

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION
Plaintiff,

v.

JAMES G. TEMME, and
STEWARDSHIP FUND, LP,
Defendants.

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Civil Action No. 4:11-cv-655

**RECEIVER'S FIRST INTERIM APPLICATION TO ALLOW AND PAY (1)
RECEIVER'S FEES AND EXPENSES; AND (2) ATTORNEYS' FEES AND EXPENSES**

Keith M. Aurzada as Receiver (the "*Receiver*") for James G. Temme, Stewardship Fund, LP, and all other entities directly or indirectly controlled by James G. Temme or Stewardship Fund, LP, including but not limited to, Stewardship Advisors, LLC, d/b/a Stewardship Advisors, LP, Stewardship Asset Management Genpar I, LLC, Stewardship Group, LLC, Destiny Fund, LP and Stewardship Management, LP (collectively, the "*Defendants*"), hereby files his First Interim Application to Allow and Pay Receiver's Fees and Expenses and (2) Attorneys' Fees and Expenses and, in support of such, would respectfully show unto the Court as follows:

BACKGROUND

1. Prior to the initiation of the above-captioned action by the Securities and Exchange Commission ("*Commission*"), Defendants raised at least \$35 million from various investors seeking to purchase distressed residential mortgage loans. In offering and selling the notes, the Defendants represented to investors that the offerings and proceeds would be used to

buy real property at deeply discounted values, and that the properties would be improved to become performing mortgages to be leased or resold at a profit.

2. As the Receiver has conducted his investigation, it has become apparent that the Defendants' means for acquiring properties was to obtain funds from various groups or individuals to invest in limited partnerships in which the general partner would acquire at a discount, tapes of distressed, non-performing mortgage loans.

3. In the spring of 2011, Defendants' scheme collapsed, payments to investors ceased, and lienholders began foreclosure proceedings on the properties acquired and held by the Defendants. Many of the properties are in dilapidated conditions. Moreover, it is difficult to tell from the Defendants' records how the properties were acquired, the consideration paid for each of the properties, and the complete transactional history with respect to each property. Moreover, many of the properties were and are delinquent on ad valorem taxes and have been lost to foreclosure.

4. Since commencing his duties, the Receiver has identified through the loan servicing company database and public record searches most of the lienholders on each of the properties. The receivership is still in the discovery phase, with a large focus of the Receiver being to identify, locate, and secure assets.

**APPLICATION FOR FEES AND EXPENSES
OF THE RECEIVER AND HIS ATTORNEYS**

5. This Application seeks the approval and payment of fees and reimbursable expenses for the Receiver and Bryan Cave LLP ("**BC**") for the time period from October 28, 2011 through February 28, 2012.

6. During the period covered by this Application, the Receiver has incurred fees and expenses with respect to his activities and those of BC as to these proceedings on a monthly basis as follows:

Month	Fees	Expenses
October 2011	\$4,466.00	\$0.00
November 2011	\$29,481.50	\$46.87
December 2011	\$15,284.00	\$1,230.25
January 2012	\$21,675.00	\$1,143.96
February 2012	\$19,444.00	\$1,216.51
TOTAL:	\$90,350.50	\$3,637.59 ¹

7. Exhibit A, which is attached and incorporated for all purposes, conveys the following information for the time period of October 28, 2011 through February 28, 2012: (a) the number of hours worked by each attorney and staff member on a particular day; (b) the manner and type of work performed by each attorney and staff member; (c) the customary billing rate for each person rendering service in this matter; (d) the monetary value assigned to each task performed by a given attorney and/or staff member; and (e) each expense item incurred.² Each of the invoices attached as Exhibit A reflect aggregate expenses by category during a given month. A summary of the time billed by each task code is included at the end of the invoices.

¹ All Mileage rates charged by BC conform to the IRS standard mileage rates for 2011 and 2012. All expenses included in Exhibit A reflect actual vendor costs incurred by BC.

² Exhibit A reflects Westlaw Computerized Research of \$539.08. The Receiver is not seeking reimbursement for these expenses, and the amounts requested herein do not include such expenses.

DESCRIPTION OF RECEIVERSHIP ASSETS

8. As of October 25, 2012, the balance of the Receiver's liquid accounts totaled \$127,116.97. This does not include other, non-liquid assets of the Receivership Estate such as interests in notes, properties, or potential causes of action.

9. Additionally, the Receiver expects to increase the aforementioned balance in the coming weeks due to three contingencies, which are contingent only on court approval. First, the Receiver has moved for approval of a settlement with the MCS Parties (the term "MCS Parties" refers to MC Smith Realty, LLC, MCS Small Cap Fund I, LP ("MCS Small Cap"), MCS Stewardship No. 2 Invest, LP ("MCS 2 LP"), and MCS Stewardship No. 3 Invest, LP ("MCS 3 LP"). Through such settlement, if approved, the MCS Parties will pay the Receiver, for the benefit of the Receivership Entities, \$1,335,000.00 (the "MCS Settlement Payment"), which, after payment of contingency fees and expenses, will result in net amount of just over \$1 million. *See* Docket No. 152.

10. Next, the Receiver expects to liquidate a retirement account held for the benefit of Jay Temme, and such account currently has a balance of approximately \$116,000.

11. Finally, the Receiver expects to receive certain sale proceeds from pending sale motions in or about December 2012 (*see* Docket No. 103 and Docket No. 104, respectively, which are incorporated by reference).

12. At this time, the Receiver seeks approval of all fees and expenses requested herein, on an interim basis. However, the Receiver only seeks reimbursement of 50% of his fees and expenses, with the balance to be reimbursed without further order of the Court upon receipt of the MSC Settlement Payment. All fees and expenses approved and reimbursed would be

approved and reimbursed on an interim basis, with final approval to be determined at the close of the Receivership.

JOHNSON FACTORS

13. In support of this request for compensation and reimbursement of expenses, the Receiver respectfully directs this Court's attention to those factors generally considered by courts in awarding compensation to professionals for services performed in connection with the administration of a receivership estate. As stated by the Fifth Circuit Court of Appeals in *Migis v. Pearle Vision, Inc.*, 135 F.3d 1041, 1047 (5th Cir. 1998), "The calculation of attorneys fees involves a well-established process. First, the court calculates a 'lodestar' fee by multiplying the reasonable number of hours expended on the case by the reasonable hourly rates for the participating lawyers. The court then considers whether the lodestar figure should be adjusted upward or downward depending on the circumstances of the case. In making a lodestar adjustment the court should look at twelve factors, known as the Johnson factors, after *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974)." Those factors, as applied to the services rendered in this case by the Receiver and BC, are addressed below.

(a) **The Time and Labor Required.** The Receiver and BC respectfully refer the Court's attention to Exhibit A, which details the involvement of the Receiver and BC's attorneys in this case during the period covered by this Application showing that a total of more than 449 hours of attorney, Receiver, and paraprofessional time have been expended. The Receiver has endeavored to keep costs and fees down by, when possible, using secretarial assistance who do not bill for their time, and by using paralegal staff who bill at lower rates than the Receiver and his counsel.

The Receiver's efforts can be categorized and summarized as follows:

(i) **Interest in P38**

14. Through his investigation, the Receiver identified an entity known as P38 Holdings, LLC (“P38”), the original ownership of which was held 10% by Wingspan Portfolio Advisors, LLC; 45% by Charles A. Vose III (“Vose”); and 45% by TREI II Holdings, LLC (“TREI II”). The Receiver further identified TREI II as an entity directly or indirectly controlled by Temme or Stewardship Fund, LP and, as such, a part of the Receivership Estate.

15. On or about August 17, 2011, TREI II agreed to transfer its 45% interest in P38 to Vose (the “P38 Transfer”). In consideration for the P38 Transfer, TREI II received from Vose a 5% interest in Stewardship Management, LP, which was held by another entity owned by Vose, Southwest Federation North Texas, LP.

16. The Receiver does not believe that the P38 Transfer was for reasonably equivalent value and, therefore, believes that the P38 Transfer is an asset of the Receivership Estate. The Receiver, thus, contacted Vose and reached a settlement whereby Vose agreed to assign his interest in the P38 Transfer to the Receiver; relinquish the 5% partnership interest in Stewardship Management, LP that was transferred to TREI II; and relinquish to the Receiver the \$5,264.71 in distributions received from P38 [Dkt. No. 69].

17. The Receiver received \$5,264.71 from Vose and has received periodic small dividends from the Estate’s interest in P38.

(ii) **The Legacy Assets and the Substitute Assets**

18. The Receiver has located 458 Legacy Assets and 130 Substitute Assets that are set to be auctioned for the benefit of the Estate. [Dkt. Nos. 62, 63, and 104]. The Legacy Assets consist of properties that were titled in the name of one of the Defendants at the time the

Receiver was appointed. Upon appointment, the Receiver took possession of the Legacy Assets and turned them over to Barrier to be readied for sale.

19. The Substitute Assets were acquired through a settlement with Stewardship Fund No. 2, L.P., Stewardship Fund No. 3, L.P., Stewardship Fund No. 4, L.P. and Stewardship Fund No. 5, L.P (collectively, the “Mt. Vernon Entities”). The Receivership Estate owns a forty percent (40%) limited partnership interest in each of the Mt. Vernon Entities. The Mt. Vernon Entities acquired assets from one or more of the Defendants through a series of Asset Disposition Agreements that listed certain mortgages that were to be purchased on behalf of the limited partnerships.³ However, certain assets described in the Asset Disposition Agreements were not identified in the original limited partnership agreements (the Substitute Assets). As such, the Receiver contends that the Estate may have a claim to take title to the Substitute Assets by virtue of a fraudulent conveyance claim. The Mt. Vernon Entity Investors disagree and assert that they are entitled to ownership. Based on the potential Receiver’s claim to the Substitute Assets, the Mt. Vernon Entities entered into a settlement whereby the Estate will be granted a 40% profits interest in the Substitute Assets in exchange for the Mt. Vernon Entities continued efforts to preserve the value of the Substitute Assets. *See* Order Granting Receiver’s Emergency Motion to Approve Asset Disposition Agreement [Dkt. No. 63].

(iii) Settlement with the Boyce Parties

20. Through his investigation, the Receiver learned that in 2011, Robert and Elizabeth Boyce and ER, LLC (collectively the “Boyce Parties”) advanced \$1.3 million to one or more of the Defendants. In return, the Boyce Parties received \$250,000 in cash, oil and gas leases of

³ Currently the Mt. Vernon Entities hold approximately 1,184 assets. The Receivership Estate will receive dividends from the sale of those assets as they occur. However, because the Estate’s interest is only as a limited partner, the Receiver has no control over the sale of such assets.

undetermined value, and 71 properties (mostly REO). In December of 2011, the Boyce Parties sold 53 of the properties for net proceeds of approximately \$650,000, leaving 18 properties in their possession (the Receiver believes that the properties have a value of approximately \$50,000).

21. The Receiver believes that the Estate may have claims against the Boyce Parties arising out of their transactions with the Defendants. Accordingly, the Receiver contacted the Boyce Parties and reached a settlement whereby the Boyce Parties agreed to transfer to the Receiver the 18 properties acquired from Defendants, transfer to the Receiver 8 oil and gas leases relating to approximately 11,709 acres and the associated overriding royalty interests, and pay the Receiver \$50,000 [Dkt. Nos. 80 and 95]. The Receiver has received the deeds to the REO properties and a \$25,000 payment and is awaiting original copies of the oil and gas leases and additional \$25,000 payment. The 18 properties are currently being marketed for sale by Barrier. The oil and gas leases will be marketed for public sale through a reputable broker when they are received.

(iv) Settlements with the Harbour and Cavco Entities

22. Through his investigation, the Receiver determined that in July 2008, Harbour Portfolio I, LLC ("Harbour I") and Harbour Portfolio II, LLC ("Harbour II") attempted to purchase from Defendants 221 and 172 distressed real estate mortgages and corresponding notes for \$2,032,395.69 and \$1,321,103.80 respectively. As part of the transaction, each of the mortgages should have been assigned to Harbour I and Harbour II (and the assignments recorded) and an allonge should have been executed for each note indicating that Harbour I and Harbour II were the new holders of the notes. Although the transactions closed in 2008, few, if any, of the mortgage assignments or allonges were ever executed or recorded. As a result, the

Receivership claimed an interest in the remaining mortgages and notes owned by Harbour I and Harbour II.

23. Similarly, in February 2010, Harbour Portfolio IV (“Harbour IV”) attempted to purchase 199 distressed real estate mortgages and corresponding notes for a purchase price of \$645,000 and from March 2009 to June 2010, Cavco Holdings, LLC (“Cavco”) attempted to purchase 203 distressed real estate mortgages and corresponding notes for a total purchase price of approximately \$917,000. As with Harbour I and Harbour II, Harbour IV and Cavco failed to properly assign and transfer the mortgages and notes. As a result, the Receiver claimed an interest in the mortgages and notes owned by Harbour IV and Cavco.

24. Based on the Receiver’s potential claims, Harbour I, Harbour II, Harbour IV, and Cavco entered into settlement agreements with the Receiver [Dkt. No. 79]. Under the settlement agreements, Harbour I agreed to transfer its interest in eighty (80) mortgages and notes to the Receivership Estate; Harbour II agreed to transfer its interest in thirty seven (37) mortgages and notes to the Receivership Estate; Harbour IV and the Receiver will divide the net proceeds from sale of Harbour IV’s assets 40% to the Receivership Estate and 60% to Harbour IV; and Cavco and the Receiver will divide the net proceeds from sale of Cavco’s assets 40% to the Receivership Estate and 60% to Cavco.

25. The assets received from settlements with the Harbour and Cavco entities have been marketed for sale through Halo Companies, Inc. (“Halo”). Halo has identified a potential buyer (Lakeside Portfolio Management, LLC) for the assets and has filed a motion seeking authorization to sell the assets. *See* Motion for Authority to Sell Properties to Lakeside Portfolio Management, LLC [Dkt. No. 103]. However, based on objections from investors, the sale of the assets has been delayed until December 2012. The Receiver has been in regular contact with the

potential purchaser and has provided its due diligence materials to any investor that has requested it.

(v) **Anglers and Hunters, Inc.**

26. Through his investigation, the Receiver determined that the Estate has an interest in Angler and Hunters, Inc., a now defunct entity owned or controlled by Temme. Although Anglers and Hunters, Inc. is no longer operating, the Receiver identified a bank account owned by Anglers and Hunters that contained \$19,988.36. The Receiver has acquired the funds in the account and closed the account.

(vi) **Other Assets of Defendants**

27. Through his investigation, the Receiver has also located a personal retirement account owned by Temme. Temme has agreed to relinquish his right to the funds in the account to the Receiver, and the Receiver intends to file a motion to liquidate the account shortly.

28. The Receiver intends to hire a private investigator to determine whether there are any additional assets owned by the Defendants that can be sold for the benefit of the Estate.

(vii) **“Disposed” and “Sold” Assets**

29. The Receiver has located numerous boxes containing asset files for properties that were identified by the Defendants as “disposed” assets and numerous containing asset files for properties that were identified by the Defendants as “sold” assets. At this time, the Receiver is working with investors to cull, identify, and analyze the “disposed” and “sold” assets.

(viii) **Litigation**

30. On May 15, 2012, MDA Realty Holdings, LLC, MVB Realty Holdings, LLC, LF Realty Holdings, LLC and F & B Note Holdings LLC (the “Finch and Barry Group”) filed a Motion for Relief from Stay [Dkt. No. 83] in which they “request[] that they be permitted to

proceed with an investigation of potential claim or the filing of a lawsuit against nonparties” (the “Lift Stay Motion”). In connection with the Lift Stay Motion, the Receiver received requests for production from the Finch and Barry Group. The Receiver opposed the Finch and Barry Group’s request to lift the stay and take discovery from the Receiver.

31. On September 13, 2012, the Court denied the request to lift the stay and take discovery from the Receiver. *See* Order Denying Lifting Stay [Dkt. No. 135]. The Receiver has subsequently received requests for discovery from other investor groups. The Receiver will continue to oppose requests to take discovery from the Receiver at the expense of the investors. Moreover, the Receiver believes that the documents requested are almost entirely available from the nonparties. To the extent documents are available from nonparties, the Receiver believes the cost of producing such documents should be born by those nonparties rather than the Receivership Estate.

(b) **The Novelty and Difficulty of the Questions.** Many of the tasks reflected in Exhibit A involved factual and legal questions that were of substantial complexity. Moreover, the Defendants’ complete lack of systematic record keeping and failure to complete basic paperwork has substantially hindered the Receiver’s efforts.

(c) **The Skill Requisite to Perform the Service.** The Receiver believes that the services performed in this case have required individuals possessing considerable experience in asset seizure, tracing and liquidation. The Receiver and BC have considerable experience in such areas and have consulted additional resources where necessary.

(d) **The Preclusion of Other Employment Due to Acceptance of the Case.** The Receiver and BC have not declined any representation solely because of their services as Receiver and counsel for the Receiver.

The Customary Fee. The hourly rates sought herein are commensurate with or lower than the rates charged by other practitioners of similar experience levels in the Eastern District of Texas and actually reflect a discount from the standard rates charged by the Receiver and his counsel. During the course of these proceedings, both lawyers and paralegals have performed services on behalf of the Receiver with respect to these proceedings. The timekeepers who have performed services for the Receiver, and their status at BC, are indicated in Exhibit A and in the chart below. BC Attorney Profiles of lawyers who have performed services for the Receiver are available at www.bryancave.com. Finally, part of the Receiver's work in this case has been to catalogue thousands of entries concerning the investors, payments, and receipts. Where possible, non-billable BC staff has been used to complete those duties. The timekeepers utilized, their position, their standard rates for 2011 and 2012, the rate applied here, as well as the amount of any applicable discount, are summarized as follows:

Name:	Position	Standard Rate 2011	% of Discount for 2011	Standard Rate 2012	% of Discount for 2012	Discounted Rate
Keith M. Aurzada	Partner	\$485.00	18.50	\$505.00	21.70	\$395.00
Jay L. Krystinik	Associate	\$420.00	8.30	\$460.00	16.30	\$385.00
Bradley J. Purcell	Associate	\$295.00	8.40	\$295.00	8.40	\$270.00
Edward T. Robertson	Associate	\$415.00		\$440.00		N/A
LeEtta Detrich	Legal Assistant	\$80.00		\$80.00		N/A

(e) **Whether the Fee is Fixed or Contingent.** The Receiver's and BC's fees are fixed insofar as monies exist by way of Receivership Assets from which to pay such fees. Payment of such fees, however, is subject to Court approval.

(f) **Time Limitations Imposed by the Client or Other Circumstances.** The time requirements during the period covered by this Application have been substantial.

(g) **The Experience, Reputation and Ability of the Attorneys.** BC has several attorneys who specialize exclusively in the practice of civil trial law. The practice of those attorneys regularly includes the representation of bankruptcy trustees and receivers. The reputation of BC's attorneys is recognized and respected in their community in Texas.

(h) **The Undesirability of the Case.** The representation of the Receiver incident to this case has not been undesirable.

(i) **The Nature and Length of the Professional Relationship with the Client.** BC did not represent the Receiver in these proceedings prior to being retained in these proceedings.

(j) **Award in Similar Cases.** BC believes that the fees requested in this case are less than or equal to those which have been awarded in similar cases in this District.

WHEREFORE, the Receiver respectfully requests that the Court allow the requested compensation for professional services and expenses rendered by the Receiver and his legal counsel, and authorize the Receiver to pay BC \$46,994.05, representing \$45,175.25 in interim fees (50% of \$90,350.50 in fees) and \$1,818.80 in interim expenses (50% of \$3,637.59 in expenses) for the time period from October 28, 2011 through February 28, 2012, with the balance of all such fees and expenses to be paid to BC without further order of the Court immediately upon receipt of the MCS Settlement Payment.⁴

⁴ If the settlement with MCS is not approved, the balance can be distributed after further application and order.

Dated: November 1, 2012

Respectfully submitted:

//s// Keith Miles Aurzada
Keith Miles Aurzada, Receiver

2200 Ross Avenue, Suite 3300
Dallas, Texas 75201
Telephone: 214.721.8041
Facsimile: 214.721.8100

CERTIFICATE OF CONFERENCE

I hereby certify that, in accordance with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission, I delivered the invoices attached to the foregoing as Exhibit A to David B. Reece, counsel for the Commission. Additionally, my counsel has discussed the relief requested with David B. Reece, and has been advised that the Commission does not object to the relief requested. Therefore this matter is present to the Court for determination.

//s// Keith Miles Aurzada
Keith Miles Aurzada, Receiver

CERTIFICATE OF SERVICE

I certify that on November 1, 2012, I served a true and correct copy of the foregoing pleading by electronic mail through the Court's CM/ECF system to all parties consenting to service through same, including to counsel for the SEC, the Defendants, and all others consenting to service through same.

Moreover, the foregoing will be uploaded to www.stewardshipfundreceivership.com

//s// Keith Miles Aurzada
Keith Miles Aurzada

EXHIBIT A



Bryan Cave LLP Atlanta | Boulder | Charlotte | Chicago | Colorado Springs | Dallas | Denver | Frankfurt | Hamburg | Hong Kong | Irvine
Jefferson City | Kansas City | Los Angeles | New York | Paris | Phoenix | San Francisco | Shanghai | Singapore | St. Louis | Washington, D.C.

EMPLOYER IDENTIFICATION NUMBER: 43-0602162

Keith M. Aurzada
2200 Ross Avenue, Suite 3300
Dallas, TX 75201

February 23, 2012
Invoice # 10131776
Client # C071707
Payment is due upon
Receipt

STATEMENT OF ACCOUNT

CURRENT CHARGES FOR MATTER:

File #0330022
Keith M. Aurzada, Receiver for SEC v. Temme

Fees for Legal Services	\$	70,791.00
Expenses and Other Charges		2,311.83
TOTAL CHARGES THIS INVOICE	\$	73,102.83
STATEMENT TOTAL	\$	73,102.83

PAYMENT INSTRUCTIONS

Check Payment Instructions:

Bryan Cave LLP
P.O. Box 503089
St. Louis, MO 63150-3089

Please return Remittance Advice with
payment in the enclosed envelope.

ACH Payment Instructions:

ACH to: Bank of America
One Bank of America Plaza
St. Louis, MO 63101
Routing #081000032
Account # 100101007976

Wire Instructions:

Wire to: Bank of America
One Bank of America Plaza
St. Louis, MO 63101
ABA #0260-0959-3
Account # 100101007976

Swift Codes:
BOFAUS3N (incoming US wires)
BOFAUS6S (incoming Non-US wires)

Please include the Client, Matter, or Invoice Number with all payments.

Keith M. Aurzada

2906

February 23, 2012

Invoice # 10131776

Client # C071707

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For Legal Services Rendered Through January 31, 2012

File #0330022

Keith M. Aurzada, Receiver for SEC v. Temme

10/28/11	J. L. Krystinik	L110	5.00 hrs.	1,925.00	Review receivership orders (.4) and work session with K. Aurzada regarding same (.2); compose and send letter to various banks regarding receivership orders and asset freeze (.8); lengthy conference call with counsel for Mt. Vernon investors regarding case status (1.0); travel to Stewardship Fund offices, communicate with property manager regarding securing premises, and inspect premises, documenting visit by pictures and video (2.6).
10/31/11	J. L. Krystinik	B150	6.60 hrs.	2,541.00	Prepare for and attend lengthy meeting with counsel for Mt. Vernon investors regarding case background information (4.8); telephone call with Halo personnel regarding their services for receivership entities (.4); telephone call to Lender Live regarding same (.2); communicate with Temme counsel regarding laptop computer and case status (.2); lengthy work session with receiver regarding strategy moving forward (0.8); review proposed stipulation from Mt. Vernon investors (.2).
11/01/11	J. L. Krystinik	L110	2.50 hrs.	962.50	Work session with B. Purcell regarding potential subpoena to e-mail providers (.2); telephone call with Legacy Bank regarding account closure (.2); telephone call with D. Roosien regarding case status and assistance from Mt. Vernon (.5); review state court pleadings to prepare for injunction hearing (1.6).
11/02/11	K. M. Aurzada	L110	1.00 hrs.	395.00	Attend meeting with Russ Lambert and J. Krystinik (1.0)
11/02/11	J. L. Krystinik	L450	7.50 hrs.	2,887.50	Prepare for hearing and travel to and from court (.7); attend hearing and negotiations with Temme regarding receivership order (1.5); work session

Keith M. Aurzada

2907

February 23, 2012

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					with counsel for Mt. Vernon (.2) and intervenors (.2); work session with receiver regarding same (.1); obtain stock certificate and provide receipt to Temme counsel regarding same (.3); travel to Stewardship Fund offices and meeting with landlord and Russ Lambert (1.5); travel to Halo and meet with Halo principals (3.0).
11/04/11	J. L. Krystinik	L120	3.00 hrs.	1,155.00	Attention to multiple e-mails regarding contact with Temme (0.8); research rules regarding same (.2); telephone call with K. Aurzada regarding same (.2); telephone call with SEC regarding same (.3); communicate with court regarding same and regarding scheduling issues (.1); multiple e-mails with opposing counsel regarding same (.4); review motion to remove receiver and outline response to same (.6); telephone call with Halo regarding meeting with receiver (.2); work session with receiver regarding same (.2).
11/07/11	J. L. Krystinik	B150	1.20 hrs.	462.00	Telephone call with R. Chron at Halo regarding case status (.2); communicate with Mt. Vernon counsel and Temme's prior counsel at Jackson Walker regarding obtaining documents (.8); work session with B. Purcell regarding obtaining FBI documents (.2).
11/08/11	J. L. Krystinik	L110	3.90 hrs.	1,501.50	Telephone call and e-mail with W. McGee regarding Lender Live (.2); coordinate with Figari Davenport (Mt. Vernon counsel) regarding obtaining documents (.2); coordinate with Jackson Walker (Temme former counsel) regarding obtaining documents (.2); conduct interview of D. Fuerra (2.9); work session with K. Aurzada regarding same (.3); e-mail Temme counsel regarding computer (.1);
11/09/11	K. M. Aurzada	L120	1.50 hrs.	592.50	Telephone conference with P. Keating (.2); telephone call with M. Morgan (.2); review and analyze documents in order to prepare for further analysis of mortgage loans (1.1)
11/09/11	J. L. Krystinik	L110	2.60 hrs.	1,001.00	Lengthy telephone call with Bank of America regarding Temme accounts

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					(.6); work session with receiver regarding same (.1); e-mail Temme counsel regarding same (.1); review documents produced by Mr. Vernon counsel (1.2); telephone call with D. Reece regarding case status (.4); work session with K. Aurzada regarding same (.2).
11/10/11	K. M. Aurzada	L120	1.00 hrs.	395.00	Analyze response to motion to remove K. Aurzada as receiver (.6); telephone conferences with investors (.3); analyze potential consulting by prior IT consultant (.1)
11/10/11	J. L. Krystinik	L190	0.80 hrs.	308.00	Review SEC response to motion to remove receiver (.3); work session with K. Aurzada regarding same (.5).
11/10/11	B. J. Purcell	L190	1.00 hrs.	270.00	Correspond with vendor regarding setting up a website that will provide consumers information regarding the receivership.
11/11/11	K. M. Aurzada	L190	2.00 hrs.	790.00	Meet with T. Bibby regarding potential loan brokerage services (1.4); prepare for and meet with J. Hamm regarding Logos Data Services (.6)
11/11/11	J. L. Krystinik	L210	2.80 hrs.	1,078.00	Work session with K. Aurzada regarding response to motion to remove receiver (.4); e-mails with J. Helms regarding case status (.2); e-mails with Jackson Walker regarding obtaining additional files (.2); prepare and file response to motion to remove receiver (2.0).
11/13/11	J. L. Krystinik	L110	0.80 hrs.	308.00	Prepare for hearing on motion to remove receiver.
11/14/11	K. M. Aurzada	B440	4.50 hrs.	1,777.50	Prepare for and attend hearing on Motion for Disqualification
11/14/11	J. L. Krystinik	L440	6.50 hrs.	2,502.50	Prepare for hearing on motion to remove receiver (.4); attend hearing, present opposition, and obtain order denying motion (5.2); multiple telephone calls with investors regarding case status (.3); coordinate and obtain computer from Temme (.4); deliver same for forensic analysis (.2).
11/15/11	K. M. Aurzada	B150	0.50 hrs.	197.50	Participate in investor call with Mr. Arnold regarding his investment in Route 66 Ethanol and real estate investments

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11/16/11	K. M. Aurzada	L110	2.30 hrs.	908.50	Prepare for meeting with J. Temme and J. Helms
11/16/11	J. L. Krystinik	L110	0.50 hrs.	192.50	Telephone conference with Equitas counsel regarding Rule 202 depositions (.2); work session with K. Aurzada regarding same (.2); multiple e-mails with Equitas counsel regarding same (.1).
11/16/11	B. J. Purcell	L110	0.30 hrs.	81.00	Confer with SEC and FBI regarding accessing documents in the government's possession.
11/17/11	J. L. Krystinik	B110	0.40 hrs.	154.00	Review form partnership agreement provided by Temme's counsel (.2); work session with B. Purcell regarding inspection of FBI files (.2)
11/18/11	K. M. Aurzada	L110	2.00 hrs.	790.00	Prepare for and attend meeting at Halo to review documents and other items.
11/18/11	J. L. Krystinik	B120	3.80 hrs.	1,463.00	Attend lengthy meeting with Halo regarding asset management of legacy assets and potential sale of same.
11/21/11	K. M. Aurzada	B150	1.40 hrs.	553.00	Meet with investor (1.0); telephone conference with borrower regarding payments made and loss of home to tax foreclosure and follow up on same (.4)
11/21/11	B. J. Purcell	B150	0.60 hrs.	162.00	Confer with homeowner regarding status of receivership (.4); confer with receiver regarding mortgage payments being made by homeowners (.2).
11/21/11	B. J. Purcell	L120	0.70 hrs.	189.00	Confer with receiver and J. Krystinik regarding strategy for finding assets and responding to consumer inquiries.
11/22/11	K. M. Aurzada	B150	1.70 hrs.	671.50	Analyze documents received from investors (.7); meeting with D. Roosen (1.0)
11/22/11	J. L. Krystinik	B150	0.20 hrs.	77.00	Communicate with Mt. Vernon counsel regarding case status.
11/22/11	B. J. Purcell	B150	0.70 hrs.	189.00	Confer with homeowner regarding mortgage payment and tax escrow (.4); confer with receiver regarding the same (.3).
11/25/11	K. M. Aurzada	B120	1.00 hrs.	395.00	Review voluminous documents received from investors regarding their claims and correspondence with various parties.
11/28/11	K. M. Aurzada	B120	3.50 hrs.	1,382.50	Review documents at Stewardship

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					offices
11/29/11	K. M. Aurzada	L120	3.00 hrs.	1,185.00	Attend lengthy meeting with SEC to discuss case status
11/29/11	J. L. Krystinik	L190	1.00 hrs.	385.00	Telephone calls and e-mails with website development team regarding receivership website (.5); work session with B. Purcell regarding same (.2); communicate with Temme's prior counsel regarding obtaining files (.3).
11/29/11	B. J. Purcell	L130	2.30 hrs.	621.00	Confer with website team regarding getting the website live this week (.5); draft motion for claims procedures (1.8).
11/30/11	K. M. Aurzada	B120	6.40 hrs.	2,528.00	Review voluminous materials at offices of Stewardship and assist with boxing of same (2.4); Meet with D. Reece and other SEC attorneys to discuss status (3.0); review materials received from investors and attend conference calls with potential stalking horses (1.0)
11/30/11	J. L. Krystinik	L130	1.40 hrs.	539.00	E-mails with website development team regarding receivership website (.2); telephone call with Jackson Walker (.7); work session with K. Aurzada regarding same (.2); review and revise motion to approve claim procedures (.2); work session with B. Purcell regarding same (.1).
11/30/11	B. J. Purcell	L120	1.60 hrs.	432.00	Confer with website team (.2); draft motion for claims procedures, order regarding the same, and claims procedures forms (1.0); confer with SEC regarding the same (.4).
12/02/11	K. M. Aurzada	L120	3.50 hrs.	1,382.50	Attend meeting with SEC and Halo
12/05/11	K. M. Aurzada	L120	1.20 hrs.	474.00	Evaluate potential suits against investors and the requirements for bringing actions under the UFTA
12/05/11	J. L. Krystinik	B130	3.60 hrs.	1,386.00	Finalize and motion to approve claims procedure process (0.8); review documents received from Mt. Vernon counsel and Stewardship Fund's prior counsel (2.2); telephone call with John Graves (.4); work session with K. Aurzada regarding same (.2).
12/05/11	B. J. Purcell	L210	0.90 hrs.	243.00	Review and revise claims procedure motion and order.

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12/06/11	K. M. Aurzada	B150	2.50 hrs.	987.50	Attend meeting with investors (1.8); mark up loan sale agreement and return same (.3); research regarding property located in Port Charlotte and email D. Roosen regarding same (.4).
12/06/11	E. T. Robertson	B120	0.90 hrs.	373.50	Preparation of Non-Disclosure Agreements for potential purchases
12/07/11	K. M. Aurzada	B120	1.50 hrs.	592.50	Meetings and calls with potential stalking horse bidders
12/07/11	B. J. Purcell	L210	2.40 hrs.	648.00	Draft motion to employ accountant and order (.6) ;confer with SEC regarding the same (.2); confer with G. Murray regarding the same (.1); confer with A. Whitaker regarding document production (.3); confer with homeowner regarding location of title documents (.7); confer with Halo regarding same (.5).
12/07/11	L. T. Detrich	B120	4.00 hrs.	320.00	Retrieve and organize loan files as part of receivership from Halo
12/08/11	J. L. Krystinik	B150	0.80 hrs.	308.00	Meet with John Graves regarding Temme investments (.4) communicate with Mt. Vernon counsel regarding SEC request for records (.2); communicate with K. Aurzada regarding same (.2).
12/08/11	B. J. Purcell	L210	0.60 hrs.	162.00	Begin drafting motion to employ accountant G. Murray.
12/09/11	B. J. Purcell	B150	0.60 hrs.	162.00	Conduct phone interview with mortgage holders.
12/12/11	B. J. Purcell	L210	0.60 hrs.	162.00	Draft motion to employ accountant G. Murray.
12/12/11	B. J. Purcell	B150	0.80 hrs.	216.00	Correspond with counsel for investor group regarding filing claims forms (.5); correspond with individual investor regarding the same (.3)
12/12/11	L. T. Detrich	B120	1.00 hrs.	80.00	Cross-referencing loan files retrieved at Halo with AMX
12/13/11	K. M. Aurzada	B120	1.40 hrs.	553.00	Analyze property title issues and discuss same with W. Magee at Lender Live
12/13/11	B. J. Purcell	L210	0.40 hrs.	108.00	Finalize motion to employ G. Murray and corresponding order and file the same.
12/13/11	B. J. Purcell	B150	0.40 hrs.	108.00	Correspond with D. Stephens regarding investment in Stewardship Fund and improper listing as

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					borrower (.2); correspond with counsel for investor group (.2)
12/13/11	L. T. Detrich	B120	1.50 hrs.	120.00	Cross-reference loan files with AMX
12/14/11	K. M. Aurzada	B120	1.30 hrs.	513.50	Review issues concerning sale of assets and potential stalking horse bidders including review of physical files collected from Halo
12/14/11	B. J. Purcell	B120	2.60 hrs.	702.00	Respond to inquiries from homeowners and investors J. Gonzales, D. Holley, J. Phelps, S. Jackson
12/14/11	L. T. Detrich	B120	2.50 hrs.	200.00	Cross-reference loan files onsite with AMX and spreadsheets and track down recorded documents and send to recipient list
12/15/11	B. J. Purcell	B120	0.80 hrs.	216.00	Respond to inquiries from homeowner and investor
12/15/11	L. T. Detrich	B120	4.10 hrs.	328.00	Cross-referencing onsite loan files with AMX and spreadsheets
12/16/11	B. J. Purcell	B120	0.60 hrs.	162.00	Respond to homeowner inquiries regarding claims form
12/16/11	L. T. Detrich	B120	6.50 hrs.	520.00	Organize and categorize loan files retrieved from storage and compare to AMX
12/17/11	L. T. Detrich	B120	3.00 hrs.	240.00	Compare loan file inventory to Bid Tape from Catherine Castle and send
12/19/11	L. T. Detrich	B120	2.00 hrs.	160.00	Compare outstanding files from Bid Tape to AMX (1.0); record all pieces of mail received for each loan (1.0)
12/20/11	B. J. Purcell	B120	1.30 hrs.	351.00	Answer investor questions regarding claim form
12/21/11	B. J. Purcell	B120	1.80 hrs.	486.00	Answer questions from homeowners, investors, and creditors of Stewardship Fund, including L. Lohestro.
12/22/11	B. J. Purcell	B120	1.40 hrs.	378.00	Correspond with homeowners and investors.
12/27/11	K. M. Aurzada	B150	1.20 hrs.	474.00	Prepare for and attend meeting with Linda Schoendist
12/27/11	B. J. Purcell	B150	2.40 hrs.	648.00	Correspond with homeowners and investors regarding declaration form, including L. Lohstroh, R. Juarez, A Corrado, and C. Santana.
12/28/11	B. J. Purcell	B120	1.80 hrs.	486.00	Correspond with homeowners and investors regarding claim form and receivership status.

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12/29/11	B. J. Purcell	B120	0.80 hrs.	216.00	Correspond with investor representative regarding case status.
12/30/11	J. L. Krystinik	L190	0.30 hrs.	115.50	Review court order regarding answer deadline (.1); work session with receiver regarding same (.1); communicate with SEC regarding same (.1).
12/30/11	B. J. Purcell	B120	1.40 hrs.	378.00	Correspond with homeowners and investors regarding claims form and procedures, including R. Thornton and L. Bodeweese.
12/30/11	B. J. Purcell	B150	1.20 hrs.	324.00	Conduct research regarding potential show cause motion.
01/02/12	B. J. Purcell	B120	3.30 hrs.	891.00	Correspond with investors and homeowners (.8); correspond with official for Washentaw county regarding potential foreclosure suit against Receiver (.6); draft motion to release escrow funds (1.9).
01/03/12	B. J. Purcell	B110	6.00 hrs.	1,620.00	Review and revise motion to release escrow funds (.6); correspond with homeowners regarding release of escrow funds (.8); review mail from Receivership Entities (4.6).
01/03/12	L. T. Detrich	B120	0.50 hrs.	40.00	Teleconference and emails with Catherine Castle regarding Bid Tape
01/03/12	L. T. Detrich	B120	1.00 hrs.	80.00	Reconcile list of assets and determine final list eligible for sale for Catherine Castle
01/03/12	L. T. Detrich	B150	0.60 hrs.	48.00	Prepare and organize spreadsheets for initial meeting at Mt. Vernon Investments
01/03/12	L. T. Detrich	B110	4.50 hrs.	360.00	Review and inventory case materials on Canadian Peso
01/04/12	J. L. Krystinik	B150	0.10 hrs.	38.50	Communicate with Digital Discovery regarding forensic copies of hard drives.
01/04/12	B. J. Purcell	B150	4.60 hrs.	1,242.00	Correspond with counsel for investor group J. Phelps (.9); review Receivership Entities' mail for foreclosure notices and lawsuits (3.1); inquire into two lawsuits filed against Receivership Entities (.6).
01/04/12	L. T. Detrich	B110	0.50 hrs.	40.00	Conference with K. Aurzada on loan file spreadsheets and totals before meeting at Mt. Vernon Investments
01/04/12	L. T. Detrich	B150	2.60 hrs.	208.00	Meeting with Jonathan Adams, Jerry Wheeler, Jennifer and Dennis

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					Roossien at Mt. Vernon Investments regarding their propped assets purchased from Temme
01/04/12	L. T. Detrich	B120	5.00 hrs.	400.00	Enter data onto loan file spreadsheets for our assets (3.0); prepare for work session at Mt. Vernon for the next day (2.0)
01/05/12	K. M. Aurzada	B150	4.50 hrs.	1,777.50	Attend meeting and analyze issues regarding Mt. Vernon (2.0); attend meeting with Barrier and review files for purposes of note sales (2.5)
01/05/12	B. J. Purcell	B120	1.20 hrs.	324.00	Correspond with Receiver and SEC regarding homeowners that have paid escrow funds but not received them from servicers (.7); correspond with homeowners regarding the same (.5).
01/05/12	L. T. Detrich	B120	1.00 hrs.	80.00	Double check spreadsheets and checklists for prep for work session at Mt. Vernon
01/05/12	L. T. Detrich	B150	4.00 hrs.	320.00	Work session at Mt. Vernon Investments with K. Aurzada, Jerry Wheeler, Jennifer and Dennis Roossien mapping their assets
01/05/12	L. T. Detrich	B110	1.00 hrs.	80.00	Post-meeting follow-up and discussion with K. Aurzada and B. Purcell including organizing notes and next step
01/06/12	B. J. Purcell	L130	0.30 hrs.	81.00	Correspond with webteam regarding updating website (.3).
01/06/12	L. T. Detrich	B120	3.00 hrs.	240.00	Log and sort incoming mail for various Stewardship Funds
01/09/12	J. L. Krystinik	B110	0.20 hrs.	77.00	Communicate with Alan Pennington regarding Rule 202 presuit depositions and status thereof.
01/10/12	L. T. Detrich	B110	3.00 hrs.	240.00	Review and inventory materials on old Canadian Peso case
01/10/12	L. T. Detrich	B120	3.00 hrs.	240.00	Compare new lists of assets to master inventory
01/11/12	J. L. Krystinik	L130	0.30 hrs.	115.50	Telephone conference with Digital Discovery regarding forensic copies of hard drives.
01/11/12	L. T. Detrich	B110	2.50 hrs.	200.00	Review and inventory materials from Canadian Peso and prior cases
01/12/12	J. L. Krystinik	L120	0.40 hrs.	154.00	Work session with B. Purcell regarding New Hampshire action against Stewardship Fund (.2); communicate with Equitas counsel

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Date	Attorney	Case No.	Hours	Rate	Description
					regarding case status (.2).
01/12/12	B. J. Purcell	B110	1.30 hrs.	351.00	Review adversary filed against Receivership Entity (.3); correspond with counsel that filed adversary proceeding regarding stay (.6); approve withdrawal of adversary proceeding (.4).
01/13/12	J. L. Krystinik	L130	0.80 hrs.	308.00	Telephone call with Equitas counsel regarding case status and Rule 202 suit for presuit discovery against non-receivership entities (.5); work session with receiver regarding same (.3).
01/16/12	K. M. Aurzada	B120	0.50 hrs.	197.50	Meet with J. Little regarding asset sales
01/16/12	K. M. Aurzada	B150	0.80 hrs.	316.00	Call with D. Roosein regarding status of case, litigation, and avoidance actions
01/17/12	J. L. Krystinik	L120	0.40 hrs.	154.00	Work session with B. Purcell and K. Aurzada regarding suit against Stewardship in New Hampshire (.2); review e-mails with opposing counsel regarding same (.1); confirm dismissal of same (.1).
01/17/12	B. J. Purcell	L210	0.60 hrs.	162.00	Conduct search for other actions filed against Receivership Entities.
01/17/12	L. T. Detrich	B110	3.00 hrs.	240.00	Review and inventory materials from previous suits
01/17/12	L. T. Detrich	B120	0.20 hrs.	16.00	Email correspondence with Catherine Castle and C. Korologos regarding final onsite asset totals
01/20/12	K. M. Aurzada	B150	1.00 hrs.	395.00	Prepare for meeting with D. Roosein regarding case status and attempts to sell loan portfolio.
01/20/12	B. J. Purcell	L210	1.40 hrs.	378.00	Review and revise motion to show cause.
01/23/12	K. M. Aurzada	B150	0.50 hrs.	197.50	Meet with D. Roosein regarding sale of assets (.2); conference call with Deloitte and DebtX regarding same of assets (.3)
01/23/12	B. J. Purcell	B120	3.60 hrs.	972.00	Correspond with Halo regarding previously unidentified PO Box receiving payments from homeowners (1.6); correspond with postmaster regarding forwarding same to Receiver (.4); correspond with homeowners regarding progress of receivership and ability to receive deeds from Halo (1.6)

Keith M. Aurzada

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01/24/12	K. M. Aurzada	L210	0.60 hrs.	237.00	Finalize motion to show cause regarding ownership of assets
01/24/12	J. L. Krystinik	L210	0.60 hrs.	231.00	Revise show cause motion (.3); work sessions with K. Aurzada and B. Purcell regarding same (.3).
01/24/12	B. J. Purcell	B150	3.40 hrs.	918.00	Correspond with investor groups including D. Lunn (.6); attempt to contact D. Abbott regarding reviewing Temme files (.3); review and revise motion to show cause (2.1); draft service list regarding the same (.4)
01/24/12	L. T. Detrich	B120	4.00 hrs.	320.00	Check and compare Deloitte's categories with ours and our on-site inventory of assets (hard file and database) (2.5); look up names of registered agents for funds and enter on table (1.0); email correspondence with Deloitte to schedule teleconference (.5)
01/25/12	J. L. Krystinik	B150	0.40 hrs.	154.00	Communicate with creditors regarding claim form for creditors (.2); work session with receiver regarding same (.1); continued attention to show cause motion (.1).
01/26/12	B. J. Purcell	B120	2.60 hrs.	702.00	Draft form letter to send to preserve Receivership Estate property (1.1); review notices of foreclosure and set up system regarding same (1.5).
01/26/12	L. T. Detrich	B120	0.30 hrs.	24.00	Teleconference with Lev Yagudayev from Deloitte to walk him through the online AMX database and answer his questions
01/26/12	L. T. Detrich	B110	1.00 hrs.	80.00	Correspondence to interrupt foreclosure sales and enforce receivership orders.
01/27/12	K. M. Aurzada	L110	2.00 hrs.	790.00	Review documents at evidence locker at 1 Justice Way
01/27/12	B. J. Purcell	B110	7.30 hrs.	1,971.00	Review files with Receiver at the FBI evidence locker.
01/27/12	L. T. Detrich	L110	5.00 hrs.	400.00	Work session at the FBI with K. Aurzada, B. Purcell and agents, D. Abbott, Danica and another female agent
01/27/12	L. T. Detrich	B120	2.00 hrs.	160.00	Organize and log incoming mail from various funds into files and spreadsheets
01/30/12	K. M. Aurzada	L110	0.50 hrs.	197.50	Call with D. Reece regarding status of

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					case
01/30/12	J. L. Krystinik	L120	0.90 hrs.	346.50	Work session with B. Purcell regarding show cause motion (.2); review and revise motion and order regarding allowance of escrow payments (.2); telephone call with Home Solutions counsel regarding show cause motion and information needed to resolve same (.5).
01/30/12	B. J. Purcell	B120	3.10 hrs.	837.00	Review and revise letter to preserve receivership assets (.8); review and revise motion to release escrow funds (1.7); correspond with SEC regarding motion to show cause (.6).
01/30/12	L. T. Detrich	B120	6.00 hrs.	480.00	Correspondence to interrupt foreclosure sales and enforce receivership order
01/31/12	B. J. Purcell	B150	2.40 hrs.	648.00	Correspond with homeowners and investors, including American Mutual (1.0); correspond with SEC regarding show cause motion (1.4)
01/31/12	L. T. Detrich	B120	6.00 hrs.	480.00	Correspondence to interrupt foreclosure sales and enforce receivership order

TIMEKEEPER SUMMARY OF FEES

		Hours	Amount
K. M. Aurzada	PARTNER	54.80	21,646.00
J. L. Krystinik	ASSOCIATE	59.30	22,830.50
E. T. Robertson	ASSOCIATE	0.90	373.50
B. J. Purcell	ASSOCIATE	71.10	19,197.00
L. T. Detrich	LEGAL ASST	84.30	6,744.00
TOTAL		270.40	70,791.00

Total Hours 270.40

Total Fees for Legal Services \$ 70,791.00

EXPENSES AND OTHER CHARGES

12/07/11	Outside Copy - Elite Copy Solutions, Inc. Forensic Imaging Of Jay Temme hard drive	811.88
12/19/11	Outside Copy - Elite Copy Solutions, Inc. Conversion of Cassett to CD of a telephone conversation between Temme Investors	119.08

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12/13/11	Bishop, Susan Paige - Filing/Service Fee 3960 - OPERATING - Filing fees ordered from Cass County, MI	40.00
12/13/11	Bishop, Susan Paige - Filing/Service Fee 3960 - OPERATING - Filing Fees ordered from Cass County, MI	43.75
11/21/11	Parking - Jay Lloyd Krystinik Parking on 11/02 at courthouse for Motion for Contempt hearing	9.00
11/21/11	Parking - Jay Lloyd Krystinik Parking on 10/31 at Bank of America for Stewartship Fund Meeting	18.00
12/09/11	Parking - Keith Aurzada Parking on 11/2/11 at courthouse	9.00
11/21/11	Local Transportation - Jay Lloyd Krystinik Mileage on 10/28 to New Receivership Property	19.87
12/12/11	Local Transportation - Pamela Easter-Yancy Mileage on 11/29/11 - travel to real estate office to store file	8.33
12/12/11	Local Transportation - Pamela Easter-Yancy Mileage on 11/30/11 - travel to real estate office to store file	8.33
12/12/11	Local Transportation - Pamela Easter-Yancy Mileage on 11/28/11 - travel to real estate office to store file	8.33
12/17/11	Local Transportation - Gia Smith Mileage on 12/8/11 for round trip travel to Plano	22.20
12/19/11	Local Transportation - LeEtta Detrich Mileage on 12/7/11 round trip travel to Halo Companies for organization and collection of loan files for K. Aurzada.	28.53
12/19/11	Local Transportation - Jay Lloyd Krystinik Mileage on 11/14/11 for trip to Federal Courthouse in Sherman	81.57
01/31/12	Local Transportation - Dallas Petty Cash mileage and toll tags for DTI employee to Temme Office for Keith Aurzada	31.57
	Copy Charges	97.40
	Express Package Delivery	8.53
	Local Delivery - External Service - For transport of 25 boxes of loan files from Halo to BC	713.76
	Postage	19.00
	Long Distance Telephone Charges	67.50
	Scanning PDF Charges	130.20
	Filing Fee	16.00
	Total Expenses and Other Charges	\$ 2,311.83
	TOTAL CHARGES FOR THIS MATTER	\$ 73,102.83



Bryan Cave LLP Atlanta | Boulder | Charlotte | Chicago | Colorado Springs | Dallas | Denver | Frankfurt | Hamburg | Hong Kong | Irvine
Jefferson City | Kansas City | Los Angeles | New York | Paris | Phoenix | San Francisco | Shanghai | Singapore | St. Louis | Washington, D.C.

EMPLOYER IDENTIFICATION NUMBER: 43-0602162

Keith M. Aurzada
2200 Ross Avenue, Suite 3300
Dallas, TX 75201

February 23, 2012
Invoice # 10131776
Client # C071707
Matter # 0330022

REMITTANCE ADVICE

CURRENT CHARGES

Fees for Legal services	\$	70,791.00
Expenses and Other Charges		2,311.83
TOTAL CHARGES THIS INVOICE	\$	73,102.83

PAYMENT INSTRUCTIONS

Check Payment Instructions:

Bryan Cave LLP
P.O. Box 503089
St. Louis, MO 63150-3089

Please return Remittance Advice with
payment in the enclosed envelope.

ACH Payment Instructions:

ACH to: Bank of America
One Bank of America Plaza
St. Louis, MO 63101
Routing #081000032
Account # 100101007976

Wire Instructions:

Wire to: Bank of America
One Bank of America Plaza
St. Louis, MO 63101
ABA #0260-0959-3
Account # 100101007976

Swift Codes:
BOFAUS3N (incoming US wires)
BOFAUS6S (incoming Non-US wires)

Please include the Client, Matter, or Invoice Number with all payments.



Bryan Cave LLP Atlanta | Boulder | Charlotte | Chicago | Colorado Springs | Dallas | Denver | Frankfurt | Hamburg | Hong Kong | Irvine
Jefferson City | Kansas City | Los Angeles | New York | Paris | Phoenix | San Francisco | Shanghai | Singapore | St. Louis | Washington, D.C.

EMPLOYER IDENTIFICATION NUMBER: 43-0602162

Keith M. Aurzada
2200 Ross Avenue, Suite 3300
Dallas, TX 75201

March 31, 2012
Invoice # 10131778
Client # C071707
Payment is due upon
Receipt

STATEMENT OF ACCOUNT

CURRENT CHARGES FOR MATTER:

File #0330022
Keith M. Aurzada, Receiver for SEC v. Temme

Fees for Legal Services	\$	19,559.50
Expenses and Other Charges		644.86
TOTAL CHARGES THIS INVOICE	\$	20,204.36
STATEMENT TOTAL	\$	20,204.36

PAYMENT INSTRUCTIONS

Check Payment Instructions:

Bryan Cave LLP
P.O. Box 503089
St. Louis, MO 63150-3089

Please return Remittance Advice with
payment in the enclosed envelope.

ACH Payment Instructions:

ACH to: Bank of America
One Bank of America Plaza
St. Louis, MO 63101
Routing #081000032
Account # 100101007976

Wire Instructions:

Wire to: Bank of America
One Bank of America Plaza
St. Louis, MO 63101
ABA #0260-0959-3
Account # 100101007976

Swift Codes:
BOFAUS3N (incoming US wires)
BOFAUS6S (incoming Non-US wires)

Please include the Client, Matter, or Invoice Number with all payments.

Keith M. Aurzada

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For Legal Services Rendered Through February 29, 2012

File #0330022
 Keith M. Aurzada, Receiver for SEC v. Temme

01/20/12	J. L. Krystinik	L130	0.30 hrs.	115.50	Work session with B. Purcell regarding mail forwarding; communicate with U.S. postal service regarding same.
02/01/12	B. J. Purcell	B120	2.20 hrs.	594.00	Correspond with homeowners regarding receivership and investors regarding proof of claim.
02/01/12	L. T. Detrich	B120	0.50 hrs.	40.00	Compare new asset list to our inventory and master inventory and send findings to K. Aurzada
02/01/12	L. T. Detrich	B120	1.30 hrs.	104.00	Correspondence to interrupt foreclosure sales and enforce receivership order
02/02/12	B. J. Purcell	B120	3.60 hrs.	972.00	Correspond with Florida Foreclosure Attorneys and G. Caballero regarding \$70,000 in checks that was received by Stewardship Fund (2.7); determine process to assign and deposit same (.3); correspond with FBI regarding bank statements and oil and gas leases (.6).
02/02/12	L. T. Detrich	B120	6.50 hrs.	520.00	Correspondence to interrupt foreclosure sales and enforce receivership order.
02/03/12	B. J. Purcell	L210	2.20 hrs.	594.00	Draft motion to employ Barrier Advisors (1.8); correspond with SEC and court clerk regarding same (.4).
02/03/12	L. T. Detrich	B120	4.00 hrs.	320.00	Correspondence to interrupt foreclosure sales and enforce receivership order
02/06/12	B. J. Purcell	B120	1.80 hrs.	486.00	Correspond with Halo regarding checks sent to post office box in Plano (.1); correspond with receiver regarding same (.4); contact post master regarding same (1.3).
02/06/12	L. T. Detrich	B120	0.50 hrs.	40.00	Due diligence on Stewardship Fund LP checks and monies
02/07/12	B. J. Purcell	L210	6.20 hrs.	1,674.00	Draft motion to release escrow funds

Keith M. Aurzada

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March 31, 2012

Invoice # 10131778

Client # C071707

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					(2.1); draft proposed order regarding the same (.3); draft motion to show cause regarding turnover of assets (1.4); draft proposed order regarding the same (.3); conduct research regarding show cause standard (1.7); conduct research regarding expedited consideration of motion (.2); draft notice of appearance (.2).
02/08/12	B. J. Purcell	L210	1.20 hrs.	324.00	Correspond with SEC regarding motion to employ Barrier and motion to release escrow funds (.8); review and revise same (.4).
02/08/12	L. T. Detrich	B120	6.50 hrs.	520.00	Correspondence to interrupt foreclosure sales and enforce receivership order.
02/09/12	K. M. Aurzada	B150	3.50 hrs.	1,382.50	Prepare for and attend meeting with A. Pennington and D. Reece
02/09/12	B. J. Purcell	B120	2.40 hrs.	648.00	Correspond with homeowners regarding status of case and IRS 1098s.
02/09/12	L. T. Detrich	B120	6.00 hrs.	480.00	Correspondence to interrupt foreclosure sales and enforce receivership order.
02/10/12	B. J. Purcell	L210	2.40 hrs.	648.00	Draft motion to negotiate funds (.9); draft proposed order regarding same (.2); correspond with homeowners regarding 1098s (1.3)
02/10/12	L. T. Detrich	B120	7.00 hrs.	560.00	Correspondence to interrupt foreclosure sales and enforce receivership order.
02/13/12	B. J. Purcell	B150	1.60 hrs.	432.00	Correspond with investors regarding filing proofs of claim.
02/13/12	L. T. Detrich	B110	3.50 hrs.	280.00	Categorize evidence from FBI
02/13/12	L. T. Detrich	B120	3.80 hrs.	304.00	Correspondence to interrupt foreclosure sales and enforce receivership order
02/14/12	L. T. Detrich	B120	4.00 hrs.	320.00	Correspondence to interrupt foreclosure sales and enforce receivership order.
02/15/12	K. M. Aurzada	B110	1.00 hrs.	395.00	Meet with D. Reece to discuss case status and show assets and claims
02/15/12	B. J. Purcell	B120	1.40 hrs.	378.00	Draft letter to Halo and LenderLive regarding motion to show cause (.7); correspond with homeowners regarding 1098s (.7)
02/15/12	L. T. Detrich	B120	5.00 hrs.	400.00	Correspondence to interrupt foreclosure sales and enforce

Keith M. Aurzada

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Date	Attorney	Case No.	Hours	Rate	Description
					receivership order.
02/16/12	K. M. Aurzada	B150	1.50 hrs.	592.50	Prepare for meeting with Mt. Vernon investments
02/16/12	B. J. Purcell	B150	2.20 hrs.	594.00	Correspond with homeowners regarding 1098s (1.0); correspond with counsel for Homesolutions regarding show cause hearing (1.2)
02/16/12	L. T. Detrich	B120	3.00 hrs.	240.00	Correspondence to interrupt foreclosure and enforce receivership order
02/17/12	L. T. Detrich	B120	1.80 hrs.	144.00	Correspondence to interrupt foreclosures and enforce receivership order
02/21/12	K. M. Aurzada	B310	1.20 hrs.	474.00	Prepare for and attend meeting with L. Hirsch and MCS representatives; analyze potential fraudulent conveyance issues
02/21/12	B. J. Purcell	B310	2.80 hrs.	756.00	Correspond with G. Caballero regarding assigning check to receiver (1.4); review documents assigning underlying loan to Stewardship Fund (1.4)
02/22/12	K. M. Aurzada	L210	2.20 hrs.	869.00	Analyze fraudulent transfer issues and review pleadings regarding same (1.8); telephone conference with D. Reece to provide status update (.2); review files of assets to which SFD obtained deeds (.2)
02/22/12	B. J. Purcell	B120	0.60 hrs.	162.00	Draft letter to Mount Vernon counsel regarding preservation of assets.
02/22/12	L. T. Detrich	B120	1.50 hrs.	120.00	Arrange for a quote on title abstracts on nine specific REO properties.
02/27/12	K. M. Aurzada	B150	1.80 hrs.	711.00	Negotiate agreement with Mt. Vernon and discuss same with D. Reece (1.0); attend meeting with Barrier and prepare for due diligence (.8)
02/27/12	B. J. Purcell	B130	2.90 hrs.	783.00	Review asset disposition agreement (1.9); draft motion to approve asset disposition agreement (1.0).
02/28/12	B. J. Purcell	L210	3.20 hrs.	864.00	Draft motion to show cause regarding P38 Holdings (2.1); correspond with opposing counsel regarding same (1.1).
02/29/12	K. M. Aurzada	B180	1.00 hrs.	395.00	Meet with J. Goldfarb to discuss fraudulent transfer claims
02/29/12	B. J. Purcell	L210	1.20 hrs.	324.00	Correspond with counsel for Home Solutions regarding status conference

for motion to show cause (.5); meet
with potential third-party counsel (.7).

TIMEKEEPER SUMMARY OF FEES

		Hours	Amount
K. M. Aurzada	PARTNER	12.20	4,819.00
J. L. Krystinik	ASSOCIATE	0.30	115.50
B. J. Purcell	ASSOCIATE	37.90	10,233.00
L. T. Detrich	LEGAL ASST	54.90	4,392.00
	TOTAL	105.30	19,559.50

Total Hours 105.30

Total Fees for Legal Services \$ 19,559.50

EXPENSES AND OTHER CHARGES

02/09/12	Miscellaneous Fees - Elite Copy Solutions, Inc. Temme - Client mass mail out	37.66
02/13/12	Parking - LeEtta Detrich Parking fees 1/5/12	8.00
02/13/12	Local Transportation - LeEtta Detrich Mileage 1/5/12 roundtrip to/from Mt Vernon Investments for work sessions which included K. Aurzada and their counsel	10.55
02/13/12	Local Transportation - LeEtta Detrich Mileage 1/27/12 round trip to/from the FBI Bldg for work session, which included K. Aurzada & B. Purcell	11.77
02/14/12	Local Transportation - LeEtta Detrich Mileage 1/4/12 to/from Mt Vernon Investments for work session, which included K. Aurzada, the investors and their counsel	10.55
	Copy Charges	148.60
	Local Delivery Charges	83.88
	Search Fee	31.90
	Postage	94.45
	Long Distance Telephone Charges	14.70
	Scanning PDF Charges	189.80
	Filing Fee	3.00
	Total Expenses and Other Charges	\$ 644.86

TOTAL CHARGES FOR THIS MATTER \$ 20,204.36



Bryan Cave LLP Atlanta | Boulder | Charlotte | Chicago | Colorado Springs | Dallas | Denver | Frankfurt | Hamburg | Hong Kong | Irvine
 Jefferson City | Kansas City | Los Angeles | New York | Paris | Phoenix | San Francisco | Shanghai | Singapore | St. Louis | Washington, D.C.

EMPLOYER IDENTIFICATION NUMBER: 43-0602162

Keith M. Aurzada
 2200 Ross Avenue, Suite 3300
 Dallas, TX 75201

March 31, 2012
 Invoice # 10131778
 Client # C071707
 Matter # 0330022

**SUMMARY OF TIME BILL BY TASK
 FOR BOTH INVOICES (10131776 & 10131778)**

TASK	DESCRIPTION	TOTAL
B110	Case Administration	\$ 6,088.00
B120	Asset Analysis and Recovery	\$ 26,979.50
B130	Asset Disposition	\$ 2,169.00
B150	Meetings of and Communications with Creditors	\$ 18,055.00
B180	Avoidance Action Analysis	\$ 395.00
B310	Claims Administration and Objections	\$ 1,230.00
L110	Fact Investigation/Development	\$ 9,452.50
L120	Analysis/Strategy	\$ 6,459.50
L130	Experts/Consultants	\$ 1,780.00
L190	Other Case Assessment, Development and Administration	\$ 1,868.50
L210	Pleadings	\$ 8,706.00
L440	Other Trial Preparation and Support	\$ 4,280.00
L450	Trial and Hearing Attendance	\$ 2,887.50
		\$ 90,350.50

REMITTANCE ADVICE

PAYMENT INSTRUCTIONS

Check Payment Instructions:

Bryan Cave LLP
 P.O. Box 503089
 St. Louis, MO 63150-3089

Please return Remittance Advice with
 payment in the enclosed envelope.

ACH Payment Instructions:

ACH to: Bank of America
 One Bank of America Plaza
 St. Louis, MO 63101
 Routing #081000032
 Account # 100101007976

Wire Instructions:

Wire to: Bank of America
 One Bank of America Plaza
 St. Louis, MO 63101
 ABA #0260-0959-3
 Account # 100101007976

Swift Codes:
 BOFAUS3N (incoming US wires)
 BOFAUS6S (incoming Non-US wires)

Please include the Client, Matter, or Invoice Number with all payments.



Bryan Cave LLP Atlanta | Boulder | Charlotte | Chicago | Colorado Springs | Dallas | Denver | Frankfurt | Hamburg | Hong Kong | Irvine
Jefferson City | Kansas City | Los Angeles | New York | Paris | Phoenix | San Francisco | Shanghai | Singapore | St. Louis | Washington, D.C.

EMPLOYER IDENTIFICATION NUMBER: 43-0602162

Keith M. Aurzada
2200 Ross Avenue, Suite 3300
Dallas, TX 75201

March 31, 2012
Invoice # 10131778
Client # C071707
Matter # 0330022

CURRENT CHARGES

Fees for Legal services	\$	19,559.50
Expenses and Other Charges		644.86
TOTAL CHARGES THIS INVOICE	\$	20,204.36

PAYMENT INSTRUCTIONS

Check Payment Instructions:

Bryan Cave LLP
P.O. Box 503089
St. Louis, MO 63150-3089

Please return Remittance Advice with
payment in the enclosed envelope.

ACH Payment Instructions:

ACH to: Bank of America
One Bank of America Plaza
St. Louis, MO 63101
Routing #081000032
Account # 100101007976

Wire Instructions:

Wire to: Bank of America
One Bank of America Plaza
St. Louis, MO 63101
ABA #0260-0959-3
Account # 100101007976

Swift Codes:
BOFAUS3N (incoming US wires)
BOFAUS6S (incoming Non-US wires)

Please include the Client, Matter, or Invoice Number with all payments.

PROPOSED ORDER

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION
Plaintiff,

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v.

Civil Action No. 4:11-cv-655

JAMES G. TEMME, and
STEWARDSHIP FUND, LP,
Defendants.

**ORDER GRANTING RECEIVER’S FIRST INTERIM APPLICATION TO ALLOW
AND PAY (1) RECEIVER’S FEES AND EXPENSES; AND (2) ATTORNEYS’ FEES
AND EXPENSES**

CAME ON FOR CONSIDERATION the Receiver’s First Interim Application to Allow and Pay (1) Receiver’s Fees and Expenses; and (2) Attorneys’ Fees and Expenses (the “**Application**”), which requests reimbursement for fees incurred for the time period from October 28, 2011 through February 28, 2012. The Receiver seeks to pay Bryan Cave LLP (“**BC**”) \$46,994.05, representing \$45,175.25 in interim fees (50% of \$90,350.50 in fees) and \$1,818.80 in interim expenses (50% of \$3,637.59 in expenses), with the balance of all such fees and expenses to be paid to BC immediately upon receipt of the MCS Settlement Payment (as defined in the Application).

No opposition has been filed to this Application. Counsel for the Commission has reviewed the fee application and been afforded the opportunity to object, but does not object to the relief sought. Based upon a review of the Application and the pleadings on file, the Court finds and concludes that (a) the relief requested in the Application is in the best interests of the Receiver and his receivership estates; (b) proper and adequate notice of the Application has been

given and that no other or further notice is necessary; and (c) good and sufficient cause exists for the granting of the relief requested in the Application after having given due deliberation upon the Application and all of the proceedings had before the Court in connection with the Application. Therefore, it is hereby **ORDERED** that:

- i. The Application is **GRANTED**.
- ii. The Court approves, on an interim basis, the fees (\$90,350.50) and expenses (\$3,637.59) incurred by the Receiver from October 28, 2011 through February 28, 2012.
- iii. The Receiver is authorized to immediately pay BC the total sum of \$46,994.05, representing \$45,175.25 in interim fees (50% of \$90,350.50 in fees) and \$1,818.80 in interim expenses (50% of \$3,637.59 in expenses) for the time period from October 28, 2011 through February 28, 2012.
- iv. Immediately upon receipt of the MCS Settlement Payment, the Receiver is authorized to pay to BC, without further order of the Court, the sum of \$46,994.04, constituting the balance of the fees and expenses approved above, with such amounts equaling \$45,175.25 in fees and \$1,818.79 in expenses. If the settlement with MCS is not approved, the balance can be distributed after further application and order of this Court.

Dated this ____ day of _____, 2012.

AMOS L. MAZZANT
UNITED STATES MAGISTRATE JUDGE

Submitted and prepared by:

//s// Jay L. Krystinik

Jay L. Krystinik

Texas Bar No. 24041279

2200 Ross Avenue, Suite 3300

Dallas, Texas 75201

Telephone: 214.721.8041

Facsimile: 214.721.8100

Counsel for Keith Miles Aurzada, Receiver

PROPOSED ORDER

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION
Plaintiff,

v.

JAMES G. TEMME, and
STEWARDSHIP FUND, LP,
Defendants.

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Civil Action No. 4:11-cv-655

**ORDER GRANTING RECEIVER’S FIRST INTERIM APPLICATION TO ALLOW
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Dated this ____ day of _____, 2012.

AMOS L. MAZZANT
UNITED STATES MAGISTRATE JUDGE

Submitted and prepared by:

//s// Jay L. Krystinik

Jay L. Krystinik

Texas Bar No. 24041279

2200 Ross Avenue, Suite 3300

Dallas, Texas 75201

Telephone: 214.721.8041

Facsimile: 214.721.8100

Counsel for Keith Miles Aurzada, Receiver

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION
Plaintiff,

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v.

Civil Action No. 4:11-cv-655

JAMES G. TEMME, and
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