

1 HOLLAND & KNIGHT LLP
2 Kristina S. Azlin (SBN 235238)
3 Samuel J. Stone (SBN 317013)
4 kristina.azlin@hkllaw.com
5 sam.stone@hkllaw.com
6 400 South Hope Street, 8th Floor
7 Los Angeles, California 90071
8 Telephone: 213.896.2400
9 Facsimile: 213.896.2450

7 Jose A. Casal (*pro hac vice*)
8 jose.casal@hkllaw.com
9 701 Brickell Avenue, Suite 3300
10 Miami, Florida 33131
11 Telephone: 305.789.7736

10 *Attorneys for Josias Dewey, Court-appointed*
11 *Receiver for Receivership Entities*

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

15
16 SECURITIES AND EXCHANGE
17 COMMISSION,

17 Plaintiff,

18 vs.

19
20 TITANIUM BLOCKCHAIN
21 INFRASTRUCTURE SERVICES,
22 INC.; EHI INTERNETWORK AND
23 SYSTEMS MANAGEMENT, INC.
24 aka EHI-INSM, INC.; and MICHAEL
25 ALAN STOLLERY aka MICHAEL
26 STOLLAIRE,

24 Defendants.

Case No. 18-4315 DSF (JPRx)

**THIRD INTERIM FEE
APPLICATION OF HOLLAND &
KNIGHT LLP, AS COUNSEL TO
RECEIVER, FOR ALLOWANCE OF
COMPENSATION AND
REIMBURSEMENT OF EXPENSES;
CERTIFICATION OF COUNSEL IN
SUPPORT THEREOF; [PROPOSED]
ORDER**

[FRCP 66; L.R. 66-7]

Date: September 12, 2022
Time: 1:30 pm
Ctrm: 7D
Judge: Hon. Dale S. Fischer

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on September 12, 2022, at 1:30 pm, or as soon
3 thereafter as the matter may be heard before the Honorable Dale S. Fischer, in
4 Courtroom 7D of the United States District Court, Central District of California,
5 Western Division, 350 West 1st Street, 6th Floor, Los Angeles, California, 90012,
6 Holland & Knight LLP (“Counsel” or “H&K”), counsel to Josias Dewey, as Court-
7 appointed Receiver (the “Receiver”) for the estates of Defendant Titanium Blockchain
8 Infrastructure Services, Inc. and its subsidiaries and/or affiliates (collectively, the
9 “Receivership Entities”), will and hereby does submit this third interim fee application
10 (the “Application”).

11 This Application is submitted pursuant to paragraphs XI(F) and XVII of this
12 Court’s Order Appointing Permanent Receiver, entered May 30, 2018 (the “Permanent
13 Receivership Order”), Rule 66 of the Federal Rules of Civil Procedure, and Local Rule
14 66-7. This Application is made following the conference of counsel pursuant to Local
15 Rule 7-3 which took place beginning in June 2022 and continued through July 2022.

16 This Application is based upon this Notice of Application and Application, the
17 Arguments and Authorities in Support of Fee Application incorporated therein, the
18 Certification of Counsel, all papers and records on file herein, and such other matters as
19 may be presented to the Court at or before the hearing on this Application.

20
21 Dated: August 10, 2022

Respectfully submitted,
HOLLAND & KNIGHT LLP

/s/ Kristina S. Azlin
/s/ Jose A. Casal

Kristina S. Azlin (SBN 235238)
Jose A. Casal (*pro hac vice*)
Samuel J. Stone (SBN 317013)

*Attorneys for Josias Dewey, Court-appointed
Receiver for Receivership Entities*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TABLE OF CONTENTS

I. SUMMARY OF FEE REQUEST3

II. STANDARDIZED FUND ACCOUNTING REPORT5

III. CASE STATUS5

IV. BACKGROUND10

V. SUMMARY OF SERVICES PROVIDED14

VI. FEE APPLICATION17

VII. POINTS AND AUTHORITIES IN SUPPORT OF
FEE APPLICATION18

VIII. CONCLUSION.....21

TABLE OF AUTHORITIES

Page(s)

Cases

Drilling & Exploration Corp. v. Webster,
69 F.2d 416 (9th Cir. 1934) 19

Gaskill v. Gordon,
27 F.3d 248 (7th Cir. 1994) 20

In Re McGann Mfg. Co.,
188 F.2d 110 (3d Cir. 1951) 19

Quilling v. Trade Partners, Inc.,
572 F.3d 293 (6th Cir. 2009) 19

SEC v. Elliot,
953 F.2d 1560 (11th Cir. 1992) (rev’d in part on other grounds, 998
F.2d 922 (11th Cir. 1993)) 19

SEC v. Hardy,
803 F.2d 1034 (9th Cir. 1986) 18

SEC v. Nationwide Automated Sys. Inc.,
CV 14-07249 19

SEC v. Small Bus. Cap. Corp.,
No. 5:12-CV-03237 EJD, 2014 WL 1901257 (N.D. Cal. May 9,
2014) 19–20

SEC v. W.L. Moody & Co., Bankers (Unincorporated),
374 F.Supp. 465 (S.D. Tex. 1974) 20

SEC v. Wang,
2015 WL 12656904 (C.D. Cal., Feb. 17, 2015, No. CV 13-7553 JAK
(SS)) 19

Southwestern Media, Inc. v. Rau,
708 F.2d 419 (9th Cir. 1983) 20

United States v. Code Prods. Corp.,
362 F.2d 669 (3d Cir. 1966) 19–20

1 **Statutes**

2 Exchange Act Section 10(b) 12–13

3 Securities Act of 1933 Section 17(a) [15 U.S.C. §§ 78j(b) and 78o(a)] 12

4 Securities Act Sections 5(a), 5(c), and 17(a) 12–13

5 **Other Authorities**

6 17 C.F.R. § 240.10b-5 (Rule 10b-5) 12

7 Federal Rules of Civil Procedure Rule 66 2–3

8 Local Rule 7-3..... 2

9 Local Rule 66-7..... 2–3

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

**THIRD INTERIM FEE APPLICATION OF HOLLAND & KNIGHT LLP,
AS COUNSEL TO RECEIVER, FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Pursuant to paragraphs XI(F) and XVII of this Court’s Order Appointing Permanent Receiver, entered May 30, 2018 (the “Permanent Receivership Order”) (Dkt. 48), Rule 66 of the Federal Rules of Civil Procedure, and Local Rule 66-7, Holland & Knight LLP (“Counsel” or “H&K”), counsel to Josias Dewey, as Court-appointed Receiver (the “Receiver”) for the estates of Defendant Titanium Blockchain Infrastructure Services, Inc. (“TBIS”) and its subsidiaries and/or affiliates (collectively, the “Receivership Entities”), hereby submits this third interim fee application (the “Application”).

In support of this Application, H&K respectfully states the following:

I. SUMMARY OF FEE REQUEST

1. This interim fee application covers the period from January 1, 2020 through August 11, 2021 (the “Third Application Period”)¹ and is submitted in accordance with the Permanent Receivership Order, the Local Rules of this Court, and the Billing Instructions for Receivers in Civil Actions Commenced by the United States Securities and Exchange Commission (the “Billing Instructions”).

2. On April 4, 2019, this Court entered an Amended Order (Dkt. 80) Partially Granting First Interim Fee Application of Holland & Knight LLP, as Counsel to the Receiver, for Allowance of Compensation and Reimbursement of Expenses (the “First Interim Fee Application”), allowing and approving H&K’s fees and expenses for the period of May 23, 2018 through June 22, 2018 (the “First Application Period”), on an interim basis, in the amounts of \$52,828.49 for attorneys’ fees incurred by H&K and \$66,451.25 for expenses (which reflected the amount invoiced for forensic services rendered by Kroll Cyber Security), for a total of \$119,279.74 (the “First Interim”).

¹ The anticipated Fourth Application Period will run from August 12, 2021 through the execution of the Distribution Plan.

1 Allowance)². H&K received full payment of the First Interim Allowance (the “First
2 Interim Payment”). On September 8, 2021, this Court entered an Order (Dkt. 106)
3 Granting Second Interim Fee Application of Holland & Knight LLP, as Counsel to the
4 Receiver, for Allowance of Compensation and Reimbursement of Expenses (the
5 “Second Interim Fee Application”), allowing and approving H&K’s fees and expenses
6 for the period of June 23, 2018 through December 31, 2019 (the “Second Application
7 Period”), on an interim basis, in the amounts of \$138,865.27 for attorneys’ fees incurred
8 by H&K and \$16,734.49 for expenses (which included the amount invoiced for
9 accounting services rendered by Grobstein Teeple LLP), for a total of \$155,599.76 (the
10 “Second Interim Allowance”). H&K received full payment of the Second Interim
11 Allowance (the “Second Interim Payment”). Since the Second Application Period,
12 Counsel has rendered additional services to the Receiver for the benefit of the
13 Receivership Entities, as discussed more fully herein.

14 3. Through this Application, H&K seeks approval, on an interim basis, of
15 \$155,858.40 in fees and \$109,815.05 in expenses (inclusive of \$4,086.48 for forensic
16 services rendered by Kroll Cyber Security, LLC (“Kroll”), \$102,392.50 for claims
17 administration services rendered by RCB Fund Services LLC (“RFS”), \$6,689.00 for
18 claims noticing services rendered by Fleishman-Hillard, Inc. (“Fleishman”), and other
19 administrative expenses invoiced to H&K) for the Third Application Period, for a total
20 of **\$265,673.45** (the “Fees”).
21
22
23

24 ² Pursuant to paragraph XVII of the Permanent Receivership Order, fees and costs for
25 the Receiver and all others retained to assist him in the administration and liquidation
26 of the estate were capped at \$125,000 for the initial 30 days of the receivership (the
27 “Fee Cap”). H&K actually incurred \$144,369.52 in fees and \$72,171.51 in expenses,
28 for a total of \$216,541.03, during the First Application Period, but limited that
application to \$125,000 pursuant to the Fee Cap. H&K does not intend to make an
application for the remaining \$91,541.03 in fees incurred over the Fee Cap during the
First Application Period.

1 **II. STANDARDIZED FUND ACCOUNTING REPORT**

2 4. Attached as **Exhibit A** is the Standardized Fund Accounting Report
3 (SFAR) for the Receivership Entities for the period from July 1, 2021 through March 31,
4 2022 (the “SFAR Reporting Period”).³

5 **III. CASE STATUS**

6 5. Cash On Hand: The amount of cash on hand in the Receiver’s bank account
7 is \$20,280.84 as of the end of the SFAR Reporting Period. These funds were received
8 by taking control of TBIS’s bank accounts held at US Bank (\$58,583.45) and JPMorgan
9 Chase (\$252,208.40).

10 Other Assets: In addition to the cash on hand, the Receiver has also taken
11 possession, or has caused third-party custodians to freeze, the following assets:

Asset	Units (if applicable)	Unit Value (as of 12/31/2018)	Aggregate Value (as of 12/31/2018)	Unit Value (as of 03/31/2022, end of SFAR Period)	Aggregate Value (as of 03/31/2022, end of SFAR Period)
Bitcoin (BTC)	113.471	\$3,819.7400	\$433,429.72	\$45,538.68	\$5,167,319.56
Bitcoin SV (BSV)	1.55416	\$87.4500	\$135.91	\$94.54	\$146.93
Ether (ETH)	2151.37	\$136.8200	\$294,350.44	\$3,281.64	\$7,060,021.85
Zcash (ZEC)	7.9046	\$58.6000	\$463.21	\$178.02	\$1,407.18
Litecoin (LTC)	4358.11	\$81.6100	\$355,665.36	\$123.72	\$539,185.37
Bitcoin Cash (BCH)	0.0004694	\$164.8500	\$0.08	\$384.04	\$0.18
Electroneum (ETN)	21035514	\$0.0076	\$160,332.69	\$0.006191	\$130,230.87
OMG (OMG)	51.5600014	\$1.4316	\$73.81	\$5.49	\$283.06

24
25
26
27 ³ While the Third Application Period runs through August 11, 2021, the SFAR
28 Reporting Period runs through the end of the most recent quarter, providing a more accurate and complete picture of the current case status.

Asset	Units (if applicable)	Unit Value (as of 12/31/2018)	Aggregate Value (as of 12/31/2018)	Unit Value (as of 03/31/2022, end of SFAR Period)	Aggregate Value (as of 03/31/2022, end of SFAR Period)
Computer equipment, televisions, phones (est)			\$5,000.00		\$2,000.00
		Total	\$1,249,451.22		\$12,900,594.99⁴

6. The Receiver has established multiple cryptocurrency wallets to hold the cryptocurrencies listed above and is either (i) in possession of the private keys associated with these wallets, or (ii) has caused a third party custodian to freeze such assets. As of the end of the SFAR Reporting Period, and based on values taken from a market aggregator, the value of the cryptocurrency assets held by or for the benefit of the Receivership Estate is approximately \$12,898,594.99. This figure should be taken with caution because the value of cryptocurrency assets fluctuates rapidly, and the markets for some cryptocurrencies can be opaque and illiquid, and subject to market manipulation. Furthermore, some assets, like Electroneum (ETN), may constitute unregistered securities, making it difficult, or impossible, for the Receiver to liquidate to fiat currency.

7. Pursuant to the Receiver’s November 1, 2019 Motion for Leave to Partially Liquidate Assets (Dkt. 91) (the “Partial Liquidation Motion”), and the Court’s November 22, 2019 Order granting the Partial Liquidation Motion (Dkt. 93), the Receiver obtained authorization from the Court to partially liquidate the cryptocurrency

⁴ The total value of the cryptocurrency assets is extremely variable due to the high volatility of the market. As of June 1, 2022, the total approximate value of the cryptocurrencies listed above is \$7,664,102.75.

1 assets listed above in order to pay current and future expenses for which the Receiver
2 had insufficient cash on hand.

3 8. Expenses: The Receiver has incurred administrative expenses as a result of
4 his efforts to marshal and preserve the assets of the Receivership. Expenses for the
5 Third Application Period were advanced by H&K, Kroll, RFS, and Fleishman, as set
6 forth in attached **Exhibit E**. Lastly, the Receivership has advanced certain ordinary
7 course expenses, such as costs incurred in connection with server hosting fees, incurred
8 by the Receiver in the aggregate amount of \$2,916.00 in administering the Receivership
9 Entities.

10 9. Creditor Claims: As set forth in the Receiver’s Notice to Court Regarding
11 Status of Claims Process and Claims Bar Date, filed on March 22, 2021 (the “Claims
12 Process Status Notice”) (Dkt. 102), the creditor claims process is underway pursuant to
13 the procedures developed by the Receiver and approved by this Court’s August 21, 2020
14 Order Approving Claims Process and Bar Date (Dkt. 96) for overseeing the
15 administration of claims of creditors, investors who acquired unregistered securities
16 from TBIS and certain investors otherwise harmed by TBIS’s fraud.

17 10. As detailed in the Claims Process Status Notice, the Receiver, claims
18 administrator RFS, and Counsel have worked diligently to test, validate, and ultimately
19 deploy a first-of-its-kind automated validation-based claims process system (the “Claims
20 Portal”). The Claims Portal involves using the record of the fraudulent transaction – the
21 sale of unregistered securities represented by virtual ERC-20 cryptocurrency tokens
22 which exist on the public Ethereum blockchain network (“Ethereum Network”) – to
23 validate the legitimacy of claims and prevent fraudulent or duplicative claims. The
24 Ethereum Network is the decentralized transaction ledger on which Ether, one of the
25 world’s most popular cryptocurrencies, exists. The Ethereum Network reflects the
26 transactions occurring insofar as it is, in and of itself, a ledger of transactions.

27 11. Pursuant to the Court’s December 8, 2020 Order Appointing a Claims
28 Administrator (Dkt. 100), the Receiver engaged RFS as claims administrator for

1 purposes of effectuating the Court’s August 21, 2020 Order approving the claims
2 process. On December 15, 2020, the Court granted TBIS’s and the Securities and
3 Exchange Commission’s (“SEC”) Joint Stipulation to Extend Claims Bar Date (Dkt.
4 101). Pursuant to that Order, the Court established that the claims period for potential
5 claimants of the Receivership Entities would run for 180 calendar days following
6 publication of the Claims Process Notice (the “Notice”). Any claims submitted after
7 11:59 p.m. Pacific Time on the date 180 calendar days following initial publication of
8 the Notice would be barred (the “Bar Date”).

9 12. On February 12, 2021, the Receiver published the initial Notice of the
10 Claims Process and Bar Date on PR Newswire and Twitter, thus establishing the Claims
11 Bar Date as August 11, 2021. In addition to the initial Notice, the Receiver has provided
12 direct email notices to potential claimants whose email addresses are known and has re-
13 published the Notice on additional occasions, through multiple channels. The initial
14 round of publication and direct emails reached a wide audience and resulted in a number
15 of claims being filed, as evidenced by both the number of claims authenticated and
16 submitted to date and the geographic diversity of the claimants. The Receiver made
17 subsequent publications of the Notice throughout the claims period, including on PR
18 Newswire, Coin Telegraph, and Twitter.

19 13. The Claims Portal went live on February 27, 2021 and remained open until
20 11:59 p.m. Pacific Time on the August 11, 2021 Bar Date. The Receiver has been
21 reviewing and validating submitted claims and responding to inquiries from claimants
22 and potential claimants.

23 14. As of June 1, 2022, 669 claims submitted through the Claims Portal cleared
24 validation, meaning that the claims process deemed them to be legitimate claims arising
25 from purchase or acquisition of unregistered TBIS securities. An additional 337 claims
26 had been created, but not yet finalized, meaning that claimants still had to take additional
27
28

1 steps to finish the claims submission (e.g., upload documentation)—55 of these claims
2 were deemed to be duplicates.⁵

3 15. Now that the Bar Date has passed, the Receiver has begun work on
4 reviewing and validating submitted claims. Of those claims that cleared validation, the
5 Receiver has sent out 646 notices of determination to claimants. In anticipation of the
6 next step of this process, the Receiver submitted its proposed Distribution Plan (Dkt.
7 107), which the Court subsequently granted on May 9, 2022 (Dkt. 109). Once all
8 claimants have received a notice of determination, the Receiver will begin distributing
9 the assets pursuant to the plan.

10 16. The Receiver has taken substantial steps in furtherance of administrating the
11 Estate during this time, including but not limited to establishing a claims administration
12 process among the first of its kind and moving the Court for approval of the same,
13 setting a Claims Bar Date and giving notice to the Parties and public of the Claims Bar
14 Date and claims process, publishing (and re-publishing) information about the claims
15 administration process, creating a public-facing webpage and portal for potential
16 creditors and victims of the fraud described herein, overseeing professionals engaged in
17 administration and validation of claims, and actually opening the claims period,
18 communicating with claimants who have questions about their claim submission or
19 difficulties validating their address, coordinating with tax advisors regarding the
20 Receivership’s tax liabilities, collaborating with foreign counsel and cryptocurrency
21 exchanges regarding stolen assets.

22 17. The Receiver has negotiated with additional third parties, as well as the
23 Defendant, with respect to certain cryptocurrency assets that were transferred from a
24 wallet owned by TBIS to a wallet owned by a third-party and hosted by Coinbase. This
25 cryptocurrency is the property of TBIS and therefore should be transferred to the
26 Receivership. The Receiver successfully negotiated with all third-parties involved,
27

28 ⁵ The Receiver can provide updated information if needed at the time of hearing or
reply.

1 including Defendant, to enter into a stipulation releasing the cryptocurrency to the
2 Receivership, which was approved pursuant to the Court’s April 10, 2019 Order
3 Granting Stipulation and Request for Modification of Asset Freeze To Allow Release of
4 Frozen Assets (Dkt. 82).

5 18. The Receiver has, and continues to, pursue the recovery of certain
6 cryptocurrency assets (approximately 477.647 Ethereum and 38.75387 Bitcoin, valued at
7 approximately \$2,352,166.36 as of the end of the SFAR Reporting Period) that were
8 stolen from a wallet owned by TBIS and transferred to a wallet owned by a third-party
9 and hosted by HitBTC (an offshore cryptocurrency exchange which, according to its
10 website, was headquartered in Hong Kong but is now operating out of Chile and the
11 Seychelles) (the “HitBTC Crypto”). The Receiver, using certain forensic cryptocurrency
12 software tools, was able to trace the HitBTC Crypto through a series of complex
13 transfers and, ultimately, was able to identify the individual owner of the wallet. The
14 Receiver successfully negotiated with HitBTC to freeze the HitBTC Crypto (which, as
15 of the date hereof, appears to remain frozen on the exchange), but despite repeated
16 attempts to secure the transfer of the HitBTC Crypto to the Receivership (including
17 filing suit through local counsel in Hong Kong to order HitBTC to transfer the HitBTC
18 Crypto to the Receivership) HitBTC ceased communications with the Receiver (and its
19 various counsel). The Receivership continues to pursue recovery of the HitBTC Crypto
20 and has established communications with counsel in the Seychelles to explore remedies
21 it may seek in that jurisdiction.

22 **IV. BACKGROUND**

23 19. On May 22, 2018, the Securities and Exchange Commission filed a
24 complaint against Defendants Titanium, EHI Internetwork and Systems Management,
25 Inc., also known as EHI-INSM, Inc.(“EHI”), and Michael Alan Stollery, also known as
26 Michael Stollaire (collectively “Defendants”), along with an application for the
27 appointment of a receiver for the Receivership Entities.
28

1 20. The Court concluded that the appointment of a receiver in this action was
2 necessary and appropriate for the purposes of marshaling and preserving all assets,
3 tangible and intangible, that are owned, controlled or possessed by the Receivership
4 Entities, and accordingly, on May 23, 2018, the Court entered a Temporary Restraining
5 Order (the “TRO”) and Orders (1) Freezing Assets; (2) Prohibiting the Destruction or
6 Alteration of Documents; (3) Granting Expedited Discovery; (4) Requiring Accountings;
7 and (5) Appointing a Temporary Receiver (the “Temporary Receivership Order”) (Dkt.
8 2), appointing Josias N. Dewey as temporary receiver for the Receivership Entities. On
9 May 24, 2018, all Defendants were served with the summons, complaint, TRO, and
10 Temporary Receivership Order. (Dkt. 49, 50, 51.)

11 21. On May 30, 2018, the Court entered the Permanent Receivership Order
12 (together with the Temporary Receivership Order, collectively, the “Receivership
13 Order”) (Dkt. 48). The Defendants consented to the entry of the Permanent
14 Receivership Order (Dkt. 47.)

15 22. On June 6, 2018, the Court entered orders approving the Receiver’s
16 decision to employ H&K as legal counsel and Kroll as a forensic and investigative
17 consultant, to assist him in carrying out his duties as the Receiver. H&K and Kroll
18 began performing services for the Receiver on or about May 23, 2018.

19 23. As set forth in more detail in the Receiver’s Initial Status Report for
20 Receivership Estate of Titanium Blockchain Infrastructure Services, Inc., filed on June
21 25, 2018 (the “Initial Status Report”), the Receiver and his advisors focused most of
22 their initial efforts on investigating, identifying, collecting, and preparing an inventory of
23 assets of the Receivership Entities. (Dkt. 57.) The principal assets recovered include
24 cryptocurrency, U.S. currency, electronic data, and physical assets such as computer
25 equipment.

26 24. On May 24, 2018, the Receiver and his legal counsel, together with the
27 assistance of Kroll, were able to seize and search computer equipment, mobile phones
28 and other electronic devices belonging to the Receivership Entities and interview Mr.

1 Stollery and certain of his associates at their offices in Sherman Oaks, California and
2 Springfield, Oregon. (Dkt. 57.)

3 25. Based on information gained through the search and interviews, the
4 Receiver identified and took control of certain cryptocurrency assets. In addition, the
5 Receiver collected other assets at the Sherman Oaks site and from an office site in
6 Springfield, Oregon that had been leased on behalf of Titanium. (Dkt. 57.)

7 26. The Initial Status Report and the First Interim Fee Application provide
8 additional detail on the Receiver's initial efforts and actions taken in order to identify
9 and secure assets of the Receivership and to work on identifying additional assets for
10 recovery. (Dkt. 57, 76.)

11 27. On May 10, 2019, the SEC reached bifurcated settlements with EHI and
12 Stollaire, which were signed and filed with the Court (Dkt. 83 and 84 respectively),
13 whereby EHI and Stollaire consented, without admitting or denying the allegations of
14 the complaint, to the entry of judgments on all claims against them and to the issuance of
15 permanent injunctions against them on those claims, as well as to the issuance of a
16 permanent injunction enjoining Stollaire from directly or indirectly, participating in the
17 offering of digital or other securities. Pursuant to the terms of the bifurcated settlements,
18 EHI and Stollaire agreed that the amounts of disgorgement and civil penalty they must
19 pay shall be determined by the Court upon motion of the SEC, assuming no further
20 settlement can be reached with the SEC as to those amounts.

21 28. On May 14, 2019, the Court entered its Judgment as to Defendant EHI,
22 which, among other things, (i) permanently restrains and enjoins EHI from violations of
23 Section 17(a) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. §§ 78j(b) and
24 78o(a)] and Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") [15
25 U.S.C. §§ 78j(b) and 78o(a)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5]; and
26 (ii) orders EHI to pay disgorgement, prejudgment interest thereon, and a penalty in
27 amounts to be determined by the Court upon motion of the SEC (Dkt. 86). EHI
28 consented to such Judgment. (Dkt. 84.)

1 29. On May 14, 2019, the Court entered its Judgment as to Defendant Stollaire,
2 which, among other things, (i) permanently restrains and enjoins Stollaire from
3 violations of Sections 5(a), 5(c), and 17(a) of the Securities Act and Section 10(b) of the
4 Exchange Act and Rule 10b-5 thereunder; (ii) permanently restrains and enjoins Stollaire
5 from directly or indirectly, including, but not limited to, through any entity owned or
6 controlled by Stollaire, participating in the offering of digital or other securities,
7 provided, however, that such injunction shall not prevent Stollaire from purchasing or
8 selling digital or other securities for himself or his own personal account; and (iii) orders
9 Stollaire to pay disgorgement, prejudgment interest thereon, and a penalty in amounts to
10 be determined by the Court upon motion of the SEC (Dkt. No. 87). Stollaire consented
11 to such Judgment. (Dkt. 83.)

12 30. On May 22, 2019, the Receiver executed a Consent of Defendant Titanium
13 Blockchain Infrastructure Services, Inc. (Dkt. 89), consenting to the entry of a Judgment
14 against TBIS that permanently restrains and enjoins TBIS from violations of Sections
15 5(a), 5(c), and 17(a) of the Securities Act and Section 10(b) of Exchange Act and Rule
16 10b-5 thereunder; (b) orders TBIS to pay disgorgement, prejudgment interest thereon,
17 and a penalty in amounts to be determined by the Court upon motion of the SEC. The
18 Court entered its Judgment as to Defendant TBIS on May 23, 2019 (Dkt. 90).

19 31. Pursuant to the Receiver's November 1, 2019 Partial Liquidation Motion
20 (Dkt. 91), and the Court's November 22, 2019 Order granting the Partial Liquidation
21 Motion (Dkt. 93), the Receiver obtained authorization from the Court to partially
22 liquidate the cryptocurrency assets listed in Section III above in order to pay current and
23 future expenses for which the Receiver had insufficient cash on hand.

24 32. On July 28, 2020 the Receiver submitted a Motion for the Court to approve
25 his proposed Claims Process and Bar Date (Dkt. 94), which included categorizing a list
26 of eligible claimants, providing internet-based notice to victims of the fraud, submitting
27 claims and validating them using blockchain token confirmation system. The Court
28 granted the Motion in all respects (Dkt. 96).

1 33. The Receiver also moved the Court to approve RFS as its claim
2 administrator (Dkt. 97), and it was accordingly granted (Dkt. 101).

3 34. Given the complexities of this novel claims process, in November 2020, the
4 Receiver, TBIS, and the SEC entered into a joint Stipulation to extend the Bar Date by a
5 period of 90 days (Dkt. 98). The Court granted the relief the following month (Dkt. 101).

6 35. As set forth in more detail in the Receiver’s Notice to Court Regarding
7 Status of Claims Process and Claims Bar Date, filed on March 22, 2021 (the “Claims
8 Status Report”), the Receiver and his advisors developed and launched the claims portal,
9 distributed notice of the Claims Process and Bar Date to victims, and validated several
10 hundred initial claims (Dkt. 102).

11 36. On September 8, 2021, this Court entered an Order (Dkt. 106) granting the
12 Second Interim Fee Application (Dkt. 103), allowing and approving H&K’s fees and
13 expenses for the period of June 23, 2018 through December 31, 2019.

14 37. Lastly, on April 5, 2022, the Receiver submitted his proposed distribution
15 plan (Dkt. 107), which the Court approved on May 9, 2022 (Dkt. 109).

16 **V. SUMMARY OF SERVICES PROVIDED**

17 38. H&K has continued to assist the Receiver with all aspects of his duties in
18 this case during the Third Application Period, including continued work on
19 investigating, identifying, collecting, and preparing an inventory of assets of the
20 Receivership Entities including cryptocurrency, U.S. currency, electronic data, and
21 physical assets such as computer equipment, negotiations with third parties to stipulate
22 to the recovery of additional cryptocurrency assets, and initial work on developing
23 claims administration and distribution procedures.

24 39. Additional actions in which H&K has assisted the Receiver include, but are
25 not limited to, the following:

- 26 a. Establishing a Receivership website (<http://tbis.io>) and an email
27 address (TBIS@hkclaw.com) so that TBIS’s investors and other creditors
28 can receive information pertaining to the Receivership;

1 b. Identifying cryptocurrency wallets and/or accounts controlled by the
2 Defendants containing various cryptocurrencies (bitcoin, Bitcoin Cash,
3 Ether, Litecoin, Dash, Electroneum, ZCash, BAR and TBAR), and either
4 transferring such cryptocurrency to wallets controlled by the Receiver or
5 causing third party custodial agents to freeze such accounts;

6 c. Taking control of TBIS's U.S. Bank account and having the entire
7 account balance transferred to an account established by the Receiver;

8 d. Taking control of Titanium's JPMorgan Chase Bank account and
9 requesting that the entire account balance be transferred to an account
10 established by the Receiver;

11 e. Securing access to Mr. Stollery's safe deposit box and the retrieval
12 of relevant information and assets from same;

13 f. Reviewing TBIS's provisional patent application and GitLab
14 account, and conducting telephone interviews with TBIS's chief
15 technology officer, to evaluate the current value of intellectual property
16 and TBIS as a going concern;

17 g. Engaging Kroll to inventory and image computers and phones
18 collected from TBIS's offices in Sherman Oaks, California, and
19 Springfield, Oregon;

20 h. Interviewing TBIS's chief operating officer regarding business
21 operations and matters pertaining to theft of virtual currencies from the
22 Defendant TBIS;

23 i. Obtaining information from special agents with the United States
24 Secret Service and Federal Bureau of Investigations regarding the theft of
25 virtual currencies from the Defendant TBIS;

26 j. Securing personal property owned or leased by TBIS at both of its
27 offices;

28 k. Changing the locks at both commercial offices of Defendant TBIS;

- 1 l. Negotiating with commercial landlords to secure the termination of
- 2 TBIS's leases;
- 3 m. Serving written notices on cryptocurrency exchanges and other third
- 4 parties to locate additional assets, including certain overseas exchanges;
- 5 n. Analyzing payroll and employment matters, including status of
- 6 employment tax payments;
- 7 o. Terminating the employment of employees of Defendant TBIS;
- 8 p. Communicating with hundreds of prospective claimants about their
- 9 potential claims and answering their questions;
- 10 q. Establishing a first-of-its-kind claims process that involves an semi-
- 11 automated method of validating certain claims by utilizing publicly
- 12 available information on the Ethereum blockchain;
- 13 r. Seeking, engaging and directing local counsel in Hong Kong and the
- 14 Seychelles to pursue the recovery of the HitBTC Crypto;
- 15 s. Engaging the services of, and work closely with, RFS to assist the
- 16 Receiver, and its counsel, in the claims, validation and distribution process,
- 17 including the development of a unique electronic claims portal, allowing
- 18 the Receiver to reduce the time necessary to review and process a claim (as
- 19 well as solving certain unique challenges in confirming claims pertaining
- 20 to transactions that took place on a pseudo-anonymous basis on a
- 21 blockchain);
- 22 t. Analyzing and troubleshooting hundreds of claim applications and
- 23 questions submitted through the claim application portal;
- 24 u. Updating the Receiver's website with docket entries and claims
- 25 notices; and
- 26 v. Administering and drafting the Motion to Approve Bar Date and
- 27 Claims Process (Dkt. 94), Motion to Extend Bar Date (Dkt. 98), Motion for
- 28

1 Approval to Appoint Claims' Process Administrator (Dkt. 97), Receiver's
 2 Status Notice Regarding Claims Bar Date and Claims Process (Dkt. 102).

3 40. Each of these tasks was reasonably necessary to identify and secure assets
 4 of the Receivership, to work on identifying additional assets for recovery, and to begin
 5 work on developing the procedures for overseeing the administration and payment of
 6 claims of creditors, investors who acquired unregistered securities from TBIS and
 7 certain investors otherwise harmed by TBIS's fraud.

8 **VI. FEE APPLICATION**

9 41. During the Third Application Period, H&K professionals provided services
 10 to the Receiver for the benefit of the Receivership Entities with a value of at least
 11 \$155,858.40 and incurred reimbursable expenses in the amount of \$109,815.05,⁶ for a
 12 total of \$265,673.45 in fees and expenses. Through this Application, H&K requests
 13 entry of an Order approving the Fees on an interim basis.

14 42. This Application is the third Interim Fee application that H&K has
 15 submitted in this matter. Below is a summary of prior fees and expenses requested,
 16 allowed, and paid to H&K to date:

Application; Date Filed	Period Covered	Requested		Allowed		Paid	
		Fees	Expenses	Fees	Expenses	Fees	Expenses
First Interim; 3/1/2019 (Docket # 76)	5/23/2018 – 6/22/2018	\$52,828.49 ⁷	\$72,171.51	\$52,828.49	\$66,451.25	\$52,828.49	\$66,451.25

24 ⁶ These expenses include \$4,086.48 for forensic services rendered by Kroll,
 25 \$102,392.50 for claims services rendered by RFS, and \$6,689.00 for claims noticing
 services rendered by Fleishman, and invoiced to H&K.

26 ⁷ H&K actually incurred \$144,369.52 in fees and \$72,171.51 in expenses, for a total
 27 of \$216,541.03, during the First Application Period, but limited that application to
 28 \$125,000 pursuant to the Fee Cap. H&K does not intend to make an application for
 the remaining \$91,541.03 in fees incurred over the Fee Cap during the First
 Application Period.

		Requested		Allowed		Paid	
Second Interim; 8/2/2021 (Docket # 103)	6/23/2018 – 12/31/2019	\$138,865.27	\$16,734.49	\$138,865.27	\$16,734.49	\$138,865.27	\$16,734.49
TOTALS:		\$191,693.76	\$88,906.00	\$191,693.76	\$88,906.00	\$191,693.76	\$88,906.00

43. No balance remains outstanding from the prior fee period.

44. Through this Application, H&K further requests entry of an Order authorizing the Receiver to make payment to H&K in the amount of \$265,673.45.

45. The names, hours worked, hourly billing rates, and total fees of all H&K professionals who have billed time to this matter, excluding the Receiver, are listed in the attached **Exhibit B**. Standard H&K hourly billing rates have been discounted by 10%. Travel time has been billed at 50% of H&K’s standard hourly billing rates in accordance with the Billing Instructions, and those reduced rates have been further discounted by 10%. H&K’s actual fees for the Third Application Period have been reduced by at least \$17,317.60 pursuant to this discount.

46. In further accordance with the Billing Instructions, H&K professionals have separately categorized their services by task. The attached **Exhibit C** summarizes the respective number of hours incurred relative to each task category during the Third Application Period.

47. The services rendered by H&K are itemized fully in the contemporaneously maintained electronic time records attached hereto as **Exhibit D**.

48. An itemization of reasonable and reimbursable expenses incurred by H&K at the levels set forth in accordance with the Billing Instructions is attached hereto as **Exhibit E**. Further details on the services provided by Kroll, RFS, and Fleishman are outlined in **Exhibit E-1**, **Exhibit E-2**, and **Exhibit E-3**, respectively.

VII. POINTS AND AUTHORITIES IN SUPPORT OF FEE APPLICATION

1 49. The district court’s “power to supervise an equity receivership and to
2 determine the appropriate action to be taken in the administration of the receivership is
3 extremely broad.” *SEC v. Hardy*, 803 F.2d 1034, 1037 (9th Cir. 1986). That broad
4 authority “arises out of the fact that most receiverships involve multiple parties and
5 complex transactions.” *Id.*⁸ This “extremely broad” discretion “includes awards of
6 receivership fees, including attorneys’ fees.” *SEC v. Wang*, 2015 WL 12656904, at *3
7 (C.D. Cal., Feb. 17, 2015, No. CV 13-7553 JAK (SS)), citing *In re San Vincente*
8 *Medical Partners Ltd.*, 962 F.2d 1402, 1409 (9th Cir. 1992) (“The award of receivership
9 fees in an SEC action is analogous to the award of receivership fees in bankruptcy
10 proceedings, and we review the district court’s award for an abuse of discretion.”).

11 50. Decisions regarding the timing and amount of an award of fees and costs
12 are committed to the sound discretion of the Court. *See Drilling & Exploration Corp. v.*
13 *Webster*, 69 F.2d 416, 418 (9th Cir. 1934) (“The court appointing the receiver has full
14 power to fix the compensation of such receiver and the compensation of the receiver’s
15 attorney or attorneys.”); *Quilling v. Trade Partners, Inc.*, 572 F.3d 293, 301 (6th Cir.
16 2009) (“[T]he district court has wide discretion in distributing receivership assets.”);
17 *SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev’d in part on other grounds, 998
18 F.2d 922 (11th Cir. 1993)); *SEC v. Wang*, 2015 WL 12656904, at *1; *SEC v. Small*
19 *Business Capital Corp.*, 2014 WL 3920320, at *2 (N.D. Cal. Aug. 7, 2014).

20 51. An award of interim fees may be appropriate where, like here, a receiver or
21 the professionals employed by the receiver “regularly devote[] a portion of his time,
22 either daily or weekly, to the administration of the estate[.]” *In Re McGann Mfg. Co.*,
23 188 F.2d 110, 112 (3d Cir. 1951) (interim fees to bankruptcy trustee or his counsel); *see*
24 *also SEC v. Small Bus. Cap. Corp.*, No. 5:12-CV-03237 EJD, 2014 WL 1901257, at *1
25
26

27 ⁸ *See also Id.* at 1037 (Recognizing that “case law involving district court
28 administration of an equity receivership (once the receivership is underway) is
sparse...”).

1 (N.D. Cal. May 9, 2014) (granting interim fee application to receiver and receiver’s
2 counsel).

3 52. In allowing fees, a court should consider “the time, labor and skill required,
4 but not necessarily that actually expended, in the proper performance of the duties
5 imposed by the court upon the receiver[], the fair value of such time, labor and skill
6 measured by conservative business standards, the degree of activity, integrity and
7 dispatch with which the work is conducted and the result obtained.” *United States v.*
8 *Code Prods. Corp.*, 362 F.2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted).
9 Moreover, an “award of interim fees is appropriate ‘where both the magnitude and the
10 protracted nature of a case impose economic hardships on professionals rendering
11 services to the estate.’” *SEC v. Small Bus. Cap. Corp.*, 2014 WL 1901257, at *2
12 (quoting *In re Alpha Telcom, Inc.*, No. 01–CV–1283–PA, 2006 WL 3085616, at *3
13 (D.Or. Oct. 27, 2006)).

14 53. In practical terms, when awarding interim fees, receiver and professional
15 compensation turns upon the result of an equitable, multi-factor balancing test involving
16 the “economy of administration, the burden that the estate may be able to bear, the
17 amount of time required, although not necessarily expended, and the overall value of the
18 services to the estate.” *Id.* (quoting *In re Imperial 400 Nat’l, Inc.*, 432 F.2d 232, 237 (3d
19 Cir. 1970)). Regardless of how this balancing test is formulated, no single factor is
20 determinative and “a reasonable fee is based [upon] all circumstances surrounding the
21 receivership.” *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.Supp. 465,
22 480 (S.D. Tex. 1974). Generally, the starting point is to multiply the number of hours
23 expended by an hourly rate. *Southwestern Media, Inc. v. Rau*, 708 F.2d 419, 427 (9th
24 Cir. 1983) (bankruptcy case). The hourly rate is based on the rate the professional would
25 charge for comparable service in other matters. *Id.*

26 54. “As a general rule, the expenses and fees of a receivership are a charge
27 upon the property administered.” *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994)
28 (citing *Atl. Trust Co. v. Chapman*, 208 U.S. 360 (1908)); *see also SEC v. Nationwide*

1 *Automated Sys. Inc.*, CV 14-07249 SJO (FFMx), 2018 WL 11295810 (C.D. Cal. April
2 26, 2018) (quoting *Gaskill* and granting thirteenth interim fee applications of receiver
3 and counsel). These expenses include the fees and expenses of the Receiver’s
4 professionals, including H&K.

5 55. In support of the application, H&K submits the above-referenced Exhibits
6 A-E for the Court’s review, along with the Certification of Jose A. Casal addressing the
7 reasonableness of the rates charged and hours billed by professionals at H&K.

8 56. H&K has charged fees that are 10% less than the standard billing rates for
9 the professionals working on this matter, and those fees are at or below customary fees
10 charged by like professionals in their respective markets. H&K has billed all
11 reimbursable expenses at their actual costs with no mark-up added, and they are not
12 seeking overhead charges.

13 57. Further, pursuant to the Fee Cap, H&K’s actual fees for the First
14 Application Period were previously reduced by \$91,541.03—which was an additional
15 63% discount for the services rendered during that prior application period.

16 58. As set forth above and in the Claims Process Status Notice, among other
17 filings, H&K has assisted the Receiver in performing various tasks that have added value
18 to the Receivership Entities. Each task was staffed and performed as efficiently as
19 possible. The fees and expenses sought in this Application are reasonable and were
20 necessary for the proper administration of the Receiver’s duties.

21 **VIII. CONCLUSION**

22 H&K therefore respectfully requests that this Court enter an Order:

23 1. Allowing, on an interim basis, fees in the amount of \$155,858.40 and
24 reimbursement of expenses in the amount of \$109,815.05, for total compensation of
25 \$265,673.45;

26 2. Authorizing and directing the Receiver to make payment to H&K in the
27 amount of \$265,673.45; and
28

1 3. Directing such other and further relief as the Court deems appropriate.
2

3 Dated: August 10, 2022

Respectfully submitted,

4 HOLLAND & KNIGHT LLP

5 /s/ Kristina S. Azlin

6 Jose A. Casal (*pro hac vice*)
7 Kristina S. Azlin (SBN 235238)
8 Samuel J. Stone (SBN 317013)

9 *Attorneys for Josias Dewey, Court-appointed
Receiver for Receivership Entities*

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 HOLLAND & KNIGHT LLP
2 Kristina S. Azlin (SBN 235238)
3 Samuel J. Stone (SBN 317013)
4 kristina.azlin@hkllaw.com
5 sam.stone@hkllaw.com
6 400 South Hope Street, 8th Floor
7 Los Angeles, California 90071
8 Telephone 213.896.2400
9 Facsimile 213.896.2450

7 Jose A. Casal (*pro hac vice*)
8 jose.casal@hkllaw.com
9 701 Brickell Avenue, Suite 3300
10 Miami, Florida 33131
11 Telephone 305.789.7736

10 *Attorneys for Josias Dewey, Court-appointed*
11 *Receiver for Receivership Entities*

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

15 SECURITIES AND EXCHANGE
16 COMMISSION,

17 Plaintiff,

18 vs.

19 TITANIUM BLOCKCHAIN
20 INFRASTRUCTURE SERVICES,
21 INC.; EHI INTERNETWORK AND
22 SYSTEMS MANAGEMENT, INC.
23 aka EHI-INSM, INC.; and MICHAEL
24 ALAN STOLLERY aka MICHAEL
25 STOLLAIRE,

24 Defendants.

Case No. 18-4315 DSF (JPRx)

**CERTIFICATION OF COUNSEL IN
SUPPORT OF THIRD INTERIM FEE
APPLICATION OF HOLLAND &
KNIGHT LLP, AS COUNSEL TO
RECEIVER, FOR ALLOWANCE OF
COMPENSATION AND
REIMBURSEMENT OF EXPENSES**

26 ///

27 ///

28 ///

1 **CERTIFICATION IN SUPPORT OF THIRD INTERIM FEE APPLICATION OF**
2 **HOLLAND & KNIGHT LLP, AS COUNSEL TO RECEIVER, FOR**
3 **ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES**

4 I, Jose A. Casal, counsel to the Receiver in the above-captioned matter and in
5 connection with the Third Interim Fee Application of Holland & Knight LLP therein, do
6 hereby certify as follows:

7 1. I have reviewed the Third Interim Fee Application of Holland & Knight
8 LLP, including all Exhibits thereto (the “Application”);

9 2. To the best of my knowledge, information and belief formed after
10 reasonable inquiry, the Application and all fees and expenses in it are true and accurate
11 and comply with the SEC Billing Instructions;

12 3. All fees contained in the Application are reasonable, necessary and
13 commensurate with the skill and experience required for the activity performed;

14 4. The amount for which reimbursement is sought in the Application does not
15 include the amortization of the cost of any investment, equipment, or capital outlay; and

16 5. The requests for reimbursement of services that were justifiably purchased
17 or contracted for from third parties (such as copying, imaging, bulk mail, messenger
18 service, overnight courier, computerized research, or title and lien searches) include only
19 the amount billed to Holland & Knight LLP by the third-party vendor and paid by
20 Holland & Knight LLP to such vendor.

21 Dated: August 10, 2022

22 */s/ Jose A. Casal*

23 Jose A. Casal (*pro hac vice*)
24 Kristina S. Azlin (SBN 235238)
25 Holland & Knight LLP
26 Counsel for Josias N. Dewey, Court-appointed
27 permanent receiver for Defendant Titanium
28 Blockchain Infrastructure Services, Inc.

*Attorneys for Josias Dewey, Court-appointed
Receiver for Receivership Entities*

EXHIBIT A
STANDARDIZED FUND ACCOUNTING REPORT

Receivership in SEC v. Titanium Blockchain Infrastructure Services, Inc., et al.
Civil Court Docket No. 18-4315 DSF (JPRx)

Reporting Period - 6/30/2021 to 03/31/2022

Fund Accounting:		Reporting Period	Subtotal Prior Periods	Grand Total
Line 1	Beginning Balance (as of 7/1/2021)	\$21,180.60		
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	\$0.00	\$0.00	\$0.00
Line 3	Cash and Securities	\$0.00	\$0.00	\$0.00
Line 4	Interest/Dividends Income	\$0.00	\$0.00	\$0.00
Line 5	Business Asset Liquidation	\$157,616.00	\$45,190.13	\$202,806.13
Line 6	Personal Asset Liquidation	\$0.00	\$0.00	\$0.00
Line 7	Third-Party Litigation Income	\$0.00	\$0.00	\$0.00
Line 8	Miscellaneous - Other	\$0.00	\$0.00	\$0.00
Line 8a	Total Funds Available (Lines 1-8)	\$178,796.60	\$0.00	\$178,796.60
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors	\$0.00	\$0.00	\$0.00
Line 10	Disbursements for Receivership Operations	\$0.00	\$0.00	\$0.00
Line 10a	Disbursements to Receiver or Other Professionals	\$155,599.76	\$119,279.74	\$274,879.50
Line 10b	Business Asset Expenses	\$2,916.00	\$215,521.62	\$218,437.62
Line 10c	Personal Asset Expenses	\$0.00	\$0.00	\$0.00
Line 10d	Investment Expenses	\$0.00	\$0.00	\$0.00
Line 10e	Third-Party Litigation Expenses			
	1. Attorneys Fees	\$0.00	\$0.00	\$0.00
	2. Litigation Expenses	\$0.00	\$0.00	\$0.00
	Total Third-Party Litigation Expenses	\$0.00	\$0.00	\$0.00
Line 10f	Tax Administrator Fees and Bonds	\$0.00	\$0.00	\$0.00
Line 10g	Federal and State Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursements for Receivership Operations	\$158,515.76	\$334,801.36	\$493,317.12
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	<i>Distribution Plan Development Expenses:</i>			
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administration	\$0.00	\$0.00	\$0.00
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	Total Plan Development Expenses	\$0.00	\$0.00	\$0.00
Line 11b	<i>Distribution Plan Implementation Expenses</i>			
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administration	\$0.00	\$0.00	\$0.00
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification	\$0.00	\$0.00	\$0.00
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00
	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses	\$0.00	\$0.00	\$0.00
	Total Plan Implementation Expenses	\$0.00	\$0.00	\$0.00
	Total Disbursements for Distribution Expenses Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 12	Disbursements to Court/Other			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$0.00	\$0.00	\$0.00
Line 12b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursements to Court/Other:	\$0.00	\$0.00	\$0.00
	Total Funds Disbursed (Line 9-11):	\$158,515.76	\$334,801.36	\$493,317.12
Line 13	Ending Balance (As of 06/30/2021):	\$20,280.84		

Line 14		Ending Balance of Fund - Net Assets:		
Line 14a	Cash & Cash Equivalents	\$0.00	\$0.00	\$0.00
Line 14b	Investments	\$0.00	\$0.00	\$0.00
Line 14c	Other Assets or Uncleared Funds (Frozen Accounts)	See Note 1	See Note 1	See Note 1
Total Ending Balance of Fund - Net Assets		\$0.00	\$0.00	\$0.00
Other Supplemental Information:		Reporting Period	Subtotal Prior Periods	Grand Total
Report of Items NOT To Be Paid by the Fund:				
Line 15 Disbursements for Plan Administration Expenses Not Paid by the Fund:				
Line 15a	<i>Plan Development Expenses Not Paid by the Fund:</i>			
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	<i>Total Plan Development Expenses Not Paid by the Fund</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
Line 15b	<i>Plan Implementation Expenses Not Paid by the Fund:</i>			
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification:	\$0.00	\$0.00	\$0.00
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00
	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	Web Site Maintenance/Call Center	\$0.00	\$0.00	\$0.00
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. FAIR Reporting Expenses	\$0.00	\$0.00	\$0.00
	<i>Total Plan Implementation Expenses Not Paid by the Fund</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
Line 15c	<i>Tax Administrator Fees & Bonds Not Paid by the Fund</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
Total Disbursements for Plan Administration Expenses Not Paid by the Fund		\$0.00	\$0.00	\$0.00
Line 16	Disbursements to Court/Other Not Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 16a	Investment Expenses/CRIS Fees	\$0.00	\$0.00	\$0.00
Line 16b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
Total Disbursements to Court/Other Not Paid by the Fund:		\$0.00	\$0.00	\$0.00
Line 17	DC & State Tax Payments	\$0.00	\$0.00	\$0.00
Line 18	No. of Claims:			
Line 18a	# of Claims Received This Reporting Period	620	410	1030
Line 18b	# of Claims Received Since Inception of Fund	1030	193	1030
Line 19	No. of Claimants/Investors			
Line 19a	# of Claimants/Investors Paid This Reporting Period	0	0	0
Line 19b	# of Claimants/Investors Paid Since Inception of Fund	0	0	0

Notes:

1)	The receivership holds the following non-cash business assets:	Amount of Units (if applicable)	Unit Value (as of 03/31/2022)**	Aggregate Value (as of 03/31/2022)
	Bitcoin (BTC)	113.471	\$45,538.68	\$5,167,319.56
	Bitcoin SV (BSV)	1.55416	\$94.54	\$146.93
	Ether (ETH)	2151.37	\$3,281.64	\$7,060,021.85
	Zcash (ZEC)	7.9046	\$178.02	\$1,407.18
	Litecoin (LTC)	4358.11	\$123.72	\$539,185.37
	Bitcoin Cash (BCH)	0.0004694	\$384.04	\$0.18
	Electroneum (ETN)	21,035,514	\$0.006191	\$130,230.87
	OMG (OMG)	51.56000141	\$5.49	\$283.06
	Computer equipment, televisions, phones			\$2,000.00 (est)
		Total		\$12,900,594.99

*As of June 1, 2022, the total approximate value of the cryptocurrencies listed above is \$7,664,102.75. There is significant market volatility in the prices of most of these cryptocurrencies.

**sourced from <https://coinmarketcap.com/>

EXHIBIT B

SUMMARY OF FEES BY PROFESSIONAL

Name	Title	H&K Office Location	Hourly Billing Rate¹	Total Hours	Total Fees
Kristina S. Azlin	Partner	Los Angeles	\$800.00	3.2	\$2,560.00
Kristina S. Azlin	Partner	Los Angeles	\$900.00	16.9	\$15,210.00
Jose A. Casal	Partner	Miami	\$950.00	1.6	\$1,520.00
Jose A. Casal	Partner	Miami	\$975.00	1.9	\$1,852.50
Josias N. Dewey	Partner	Miami	\$920.00	1.8	\$1,656.00
Shawn S. Amuial	Associate	Miami	\$555.00	47.9	\$26,584.50
Shawn S. Amuial	Associate	Miami	\$595.00	143.5	\$85,382.50
Andrew W. Balthazor	Associate	Miami	\$435.00	8.9	\$3,871.50
Samir S. Patel	Associate	Miami	\$455.00	3.3	\$1,501.50
Samuel J. Stone	Associate	Los Angeles	\$560.00	0.6	\$336.00
Samuel J. Stone	Associate	Los Angeles	\$615.00	40.5	\$24,907.50
Trisha M. Thompson	Associate	Portland	\$375.00	0.5	\$187.50
Ryan A. Augusta	Attorney	Tampa	\$95.00	3.1	\$294.50
Rachael Belensz	Attorney	Miami	\$95.00	2.0	\$190.00
Jeanne Habib	Attorney	Miami	\$95.00	3	\$285.00
Jacob I. Long	Attorney	Tampa	\$95.00	6.2	\$589.00
Douglas D. Rinner	Attorney	Tampa	\$95.00	2.0	\$190.00
Delia M. Hayes	Paralegal	Miami	\$285.00	0.5	\$142.50
Shannan Whalen	Paralegal	Boston	\$350.00	5.2	\$1,820.00
Elvin Ramos	Special Assistant	New York	\$310.00	0.3	\$93.00
Jophy Cheng	eData Analyst	San Francisco	\$215.00	0.7	\$150.50
Kristen D. Wiwczar	eData Project Manager	Boston	\$360.00	10.7	\$3,852.00
Subtotal:				304.3	\$173,176.00
<i>(Less 10% Discount)</i>					<i>(\$17,317.60)</i>
TOTAL:					\$155,858.40

¹ Before application of 10% discount.

Overall Total:	\$155,858.40
Attorney Fees:	\$150,406.20
Total Attorney Hours:	286.9
Attorneys' Blended Rate:	\$524.25

EXHIBIT C

SUMMARY OF FEES BY TASK CATEGORY

Task Code	Description	Total Hours	Total Fees
B110	Case Administration	112.1	\$63,996.00
B120	Asset Analysis and Recovery	12.1	\$6,568.00
B130	Asset Disposition	0.7	\$388.50
B150	Creditor Communications	16.7	\$1,739.50
B160	Fee/Employment Applications	0	0
B210	Business Operations	0.7	\$316.50
B240	Tax Issues	6.0	\$3,084.00
B310	Claims Administration	156.0	\$97,083.50
	Subtotal:	304.3	\$173,176.00
	<i>(Less 10% Discount)</i>		<i>(\$17,317.60)</i>
	TOTAL:	304.3	\$155,858.40

EXHIBIT D

DAILY TIME RECORDS

Holland & Knight

P.O. Box 936937 | Atlanta, GA 31193-6937
Email account.services@hklaw.com | T 813.901.4180
Holland & Knight LLP | www.hklaw.com | EIN 59-0663819

Josias N. Dewey as Receiver
701 Brickell Avenue, Suite 3300
Miami, FL 33131

May 29, 2022
Invoice: 32917991

TERMS: DUE ON RECEIPT

REMITTANCE COPY

Our Matter: 159447.00001
SEC v. Titanium Blockchain Infrastructure Services, Inc., et al.

FEES FOR PROFESSIONAL SERVICES:	\$	173,176.00
LESS COURTESY DISCOUNT:	\$	<u>-17,317.60</u>
PROFESSIONAL FEES:	\$	155,858.40
REIMBURSABLE COSTS:	\$	7,422.55

TOTAL DUE THIS INVOICE: (U.S. Dollar) \$ 163,280.95

Holland & Knight kindly thanks you for your business and prompt payment.

Wire:

Wells Fargo Bank N.A.
Holland & Knight LLP
420 Montgomery Street
San Francisco, CA 94104-1207
Routing/ABA #121000248
Account #2090002390441

Swift Routing Number: WFBIUS6S
(for international wires)

ACH:

Holland & Knight LLP
Wells Fargo Bank N.A.
Routing/ABA #063107513
Account #2090002390441
CTX format is preferred.

Mail:

Holland & Knight LLP
P.O. Box 936937
ATLANTA, GA 31193-6937

**For Overnight Express
(UPS, FedEx, etc.) or**

Courier Delivery:

LOCKBOX SERVICES 936937
Holland & Knight LLP
3585 ATLANTA AVENUE
HAPEVILLE, GA 30354-1705

For payment questions or wire and ACH instruction verification: account.services@hklaw.com | 813-901-4180

Holland & Knight

P.O. Box 936937 | Atlanta, GA 31193-6937
Email account.services@hklaw.com | T 813.901.4180
Holland & Knight LLP | www.hklaw.com | EIN 59-0663819

To expedite processing of your payment, please include the matter number(s) or invoice number(s) with your payment.

Wire:

Wells Fargo Bank N.A.
Holland & Knight LLP
420 Montgomery Street
San Francisco, CA 94104-1207
Routing/ABA #121000248
Account #2090002390441

Swift Routing Number: WFBIUS6S
(for international wires)

ACH:

Holland & Knight LLP
Wells Fargo Bank N.A.
Routing/ABA #063107513
Account #2090002390441
CTX format is preferred.

Mail:

Holland & Knight LLP
P.O. Box 936937
ATLANTA, GA 31193-6937

**For Overnight Express
(UPS, FedEx, etc.) or**

Courier Delivery:

LOCKBOX SERVICES 936937
Holland & Knight LLP
3585 ATLANTA AVENUE
HAPEVILLE, GA 30354-1705

For payment questions or wire and ACH instruction verification: account.services@hklaw.com | 813-901-4180

Holland & Knight

P.O. Box 936937 | Atlanta, GA 31193-6937
Email account.services@hklaw.com | T 813.901.4180
Holland & Knight LLP | www.hklaw.com | EIN 59-0663819

Josias N. Dewey as Receiver
701 Brickell Avenue, Suite 3300
Miami, FL 33131

May 29, 2022
Invoice: 32917991
Page 1

TERMS: DUE ON RECEIPT

For professional services rendered through August 11, 2021 in connection with the following:

Our Matter: 159447.00001
SEC v. Titanium Blockchain Infrastructure Services, Inc., et al.

TASK/ACTIVITY

B110 - Case Administration A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/16/20	Shawn S. Amuial	Work to finalize claims process with RCB	0.80	595.00	476.00
10/28/20	Shawn S. Amuial	Assist with preparation and filing of extensions of claims process and hiring of claims processor	1.20	595.00	714.00
12/15/20	Delia M. Hayes	Review docket and assist counsel in updating Receiver's website.	0.50	285.00	142.50
12/17/20	Shawn S. Amuial	Continue to work on revisions to website and claims portal	0.20	595.00	119.00
12/18/20	Shawn S. Amuial	Review correspondence from Hong Kong counsel re default judgment	0.30	595.00	178.50
Total:	B110 A101	Case Administration Plan and Prepare for	3.00		1,630.00

B110 - Case Administration A102 - Research

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/19/21	Shawn S. Amuial	Work on retaining counsel in Seychelles re HitBtc matter	0.40	595.00	238.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 2

Josias N. Dewey as Receiver
 159447.00001

Total:	B110	Case Administration			
	A102	Research	0.40		238.00

B110 - Case Administration
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/2/20	Shawn S. Amuial	Discuss revisions to claims form and determine and work on next steps for filing	1.10	555.00	610.50
6/16/20	Shawn S. Amuial	Call with SEC and receiver and make changes to claims motion per SEC's feedback and circulate for review	2.10	555.00	1,165.50
6/17/20	Shawn S. Amuial	Call with Receiver regarding claims motion and further revise motion accordingly in advance of SEC review.	1.10	555.00	610.50
6/18/20	Shawn S. Amuial	Call with receiver and further revise claims motion and circulate claims motion to SEC	2.10	555.00	1,165.50
7/28/20	Shawn S. Amuial	Assist West Coast team throughout the day in revising and getting claims motion ready for filing	2.90	555.00	1,609.50
7/29/20	Shawn S. Amuial	Work on responses to RCB's inquiries in connection with their bid to assist with claims process	0.60	555.00	333.00
1/27/21	Shawn S. Amuial	Revise draft claims notice and call with Receiver to discuss	0.50	595.00	297.50
1/29/21	Shawn S. Amuial	Discuss draft notice to claims with receiver and correspondences with SEC and RCB and LA litigation team regarding same	0.70	595.00	416.50
2/1/21	Shawn S. Amuial	Continue to work on revised notice to claimants and revisions to claims portal with Joe Dewey and Josh Strickon	1.90	595.00	1,130.50
2/2/21	Shawn S. Amuial	Continue to work on revised notice to claimants and revisions to claims portal with Joe Dewey and Josh Strickon	1.10	595.00	654.50
2/3/21	Shawn S. Amuial	Work on revised language for TBIS website alerting claimants of claims process and working to publish claims notice	1.50	595.00	892.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 3

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/4/21	Shawn S. Amuial	Continue to work on revised notice to claimants and revisions to claims portal with Joe Dewey and Josh Strickon	0.50	595.00	297.50
2/5/21	Shawn S. Amuial	Work on revised language for TBIS website alerting claimants of claims process and working to publish claims notice	1.20	595.00	714.00
2/8/21	Shawn S. Amuial	Continue to work on finalizing claims notice distribution; call with SEC; call with Joe Dewey	1.00	595.00	595.00
2/9/21	Shawn S. Amuial	Continue to work on finalizing claims notice distribution	0.30	595.00	178.50
2/10/21	Shawn S. Amuial	Continue to work on finalizing claims notice distribution	1.70	595.00	1,011.50
2/11/21	Shawn S. Amuial	Continue to work on finalizing claims notice distribution throughout day	2.90	595.00	1,725.50
2/12/21	Shawn S. Amuial	Continue to work on finalizing claims notice distribution throughout day	4.80	595.00	2,856.00
2/16/21	Shawn S. Amuial	Continue to work on finalizing claims portal with RCB, Josh Strickon and Joe Dewey throughout entire day	4.30	595.00	2,558.50
2/17/21	Shawn S. Amuial	Continue to work on finalizing claims portal with RCB, Josh Strickon and Joe Dewey throughout day	1.50	595.00	892.50
2/18/21	Shawn S. Amuial	Continue to work on finalizing claims portal with RCB, Josh Strickon and Joe Dewey throughout day	1.70	595.00	1,011.50
2/19/21	Shawn S. Amuial	Continue to work on finalizing claims portal with RCB, Josh Strickon and Joe Dewey throughout day	1.60	595.00	952.00
2/25/21	Shawn S. Amuial	Continue to work on finalizing claims portal with RCB, Josh Strickon and Joe Dewey throughout day	1.00	595.00	595.00
2/26/21	Shawn S. Amuial	Continue to work on finalizing claims portal with RCB, Josh Strickon and Joe Dewey	3.20	595.00	1,904.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 4

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		throughout day			
3/2/21	Shawn S. Amuial	Work on disseminating notice of claims process and responding to inquiries from investors	1.50	595.00	892.50
3/3/21	Shawn S. Amuial	Work on disseminating notice of claims process and responding to inquiries from investors	1.50	595.00	892.50
3/18/21	Samuel J. Stone	Revise status update to Court and correspondence re same	0.70	615.00	430.50
7/1/21	Shannan E. Whalen	Work on preparation of SFAR report for period ending 6/30/2021 and emails with S. Amuial re: same.	1.60	350.00	560.00
7/2/21	Shannan E. Whalen	Work on review of bank statements and preparation of associated list of disbursements for SFAR report for period ending 6/30/2021.	1.80	350.00	630.00
7/7/21	Shannan E. Whalen	Review 2020-2021 bank statements, update list of disbursements, and revise SFAR report accordingly.	1.80	350.00	630.00
Total:	B110 A103	Case Administration Draft/Revise	50.20		28,213.00

B110 - Case Administration
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/6/20	Shawn S. Amuial	Review and mark up draft receiver's motion for approval of claims process and bar date	0.70	555.00	388.50
1/7/20	Shawn S. Amuial	Work with team to finalize review and mark-up of draft motion for approval of claims process and bar date and discuss comments/issues.	1.50	555.00	832.50
1/9/20	Shawn S. Amuial	Further discuss Receiver's motion for approval of claims process with Josias Dewey.	0.30	555.00	166.50
1/21/20	Shawn S. Amuial	Review further updated claims motion and correspondences with Andrew Balthazor	0.50	555.00	277.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 5

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/22/20	Shawn S. Amuial	Work with receiver and A. Balthazor to revise and finalize motion for approval of claims process.	3.20	555.00	1,776.00
1/23/20	Shawn S. Amuial	Review comments from SEC re claims motion and work with Andrew Balthazor to both transmit documents back to SEC and implement prior received comments	0.60	555.00	333.00
1/24/20	Shawn S. Amuial	Review further revised engagement letter and requests from Hong Kong counsel	0.30	555.00	166.50
1/27/20	Shawn S. Amuial	Deliver requested items to Hong Kong counsel and coordinate transmission of wire	0.30	555.00	166.50
1/28/20	Shawn S. Amuial	Calls and correspondence with Wells Fargo re transmission of wire	0.30	555.00	166.50
2/6/20	Shawn S. Amuial	Review and mark up revised claims motion and exhibits	0.70	555.00	388.50
2/7/20	Shawn S. Amuial	Finalize review and mark up of revised claims motion and exhibits and discuss with Andrew Balthazor	0.40	555.00	222.00
2/18/20	Shawn S. Amuial	Discuss revisions to claims motion with Joe Dewey	0.20	555.00	111.00
2/19/20	Shawn S. Amuial	Finalize revisions to claims motion with Joe Dewey and circulate to Andrew Balthazar	0.70	555.00	388.50
3/6/20	Shawn S. Amuial	Review needed information for Hong Kong demand letter	0.10	555.00	55.50
3/16/20	Shawn S. Amuial	Review proposed revisions to claims motion sent by SEC	0.50	555.00	277.50
4/13/20	Shawn S. Amuial	Review further revised claims process motion and work with team on same.	1.20	555.00	666.00
4/30/20	Shawn S. Amuial	Review revised demand letter for Hong Kong counsel and correspondence with Hong Kong counsel	0.40	555.00	222.00
5/4/20	Shawn S. Amuial	Continue to review and work through comments from Hong Kong counsel	0.50	555.00	277.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 6

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/13/20	Shawn S. Amuial	Review draft motion before sent to SEC	0.40	555.00	222.00
5/22/20	Shawn S. Amuial	Review final, circulated, demand letters to HitBTC	0.40	555.00	222.00
6/4/20	Shawn S. Amuial	Review language in demand made by Hong Kong counsel to crypto exchange	0.20	555.00	111.00
6/9/20	Shawn S. Amuial	Further revisions to draft claims motion before circulating to SEC.	1.30	555.00	721.50
6/29/20	Shawn S. Amuial	Review SEC's comments to claims process motion	0.50	555.00	277.50
7/13/20	Shawn S. Amuial	Review finalized claims process motion and correspondences with SEC and discussion with Receiver in connection with filing	0.90	555.00	499.50
7/14/20	Shawn S. Amuial	Finalize claims process motion and work with LA team on filing logistics.	1.20	555.00	666.00
7/23/20	Shawn S. Amuial	Work on filing claims motion and second interim fee application	0.50	555.00	277.50
8/24/20	Shawn S. Amuial	Review order re claims process and correspondences with internal team	0.30	555.00	166.50
8/27/20	Shawn S. Amuial	Review draft pleading prepare by Hong Kong counsel and confer internally	0.30	555.00	166.50
9/2/20	Shawn S. Amuial	Review contents of fee application	0.50	555.00	277.50
9/15/20	Shawn S. Amuial	Review revised proposal from RCB re claims admin	0.30	555.00	166.50
9/30/20	Shawn S. Amuial	Review filed writ in Hong Kong court and correspondences with Hong Kong counsel	0.30	555.00	166.50
10/1/20	Shawn S. Amuial	Work on compiling investor information to provide to RCB in connection with commencement of claims process	1.30	595.00	773.50
11/11/20	Shawn S. Amuial	Review, analyze and revise motions for extended claims motion and motion to hire RFS throughout the day and correspondences	2.60	595.00	1,547.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 7

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		with RFS and correspondences with Hong Kong counsel			
11/12/20	Shawn S. Amuial	Work with RFS and internal team on review, analysis and revisions to motions for extended claims motion and motion to hire RFS.	1.70	595.00	1,011.50
11/13/20	Shawn S. Amuial	Review, analyze and revise motions for extended claims motion and motion to hire RFS throughout the day and correspondences with RFS and correspondences with internal team	0.80	595.00	476.00
12/8/20	Shawn S. Amuial	Review court order permitting appointment of administrative Agent and correspondence with RCB re remaining issues necessary to deploy claims portal	0.70	595.00	416.50
12/8/20	Samuel J. Stone	Attention to Court's order granting appointment of receiver	0.20	615.00	123.00
12/10/20	Shawn S. Amuial	Review and discuss correspondences from Hong Kong counsel with receiver	0.20	595.00	119.00
1/22/21	Shawn S. Amuial	Call with internal team and RCB to discuss claims portal modifications and follow up call internally	1.00	595.00	595.00
1/25/21	Shawn S. Amuial	Work with LA Litigation team to finalize claims notice and work with RCB to finalize claims portal	0.60	595.00	357.00
1/26/21	Shawn S. Amuial	Work on revisions to claims notice and discuss with Joe Dewey	0.60	595.00	357.00
2/9/21	Shawn S. Amuial	Review proposal by Hong Kong counsel	0.30	595.00	178.50
3/4/21	Shawn S. Amuial	Continue to work on claims notice dissemination and assist with issues dealing with claims submission and verification throughout the day	2.40	595.00	1,428.00
3/11/21	Shawn S. Amuial	Work on second set of notices and assist with court update filing	0.90	595.00	535.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 8

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/19/21	Kristen D. Wiwczar	Review categories report prepared by S. Lewis, edit and send to legal team for review.	0.40	360.00	144.00
4/19/21	Shawn S. Amuial	Review second interim fee application in anticipation of filing	0.90	595.00	535.50
4/20/21	Shawn S. Amuial	Attention to claims process including drafting responses to claimant inquiries, coordination of validation troubleshooting, and review and discussion of claims data.	2.70	595.00	1,606.50
4/21/21	Shawn S. Amuial	Attention to claims administration including responses to claimant inquiries, coordination of validation troubleshooting, and review and discussion of claims data with receiver and consultant.	1.50	595.00	892.50
4/22/21	Shawn S. Amuial	Review and discuss claims data with consultant and assist in preparation of paper application	0.70	595.00	416.50
4/23/21	Shawn S. Amuial	Draft responses to claimant inquiries and coordinate validation troubleshooting.	1.40	595.00	833.00
7/12/21	Shawn S. Amuial	Review of coinbase account balances in preparation for upcoming filings.	0.20	595.00	119.00
Total:	B110 A104	Case Administration Review/Analyze	40.60		23,287.00

B110 - Case Administration
A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/29/20	Shawn S. Amuial	Discussion with Joe Dewey re claims motion	0.20	555.00	111.00
5/15/20	Shawn S. Amuial	Review/discuss next steps for filing as Andy departs for clerkship	0.50	555.00	277.50
5/19/20	Shawn S. Amuial	Review/discuss next steps for filing as Andy departs for clerkship	0.40	555.00	222.00
5/21/20	Shawn S. Amuial	Call with Joe Dewey and Jose Casal to discuss next steps for case administration	0.40	555.00	222.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 9

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/30/20	Shawn S. Amuial	Discuss SEC's comments to claims process motion and discuss filing with team	0.30	555.00	166.50
7/20/20	Shawn S. Amuial	Internal call to discuss required filings and response to HitBTC	0.60	555.00	333.00
7/22/20	Shawn S. Amuial	Communications internally re status of claims application	0.20	555.00	111.00
7/27/20	Shawn S. Amuial	Correspondences internally re filing of claims motion, distribution motion and value of receivership assets.	0.30	555.00	166.50
8/4/20	Shawn S. Amuial	Internal discussion re next steps with Hong Kong counsel	0.30	555.00	166.50
9/29/20	Shawn S. Amuial	Correspondences and planning internally to prepare draft motion seeking extension for commencement of claims period	0.70	555.00	388.50
10/13/20	Shawn S. Amuial	Internal correspondences and discussion re motion to amend claims process timeline	0.30	595.00	178.50
11/4/20	Shawn S. Amuial	Review issues with internal claims website and email IT to address and correspondences to West Coast litigation team re revised claims motion	0.40	595.00	238.00
11/16/20	Shawn S. Amuial	Correspondences re issues with claims administration test site	0.30	595.00	178.50
11/23/20	Shawn S. Amuial	Call with Joe Dewey and Josh Strickon to discuss initial smart contract token issuances in order to help facilitate distribution claims process	1.30	595.00	773.50
1/5/21	Shawn S. Amuial	Call with Joe Dewey to discuss status of claims portal	0.50	595.00	297.50
1/6/21	Shawn S. Amuial	Call with Joe Dewey to discuss status of claims portal	1.00	595.00	595.00
3/15/21	Samuel J. Stone	Correspondence re status update to court	0.20	615.00	123.00
3/15/21	Kristen D. Wiwczar	Consult with S. Amuial, G. Reisher, S. Lewis re review and next steps.	0.50	360.00	180.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 10

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/15/21	Kristen D. Wiwczar	Draft autoreply for tbsis and tbsiq inboxes.	0.20	360.00	72.00
7/12/21	Jose A. Casal	Prepare for and participate in extensive team call on status of case administration and creditor claims.	0.80	975.00	780.00
Total:	B110 A105	Case Administration Communicate (in firm)	9.40		5,580.50

B110 - Case Administration
A106 - Communicate (with client)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/15/20	Andrew W. Balthazor	Drafting transition memo for client.	0.30	435.00	130.50
5/21/20	Jose A. Casal	Conference call with receiver regarding collection strategies and claims administration.	0.50	950.00	475.00
Total:	B110 A106	Case Administration Communicate (with client)	0.80		605.50

B110 - Case Administration
A107 - Communicate (other outside counsel)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/14/20	Jose A. Casal	Telephone conversation with SEC counsel D. Brown on status of receivership and claims determination.	0.30	975.00	292.50
12/15/20	Jose A. Casal	Follow up with SEC counsel on bar date order and review order.	0.20	975.00	195.00
Total:	B110 A107	Case Administration Communicate (other outside counsel)	0.50		487.50

B110 - Case Administration
A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
-------------	---------------------	--------------------	--------------	-------------	---------------

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 11

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/3/20	Shawn S. Amuial	Correspondences from SEC re claims motion and internal discussion to coordinate call with SEC	0.10	555.00	55.50
2/5/20	Shawn S. Amuial	Plan and participate in call with SEC to discuss claims motion and correspondence with Andrew Balthazar re changes to motion	0.90	555.00	499.50
2/25/20	Shawn S. Amuial	Correspondences with Hong Kong counsel and review the written material provided	0.30	555.00	166.50
5/20/20	Shawn S. Amuial	Correspondences with Hong Kong counsel re HitBTC demand	0.20	555.00	111.00
5/20/20	Shawn S. Amuial	Correspondences with SEC re filing of motion and revisions	0.20	555.00	111.00
5/21/20	Shawn S. Amuial	Further correspondences with Hong Kong counsel re HitBTC demand	0.30	555.00	166.50
5/27/20	Shawn S. Amuial	Review correspondences from SEC re comments to claims motion and discuss with Joe Dewey	0.30	555.00	166.50
5/28/20	Shawn S. Amuial	Review correspondences from SEC and Joe Dewey and call with SEC	0.60	555.00	333.00
6/8/20	Shawn S. Amuial	Correspondences to Hong Kong counsel re demand letter	0.20	555.00	111.00
6/26/20	Shawn S. Amuial	Correspondences re claims motion	0.20	555.00	111.00
7/2/20	Shawn S. Amuial	Correspondences with investors requesting updates re receivership	0.30	555.00	166.50
7/14/20	Shawn S. Amuial	Correspondences with RCB re potential engagement as claims administrator	0.30	555.00	166.50
7/20/20	Shawn S. Amuial	Correspondences with HITBtc re frozen assets and review correspondence and respond to Hong Kong counsel re HitBTC	0.70	555.00	388.50
7/23/20	Shawn S. Amuial	Correspondences with HITBtc re frozen assets	0.20	555.00	111.00
7/30/20	Shawn S.	Correspondences with RCB re claims	0.40	555.00	222.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 12

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amuial	administration services			
7/31/20	Shawn S. Amuial	Messages to/from TBIS investors	0.30	555.00	166.50
8/11/20	Shawn S. Amuial	Finalize engagement of Hong Kong counsel in connection with second phase of representation in conneciton with HitBTC	0.60	555.00	333.00
12/23/20	Shawn S. Amuial	Call with Hong Kong counsel to discuss required declaration to amend motion for summary judgment	0.30	595.00	178.50
3/17/21	Shawn S. Amuial	Call with counsel in the Seychelles to discuss potential action	0.50	595.00	297.50
Total:	B110 A108	Case Administration Communicate (other external)	6.90		3,861.50

B110 - Case Administration
A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/16/21	Elvin Ramos	Review and finalize for submission to the Court: First Progress Report.	0.30	310.00	93.00
Total:	B110 A111	Case Administration Other	0.30		93.00

B120 - Asset Analysis and Recovery
A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/21/20	Shawn S. Amuial	Revise engagement letter with Hong Kong attorneys and send	0.30	555.00	166.50
Total:	B120 A101	Asset Analysis and Recovery Plan and Prepare for	0.30		166.50

B120 - Asset Analysis and Recovery
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
-------------	---------------------	--------------------	--------------	-------------	---------------

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 13

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/30/20	Andrew W. Balthazor	Revising draft demand letters to include receiver cryptocurrency addresses; sending drafts to Hong Kong counsel for sending to recipients.	0.50	435.00	217.50
Total:	B120 A103	Asset Analysis and Recovery Draft/Revise	0.50		217.50

B120 - Asset Analysis and Recovery
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/9/20	Shawn S. Amuial	Review revised proposal by potential Hong Kong outside counsel and discuss with team internally	0.30	555.00	166.50
1/30/20	Shawn S. Amuial	Update asset inventory and values	0.40	555.00	222.00
2/9/20	Shawn S. Amuial	Review Centra Tech order and discuss is application to TBIS with H&K team	0.30	555.00	166.50
12/2/20	Shawn S. Amuial	Review analysis from consultant re smart contract addresses that distributed TBAR	0.30	595.00	178.50
12/3/20	Shawn S. Amuial	Review analysis from consultant re smart contract addresses that distributed TBAR	0.30	595.00	178.50
12/9/20	Shawn S. Amuial	Correspondences with consultant re smart contract addresses that distributed TBAR	0.30	595.00	178.50
1/11/21	Shawn S. Amuial	Review claims class analysis to be provided to RCB for implementation into claims portal	0.40	595.00	238.00
1/13/21	Shawn S. Amuial	Review content of claims portal and discuss revisions with receiver	0.70	595.00	416.50
6/16/21	Shawn S. Amuial	Analyze Coinbase transactions and call with Coinbase and discussions with Receiver re frozen cryptocurrency to be transferred into the receivership estate	2.10	595.00	1,249.50
Total:	B120 A104	Asset Analysis and Recovery Review/Analyze	5.10		2,994.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 14

Josias N. Dewey as Receiver
 159447.00001

B120 - Asset Analysis and Recovery
A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/8/20	Shawn S. Amual	Review correspondences from Kraken re frozen assets and send correspondences to receiver in connection therewith	0.20	595.00	119.00
Total:	B120 A105	Asset Analysis and Recovery Communicate (in firm)	0.20		119.00

B120 - Asset Analysis and Recovery
A106 - Communicate (with client)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/20/20	Jose A. Casal	Conference call with receiver on HitBTC strategy.	0.30	950.00	285.00
Total:	B120 A106	Asset Analysis and Recovery Communicate (with client)	0.30		285.00

B120 - Asset Analysis and Recovery
A107 - Communicate (other outside counsel)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/4/20	Andrew W. Balthazor	Reading email from outside counsel regarding recovery action.	0.20	435.00	87.00
4/9/20	Andrew W. Balthazor	Responding to email from Hong Kong counsel regarding recovery action.	0.10	435.00	43.50
4/11/20	Andrew W. Balthazor	Responding to Hong Kong counsel's request for information; revising draft demand letters to holders of receivership assets.	1.10	435.00	478.50
5/4/20	Andrew W. Balthazor	Research and respond to Hong Kong's counsel's information requests.	2.80	435.00	1,218.00
12/23/20	Jose A. Casal	Conference call with Hong Kong counsel regarding status and procedure for HitBTC proceeding.	0.30	975.00	292.50
Total:	B120	Asset Analysis and Recovery			

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 15

Josias N. Dewey as Receiver
 159447.00001

A107 Communicate (other outside counsel) 4.50 2,119.50

B120 - Asset Analysis and Recovery
A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/10/20	Shawn S. Amuial	Correspondence with Hong Kong counsel re engagement	0.20	555.00	111.00
7/14/20	Shawn S. Amuial	Call with Wells Fargo re receivership account debits and discussion with Receiver	0.60	555.00	333.00
8/3/20	Shawn S. Amuial	Correspondences to HitBTC re held crypto together with correspondences from Hong Kong counsel and HK team re cost of pursuit of lawsuit against HitBTCH	0.40	555.00	222.00
Total:	B120 A108	Asset Analysis and Recovery Communicate (other external)	1.20		666.00

B130 - Asset Disposition
A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/2/20	Shawn S. Amuial	Correspondences with Coinbase re release of funds and discussion with receiver re the same	0.30	555.00	166.50
1/3/20	Shawn S. Amuial	Correspondences with Coinbase re release of funds and discussion with receiver re the same and correspondences with Wells Fargo re deposit from Coinbase	0.40	555.00	222.00
Total:	B130 A108	Asset Disposition Communicate (other external)	0.70		388.50

B150 - Meetings of and Communications with Creditors
A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/19/21	Kristen D. Wiwczar	Communications re export of TBIS and TBISQ mailboxes from IT for additional analysis of emails.	0.20	360.00	72.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 16

Josias N. Dewey as Receiver
 159447.00001

Total:	B150	Meetings of and Communications with Creditors		
	A101	Plan and Prepare for	0.20	72.00

B150 - Meetings of and Communications with Creditors
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/17/21	Douglas D. Rinner	Review and categorize incoming TBAR owners' claims-related questions for the purpose of creating targeted responses.	2.00	95.00	190.00
3/17/21	Jeanne Habib	Review and categorize incoming TBAR owners' claims-related questions for the purpose of creating targeted responses.	3.00	95.00	285.00
3/17/21	Ryan A. Augusta	Review and categorize incoming TBAR owners' claims-related questions for the purpose of creating targeted responses.	3.10	95.00	294.50
3/17/21	Rachael Belensz	Review and categorize incoming TBAR owners' claims-related questions for the purpose of creating targeted responses.	2.00	95.00	190.00
7/23/21	Jacob I. Long	Review emails with Sherisse Lewis, responding to inquiries, and following up with other interested Holland and Knight attorneys as to future desired approach.	0.60	95.00	57.00
7/26/21	Jacob I. Long	Review and respond to incoming TBAR owners' claims-related questions.	0.40	95.00	38.00
7/28/21	Jacob I. Long	Review and respond to incoming TBAR owners' claims-related questions.	0.40	95.00	38.00
7/29/21	Jacob I. Long	Review and respond to incoming TBAR owners' claims-related questions.	0.60	95.00	57.00
7/30/21	Jacob I. Long	Review and respond to incoming TBAR owners' claims-related questions.	0.60	95.00	57.00
8/4/21	Jacob I. Long	Review and respond to incoming TBAR owners' claims-related questions.	1.00	95.00	95.00
8/5/21	Jacob I. Long	Review and respond to incoming TBAR owners' claims-related questions.	0.50	95.00	47.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 17

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/6/21	Jacob I. Long	Review and respond to incoming TBAR owners' claims-related questions.	0.50	95.00	47.50
8/10/21	Jacob I. Long	Review and respond to incoming TBAR owners' claims-related questions.	1.00	95.00	95.00
8/11/21	Jacob I. Long	Review and respond to incoming TBAR owners' claims-related questions.	0.60	95.00	57.00
Total:	B150	Meetings of and Communications with Creditors			
	A104	Review/Analyze	16.30		1,548.50

B150 - Meetings of and Communications with Creditors

A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/30/20	Shawn S. Amual	Voicemail from, and correspondences to, TBIS investor re the status of litigation	0.20	595.00	119.00
Total:	B150	Meetings of and Communications with Creditors			
	A108	Communicate (other external)	0.20		119.00

B210 - Business Operations

A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/27/20	Shawn S. Amual	Correspondences with former TBIS employee re employment certifications and review employment certifications	0.30	555.00	166.50
Total:	B210	Business Operations			
	A104	Review/Analyze	0.30		166.50

B210 - Business Operations

A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/30/20	Trisha M. Thompson	Confer with A. Tuttle re: inventory and shipping of TBIS Springfield assets to client	0.10	375.00	37.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 18

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		in Miami office.			
Total:	B210 A105	Business Operations Communicate (in firm)	0.10		37.50

B210 - Business Operations
A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/7/20	Trisha M. Thompson	Manage shipment of TBIS Springfield property to client.	0.10	375.00	37.50
2/11/20	Trisha M. Thompson	Manage shipment of TBIS Springfield property to client.	0.10	375.00	37.50
2/20/20	Trisha M. Thompson	Manage shipment of TBIS Springfield property to client.	0.10	375.00	37.50
Total:	B210 A111	Business Operations Other	0.30		112.50

B240 - Tax Issues
A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/13/20	Andrew W. Balthazor	Reviewing latest correspondence from state tax authorities.	0.30	435.00	130.50
Total:	B240 A101	Tax Issues Plan and Prepare for	0.30		130.50

B240 - Tax Issues
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/8/20	Shawn S. Amual	Review Oregon Department of Revenue tax bill and discuss necessary next steps with receiver	0.30	555.00	166.50
2/10/20	Shawn S. Amual	Review notice from Oregon Department of Revenue and work with Andrew Balthazar to draft notice response to Department of	0.80	555.00	444.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 19

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Revenue			
3/3/20	Shawn S. Amuial	Review letter from Oregon Department of Revenue, discuss with receiver, and discuss/correspond with Andrew Balthazar re response	0.40	555.00	222.00
5/20/20	Shawn S. Amuial	Attend to Oregon tax issues, including review all correspondences and notes in connection with Oregon DOR issues and call to Oregon DOR to address payroll tax bill.	1.60	555.00	888.00
Total:	B240 A104	Tax Issues Review/Analyze	3.10		1,720.50

B240 - Tax Issues
A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/9/20	Trisha M. Thompson	Emails re: Oregon employment taxes.	0.10	375.00	37.50
5/8/20	Andrew W. Balthazor	Responding to third party concerns regarding state tax obligations.	0.20	435.00	87.00
Total:	B240 A105	Tax Issues Communicate (in firm)	0.30		124.50

B240 - Tax Issues
A106 - Communicate (with client)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/3/20	Andrew W. Balthazor	Reviewing claims from state tax agency against receivership; proposing responses and discussing with client and counsel.	0.30	435.00	130.50
4/30/20	Andrew W. Balthazor	Reviewing correspondence from state department of revenue; conferring with client and counsel regarding how to respond to warrant.	0.60	435.00	261.00
5/11/20	Andrew W. Balthazor	Analyzing receivership order and determining applicability to state tax entities collecting	0.50	435.00	217.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 20

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		from prior principal; suggesting courses of action.			
Total:	B240 A106	Tax Issues Communicate (with client)	1.40		609.00

B240 - Tax Issues
A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/9/20	Shawn S. Amuial	Communications from former TBIS employee re tax forms	0.30	555.00	166.50
7/13/20	Shawn S. Amuial	Several correspondences and review tax forms for employee seeking tax information	0.60	555.00	333.00
Total:	B240 A108	Tax Issues Communicate (other external)	0.90		499.50

B310 - Claims Administration and Objections
A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/8/20	Kristina S. Azlin	Attention to Court's issuance of Order Approving Claims process; confer with S. Stone about same.	0.20	900.00	180.00
12/16/20	Kristina S. Azlin	Attention to status of claims notice and bar dates; confer with S. Stone about same.	0.20	900.00	180.00
1/5/21	Kristina S. Azlin	Brief attention to status of claims notice and bar dates; confer with S. Stone and S. Amuil about same.	0.20	900.00	180.00
1/21/21	Kristina S. Azlin	Continued attention to status of claims notice and bar dates; confer with S. Stone and S. Amuil about same; review Court orders and requirements pertaining to same.	0.90	900.00	810.00
1/26/21	Kristina S. Azlin	Continued attention to claims notice; work with S. Stone and S. Amuil to update and finalize same.	0.80	900.00	720.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 21

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/29/21	Kristina S. Azlin	Continued attention to claims notice; oversee finalization of same.	0.30	900.00	270.00
3/10/21	Kristen D. Wiwczar	Planning and strategy call to discuss workflow for review and response to claimant email inquiries.	0.50	360.00	180.00
3/11/21	Kristen D. Wiwczar	Coordinate collection of emails from claims and prepare for review and categorization of same.	0.60	360.00	216.00
3/12/21	Jophy Cheng	Processing and transformation of unstructured data for use in a database	0.20	215.00	43.00
3/12/21	Jophy Cheng	Processing and transformation of unstructured data for use in a database	0.50	215.00	107.50
3/12/21	Kristen D. Wiwczar	Attention to email collection and preparation of emails for review and categorization by Review team.	2.50	360.00	900.00
3/25/21	Kristen D. Wiwczar	Prepare distribution list for blast email to claimants with auto-reply message.	0.80	360.00	288.00
3/29/21	Kristen D. Wiwczar	Prepare additional emails for review and categorization.	0.40	360.00	144.00
4/14/21	Kristina S. Azlin	Brief attention to status of claims notice.	0.20	900.00	180.00
Total:	B310 A101	Claims Administration and Objections Plan and Prepare for	8.30		4,398.50

B310 - Claims Administration and Objections
A102 - Research

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/4/21	Samir S. Patel	Responding to 16 claimants that are having trouble with the control token process.	3.30	455.00	1,501.50
Total:	B310 A102	Claims Administration and Objections Research	3.30		1,501.50

B310 - Claims Administration and Objections

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 22

Josias N. Dewey as Receiver
 159447.00001

A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/11/20	Andrew W. Balthazor	Revising draft claims process motion, incorporating SEC feedback; sending to client for review.	0.90	435.00	391.50
7/14/20	Kristina S. Azlin	Review draft claims process motion; follow-up with S. Amuial regarding same.	0.40	800.00	320.00
7/28/20	Kristina S. Azlin	Work with team on issues pertaining to client validation confirmation and how to proceed with validation assistance, validation troubleshooting, and claims correspondence.	2.80	800.00	2,240.00
11/2/20	Kristina S. Azlin	Follow-up with S. Stone regarding motion to amend claims process and appoint claims administrator.	0.30	900.00	270.00
11/10/20	Kristina S. Azlin	Confer with S. Stone regarding preparation of motion to amend claims process and appoint claims administrator and follow up re: same.	1.20	900.00	1,080.00
11/10/20	Samuel J. Stone	Draft joint stipulation regarding extension of bar date, motion for approval, supporting documents and related correspondence.	3.60	615.00	2,214.00
11/11/20	Kristina S. Azlin	Work with S. Stone on revisions to draft stipulation to amend claims process and motion to appoint claims administrator, circulation of drafts to SEC and related correspondence.	2.80	900.00	2,520.00
11/11/20	Samuel J. Stone	Work on revisions to motion for appointment of settlement administrator, stipulation to continue claims deadline, and related correspondence to SEC.	1.40	615.00	861.00
11/12/20	Kristina S. Azlin	Work with team in order to update motion to appoint claims administrator in light of comments from SEC; continue to work with S. Stone on same.	0.70	900.00	630.00
11/12/20	Samuel J. Stone	Attention to correspondence from SEC and draft revision to motion per comments from SEC	0.90	615.00	553.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 23

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/13/20	Kristina S. Azlin	Further work on stipulation to amend claims process and motion to appoint claims administrator (0.7); circulate updated drafts of same to SEC (0.2); attention to communications regarding finalization and filing of same (0.2).	1.10	900.00	990.00
11/13/20	Samuel J. Stone	Finalize revisions to motion to continue claims bar date and supporting declarations per comments from SEC and attend to related correspondence re: motion/stipulation approval.	1.30	615.00	799.50
11/16/20	Kristina S. Azlin	Attention to filing of stipulation to amend claims process and motion to appoint claims administrator.	0.60	900.00	540.00
1/22/21	Samuel J. Stone	Draft revised Notice of Claims process and Claims Bar date	1.10	615.00	676.50
1/26/21	Samuel J. Stone	Correspondence re claims process notice and draft revisions to same	0.50	615.00	307.50
1/29/21	Samuel J. Stone	Finalize revisions to claims process notice	0.20	615.00	123.00
2/1/21	Kristina S. Azlin	Attention to claims notice and communications with SEC and claims administrator about same; receive and review communications regarding claims process.	0.20	900.00	180.00
2/2/21	Samuel J. Stone	Attention to correspondence regarding notice posting for website and publication	0.20	615.00	123.00
2/3/21	Samuel J. Stone	Correspondence regarding TBIS website content	0.20	615.00	123.00
2/11/21	Samuel J. Stone	Correspondence with potential claimant (0.3); draft revised claims notice and coordinate with team regarding claims notice process and related deadlines (1.8).	2.10	615.00	1,291.50
2/12/21	Samuel J. Stone	Coordinate with internal team and with client re: claims bar date, claims portal, and notice posting.	2.10	615.00	1,291.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 24

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/1/21	Samuel J. Stone	Correspondence re claims portal, publication notice, and direct email notice to claimants	0.30	615.00	184.50
3/10/21	Samuel J. Stone	Initial drafting of notice to the Court regarding claims process update and related correspondence.	1.90	615.00	1,168.50
3/11/21	Kristina S. Azlin	Work with team to review and edit Status Report to Court regarding Notice to potential claimants and claims Bar Date.	1.40	900.00	1,260.00
3/11/21	Samuel J. Stone	Draft revisions to notice to court re: claims process.	1.10	615.00	676.50
3/15/21	Kristina S. Azlin	Continue to work with S. Stone and S. Amuial in order to update and finalize written status report to Court regarding claims administration and bar date; further attention to publication of notice.	0.40	900.00	360.00
3/18/21	Kristina S. Azlin	Continue to work with S. Stone and S. Amuial in order to update and finalize written status report to Court regarding claims administration and bar date; further attention to publication of notice.	0.40	900.00	360.00
3/22/21	Kristina S. Azlin	Finalize written status report to Court regarding claims administration and bar date; confer with S. Stone and oversee filing of same.	0.80	900.00	720.00
3/24/21	Shawn S. Amuial	Review inquiries from claimants and draft FAQ's based on feedback and work with IT to update website content	3.80	595.00	2,261.00
3/24/21	Shawn S. Amuial	Review inquiries from claimants and draft FAQ's based on feedback and work with IT to update website content	1.10	595.00	654.50
3/24/21	Kristina S. Azlin	Continue to revise memorandum addressing "Frequently Asked Questions" and strategize with S. Stone and S. Amuial regarding same.	3.20	900.00	2,880.00
3/24/21	Samuel J. Stone	Work with team on revisions to TBIS FAQs and information for claimants with questions.	3.30	615.00	2,029.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 25

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/25/21	Shawn S. Amuial	Work with Josh Strickon to make further revisions to TBIS website alerting claimants of latest updates	0.30	595.00	178.50
3/25/21	Shawn S. Amuial	Attend to claims administration, including review of inquiries from claimants and work on draft FAQs, website content updates, and token validation instructions for claimants.	3.90	595.00	2,320.50
3/25/21	Samuel J. Stone	Correspondence re FAQs; finalize revisions to FAQs	1.00	615.00	615.00
3/26/21	Shawn S. Amuial	Further work on claims administration, including review of inquiries from claimants and finalization of FAQs.	1.30	595.00	773.50
3/30/21	Shawn S. Amuial	Review inquiries from claimants and work with Josh Strickon to trace atypical high-volume transactions in connection with submitted claims	2.40	595.00	1,428.00
3/30/21	Kristina S. Azlin	Follow-up regarding updated receipt of analytics concerning last round of publications.	0.10	900.00	90.00
4/28/21	Shawn S. Amuial	Assist with the drafting of paper claims application	1.10	595.00	654.50
4/29/21	Shawn S. Amuial	Assist with the drafting of paper claims application	0.40	595.00	238.00
4/30/21	Shawn S. Amuial	Assist with the drafting of paper claims application	0.70	595.00	416.50
4/30/21	Samuel J. Stone	Draft revisions to paper application for claimants per comments from claims administrator re validation process	0.30	615.00	184.50
5/6/21	Samuel J. Stone	Correspondence re fee application and analysis of records relating to Second Interim period	0.20	615.00	123.00
7/23/21	Samuel J. Stone	Correspondence re fee motion and attention to revisions to same	0.20	615.00	123.00
Total:	B310	Claims Administration and Objections			

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 26

Josias N. Dewey as Receiver
 159447.00001

A103	Draft/Revise	54.20	37,225.00
-------------	---------------------	--------------	------------------

B310 - Claims Administration and Objections

A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/11/20	Jose A. Casal	Review and edit draft motion to determine notice and claims process.	0.40	950.00	380.00
4/13/20	Jose A. Casal	Review and comment on Oregon Department of Revenue tax warrant.	0.20	950.00	190.00
7/28/20	Samuel J. Stone	Work conference re cases cited in claims process motion and proposed order and analysis of same	0.60	560.00	336.00
1/6/21	Josias N. Dewey	Conference call with engineer regarding open blockchain technical matters relevant to claims process.	1.10	920.00	1,012.00
1/21/21	Shawn S. Amuial	Work with LA Litigation team to finalize claims notice and with RCB to finalize associated claims portal.	1.50	595.00	892.50
1/21/21	Samuel J. Stone	Attorney work conference regarding claims process notice	0.90	615.00	553.50
2/1/21	Samuel J. Stone	Correspondence with potential claimant; attention to correspondence from RCB re claims process notice; attention to correspondence from SEC regarding claims process notice	0.30	615.00	184.50
2/5/21	Samuel J. Stone	Correspondence regarding website notice posting and possibility of publishing non-website notice at later time/date than website notice	0.30	615.00	184.50
2/10/21	Samuel J. Stone	Correspondence re notice by posting and outlets for same; attorney work conference re notice posting schedule and plan	0.90	615.00	553.50
3/5/21	Shawn S. Amuial	Continue to work on claims notice dissemination and assist with issues dealing with claims submission and verification throughout the day	1.60	595.00	952.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 27

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/9/21	Kristina S. Azlin	Strategize with S. Stone and S. Amuial regarding Notice plan and status of claims administration; plan and prepare for update to Court regarding same.	0.50	900.00	450.00
3/11/21	Shawn S. Amuial	Continue to work with managed review center to handle responses to claimant inquiries	1.00	595.00	595.00
3/12/21	Shawn S. Amuial	Continue to work with managed review center to handle responses to claimant inquiries	0.50	595.00	297.50
3/15/21	Shawn S. Amuial	Call with managed review center to discuss responses to investor inquiries and call with Receiver and review court status update and discuss with Receiver and work on posting additional notices and correspondences with RCB re filed claims	2.40	595.00	1,428.00
3/16/21	Shawn S. Amuial	Call with managed review center to discuss responses to investor inquiries and call with Receiver and review court status update and discuss with Receiver and work on posting additional notices and correspondences with RCB re filed claims and issues	1.90	595.00	1,130.50
3/17/21	Shawn S. Amuial	Work on posting additional notices and correspondences with RCB re filed claims and issues	0.70	595.00	416.50
3/17/21	Kristina S. Azlin	Continued attention to publication of notice on CoinTelegraph.	0.20	900.00	180.00
3/17/21	Kristen D. Wiwczar	Analysis of categorization of emails from claimants and extract text for further analysis by legal team to prepare template responses.	0.80	360.00	288.00
3/18/21	Shawn S. Amuial	Work on posting additional notices and correspondences with RCB re filed claims and issues	1.40	595.00	833.00
3/18/21	Kristen D. Wiwczar	Prepare review workflow for drafting of template responses by legal team.	1.80	360.00	648.00
3/19/21	Shawn S. Amuial	Work on posting additional notices and call with LSS re emails and responses to claimants	0.70	595.00	416.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 28

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/19/21	Kristina S. Azlin	Continued attention to publication of notice on CoinTelegraph.	0.20	900.00	180.00
3/22/21	Shawn S. Amuial	Claims administration tasks including posting additional notices, review of claims inquiries, and work on updated receivership website.	2.60	595.00	1,547.00
3/22/21	Kristen D. Wiwczar	Prepare additional email from TBIS and TBISQ mailboxes for review and categorization.	0.30	360.00	108.00
3/23/21	Shawn S. Amuial	Continue to work through claims inquiries, work on updated receivership website, and reconcile inquiries with completed validations	1.70	595.00	1,011.50
3/23/21	Kristen D. Wiwczar	Review emails and reply to S. Amuial on status; confirm addition of new emails from TBIS and TBISQ accounts for review and categorization.	0.30	360.00	108.00
3/24/21	Kristen D. Wiwczar	Prepare blast email to respond to emails from claimants sent prior to 3/16 to TBIS and TBISQ accounts.	0.30	360.00	108.00
3/31/21	Shawn S. Amuial	Work with Josh Strickon throughout the day to analyze results of RCB claims data and extract information about certain wallet transactions	2.20	595.00	1,309.00
4/1/21	Shawn S. Amuial	Work with Josh Strickon throughout the day to analyze results of RCB claims data and extract information about certain wallet transactions	2.20	595.00	1,309.00
4/2/21	Shawn S. Amuial	Work with Josh Strickon to analyze results of RCB claims data and extract information about certain wallet transactions; and with LSS to discuss claimant requests and responses.	2.00	595.00	1,190.00
4/6/21	Shawn S. Amuial	Claims administration tasks including work with Josh Strickon to analyze results of RCB claims data and extract information about certain wallet transactions, correspondences to LSS to discuss claimant requests and	2.70	595.00	1,606.50

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 29

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		responses, and research re: potential channels for additional notice postings			
4/9/21	Shawn S. Amuial	Review further claim inquiries from claimants, work with managed review service to send further responses to same, and work with Josh Strickon to resolve claims validation issue.	1.50	595.00	892.50
4/12/21	Shawn S. Amuial	Work with managed review service to send further responses to claimant inquiries; work with Josh Strickon to resolve validation issue; review further claim inquiries from claimants	0.70	595.00	416.50
4/13/21	Shawn S. Amuial	Review further claim inquiries from claimants, work with managed review service to send further responses to same, and work with RCB to resolve firewall issue.	1.30	595.00	773.50
4/14/21	Shawn S. Amuial	Review further claim inquiries from claimants and work with managed review service to send further responses to claimant inquiries.	1.50	595.00	892.50
4/15/21	Shawn S. Amuial	Review claims data from RCB along with further claim inquiries from claimants and work with managed review service to send further responses to claimants.	1.10	595.00	654.50
4/28/21	Shawn S. Amuial	Review new claims applications and data sent by RCB	0.40	595.00	238.00
5/3/21	Shawn S. Amuial	Finalize paper claims application	0.60	595.00	357.00
5/7/21	Shawn S. Amuial	Review claims data from RCB	0.40	595.00	238.00
5/14/21	Shawn S. Amuial	Internal discussion re additional strategies for disseminating notice and work with PR agency to obtain pricing work on additional notice posting on Twitter	0.70	595.00	416.50
5/18/21	Shawn S. Amuial	Review claims data compiled and analyzed by Josh Strickon re claimants and total amount of TBIS claims received	0.20	595.00	119.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 30

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/19/21	Shawn S. Amuial	Review follow up correspondences and inquiries from claimants having validation issues	0.30	595.00	178.50
5/20/21	Shawn S. Amuial	Review follow-up questions from TBIS claimants, draft responses, and coordinate validation troubleshooting for those who need assistance with metamask.	0.60	595.00	357.00
5/23/21	Shawn S. Amuial	Review proposed portal feature description for claims review and administration sent by RCB	0.50	595.00	297.50
5/27/21	Shawn S. Amuial	Review suggested implementations to changes to claims portal by RCB and correspondences with RCB	0.90	595.00	535.50
5/27/21	Shawn S. Amuial	Review and draft responses to claimants seeking assistance with token validation	0.30	595.00	178.50
5/28/21	Shawn S. Amuial	Review inquiries from claimants seeking assistance with claims submission and validation and send responses to LSS	0.50	595.00	297.50
5/28/21	Shawn S. Amuial	Work through receivership claims issues and troubleshooting	4.00	595.00	2,380.00
5/30/21	Shawn S. Amuial	Work through receivership claims issues and troubleshooting	8.00	595.00	4,760.00
6/3/21	Shawn S. Amuial	Review inquiries from claimants seeking assistance with claims submission and validation and send responses to LSS	0.20	595.00	119.00
6/7/21	Shawn S. Amuial	Review inquiries from claimants seeking assistance with claims submission and validation and send responses to LSS	0.90	595.00	535.50
6/8/21	Shawn S. Amuial	Review inquiries from claimants seeking assistance with claims submission and validation and send responses to LSS	0.30	595.00	178.50
6/11/21	Shawn S. Amuial	Review additional correspondences from claimants re validation issues.	0.20	595.00	119.00
6/28/21	Shawn S. Amuial	Review claims and validation issues from potential claimants and send proposed	0.40	595.00	238.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 31

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		responses to LSS			
7/27/21	Shawn S. Amuial	Discuss alternative forms of claims notice postings to attract more claims submissions	0.20	595.00	119.00
7/28/21	Shawn S. Amuial	Discuss alternative forms of claims notice postings to attract more claims submissions	0.20	595.00	119.00
Total:	B310 A104	Claims Administration and Objections Review/Analyze	60.10		35,809.00

B310 - Claims Administration and Objections
A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/15/20	Samuel J. Stone	Correspond with Court re stipulation to extend claims bar date (0.4); work with team to attend to Court's order regarding extending Claims Bar Date, including Claims Notice Process posting (1.0).	1.40	615.00	861.00
1/4/21	Samuel J. Stone	Correspondence regarding status of claims website and claims notice	0.10	615.00	61.50
1/5/21	Samuel J. Stone	Correspondence re claims process notice	0.10	615.00	61.50
1/25/21	Samuel J. Stone	Correspondence re claims process notice	0.20	615.00	123.00
2/8/21	Samuel J. Stone	Correspondence re posting claims process notice and attention to correspondence from claimant	0.20	615.00	123.00
2/9/21	Samuel J. Stone	Correspondence regarding notice posting by publication	0.20	615.00	123.00
2/22/21	Samuel J. Stone	Correspondence re claims process portal and tokens for login authentication et cet	0.40	615.00	246.00
2/24/21	Samuel J. Stone	Correspondence re contact from SEC re claims portal	0.20	615.00	123.00
3/2/21	Samuel J. Stone	Attention to correspondence with TBIS claimants; correspondence re claims process	0.40	615.00	246.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 32

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		notice for direct email recipients			
3/9/21	Samuel J. Stone	Attorney work conference regarding status update to Court re claims process	0.70	615.00	430.50
3/16/21	Samuel J. Stone	Correspondence re publication notice on CoinTelegraph	0.20	615.00	123.00
3/16/21	Kristen D. Wiwczar	Consult with legal team re review workflow and claims process.	0.80	360.00	288.00
3/17/21	Samuel J. Stone	Correspondence re CoinTelegraph notice and revisions to same	0.30	615.00	184.50
3/19/21	Kristen D. Wiwczar	Telephone conference with legal team re workflow for creation of stock responses to email inquiries.	0.30	360.00	108.00
3/22/21	Samuel J. Stone	Revise and arrange for filing of status update to court with information regarding Coin Telegraph posting and updated analytics.	1.10	615.00	676.50
3/23/21	Samuel J. Stone	Correspondence re posting filing on TBIS.io website	0.30	615.00	184.50
3/30/21	Samuel J. Stone	Attorney work conference re continued notice strategy	0.20	615.00	123.00
4/2/21	Samuel J. Stone	Correspondence regarding data analytics re Coin Telegraph and PRN market penetration and distribution	0.20	615.00	123.00
4/6/21	Samuel J. Stone	Correspondence re Coin Telegraph posting	0.20	615.00	123.00
4/14/21	Samuel J. Stone	Correspondence re Twitter posting of claims bar notice	0.20	615.00	123.00
4/15/21	Samuel J. Stone	Conference re future postings of notice on Twitter	0.20	615.00	123.00
4/20/21	Samuel J. Stone	Correspondence re fee application	0.30	615.00	184.50
4/28/21	Samuel J. Stone	Initial drafting of paper application for claimants and related correspondence.	1.80	615.00	1,107.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 33

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/3/21	Shawn S. Amuial	Call and correspondences with Samir Patel to discuss issues pertaining to client validation confirmation and how to proceed with validation assistance	0.60	595.00	357.00
5/4/21	Shawn S. Amuial	Work with team on issues pertaining to client validation confirmation and how to proceed with validation assistance, validation troubleshooting, and claims correspondence.	1.70	595.00	1,011.50
5/5/21	Shawn S. Amuial	Further work with team on issues pertaining to client validation confirmation and validation assistance and review of claimant correspondence.	1.20	595.00	714.00
5/6/21	Shawn S. Amuial	Call and correspondences with Samir Patel to discuss issues pertaining to client validation confirmation and how to proceed with validation assistance; review correspondences with claimants	0.60	595.00	357.00
5/7/21	Shawn S. Amuial	Discussion with Samir Patel re issues pertaining to client validation confirmation and how to proceed with validation assistance	0.20	595.00	119.00
5/12/21	Shawn S. Amuial	Discuss plan for additional notice dissemination and research additional channels for claims notice posting	0.40	595.00	238.00
5/12/21	Shawn S. Amuial	Work on claims administration including discussion with Samir Patel re: issues pertaining to client validation confirmation and how to proceed with validation assistance, review of correspondences with claimants and transmission of responses to LSS to disseminate.	1.10	595.00	654.50
5/26/21	Shawn S. Amuial	Discussion with Samir Patel re responses to claimant inquiries re validation process	0.20	595.00	119.00
5/31/21	Shawn S. Amuial	Coordinate to permit internal IT access for use of RCB portal to review and process claims submissions and data	0.40	595.00	238.00
6/14/21	Shawn S.	Work with internal team to disseminate	0.20	595.00	119.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 34

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amual	follow-up notice publications as required by court-approved claims motion			
7/14/21	Samuel J. Stone	Correspondence re posting of notices on Twitter and Cointelegraph and schedule for future postings	0.20	615.00	123.00
7/20/21	Samuel J. Stone	Correspondence re revisions to motion per SEC; correspondence re table of authorities and L.R. statement re meeting-and-conferring	0.20	615.00	123.00
7/27/21	Samuel J. Stone	Correspondence re response rate to claims in similar matter for comparison and benchmark to claims submissions rate in instant case	0.10	615.00	61.50
7/28/21	Shawn S. Amual	Internal call to discuss responses to claim inquiries	0.40	595.00	238.00
8/2/21	Samuel J. Stone	Correspondence regarding final notice prior to claims bar date; correspondence re number of submissions to portal	0.20	615.00	123.00
Total:	B310 A105	Claims Administration and Objections Communicate (in firm)	17.70		10,465.00

B310 - Claims Administration and Objections
A106 - Communicate (with client)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/13/20	Andrew W. Balthazor	Revising draft claims process motion; sending to client and SEC for final reviews.	0.60	435.00	261.00
2/16/21	Samuel J. Stone	Correspondence with RCB regarding claims process portal; attorney work conference regarding status of claims process portal	0.50	615.00	307.50
3/4/21	Samuel J. Stone	Conference re continued notice by publication schedule	0.30	615.00	184.50
Total:	B310 A106	Claims Administration and Objections Communicate (with client)	1.40		753.00

B310 - Claims Administration and Objections
A107 - Communicate (other outside counsel)

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 35

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/4/20	Andrew W. Balthazor	Reviewing claims process motion sent to SEC; reading email from SEC regarding their intended feedback due back to us.	0.40	435.00	174.00
3/18/20	Andrew W. Balthazor	Replying to SEC regarding claims process motion.	0.10	435.00	43.50
5/28/20	Jose A. Casal	Conference call with SEC on proposed claims process.	0.20	950.00	190.00
1/21/21	Jose A. Casal	Review and exchange emails with SEC counsel regarding status of claims portal.	0.30	975.00	292.50
Total:	B310 A107	Claims Administration and Objections Communicate (other outside counsel)	1.00		700.00

B310 - Claims Administration and Objections
A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/10/20	Shawn S. Amuial	Call with RCB to discuss claims intake and admin and review proposal	0.80	555.00	444.00
9/14/20	Shawn S. Amuial	Correspondences with RCB re modifications to engagement letter	0.20	555.00	111.00
11/16/20	Samuel J. Stone	Attention to filing claims motion, joint stipulation, supporting documents, and notice of appearance and correspondence with SEC re same.	2.70	615.00	1,660.50
12/16/20	Samuel J. Stone	Attention to correspondence with claims administrator	0.20	615.00	123.00
2/18/21	Samuel J. Stone	Attention to correspondence regarding claims process portal from RCB	0.20	615.00	123.00
3/19/21	Samuel J. Stone	Attorney work conference re status update of Coin Telegraph posting; correspondence with publication team re Coin Telegraph posting and revising language for same	0.90	615.00	553.50
5/11/21	Shawn S. Amuial	Call with RCB to discuss claims portal, claims receipt progress, and plan for additional notice	1.20	595.00	714.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 36

Josias N. Dewey as Receiver
 159447.00001

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		dissemination and work on related research re additional channels for claims notice posting.			
5/26/21	Shawn S. Amuial	Call with PR Agency to discuss different options for claims notice distribution and targeting	0.30	595.00	178.50
6/17/21	Shawn S. Amuial	Correspondences from claimants and help assist with validation issues	0.40	595.00	238.00
6/18/21	Shawn S. Amuial	Correspondences from claimants and help assist with validation issues	0.30	595.00	178.50
8/2/21	Samuel J. Stone	Attention to correspondence with SEC re application; attention to finalizing and filing motion	0.70	615.00	430.50
Total:	B310 A108	Claims Administration and Objections Communicate (other external)	7.90		4,754.50

B310 - Claims Administration and Objections

A110 - Manage Data/Files

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/10/21	Shawn S. Amuial	Work with LSS and RCB to finalize claims submission process and transition to distribution process	1.10	595.00	654.50
8/11/21	Shawn S. Amuial	Work with LSS and RCB to finalize claims submission process and transition to distribution process	0.30	595.00	178.50
Total:	B310 A110	Claims Administration and Objections Manage Data/Files	1.40		833.00

B310 - Claims Administration and Objections

A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/12/21	Josias N. Dewey	Conference call with RGB to finalize claims portal and discuss token verification process and other claim validation issues.	0.70	920.00	644.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 37

Josias N. Dewey as Receiver
 159447.00001

Total:	B310	Claims Administration and Objections		
	A111	Other	0.70	644.00
		LESS COURTESY DISCOUNT:	\$	<u>-17,317.60</u>
		TOTAL FEES FOR PROFESSIONAL SERVICES:	\$	155,858.40

Professional Summary through August 11, 2021:

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jose A. Casal	Partner	1.90	975.00	1,852.50
Jose A. Casal	Partner	1.60	950.00	1,520.00
Josias N. Dewey	Partner	1.80	920.00	1,656.00
Kristina S. Azlin	Partner	16.90	900.00	15,210.00
Kristina S. Azlin	Partner	3.20	800.00	2,560.00
Shawn S. Amuial	Partner	143.50	595.00	85,382.50
Shawn S. Amuial	Partner	47.90	555.00	26,584.50
Andrew W. Balthazor	Associate	8.90	435.00	3,871.50
Samir S. Patel	Associate	3.30	455.00	1,501.50
Samuel J. Stone	Associate	40.50	615.00	24,907.50
Samuel J. Stone	Associate	0.60	560.00	336.00
Trisha M. Thompson	Associate	0.50	375.00	187.50
Douglas D. Rinner	Attorney	2.00	95.00	190.00
Jacob I. Long	Attorney	6.20	95.00	589.00
Jeanne Habib	Attorney	3.00	95.00	285.00
Rachael Belenz	Attorney	2.00	95.00	190.00
Ryan A. Augusta	Attorney	3.10	95.00	294.50
Delia M. Hayes	Paralegal	0.50	285.00	142.50
Jophy Cheng	eData Analyst	0.70	215.00	150.50
Kristen D. Wiwczar	eData Project Manager	10.70	360.00	3,852.00

Holland & Knight

May 29, 2022
 Invoice: 32917991
 Page 38

Josias N. Dewey as Receiver
 159447.00001

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Shannan E. Whalen	Paralegal	5.20	350.00	1,820.00
Elvin Ramos	Special Assistant	0.30	310.00	93.00
				173,176.00

TASK SUMMARY CURRENT INVOICE

FEE TASK SUMMARY

<u>Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B110	Case Administration	112.10	63,996.00
B120	Asset Analysis and Recovery	12.10	6,568.00
B130	Asset Disposition	0.70	388.50
B150	Meetings of and Communications with Creditors	16.70	1,739.50
B210	Business Operations	0.70	316.50
B240	Tax Issues	6.00	3,084.00
B310	Claims Administration and Objections	156.00	97,083.50
TOTAL:		304.30	173,176.00

Reimbursable costs through August 11, 2021:

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/20/20	VENDOR: Legal Support Network LLC INVOICE#: LA-46432 DATE: 11/20/2020 Court Service - SD CC Re: Securities and Exchange	90.24
3/25/21	VENDOR: Fleishman-Hillard, Inc. INVOICE#: 1868889B DATE: 3/25/2021 Media Pitching	4,000.00
4/25/21	VENDOR: Fleishman-Hillard, Inc. INVOICE#: 1871457 DATE: 4/25/2021 Professional Services for the month of April.	2,689.00

Holland & Knight

May 29, 2022
Invoice: 32917991
Page 39

Josias N. Dewey as Receiver
159447.00001

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Online Research	71.90
	Westlaw	571.41
	TOTAL REIMBURSABLE COSTS:	\$ <u>7,422.55</u>
	FEES FOR PROFESSIONAL SERVICES:	\$ 173,176.00
	LESS COURTESY DISCOUNT:	\$ <u>-17,317.60</u>
	TOTAL PROFESSIONAL FEES:	\$ 155,858.40
	REIMBURSABLE COSTS:	\$ 7,422.55
	TOTAL DUE THIS INVOICE:	\$ <u>163,280.95</u>

(U.S. Dollar)

EXHIBIT E

SUMMARY OF EXPENSES

I. Summary of Charges

The standard rate charged for photocopying is \$.15 per page. The standard rate charged for outgoing facsimile transmissions is \$1.00 per page. NO CHARGES ARE INCURRED FOR INCOMING FACSIMILE TRANSMISSIONS.

II. Summary of Expenses

<u>Expense Category</u>	<u>Cost</u>
Claims Administration Services	\$102,392.50
Claims Noticing Costs	\$6,689.00
Filing Fees	\$90.24
Forensic Services	\$4,086.48
Online Research	\$643.31
TOTAL:	\$109,815.05

See attached backup for additional detail on expenses incurred by H&K, and Exhibits E-1, E-2, and E-3 for further detail on Forensic Services provided by Kroll Cyber Security LLC, Claims Administration Services provided by RCB Fund Services LLC, and Claims Noticing Services provided by Fleishman-Hillard, Inc.

Expense Detail for Third Interim Fee Period

Date	Timekeeper Name	Category	Amount	Detail
11/20/2020	Legal Support Network LLC	Filing Fees	\$90.24	VENDOR: Legal Support Network LLC INVOICE#: LA-46432 DATE: 11/20/2020 Court Service - SD CC Re: Securities and Exchange
Filing Fees Total			\$90.24	
01/02/2020	Balthazor, Andrew W.	Online Research	\$193.26	Westlaw - BALTHAZOR,ANDREW - 01/02/2020 -
01/06/2020	Balthazor, Andrew W.	Online Research	\$225.17	Westlaw - BALTHAZOR,ANDREW - 01/06/2020 -
07/28/2020	Azlin, Kristina S.	Online Research	\$3.80	Pacer--kazlin235238 Kristina Azlin (4596067)
08/31/2020	Whalen, Shannan E.	Online Research	\$0.90	Pacer--shanpacer Shannan Whalen (4667155)
09/01/2020	Whalen, Shannan E.	Online Research	\$1.90	Pacer--shanpacer Shannan Whalen (4667155)
10/21/2020	Hayes, Delia M.	Online Research	\$5.30	Pacer--falling4star Delia Hayes (4676137)
11/10/2020	Stone, Samuel J.	Online Research	\$0.80	Pacer--samuelstone Samuel Stone (5359574)
11/10/2020	Stone, Samuel J.	Online Research	\$0.80	Pacer--samuelstone Samuel Stone (5359574)
11/10/2020	Stone, Samuel J.	Online Research	\$0.10	Pacer--samuelstone Samuel Stone (5359574)
11/10/2020	Stone, Samuel J.	Online Research	\$0.10	Pacer--samuelstone Samuel Stone (5359574)
11/13/2020	Stone, Samuel J.	Online Research	\$0.10	Pacer--samuelstone Samuel Stone (5359574)
11/13/2020	Stone, Samuel J.	Online Research	\$0.10	Pacer--samuelstone Samuel Stone (5359574)
11/13/2020	Stone, Samuel J.	Online Research	\$2.60	Pacer--samuelstone Samuel Stone (5359574)
11/13/2020	Stone, Samuel J.	Online Research	\$2.60	Pacer--samuelstone Samuel Stone (5359574)
11/16/2020	Stone, Samuel J.	Online Research	\$0.80	Pacer--samuelstone Samuel Stone (5359574)
11/16/2020	Stone, Samuel J.	Online Research	\$0.80	Pacer--samuelstone Samuel Stone (5359574)
12/15/2020	Hayes, Delia M.	Online Research	\$7.80	Pacer--falling4star Delia Hayes (4676137)
12/15/2020	Stone, Samuel J.	Online Research	\$1.50	Pacer--samuelstone Samuel Stone (5359574)
12/15/2020	Stone, Samuel J.	Online Research	\$1.50	Pacer--samuelstone Samuel Stone (5359574)
01/22/2021	Stone, Samuel J.	Online Research	\$0.90	Pacer--samuelstone Samuel Stone (5359574)
01/22/2021	Stone, Samuel J.	Online Research	\$0.90	Pacer--samuelstone Samuel Stone (5359574)
03/10/2021	Stone, Samuel J.	Online Research	\$1.50	Pacer--samuelstone Samuel Stone (5359574)
03/10/2021	Stone, Samuel J.	Online Research	\$1.50	Pacer--samuelstone Samuel Stone (5359574)
03/11/2021	Stone, Samuel J.	Online Research	\$1.20	Pacer--samuelstone Samuel Stone (5359574)
03/11/2021	Stone, Samuel J.	Online Research	\$1.20	Pacer--samuelstone Samuel Stone (5359574)
03/22/2021	Azlin, Kristina S.	Online Research	\$2.50	Pacer--kazlin235238 Kristina Azlin (4596067)
06/08/2021	Whalen, Shannan E.	Online Research	\$2.50	Pacer--shanpacer Shannan Whalen (4667155)
06/09/2021	Whalen, Shannan E.	Online Research	\$11.30	Pacer--shanpacer Shannan Whalen (4667155)
06/10/2021	Whalen, Shannan E.	Online Research	\$16.20	Pacer--shanpacer Shannan Whalen (4667155)
07/01/2021	Whalen, Shannan E.	Online Research	\$0.70	Pacer--shanpacer Shannan Whalen (4667155)
07/09/2021	Stone, Samuel J.	Online Research	\$136.82	Westlaw - STONE,SAMUEL - 07/09/2021 -
07/12/2021	Stone, Samuel J.	Online Research	\$16.16	Westlaw - STONE,SAMUEL - 07/12/2021 -
Online Research Total			\$643.31	

EXHIBIT E-1

**DETAIL ON FORENSIC SERVICES
PROVIDED BY KROLL CYBER SECURITY LLC**

SUMMARY OF FEES BY PROFESSIONAL

Name	Title	Office Location	Hourly Billing Rate	Total Hours	Total Fees
R. Gregory		Dallas, TX	\$430.00	0.50	\$215.00
R. Gregory		Dallas, TX	\$430.00	1.00	\$430.00
P. Clair		Dallas, TX	\$525.00	2.50	\$1,312.50
P. Clair		Dallas, TX	\$525.00	0.50	\$262.50
M. Godec		Dallas, TX	\$430.00	1.00	\$430.00
M. Godec		Dallas, TX	\$430.00	3.00	\$1,290.00
TOTAL:				8.50	\$3,940.00

Overall Total: \$3,940.00
 Professional Fees: \$3,940.00
 Total Hours: 8.50
 Blended Rate: \$463.53

SUMMARY OF FEES BY TASK CATEGORY

Task Code	Description	Total Hours	Total Fees
1	Forensic Services	8.50	\$3,940.00
2	Postage, Courier, and Transportation Expenses		\$146.48
	TOTAL:	8.50	\$4,086.48



August 20, 2018

Josias (Joe) Dewey
Holland & Knight LLP
600 N. Florida Avenue
Tampa, FL 33601

Matter No. 0003343-0017
Invoice No. 19803422
Kroll Contact: Benedetto Demonte

**PRIVILEGED & CONFIDENTIAL
Invoice**

Through July 31, 2018

RE: Holland & Knight LLP

Fees for Hourly Professional Services Rendered

R. Gregory	0.50 hrs @ US\$ 430.00 per hr	<u>215.00</u>	US\$	215.00
------------	-------------------------------	---------------	------	--------

Out-of-Pocket Disbursements

Postage & Courier		<u>33.99</u>		33.99
-------------------	--	--------------	--	-------

Total Due:			US\$	<u>248.99</u>
-------------------	--	--	-------------	----------------------

PAYMENT METHOD:

- o For electronic payments, please wire to:
 - Account Name: Kroll Cyber Security, LLC
 - Account No: 4427582411
 - ACH ABA#: 111000012
 - Wire ABA #: 026009593
 - Swift Code: BOFAUS3N
- o For payment by check, please make payable to **Kroll Cyber Security, LLC** and send:
 - Via US Mail To: PO Box 847035, Dallas, TX 75284-7035
 - Via Courier To: Bank of America Lockbox Services, Lockbox 847035, 1950 N. Stemmons Freeway, Suite 5010, Dallas, TX 75207
- o Please include our invoice number and name of your organization with all payments

PAYMENT TERMS:

Terms: Due upon receipt
Discount: None

DETAIL HOURLY FEE BREAKDOWN

Date	Init.	Description	Hours	Unit Price	Amount
07/26/18	RJG	Replicated images files and prepared hard drive to be shipped to client.	0.50	430.00	215.00
Total:			0.50		215.00



September 25, 2018

Josias (Joe) Dewey
Holland & Knight LLP
600 N. Florida Avenue
Tampa, FL 33601

Matter No. 0003343-0017
Invoice No. 19803594
Kroll Contact: Benedetto Demonte

**PRIVILEGED & CONFIDENTIAL
Invoice**

Through August 31, 2018

RE: Holland & Knight LLP

Fees for Hourly Professional Services Rendered

R. Gregory	1.00 hrs @ US\$ 430.00 per hr	430.00	
		430.00	US\$ 430.00

Out-of-Pocket Disbursements

Ground Transportation	86.10	
Postage & Courier	13.51	
	99.61	

Total Due: **US\$ 529.61**

PAYMENT METHOD:

- o For electronic payments, please wire to:
 - Account Name: Kroll Cyber Security, LLC
 - Account No: 4427582411
 - ACH ABA#: 111000012
 - Wire ABA #: 026009593
 - Swift Code: BOFAUS3N
- o For payment by check, please make payable to **Kroll Cyber Security, LLC** and send:
 - Via US Mail To: PO Box 847035, Dallas, TX 75284-7035
 - Via Courier To: Bank of America Lockbox Services, Lockbox 847035, 1950 N. Stemmons Freeway, Suite 5010, Dallas, TX 75207
- o Please include our invoice number and name of your organization with all payments

PAYMENT TERMS:

Terms: Due upon receipt
Discount: None

DETAIL HOURLY FEE BREAKDOWN

Date	Init.	Description	Hours	Unit Price	Amount
08/07/18	RJG	Replicated requested client data to a external hard drive and shipped to the same.	1.00	430.00	430.00
Total:			1.00		430.00



Through February 28, 2019

Josias (Joe) Dewey
Holland & Knight LLP
600 N. Florida Avenue
Tampa, FL 33601

Invoice No: SC00345330
Sequence #: 1771
Client No: 711
Invoice Date : April 15, 2019
Reference: 95811
Terms: Payment Due Upon Receipt

Description
Re: Holland & Knight LLP

Contact: Benedetto Demonte
Engagement No: 95811
Total Fees: 3,295.00
Total Expenses: 0.00
Total Amount Due: USD 3,295.00

Payment Via Wiring:
Kroll Cyber Security, LLC
Bank of America-Kroll
Account # 4427582411
Wire ACH: 026009593
Swift : BOFAUS3N

Payment Via Lockbox:
Kroll Cyber Security, LLC
PO Box 847035
Dallas Tx 75284-7035

Questions
T : 952 852 7124
E : EliteAR@kroll.com

Invoice Detail Report - 95811

Invoice # SC00345330

0003343-0017 - Holland & Knight LLP

Holland & Knight LP

600 N. Florida Avenue

Tampa FL 33601

Acct Cat Detail	Description	Date	Units	Rate	Amount	Narrative
Fees						
Labor - Billable	Pierson Clair	02/19/19	2.50	525.00	1,312.50	Review/analysis of findings. Convert Stollaire MBP to TAR at Counsel's Request.
Labor - Billable	Pierson Clair	02/19/19	0.50	525.00	262.50	Telephone Conference. Communication Regarding Counsel Requested Activity.
Labor - Billable	Michael Godec	02/25/19	1.00	430.00	430.00	Research and Analysis.
Labor - Billable	Michael Godec	02/26/19	3.00	430.00	1,290.00	Research and Analysis.
					3,295.00	



Kroll

A Division of
DUFF & PHELPS

Through April 30, 2019

Josias (Joe) Dewey
Holland & Knight LLP
600 N. Florida Avenue
Tampa, FL 33601

Invoice No:	SC00353076
Sequence #:	2513
Client No:	711
Invoice Date :	June 05, 2019
Reference:	95811
Terms:	Payment Due Upon Receipt

Re: Holland & Knight LLP

Contact:	Benedetto Demonte
Engagement No:	95811
Total Fees:	0.00
Total Expenses:	12.88
Total Amount Due:	USD 12.88

Payment Via Wiring:

Kroll Cyber Security, LLC
Bank of America-Kroll
Swift : BOFAUS3N
Account # 4427582411
Wire ABA# 026009593
ACH ABA# 111000012

Payment Via Lockbox:

Kroll Cyber Security, LLC
PO Box 847035
Dallas Tx 75284-7035

Questions

T : 952 852 7124
E : EliteAR@kroll.com

EXHIBIT E-2

**DETAIL ON CLAIMS ADMINISTRATION SERVICES
PROVIDED BY RCB FUND SERVICES LLC**

SUMMARY OF FEES BY TASK CATEGORY

Task Code	Description	Total Expenses	Total Fees
1	Investor Communication	\$ -	\$26,200.00
2	Database Support	\$ -	\$70,440.00
3	Investor Support Services	\$ -	\$5,752.50
4	Tax Administrator Coordination	\$ -	\$ -
5	Finalize Proposed Distribution List	\$ -	\$ -
6	Distribution	\$ -	\$ -
7	Distribution Outreach	\$ -	\$ -
8	Fund Accounting and Reporting	\$ -	\$ -
9	Document Retention	\$ -	\$ -
	TOTAL:		\$102,392.50

INVOICE



TO: Josias N. Dewey, Partner, Holland & Knight
 joe.dewey@hkllaw.com
 Shawn Amuial, Associate, Holland & Knight
 Shawn.Amuial@hkllaw.com

MATTER: SEC v. Titanium Blockchain Infrastructure
 Services, Inc., et al.
 Case No. 18-cv-4315 (DSF)

CC: Distribution Program Analysis Group
 DistPgmAnalysis@SEC.gov // PappasC@SEC.gov

INVOICE #: TB 001

FROM: RCB Fund Services LLC
 322 N. Atlantic Drive
 Lantana, FL 33462

INVOICE DATE: 3/15/2021

INVOICE PERIOD: 9/1/2020 thru 12/31/2020

CATEGORY	FEES	EXPENSES	TOTAL
1. Investor Communication	\$ 8,025.00	\$ -	\$ 8,025.00
2. Database Support	\$ 32,175.00	\$ -	\$ 32,175.00
3. Investor Support Services	\$ 5,752.50	\$ -	\$ 5,752.50
4. Tax Administrator Coordination	\$ -	\$ -	\$ -
5. Finalize Proposed Distribution List	\$ -	\$ -	\$ -
6. Distribution	\$ -	\$ -	\$ -
7. Distribution Outreach	\$ -	\$ -	\$ -
8. Fund Accounting and Reporting	\$ -	\$ -	\$ -
9. Document Retention	\$ -	\$ -	\$ -
	\$ 45,952.50	\$ -	\$ 45,952.50

Total Services: \$ 45,952.50
Total Expenses: _____
Total Invoice: \$ 45,952.50

WIRE TRANSFER INFORMATION	
ABA/Routing Number:	021000021
Account Number:	777213349
Bank Contact:	JP Morgan Chase, NA

Please reference client name and invoice number.

Certification Statement

To the best of our knowledge; all fees and expenses are reasonable and in conformance with the proposal, and no funds are being distributed to persons or entities known to have participated in the underlying wrongdoing or are otherwise known to be conflicted from receiving any from the SEC.

Fund Administrator Signature: Linda H. Breeden Date: 3/15/2021

#2164
INVOICE



TO: Josias N. Dewey, Partner, Holland & Knight
ioe.dewey@hklaw.com
Shawn Amuial, Associate, Holland & Knight
Shawn.Amuial@hklaw.com

MATTER: SEC v. Titanium Blockchain Infrastructure
Services, Inc., et al.
Case No. 18-cv-4315 (DSF)

CC: Distribution Program Analysis Group
DistPgmAnalysis@SEC.gov // PappasC@SEC.gov

INVOICE #: TB 002

FROM: RCB Fund Services LLC
322 N. Atlantic Drive
Lantana, FL 33462

INVOICE DATE: 5/10/2021

INVOICE PERIOD: 1/1/2021 thru 3/31/2021

CATEGORY	FEES	EXPENSES	TOTAL
1. Investor Communication	\$ 16,462.50	\$ -	\$ 16,462.50
2. Database Support	\$ 26,715.00	\$ -	\$ 26,715.00
3. Investor Support Services	\$ -	\$ -	\$ -
4. Tax Administrator Coordination	\$ -	\$ -	\$ -
5. Finalize Proposed Distribution List	\$ -	\$ -	\$ -
6. Distribution	\$ -	\$ -	\$ -
7. Distribution Outreach	\$ -	\$ -	\$ -
8. Fund Accounting and Reporting	\$ -	\$ -	\$ -
9. Document Retention	\$ -	\$ -	\$ -
	\$ 43,177.50	\$ -	\$ 43,177.50

Total Services: \$ 43,177.50
Total Expenses:
Total Invoice: \$ 43,177.50

WIRE TRANSFER INFORMATION	
ABA/Routing Number:	021000021
Account Number:	777213349
Bank Contact:	JP Morgan Chase, NA

Please reference client name and invoice number.

Certification Statement

To the best of our knowledge; all fees and expenses are reasonable and in conformance with the proposal, and no funds are being distributed to persons or entities known to have participated in the underlying wrongdoing or are otherwise known to be conflicted from receiving any from the SEC.

Fund Administrator Signature: *Linda Breedon*

Date: 5-21-21

INVOICE



TO: Josias N. Dewey, Partner, Holland & Knight
 joe.dewey@hklaw.com
 Shawn Amuial, Associate, Holland & Knight
 Shawn.Amuial@hklaw.com

MATTER: SEC v. Titanium Blockchain Infrastructure Services, Inc., et al.
 Case No. 18-cv-4315 (DSF)

CC: Distribution Program Analysis Group
 DistPgmAnalysis@SEC.gov // PappasC@SEC.gov

INVOICE #: TB 003

FROM: RCB Fund Services LLC
 322 N. Atlantic Drive
 Lantana, FL 33462

INVOICE DATE: 8/27/2021

INVOICE PERIOD: 4/1/2021 thru 6/30/2021

CATEGORY	FEES	EXPENSES	TOTAL
1. Investor Communication	\$ 1,712.50	\$ -	\$ 1,712.50
2. Database Support	\$ 11,550.00	\$ -	\$ 11,550.00
3. Investor Support Services	\$ -	\$ -	\$ -
4. Tax Administrator Coordination	\$ -	\$ -	\$ -
5. Finalize Proposed Distribution List	\$ -	\$ -	\$ -
6. Distribution	\$ -	\$ -	\$ -
7. Distribution Outreach	\$ -	\$ -	\$ -
8. Fund Accounting and Reporting	\$ -	\$ -	\$ -
9. Document Retention	\$ -	\$ -	\$ -
	\$ 13,262.50	\$ -	\$ 13,262.50

Total Services: \$ 13,262.50
Total Expenses: \$ -
Total Invoice: \$ 13,262.50

WIRE TRANSFER INFORMATION

ABA/Routing Number: 021000021
Account Number: 777213349
Bank Contact: JP Morgan Chase, NA

Please reference client name and invoice number.

Certification Statement

To the best of our knowledge; all fees and expenses are reasonable and in conformance with the proposal, and no funds are being distributed to persons or entities known to have participated in the underlying wrongdoing or are otherwise known to be conflicted from receiving any from the SEC.

Fund Administrator Signature: Linda Breder Date: 9-4-2021

EXHIBIT E-3

**DETAIL ON CLAIMS NOTICING SERVICES
PROVIDED BY FLEISHMAN-HILLARD, INC.**

SUMMARY OF FEES BY TASK CATEGORY

Task Code	Description	Total Expenses	Total Fees
301	Media Pitching	\$ -	\$4,000.00
301	Media Pitching	\$ -	\$2,689.00
	TOTAL:		\$6,689.00

Invoice

#:2167



FLEISHMANHILLARD

FleishmanHillard Inc.
P.O. Box 771733
St. Louis, MO 63177

Direct Inquiries to:
314-982-1700

Holland & Knight
c/o Linda G. Butler
Sr. Communications Manager
131 South Dearborn Street,
30th Floor
Chicago, IL 60603

Invoice Number 1868889
Date 03/25/2021
Project 823661

SUMMARY PAGE

Holland & Knight

823661	000	Holland & Knight	\$4,162.50
823661	300	Media Pitching	\$16,981.25
823661	301	Media Pitching	\$4,000.00
823661	400	Research (media list cre&upda)	\$856.25

INVOICE TOTAL

\$26,000.00

(ALL AMOUNTS REPRESENTED IN US DOLLARS)

Invoice

FleishmanHillard Inc. Direct Inquiries to:
P.O. Box 771733 314-982-1700
St. Louis, MO 63177



Holland & Knight
c/o Linda G. Butler
Sr. Communications Manager
131 South Dearborn Street,
30th Floor
Chicago, IL 60603

Invoice Number 1868889
Date 03/25/2021
Project 823661

823661 000 Holland & Knight

Professional services for the month of March	\$4,162.50
Total for activity 000	\$4,162.50

823661 300 Media Pitching

Professional services for the month of March	\$16,981.25
Total for activity 300	\$16,981.25

823661 301 Media Pitching

Coin for Telegraph Alert Posting	\$4,000.00
Total for activity 301	\$4,000.00

823661 400 Research (media list cre&upda)

Professional services for the month of March	\$856.25
Total for activity 400	\$856.25

INVOICE TOTAL **\$26,000.00**

(ALL AMOUNTS REPRESENTED IN US DOLLARS)

Invoice



FLEISHMANHILLARD

FleishmanHillard Inc. Direct Inquiries to:
P.O. Box 771733 314-982-1700
St. Louis, MO 63177

Holland & Knight
c/o Linda G. Butler
Sr. Communications Manager
131 South Dearborn Street,
30th Floor
Chicago, IL 60603

Invoice Number 1868889
Date 03/25/2021
Project 823661

REMITTANCE

Please return this page with your payment

823661	000	Holland & Knight	\$4,162.50
823661	300	Media Pitching	\$16,981.25
823661	301	Media Pitching	\$4,000.00
823661	400	Research (media list cre&upda)	\$856.25

INVOICE TOTAL

\$26,000.00

(ALL AMOUNTS REPRESENTED IN US DOLLARS)

Invoice

#:2170



FLEISHMANHILLARD

FleishmanHillard Inc.
P.O. Box 771733
St. Louis, MO 63177

Direct Inquiries to:
314-982-1700

Holland & Knight
c/o Linda G. Butler
Sr. Communications Manager
131 South Dearborn Street,
30th Floor
Chicago, IL 60603

Invoice Number 1871457
Date 04/25/2021
Project 823661

SUMMARY PAGE

Holland & Knight

823661	000	Holland & Knight	\$4,895.00
823661	300	Media Pitching	\$15,067.50
823661	301	Media Pitching	\$2,689.00
823661	400	Research (media list cre&upda)	\$2,037.50

INVOICE TOTAL

\$24,689.00

(ALL AMOUNTS REPRESENTED IN US DOLLARS)

Invoice

FleishmanHillard Inc. Direct Inquiries to:
P.O. Box 771733 314-982-1700
St. Louis, MO 63177



Holland & Knight
c/o Linda G. Butler
Sr. Communications Manager
131 South Dearborn Street,
30th Floor
Chicago, IL 60603

Invoice Number 1871457
Date 04/25/2021
Project 823661

823661 000 Holland & Knight

Professional services for the month of April	\$4,895.00
Total for activity 000	\$4,895.00

823661 300 Media Pitching

Professional services for the month of April	\$15,067.50
Total for activity 300	\$15,067.50

823661 301 Media Pitching

St Louis Brand Marketing related in-house expenses for the month of April, in connection with Holland & Knight	\$2,689.00
Total for activity 301	\$2,689.00

823661 400 Research (media list cre&upda)

Professional services for the month of April	\$2,037.50
Total for activity 400	\$2,037.50

INVOICE TOTAL \$24,689.00

(ALL AMOUNTS REPRESENTED IN US DOLLARS)

Invoice



FLEISHMANHILLARD

FleishmanHillard Inc.
P.O. Box 771733
St. Louis, MO 63177

Direct Inquiries to:
314-982-1700

Holland & Knight
c/o Linda G. Butler
Sr. Communications Manager
131 South Dearborn Street,
30th Floor
Chicago, IL 60603

Invoice Number 1871457
Date 04/25/2021
Project 823661

REMITTANCE

Please return this page with your payment

823661	000	Holland & Knight	\$4,895.00
823661	300	Media Pitching	\$15,067.50
823661	301	Media Pitching	\$2,689.00
823661	400	Research (media list cre&upda)	\$2,037.50

INVOICE TOTAL

\$24,689.00

(ALL AMOUNTS REPRESENTED IN US DOLLARS)