	Adam Lang	8/30/10	Assist tax department with GF investments/participations in SVF; analysis of payments made to GF during 2009	1.20	250.00	300.00
Tax Issues	Adam Lang	8/30/10	Analysis of RCP investment and review of memo; contact and correspondence with RCP personnel	1.20	250.00	300.00
Tax Issues	David Siegel	8/30/10	Analysis of data and preparation of accounting for tax purposes.	1.10	300.00	330.00
Asset Analysis and Recovery	David Siegel	8/31/10	Analysis of investment documentation.	1.20	300.00	360.00
Asset Analysis and Recovery	Adam Lang	8/31/10	Prepare investor confirmation letter and analysis of investor subscriptions and redemptions	0.80	250.00	200.00
Asset Analysis and Recovery	Rachel Merritt	8/31/10	Analysis of email database; analysis of case management work papers; continued analysis of RCP investments and discussion re: relationship between RCP, Hartline, and Schwab accounts	2.90	150.00	435.00
Tax Issues	Adam Lang	8/31/10	Analysis of RCP investments and tax implications; search and analysis of Hartline/Schwab investment account; reconciling brokerage accounts with general ledger	3.60	250.00	900.00
Total Fees				108.20		\$ 23,805.00
<u>Expenses</u>						
Courier charges	Firm	8/27/10	SFM	0.00	67.45	67.45
Client Totals:				108.20		\$ 23,872.45

Founding Partners Receivership
Detailed Time Record for the Month Ended September 30, 2010

Activity Category	Staff Name	Date	Time Description	Hours	Rate	Amount
Asset Analysis and Recovery	Adam Lang	9/1/10	Analysis of investor subscriptions and redemption; prepare confirmation letter draft	2.70	250.00	675.00
Asset Analysis and Recovery	Rachel Merritt	9/1/10	Analysis of hybrid value fund investments and update of RCP work paper.	0.60	150.00	90.00
Asset Analysis and Recovery	David Siegel	9/1/10	Review and revise investor confirmation letter.	0.90	300.00	270.00
Asset Analysis and Recovery	Sharon Foote	9/1/10	Review and analysis of Charles Schwab account statements.	5.60	200.00	1,120.00
Tax Issues	David Siegel	9/1/10	Review of tax opinion memo.	0.60	300.00	180.00
Tax Issues	Adam Lang	9/1/10	Review and analysis of tax memo	1.90	250.00	475.00
Asset Analysis and Recovery	Jennyfer Urbina	9/2/10	Search for and analysis of William Gunlicks records re: personal expenses.	3.50	95.00	332.50
Asset Analysis and Recovery	Adam Lang	9/2/10	Update investor confirmation letter; analysis of investor subscriptions and redemptions; analysis of Gunlicks personal bank accounts/search for support on Concordance; meeting re: receivership reports	4.10	250.00	1,025.00
Asset Analysis and Recovery	Rachel Merritt	9/2/10	Updating RCP investment update summary, discussion re: Schwab Institutional statements and corresponding work papers; review of Founding Partners Capital Management Company Bermuda documents and information to assist the tax department	0.90	150.00	135.00
Asset Analysis and Recovery	Sharon Foote	9/2/10	Project meeting re: tasks for receivership reports.	0.40	200.00	80.00
Asset Analysis and Recovery	Sharon Foote	9/2/10	Review and analysis of Charles Schwab account statements.	2.10	200.00	420.00
Tax Issues	Adam Lang	9/2/10	Assist tax department with search for FP Bermuda fund financials	0.30	250.00	75.00
Asset Analysis and Recovery	Rachel Merritt	9/3/10	Analysis of lock box accounts - updating work papers through the end of August; email maintenance; finalizing RCP schedule and summary sent to B&C today.	3.80	150.00	570.00
Asset Analysis and Recovery	Jennyfer Urbina	9/3/10	Search for and analysis of William Gunlicks records re: personal expenses.	5.70	95.00	541.50
Asset Analysis and Recovery	Adam Lang	9/3/10	Analysis of Gunlicks personal payments and accounts; prepare investor confirmation letter schedules; prepare and review RCP memorandum and investment summary schedule	3.60	250.00	900.00
Asset Analysis and Recovery	Adam Lang	9/7/10	Preparation of investor confirmation letters for SVF investors; analysis of Gunlicks payments	4.30	250.00	1,075.00

Founding Partners Receivership
Detailed Time Record for the Month Ended September 30, 2010

Activity Category	Staff Name	Date	Time Description	Hours	Rate	Amount
Asset Analysis and Recovery	Jennyfer Urbina	9/7/10	Search for and analysis of William Gunlicks records re: personal expenses.	7.80	95.00	741.00
Asset Analysis and Recovery	Rachel Merritt	9/7/10	Analysis re: SVF investment support - tying cash flow to bank statements and preparing work papers	3.90	150.00	585.00
Asset Analysis and Recovery	Sharon Foote	9/7/10	Research addresses for investor letters.	1.50	200.00	300.00
Asset Analysis and Recovery	David Siegel	9/8/10	Lockbox analysis.	1.10	300.00	330.00
Asset Analysis and Recovery	David Siegel	9/8/10	Review of [REDACTED]	2.90	300.00	870.00
Asset Analysis and Recovery	Adam Lang	9/8/10	Prepare HVF and SVF investor confirmation letters; analysis of Gunlicks documents	2.30	250.00	575.00
Asset Analysis and Recovery	Jennyfer Urbina	9/8/10	Search for and analysis of William Gunlicks records re: personal expenses.	8.20	95.00	779.00
Asset Analysis and Recovery	Rachel Merritt	9/8/10	Continued analysis re: HVF and SVF investor confirmation letters; lock box analysis - review of weekly deposit reports through Sept. 3, 2010	7.60	150.00	1,140.00
Asset Analysis and Recovery	Sharon Foote	9/8/10	Research addresses for investor letters.	2.10	200.00	420.00
Asset Analysis and Recovery	Rachel Merritt	9/9/10	Update of Hotel California RCP investment work papers; continued analysis re: HVF and SVF investor confirmation letters; continued analysis re: SVF investment support - tying cash flow to bank statements	4.90	150.00	735.00
Asset Analysis and Recovery	Jennyfer Urbina	9/9/10	Search for and analysis of William Gunlicks records re: personal expenses.- target payees	8.00	95.00	760.00
Asset Analysis and Recovery	Jennyfer Urbina	9/10/10	Search for and analysis of William Gunlicks records re: personal expenses.- target payees	5.90	95.00	560.50
Asset Analysis and Recovery	Adam Lang	9/10/10	Analysis of Gunlicks documents; analysis of payees; review of investor letters	0.40	250.00	100.00
Asset Analysis and Recovery	Rachel Merritt	9/10/10	Review and analysis of PP Partnership documents for tax purposes; continued analysis and preparation of investor confirmation letters	4.40	150.00	660.00
Tax Issues	Adam Lang	9/10/10	Assist tax department with FP Bermuda questions; assist with updated addresses for investors; answer various tax related questions	1.20	250.00	300.00
Asset Analysis and Recovery	Adam Lang	9/13/10	Analysis of payments to Gunlicks and documents identified	1.40	250.00	350.00
Asset Analysis and Recovery	Rachel Merritt	9/13/10	Analysis for SVF and HVF confirmation letters	1.90	150.00	285.00
Tax Issues	David Siegel	9/13/10	Analysis of financial data and related tax issue.	1.40	300.00	420.00
Tax Issues	Adam Lang	9/13/10	Analysis of investment in FP Capital Management (Bermuda) Ltd.; analysis of QuickBooks file and GL	1.80	250.00	450.00

Founding Partners Receivership
Detailed Time Record for the Month Ended September 30, 2010

Activity Category	Staff Name	Date	Time Description	Hours	Rate	Amount
Asset Analysis and Recovery	Rachel Merritt	9/14/10	Analysis of confirmation letters, tax correspondence, and concordance investor searches	1.80	150.00	270.00
Asset Analysis and Recovery	Adam Lang	9/14/10	Analysis and respond to investor requests and letters; update and final review of investor confirmation letters	2.80	250.00	700.00
Tax Issues	David Siegel	9/14/10	Analysis of tax issue.	0.60	300.00	180.00
Asset Analysis and Recovery	Rachel Merritt	9/15/10	Analysis of concordance investor searches, assisting the tax department with investor information for 2008 and 2009 K-1s	2.60	150.00	390.00
Tax Issues	Adam Lang	9/15/10	Assist tax department with investor inquiries and other tax questions	0.90	250.00	225.00
Asset Analysis and Recovery	Rachel Merritt	9/20/10	Analysis re: SVF and HVF investor confirmation letters	1.90	150.00	285.00
Asset Analysis and Recovery	Adam Lang	9/20/10	Analysis of investor information and tax issues	0.70	250.00	175.00
Tax Issues	David Siegel	9/20/10	Analysis of tax issues.	0.60	300.00	180.00
Asset Analysis and Recovery	Adam Lang	9/21/10	Analysis of investor addresses and updated addresses; project meeting	0.30	250.00	75.00
Asset Analysis and Recovery	Rachel Merritt	9/21/10	Assisting tax department with returned K-1s, finalizing investor confirmation letters to sent to Broad and Cassel	1.80	150.00	270.00
Asset Analysis and Recovery	Adam Lang	9/22/10	Finalize investor confirmation letters and provide letters to Receiver's counsel	1.20	250.00	300.00
Asset Analysis and Recovery	Rachel Merritt	9/23/10	Review and analysis of lock box accounts; preparation of investor confirmation letter database	3.20	150.00	480.00
Asset Analysis and Recovery	Rachel Merritt	9/24/10	Analysis of RCP investments; analysis of email database; review and analysis of investor information	3.10	150.00	465.00
Asset Analysis and Recovery	Adam Lang	9/27/10	Analysis of FP loans; correspondence with Receiver's counsel re: Gunlicks analysis and investor letters; finalize Gunlicks analysis	1.40	250.00	350.00
Asset Analysis and Recovery	Rachel Merritt	9/27/10	Assisting tax department re: IRA investors, investor information analysis, analysis of email database, analysis of Gunlicks payments	5.10	150.00	765.00
Tax Issues	Adam Lang	9/27/10	Assist tax department with investor questions and IRA inquiry	0.30	250.00	75.00
Asset Analysis and Recovery	Rachel Merritt	9/28/10	Review of Concordance search documents and bank statements for analyses, assisting tax department with investor information	1.40	150.00	210.00

Founding Partners Receivership
Detailed Time Record for the Month Ended September 30, 2010

Activity/Category	Staff Name	Date	Time Description	Hours	Rate	Amount
Asset Analysis and Recovery	Rachel Merritt	9/29/10	Analysis of Gunlicks payments over \$5,000 and preparation of work papers	4.10	150.00	615.00
Asset Analysis and Recovery	Adam Lang	9/29/10	Analysis of payments to Gunlicks; correspondence with Receiver's counsel	1.20	250.00	300.00
Asset Analysis and Recovery	Jennyfer Urbina	9/30/10	Search for and analysis of William Gunlicks records re: target payees	3.10	95.00	294.50
Client Totals:				147.80	\$	24,929.00

ATTRIDE-STIRLING & WOLONIECKI



**ATTRIDE-STIRLING
& WOLONIECKI**
BARRISTERS & ATTORNEYS

Crawford House, 50 Cedar Avenue
Hamilton HM11, Bermuda

P.O. Box HM 2879
Hamilton HM LX, Bermuda

Telephone: (441) 295-6500
Facsimile: (441) 295-6566
Web: www.aswlaw.com

Statement as of April 30, 2010
Statement No. 9641

Receiver of Founding Partners Global Fund Ltd.
Broad and Cassel
21st Floor, One Biscayne Tower
2 South Biscayne Boulevard
Miami, FL 33131

Attn: Daniel Newman

Daniel Newman
Founding Partners Global Fund Ltd.
Client No: 1451-001

4/5/2010	SW	Reviewing draft motion for approval of Protocol and suggesting changes; email to Dan Newman	1.20	500.00	600.00
4/6/2010	KALG	Consider draft motion to approve protocol; discuss with Susie Wakefield	0.70	650.00	455.00
4/6/2010	SW	Call with Dan Newman to discuss motion to approve protocol; reviewing changes with Kehinde George and sending further suggested revisions	1.40	500.00	700.00
4/14/2010	KALG	Consider letter from Mourant; email to Susie Wakefield re same; email from Susie Wakefield to Dan Newman re same	0.40	650.00	260.00
4/14/2010	SW	Reviewing letter and revised protocol from JPLs' Cayman counsel; email to Dan Newman with comments	0.50	500.00	250.00
4/15/2010	KALG	Discussion Susie Wakefield re amendments to protocol	0.10	650.00	65.00
4/15/2010	SW	Emails with Dan Newman re proposed changes to Protocol	0.10	500.00	50.00
4/20/2010	KALG	Voice mail from Dan Newman; discuss with Susie Wakefield	0.20	650.00	130.00
4/21/2010	KALG	Email from Dan Newman; Telephone call with	0.30	650.00	195.00

		Dan Newman			
4/21/2010	SW	Call with Dan Newman to discuss Protocol and how to address \$91,000 subject to potential proprietary claim	0.40	500.00	200.00
4/28/2010	SW	Email to JPLs' Cayman counsel and to Dan Newman re outcome of Cayman court hearing; reviewing update from Dan Newman re the same	0.30	500.00	150.00
4/29/2010	SW	Email from Dan Newman re protocol	0.10	500.00	50.00
				Sub-total Fees:	<u>3,105.00</u>

Rate Summary

Kehinde A. L. George	1.70 hours at 650.00 /hr	1,105.00
Susie Wakefield	4.00 hours at 500.00 /hr	2,000.00
Total hours:	<u>5.70</u>	

Expenses

Telephone calls and faxes	5.82
Photocopies	2.10
Sub-total Expenses:	<u>7.92</u>

Total Current Billing:	<u>3,112.92</u>
------------------------	-----------------

Previous Balance Due:	297,746.03
-----------------------	------------

Total Now Due:	<u>\$ 300,858.95</u>
----------------	----------------------

Invoice payable upon receipt. All balances outstanding after 60 days will attract interest at 1.5% per month. Please enclose this stub with remittance or send telegraphic transfer clearing through correspondent bank: HSBC Bank USA, 452 Fifth Avenue, New York, New York, USA 10018, Swift Code: MRMDUS33, CHIPS ABA: 0108, FED ABA: 021001088 - Beneficiary Bank: The Bank of Bermuda Limited, 6 Front Street, Hamilton, Bermuda, Swift Code: BBDABMHM - Account Name: Attitude-Stirling & Woloniecki - Account No. 010 716751 501 (United States Dollars)

Attitude-Stirling & Woloniecki



**ATTRIDE-STIRLING
& WOLONIECKI**
BARRISTERS & ATTORNEYS

Crawford House, 50 Cedar Avenue
Hamilton HM11, Bermuda

P.O. Box HM 2879
Hamilton HM LX, Bermuda

Telephone: (441) 295-6500

Facsimile: (441) 295-6566

Web: www.aswlaw.com

Statement as of May 31, 2010
Statement No. 9684

Receiver of Founding Partners Global Fund Ltd.
Broad and Cassel
21st Floor, One Biscayne Tower
2 South Biscayne Boulevard
Miami, FL 33131

Attn: Daniel Newman

Daniel Newman
Founding Partners Global Fund Ltd.
Client No: 1451-001

5/10/2010	KALG	Discussion Susie Wakefield re Bermuda application for approval of protocol	0.10	650.00	65.00
5/12/2010	SW	Emails regarding orders approving protocol	0.20	500.00	100.00
5/14/2010	KALG	Discussion Susie Wakefield re protocol approval application	0.20	650.00	130.00
5/14/2010	SW	Preparing Application for Court Approval of Protocol and order for payment from Bank of Bermuda and supporting affidavit of Dan Newman	3.10	500.00	1,550.00
5/17/2010	KALG	Review draft court documents	1.00	650.00	650.00
5/17/2010	SW	Email to Dan Newman; finalizing draft affidavit in support of application for court approval of protocol	2.80	500.00	1,400.00
5/18/2010	SW	Email from Dan Newman re revised order	0.10	500.00	50.00
5/20/2010	KALG	Reviewing protocol application documents and amend	1.00	650.00	650.00
5/20/2010	SW	Reviewing Comments upon draft application for approval of Protocol and supporting affidavit	0.20	500.00	100.00
5/25/2010	KALG	Emails re revised protocol motion; discuss motion and clause 3.1.3 of protocol with Susie Wakefield;	0.40	650.00	260.00

		discussion with Susie Wakefield following her call with Jeffrey Geldens			
5/25/2010	SW	Reviewing draft supplemental motion for US court approval of protocol; emails from Dan Newman; call with Jeff Geldens; email setting out comments of protocol and motion	2.00	500.00	1,000.00
5/26/2010	KALG	Email from Susie Wakefield to Dan Newman re revised motion	0.10	650.00	65.00
5/26/2010	SW	Call with Dan Newman to discuss supplemental motion to approve protocol and issues with protocol approved by Cayman court; updating Kehinde George.	0.80	500.00	400.00
5/28/2010	KALG	Email from Dan Newman to Simon Dickson re para 3.1.3 of the protocol	0.10	650.00	65.00
				Sub-total Fees:	<u>6,485.00</u>

Rate Summary

Kehinde A. L. George	2.90 hours at 650.00 /hr	1,885.00
Susie Wakefield	9.20 hours at 500.00 /hr	4,600.00
Total hours:	<u>12.10</u>	

Expenses

Telephone calls and faxes	9.05
Sub-total Expenses:	<u>9.05</u>

A

Total Current Billing: 6,494.05

Previous Balance Due: 300,858.95

Total Now Due: \$ 307,353.00

Invoice payable upon receipt. All balances outstanding after 60 days will attract interest at 1.5% per month. Please enclose this stub with remittance or send telegraphic transfer clearing through correspondent bank: HSBC Bank USA, 452 Fifth Avenue, New York, New York, USA 10018, Swift Code: MRMDUS33, CHIPS ABA: 0108, FED ABA: 021001088 - Beneficiary Bank: The Bank of Bermuda Limited, 6 Front Street, Hamilton, Bermuda, Swift Code: BBDABMHM - Account Name: Attridge-Stirling & Woloniecki - Account No. 010 716751 501 (United States Dollars)

Attridge-Stirling + Woloniecki



**ATTRIDE-STIRLING
& WOLONIECKI**
BARRISTERS & ATTORNEYS

Crawford House, 50 Cedar Avenue
Hamilton HM11, Bermuda

P.O. Box HM 2879
Hamilton HM LX, Bermuda

Telephone: (441) 295-6500
Facsimile: (441) 295-6566
Web: www.aswlaw.com

Statement as of June 30, 2010
Statement No. 9797

Receiver of Founding Partners Global Fund Ltd.
Broad and Cassel
21st Floor, One Biscayne Tower
2 South Biscayne Boulevard
Miami, FL 33131

Attn: Daniel Newman

Daniel Newman
Founding Partners Global Fund Ltd.
Client No: 1451-001

6/15/2010	SW	File review; email Dan Newman and call re status of supplemental motion for approval of revised protocol; call to Simon Dickson re the same	0.40	500.00	200.00
6/16/2010	KALG	Discussion Susie Wakefield re further amendment to protocol	0.20	650.00	130.00
6/16/2010	SW	Emails with Jeff Geldens re protocol; reviewing and considering proposed change; reviewing and commenting on draft supplemental motion; email Simon Dickson re status in Cayman	1.20	500.00	600.00
6/17/2010	SW	Update from Jeff Geldens re status in Cayman	0.10	500.00	50.00
6/18/2010	KALG	Telephone call Dan Newman re fee applications and protocol application	0.20	650.00	130.00
Sub-total Fees:					<u>1,110.00</u>

Rate Summary

Kehinde A. L. George	0.40 hours at 650.00 /hr	260.00
Susie Wakefield	1.70 hours at 500.00 /hr	850.00
Total hours:	<u>2.10</u>	

Expenses

Telephone calls and faxes	12.28
Photocopies	59.40
Sub-total Expenses:	<u>71.68</u>

Total Current Billing:	<u>1,181.68</u>
-------------------------------	------------------------

Previous Balance Due:	307,353.00
-----------------------	------------

Total Now Due:	<u>\$ 308,534.68</u>
-----------------------	-----------------------------

Invoice payable upon receipt. All balances outstanding after 60 days will attract interest at 1.5% per month. Please enclose this stub with remittance or send telegraphic transfer clearing through correspondent bank: HSBC Bank USA, 452 Fifth Avenue, New York, New York, USA 10018, Swift Code: MRMDUS33, CHIPS ABA: 0108, FED ABA: 021001088 - Beneficiary Bank: The Bank of Bermuda Limited, 6 Front Street, Hamilton, Bermuda, Swift Code: BBDABMHM - Account Name: Attide-Stirling & Woloniecki - Account No. 010 716751 501 (United States Dollars)

Attide - Stirling + Woloniecki



**ATTRIDE-STIRLING
&WOLONIECKI**
BARRISTERS & ATTORNEYS

Crawford House, 50 Cedar Avenue
Hamilton HM11, Bermuda

P.O. Box HM 2879
Hamilton HM LX, Bermuda

Telephone: (441) 295-6500

Facsimile: (441) 295-6566

Web: www.aswlaw.com

Statement as of August 31, 2010
Statement No. 10225

Receiver of Founding Partners Global Fund Ltd.
Broad and Cassel
21st Floor, One Biscayne Tower
2 South Biscayne Boulevard
Miami, FL 33131

Attn: Daniel Newman

Daniel Newman
Founding Partners Global Fund Ltd.
Client No: 1451-001

8/5/2010	KALG	Email to Dan Newman re any response from Simon Dickson	0.10	650.00	65.00
8/10/2010	KALG	Email from Dan Newman to Ian Stokoe re protocol; Telephone call Jonathan Etra re same	0.50	650.00	325.00
8/12/2010	KALG	Telephone call Jonathan Etra re conference call with Ian Stokoe; emails re same	0.20	650.00	130.00
8/17/2010	KALG	Telephone call Dan Newman and Jon Etra re strategy for investors' call	0.80	650.00	520.00
8/19/2010	KALG	Emails between Dan Newman and Ian Stokoe re timing of call with investors	0.10	650.00	65.00
8/26/2010	KALG	Review file; email to Dan Newman re steps in contested Bermuda turnover application	1.80	650.00	1,170.00

Sub-total Fees: 2,275.00

Rate Summary

Kehinde A. L. George	3.50 hours at	650.00 /hr	2,275.00
Total hours:	3.50		

Daniel Newman
Statement No: 10225**Expenses**

Telephone calls and faxes 13.56

Sub-total Expenses: 13.56

Total Current Billing: 2,288.56

Previous Balance Due: 308,534.68

Total Now Due: \$ 310,823.24

Invoice payable upon receipt. All balances outstanding after 60 days will attract interest at 1.5% per month. Please enclose this stub with remittance or send telegraphic transfer clearing through correspondent bank: HSBC Bank USA, 452 Fifth Avenue, New York, New York, USA 10018, Swift Code: MRMDUS33, CHIPS ABA: 0108, FED ABA: 021001088 - Beneficiary Bank: The Bank of Bermuda Limited, 6 Front Street, Hamilton, Bermuda, Swift Code: BBDABMHM - Account Name: Attride-Stirling & Woloniecki - Account No. 010 716751 501 (United States Dollars)

Attride - Stirling & Woloniecki



**ATRIDE-STIRLING
& WOLONIECKI**
BARRISTERS & ATTORNEYS

Crawford House, 50 Cedar Avenue
Hamilton HM11, Bermuda

P.O. Box HM 2879
Hamilton HM LX, Bermuda

Telephone: (441) 295-6500
Facsimile: (441) 295-6566
Web: www.aswlaw.com

Statement as of September 30, 2010
Statement No. 10253

Receiver of Founding Partners Global Fund Ltd.
Broad and Cassel
21st Floor, One Biscayne Tower
2 South Biscayne Boulevard
Miami, FL 33131

Attn: Daniel Newman

Daniel Newman
Founding Partners Global Fund Ltd.
Client No: 1451-001

9/13/2010	KALG	Conference call with client, JPLs and investors	1.90	650.00	1,235.00
9/21/2010	KALG	Telephone call Jonathan Etra following up on investors' call	0.30	650.00	195.00
Sub-total Fees:					<u>1,430.00</u>

Rate Summary

Kehinde A. L. George	2.20 hours at 650.00 /hr	1,430.00
Total hours:	<u>2.20</u>	

Expenses

Telephone calls and faxes	40.05
Sub-total Expenses:	<u>40.05</u>

Payments

9/27/2010	Write-off	Write off interest	5,459.92
9/27/2010	Payment	Wire receipt (1451-001)	270,897.84
Sub-total Payments:			<u>276,357.76</u>

Total Current Billing: 1,470.05

Previous Balance Due: 34,465.48

Total Now Due: \$ 35,935.53

Invoice payable upon receipt. All balances outstanding after 60 days will attract interest at 1.5% per month. Please enclose this stub with remittance or send telegraphic transfer clearing through correspondent bank: HSBC Bank USA, 452 Fifth Avenue, New York, New York, USA 10018, Swift Code: MRMDUS33, CHIPS ABA: 0108, FED ABA: 021001088 - Beneficiary Bank: The Bank of Bermuda Limited, 6 Front Street, Hamilton, Bermuda, Swift Code: BBDABMHM - Account Name: Attitude-Stirling & Woloniecki - Account No. 010 716751 501 (United States Dollars)

Attitude - Stirling + Woloniecki

GREGORY A. WHITTMORE

GREGORY A. WHITTMORE

Attorney at Law

5910 N. Central Expressway, Suite 1010

Dallas, TX 75206-5142

kearsage@msn.com

Invoice submitted to:

Mr. Daniel S. Newman, Receiver

Broad and Cassel

One Biscayne Tower, 21st Floor

2 South Biscayne Boulevard

Miami, FL 33131

April 26, 2010

In Reference To: Annandale Partners, LP v. Sun Capital, Inc. v. Newman, Receiver
for Founding Partners Capital Management Company

Invoice #14533

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
4/6/2010 Telephone conference with David Mizgala regarding 298th stay order. E-mail to Messrs. Newman, Etra, and Ms. Barnes de Resendiz regarding Mizgala telephone conversation. Receive and review E-mail message from Dan Newman.	0.40 250.00/hr	100.00
4/9/2010 Receive & review Jon Etra's E-mail to Addison & Mizgala regarding 298th stay order.	0.10 250.00/hr	25.00
4/15/2010 Telephone conference with Michelle Visiedo-Hildago. Receive and review Michelle Visiedo-Hildago's E-mail to Addison & Mizgala.	0.30 250.00/hr	75.00
4/16/2010 Receive & review E-mail message from Michelle Visiedo-Hildago. Telephone conference with Dan Newman, Jon Etra, and Michelle Visiedo-Hildago regarding continuance motion. Telephone conference with Margaret Deacon, 298th District Court, to make announcement. Receive and review three E-mails from Jon Etra regarding communications with Rick Addison. Draft Emergency Motion for Continuance. E-mail to Dan Newman, Jon Etra, and Michelle Visiedo-Hildago regarding draft continuance motion. Telephone conference with David Mizgala regarding continuance motion. Plaintiffs agree to continuance. Revise and file emergency motion for continuance. E-mail to Dan Newman, Jon Etra, and Michelle Visiedo-Hildago regarding continuance motion. Telephone conference with Tish Avila regarding fax of motion. E-mail to Rick Addison & David Mizgala transmitting PDF copies of continuance motion. Receive and review E-mail from Rick Addison regarding stay order. E-mail to Rick Addison and David Mizgala transmitting another copy of stay order. Receive and review E-mail from Tish Avila with signature page of stay order signed by Addison. E-mail to Dan Newman, Jon Etra, and Michelle Visiedo-Hildago.	3.00 250.00/hr	750.00

Mr. Daniel S. Newman, Receiver

Page 2

	<u>Hrs/Rate</u>	<u>Amount</u>
4/20/2010 Attend docket call and present agreed stay order to Judge Tobolowsky for signature. E-mail to Rick Addison and David Mizgala transmitting signed stay order with copy to Messrs. Newman and Etra and Ms. Visiedo-Hildago.	0.80 250.00/hr	200.00
For professional services rendered	4.60	\$1,150.00
Additional Charges :		
4/16/2010 Filing fees		8.35
4/20/2010 Parking		4.00
4/26/2010 Photocopies		6.45
Postage		6.83
Total costs		\$25.63
Total amount of this bill		\$1,175.63
Previous balance		\$4,105.00
Balance due		\$5,280.63

Thank you for your business!

NOTICE TO CLIENTS

The State Bar of Texas investigates and prosecutes professional misconduct committed by Texas Attorneys.

Although not every complaint against or dispute with a lawyer involves professional misconduct, the State Bar Office of General Counsel will provide you with information about how to file a complaint.

For more information, call 1-800-932-1900. This is a toll-free call.

GREGORY A. WHITTMORE
Attorney at Law
5910 N. Central Expressway, Suite 1010
Dallas, TX 75206-5142
kearsage@msn.com

Invoice submitted to:
Mr. Daniel S. Newman, Receiver
Broad and Cassel
One Biscayne Tower, 21st Floor
2 South Biscayne Boulevard
Miami, FL 33131

May 26, 2010
In Reference To: Annandale Partners, LP v. Sun Capital, Inc. v. Newman, Receiver
for Founding Partners Capital Management Company

	<u>Amount</u>
Previous balance	\$5,280.63
Balance due	<u><u>\$5,280.63</u></u>

Thank you for your business!

NOTICE TO CLIENTS

The State Bar of Texas investigates and prosecutes professional misconduct committed by Texas Attorneys.

Although not every complaint against or dispute with a lawyer involves professional misconduct, the State Bar Office of General Counsel will provide you with information about how to file a complaint.

For more information, call 1-800-932-1900. This is a toll-free call.

GREGORY A. WHITTMORE
Attorney at Law
5910 N. Central Expressway, Suite 1010
Dallas, TX 75206-5142
kearsage@msn.com

Invoice submitted to:
Mr. Daniel S. Newman, Receiver
Broad and Cassel
One Biscayne Tower, 21st Floor
2 South Biscayne Boulevard
Miami, FL 33131

June 27, 2010
In Reference To: Annandale Partners, LP v. Sun Capital, Inc. v. Newman, Receiver
for Founding Partners Capital Management Company

	<u>Amount</u>
Previous balance	\$5,280.63
Balance due	<u><u>\$5,280.63</u></u>

Thank you for your business!

NOTICE TO CLIENTS

The State Bar of Texas investigates and prosecutes professional misconduct committed by Texas Attorneys.

Although not every complaint against or dispute with a lawyer involves professional misconduct, the State Bar Office of General Counsel will provide you with information about how to file a complaint.

For more information, call 1-800-932-1900. This is a toll-free call.

GREGORY A. WHITTMORE

Attorney at Law
5910 N. Central Expressway, Suite 1010
Dallas, TX 75206-5142
kearsage@msn.com

Invoice submitted to:
Mr. Daniel S. Newman, Receiver
Broad and Cassel
One Biscayne Tower, 21st Floor
2 South Biscayne Boulevard
Miami, FL 33131

July 26, 2010
In Reference To: Annandale Partners, LP v. Sun Capital, Inc. v. Newman, Receiver
for Founding Partners Capital Management Company

	<u>Amount</u>
Previous balance	\$5,280.63
Balance due	<u><u>\$5,280.63</u></u>

Thank you for your business!

NOTICE TO CLIENTS

The State Bar of Texas investigates and prosecutes professional misconduct committed by Texas Attorneys.

Although not every complaint against or dispute with a lawyer involves professional misconduct, the State Bar Office of General Counsel will provide you with information about how to file a complaint.

For more information, call 1-800-932-1900. This is a toll-free call.

GREGORY A. WHITTMORE
Attorney at Law
5910 N. Central Expressway, Suite 1010
Dallas, TX 75206-5142
kearsage@msn.com

Invoice submitted to:
Mr. Daniel S. Newman, Receiver
Broad and Cassel
One Biscayne Tower, 21st Floor
2 South Biscayne Boulevard
Miami, FL 33131

August 26, 2010
In Reference To: Annandale Partners, LP v. Sun Capital, Inc. v. Newman, Receiver
for Founding Partners Capital Management Company

	<u>Amount</u>
Previous balance	\$5,280.63
Balance due	<u><u>\$5,280.63</u></u>

Thank you for your business!

NOTICE TO CLIENTS

The State Bar of Texas investigates and prosecutes professional misconduct committed by Texas Attorneys.

Although not every complaint against or dispute with a lawyer involves professional misconduct, the State Bar Office of General Counsel will provide you with information about how to file a complaint.

For more information, call 1-800-932-1900. This is a toll-free call.

GREGORY A. WHITTMORE
Attorney at Law
5910 N. Central Expressway, Suite 1010
Dallas, TX 75206-5142
kearsage@msn.com

Invoice submitted to:
Mr. Daniel S. Newman, Receiver
Broad and Cassel
One Biscayne Tower, 21st Floor
2 South Biscayne Boulevard
Miami, FL 33131

September 27, 2010
In Reference To: Annandale Partners, LP v. Sun Capital, Inc. v. Newman, Receiver
for Founding Partners Capital Management Company

	<u>Amount</u>
Previous balance	\$5,280.63
9/23/2010 Payment - thank you. Check No. 138	<u>(\$3,158.00)</u>
Total payments and adjustments	<u>(\$3,158.00)</u>
Balance due	<u><u>\$2,122.63</u></u>

Thank you for your business!

NOTICE TO CLIENTS

The State Bar of Texas investigates and prosecutes professional misconduct committed by Texas Attorneys.

Although not every complaint against or dispute with a lawyer involves professional misconduct, the State Bar Office of General Counsel will provide you with information about how to file a complaint.

For more information, call 1-800-932-1900. This is a toll-free call.