

take exclusive custody and control of all assets and records of, or traceable to, the Receivership Entities.

2. The Receiver has determined the necessity of employing a technical support services firm to assist the Receiver in accessing, hosting, storing, and processing data and electronic information from the Receivership Entities.

3. The Receiver believes that Logos is capable of providing IT services that will increase the value of the Receivership Estate and at a significant efficiency over other IT service providers. Logos is experienced at handling information-technology needs, including providing secure online backup solutions, digital recovery services, network and server monitoring services, file sharing and distribution services, and other customized IT needs.

4. Moreover, the Receiver believes that employing Logos will provide efficiencies and savings over other service providers because Logos is familiar with the Receivership Entities and already has access to many of the pertinent servers and data storage facilities. Logos provided the Receivership Entities with technical support services prior to the Receivership, including hosting “cloud” data storage. As a result, Logos has access to, and is familiar with, the “cloud” storage services used by the Receivership Entities. Moreover, Logos has worked with the Receiver to preserve the information stored in the cloud since the inception of the Receivership. The Receiver, therefore, believes that continuing to use Logos for IT services will provide efficiencies that will benefit the Receivership Estate.¹

5. By this Motion, the Receiver seeks authorization from the Court to employ Logos to: (i) recover and provide to the Receiver archived email from the Receivership Entities in a

¹ Additionally, Logos has recovered and provided to the Receiver the QuickBooks files from the Receivership Entities free of charge. Access to this information has proven invaluable to the Receiver in understanding and reconstructing the financial transactions entered into by the Receivership Entities prior to this suit.

searchable and accessible format; and (ii) recover data from the on-site servers of the Receivership Entities.

6. Logos has agreed to recover and provide the Receiver with the Receivership Entities' archived email for a fee of \$6,000. Based on his research, the Receiver believes that such services have a fair market value of at least \$7,000.

7. Logos has also agreed to recover data from the Receivership Entities' on-site servers for a fee of \$105 per hour. The Receiver believes that this rate is consistent with the industry standard for these types of services and is reasonable.

8. To the best of the Receiver's knowledge, Logos does not hold or represent an interest adverse to the Receivership Estate and is disinterested for the purpose of this proceeding.

WHEREFORE, the Receiver prays for the entry of an Order by this Court:

1. Authorizing the employment of Logos as technical support services provider for the Receiver as of the date of this motion; and

2. For such other and further relief as this Court deems just and proper.

