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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**
14

15
16 SECURITIES AND EXCHANGE
17 COMMISSION,

18 Plaintiff,

19 vs.

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

26 Defendants.
27
28

Case No. 18-4315 DSF (JPRx)

**FIRST 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: Mon., April 1, 2019
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 Monday, April 1, 2019, at 1:30 p.m., or as soon
3 thereafter as the matter may be heard before the Honorable Dale S. Fischer, in Courtroom
4 7D of the United States District Court, Central District of California, Western Division,
5 350 West 1st Street, 6th Floor, Los Angeles, California, 90012, Holland & Knight LLP
6 (“Counsel” or “H&K”), counsel to Josias Dewey, as Court-appointed Receiver (the
7 “Receiver”) for the estates of Defendant Titanium Blockchain Infrastructure Services, Inc.
8 and its subsidiaries and/or affiliates (collectively, the “Receivership Entities”), will and
9 hereby does submit this first interim fee application (the “Application”).

10 This Application is submitted pursuant to paragraphs XI(F) and XVII of this Court’s
11 Order Appointing Permanent Receiver, entered May 30, 2018 (the “Permanent
12 Receivership Order”), Rule 66 of the Federal Rules of Civil Procedure, and Local Rule
13 66-7. This Application is made following the conference of counsel pursuant to Local
14 Rule 7-3 which took place on and before Friday, February 15, 2019.

15 This Application is based upon this Notice of Application and Application, the
16 attached Memorandum of Points and Authorities and Certification of Counsel, all papers
17 and records on file herein, and such other matters as may be presented to the Court at or
18 before the hearing on this Application.

19
20 Dated: February 28, 2019

Respectfully submitted,

21 /s/ Jose Casal

22 Jose Casal (*pro hac vice*)

23 Kristina S. Azlin (SBN 235238)

24 Holland & Knight LLP

25 Counsel for Josias N. Dewey, Court-appointed
26 permanent receiver for Defendant Titanium
27 Blockchain Infrastructure Services, Inc.

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

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

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

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

12 **I. SUMMARY OF FEE REQUEST**

13 1. This initial fee application covers the period from the Receiver’s initial
14 appointment on May 23, 2018 through June 22, 2018 (the “First Application Period”) and
15 is submitted in accordance with the Permanent Receivership Order, the Local Rules of this
16 Court, and the Billing Instructions for Receivers in Civil Actions Commenced by the
17 United States Securities and Exchange Commission (the “Billing Instructions”).

18 2. Through this Application, H&K seeks approval of \$52,828.49 in fees and
19 \$72,171.51¹ in expenses, for a total of \$125,000, pursuant to the fee cap applicable to the
20 first thirty (30) days of the receivership (the “Fee Cap”).²

21 **II. STANDARDIZED FUND ACCOUNTING REPORT**

22 3. Attached as **Exhibit A** is the Standardized Fund Accounting Report (SFAR)
23 for the Receivership Entities for the period from May 30, 2018 through December 31,
24

25 ¹ These expenses include \$66,451.25 for forensic services rendered by Kroll Cyber Security and
26 invoiced to H&K.

27 ² H&K actually incurred \$144,369.52 in fees and \$72,171.51 in expenses, for a total of
28 \$216,541.03, during the First Application Period, but is limiting this 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.

1 2018 (the “SFAR Reporting Period”).³

2 **III. CASE STATUS**

3 4. Cash On Hand: The amount of cash on hand in the Receiver’s bank account
4 is \$115,566.70 as of the end of the most recent SFAR Reporting Period (December 31,
5 2018). These funds were received by (i) taking control of the US Bank bank account held
6 by Titanium Blockchain Infrastructure Services, Inc. (“TBIS”) (\$58,583.45), and (ii)
7 taking control of the JPMorgan Chase bank account held by TBIS (\$252,208.40).

8 5. Other Assets: In addition to the cash on hand listed above, the Receiver has
9 also taken possession, or has caused third party custodians to freeze, the following assets:

10 Asset	Units (if applicable)	Unit Value (as of 12/31/2018)	Aggregate Value (as of 12/31/2018)	Unit Value (as of 02/26/2019)	Aggregate Value (as of 02/26/2019)
11 Bitcoin (BTC)	151.78	\$3,819.740000	\$579,760.14	\$3,848.09	\$584,063.10
12 Bitcoin Cash (BTH)	95.12103983	\$159.890000	\$15,208.90	\$133.13	\$12,663.46
13 Bitcoin SV	95.12103983	\$87.450000	\$8,318.33	\$69.14	\$6,576.67
14 Ether (ETH)	2156.288899	\$136.820000	\$295,023.45	\$136.19	\$293,664.99
15 Litecoin (LTC)	4972.997747	\$31.340000	\$155,853.75	\$45.40	\$225,774.10
16 Zcash (ZEC)	7.9046	\$58.600000	\$463.21	\$52.16	\$412.30
17 Dash (DASH)	66.59959886	\$81.610000	\$5,435.19	\$82.33	\$5,483.14
18 Electroneum (ETN)	21035513.98	\$0.007486	\$157,471.86	\$0.01	\$146,428.21
19 Computer equipment, televisions, phones (est)			\$5,000.00		\$5,000.00
		Total	\$1,217,534.83		\$1,275,065.98

20
21 6. The Receiver has established multiple cryptocurrency wallets to hold the
22 cryptocurrencies listed above and is either (i) in possession of the private keys associated
23 with these wallets, or (ii) has caused a third party custodian to freeze such assets. Based
24 on values taken from a market aggregator, the value of the cryptocurrency assets is
25 approximately \$1,275,065.98 as of February 27, 2019 and \$1,217,534.83 as of the end of
26

27 ³ While the First Application Period only includes the first thirty days of the receivership in order
28 to demonstrate compliance with the Fee Cap, the SFAR Reporting Period runs through the end of
the most recent quarter, providing a more accurate and complete picture of the current case status.

1 the SFAR Reporting Period (December 31, 2018). This figure should be taken with
2 caution because the value of cryptocurrency assets fluctuates rapidly, and the markets for
3 some cryptocurrencies can be opaque and illiquid, and subject to market manipulation.
4 Furthermore, some assets, like Electroneum (ETN), may constitute unregistered securities,
5 making it difficult, or impossible, for the Receiver to liquidate to fiat currency.

6 7. The Receiver anticipates filing a motion to seek authorization from the Court
7 to liquidate the assets listed above before he files the next status report.

8 8. Expenses: The Receiver has incurred administrative expenses as a result of
9 his efforts to marshal and preserve the assets of the Receivership. For the First Application
10 Period as well as the remainder of the SFAR Reporting Period, these expenses were
11 advanced by H&K and by Kroll, as set forth in attached **Exhibit E**. Lastly, after the
12 Receivership Entities' assets were frozen, several of TBIS's payroll payments, initiated
13 from US Bank, were mistakenly reversed. The Receivership, throughout the SFAR
14 Reporting Period, has worked to compensate those employees and contractors whose
15 payroll payments were mistakenly reversed as well as those employees who assisted the
16 Receiver after the Receivership was established, and, as a result, the Receivership has
17 incurred payroll expenses, and transactional costs related thereto, including wire fees, in
18 the approximate amount of \$195,225.13.

19 9. Creditor Claims: Given that no determination of liability has been made at
20 this time, the Receiver has not promulgated a formal claims procedure or determined the
21 validity of any possible creditor claims. However, the Receiver has established an informal
22 claims process, published on the Receiver's website, through which it has received, and
23 tracked, several hundred inquiries and claims. The Receiver is still evaluating the investor
24 contributions made to TBIS based upon information collected from computers and servers
25 and also from the information provided by people who have contacted the Receiver via its
26 informal claims process. At present, the total number of investor claims is unknown but
27 will likely be in the several thousands.

28 10. The Receiver is working on formulating a creditor claims process, including

1 procedures for (i) confirming the claims received through its informal claims process, (ii)
2 providing notice to potential claimants who have not yet inquired; (ii) receiving and
3 reviewing claims, (iii) recommending to the court procedures for establishing and
4 determining the amount of allowed claims, and (iv) the distribution of allowed claims to
5 investors. To date, the Receiver has not disbursed any funds to any investors and is
6 awaiting confirmation of a determination of liability of the Defendants before disbursing
7 any funds to investors.

8 11. The Receiver has been negotiating with additional third parties, as well as the
9 Defendant, with respect to certain cryptocurrency assets that were transferred from a
10 wallet owned by TBIS to a wallet owned by a third-party and hosted by Coinbase. The
11 cryptocurrency is the property of TBIS and therefore should be transferred to the
12 Receivership. The Receiver has successfully negotiated with all third-parties involved,
13 including Defendant, to enter into a stipulation releasing the cryptocurrency to the
14 Receivership. The Receiver intends to file a written stipulation shortly and anticipates that
15 this issue will be resolved before the hearing date on this Application.

16 12. The Receiver has filed a notice of receivership in all relevant jurisdictions
17 where assets of the Receivership are believed to be located. In addition, as a precaution,
18 the Receiver has filed a notice of receivership in a large number of other jurisdictions.

19 **IV. BACKGROUND**

20 13. On May 22, 2018, the Securities and Exchange Commission filed a complaint
21 against Defendants Titanium, EHI Internetwork and Systems Management, Inc., also
22 known as EHI-INSM, Inc., and Michael Alan Stollery, also known as Michael Stollaire,
23 along with an application for the appointment of a receiver for the Receivership Entities.
24 After reviewing the application, the Court concluded that the appointment of a receiver in
25 this action was necessary and appropriate for the purposes of marshaling and preserving
26 all assets, tangible and intangible, that are owned, controlled or possessed by the
27 Receivership Entities.

28 14. Accordingly, on May 23, 2018, the Court entered the Temporary Restraining

1 Order (the “TRO”) and Orders (1) Freezing Assets; (2) Prohibiting the Destruction or
2 Alteration of Documents; (3) Granting Expedited Discovery; (4) Requiring Accountings;
3 and (5) Appointing a Temporary Receiver (the “Temporary Receivership Order”),
4 appointing Josias N. Dewey as temporary receiver for the Receivership Entities. On May
5 24, 2018, all Defendants were served with the summons, complaint, TRO, and Temporary
6 Receivership Order.

7 15. On May 30, 2018, the Court entered the Permanent Receivership Order
8 (together with the Temporary Receivership Order, collectively, the “Receivership
9 Order”). The Defendants consented to the entry of the Permanent Receivership Order.

10 16. On June 6, 2018, the Court entered orders approving the Receiver’s decision
11 to employ H&K as legal counsel, and Kroll Cyber Security, LLC (“Kroll”) as a forensic
12 and investigative consultant, to assist him in carrying out his duties as the Receiver. H&K
13 and Kroll began working on this matter on or about May 23, 2018.

14 **V. SUMMARY OF SERVICES PROVIDED**

15 17. H&K has assisted the Receiver with all aspects of his duties in this case
16 during the First Application Period. As set forth in more detail in the Receiver’s Initial
17 Status Report for Receivership Estate of Titanium Blockchain Infrastructure Services,
18 Inc., filed on June 25, 2018 (the “Initial Status Report”), the Receiver and his advisors
19 have focused most of their efforts on investigating, identifying, collecting, and preparing
20 an inventory of assets of the Receivership Entities. The principal assets recovered include
21 cryptocurrency, U.S. currency, electronic data, and physical assets such as computer
22 equipment.

23 18. On May 24, 2018, the Receiver and his legal counsel, together with the
24 assistance of Kroll, were able to seize and search computer equipment, mobile phones and
25 other electronic devices belonging to the Receivership Entities and interview Mr. Stollery
26 and certain of his associates at their offices in Sherman Oaks, California and Springfield,
27 Oregon.

28 19. Through that search and those interviews, the Receiver identified and took

1 control of certain cryptocurrency assets. In addition, the Receiver collected other assets at
2 the Sherman Oaks site and from an office site in Springfield, Oregon that had been leased
3 on behalf of Titanium.

4 20. Additional actions in which H&K has assisted the Receiver include, but are
5 not limited to, the following:

- 6 a. Establishing a Receiver website and redirecting the DNS for <http://tbis.io>, email
7 address (TBISReceiver@gmail.com), so that Titanium's investors and other
8 creditors can receive information pertaining to the receivership;
- 9 b. Identifying cryptocurrency wallets and/or accounts controlled by the
10 Defendants and containing the cryptocurrencies bitcoin, Bitcoin Cash, Ether,
11 Litecoin, Dash, Electroneum, ZCash, BAR and TBAR, and either transferring
12 the cryptocurrency to wallets controlled by the Receiver or causing third party
13 custodial agents to freeze such accounts;
- 14 c. Taking control of Titanium's U.S. Bank account and having the entire account
15 balance transferred to an account established by the Receiver;
- 16 d. Taking control of Titanium's Chase Bank account and requesting that the entire
17 account balance be transferred to an account established by the Receiver;
- 18 e. Securing access to Mr. Stollery's safe deposit box and the retrieval of relevant
19 information and assets from same;
- 20 f. Reviewing Titanium's provisional patent application and GitLab account, and
21 conducting telephone interviews with Titanium's chief technology officer, to
22 evaluate the current value of intellectual property and Titanium as a going
23 concern;
- 24 g. Engaging Kroll to inventory and image computers and phones collected from
25 Titanium's offices in Sherman Oaks, California, and Springfield, Oregon;
- 26 h. Interviewing Titanium's chief operating officer regarding business operations
27 and matters pertaining to theft of virtual currencies from the Defendant
28 Titanium;

- 1 i. Obtaining information from special agents with the Secret Service and Federal
- 2 Bureau of Investigations regarding the theft of virtual currencies from the
- 3 Defendant Titanium;
- 4 j. Securing personal property owned or leased by Titanium at both of its offices;
- 5 k. Changing the locks at both commercial offices of the Defendant Titanium;
- 6 l. Negotiating with commercial landlords to secure the termination of Titanium's
- 7 leases;
- 8 m. Serving written notices on cryptocurrency exchanges and other third parties to
- 9 locate additional assets, including certain overseas exchanges;
- 10 n. Analyzing payroll and employment matters, including status of employment tax
- 11 payments; and
- 12 o. Terminating the employment of employees of Defendant Titanium.

13 21. Each of these tasks was reasonably necessary to identify and secure assets of
14 the Receivership and to work on identifying additional assets for recovery.

15 VI. FEE APPLICATION

16 22. During the First Application Period, H&K professionals have provided
17 services to the Receiver for the benefit of the Receivership Entities with a value of
18 \$144,369.52, and incurred reimbursable expenses in the amount of \$72,171.51,⁴ for a total
19 of \$216,541.03 in actual fees and expenses. Pursuant to paragraph XVII of the Permanent
20 Receivership Order, fees and costs for the Receiver and all others retained to assist him in
21 the administration and liquidation of the estate are capped at \$125,000 for the initial 30
22 days of the receivership. H&K has therefore reduced its fees by \$91,541.03, and through
23 this Application, H&K requests entry of an Order approving the remaining fees in the
24 amount of \$52,828.49, and reimbursable expenses in the amount of \$72,171.50, for a total
25 of \$125,000 (the "Fees") on an interim basis.

26
27
28 ⁴ These expenses include \$66,451.25 for forensic services rendered by Kroll and invoiced to H&K.

1 23. This Application is the first fee application that H&K has submitted in this
2 matter. Accordingly, no prior orders have been entered as to any interim applications, no
3 amounts have been allowed or disallowed, and no payments have been made to H&K.

4 24. Through this Application, H&K further requests entry of an Order
5 authorizing the Receiver to make payment to H&K in the amount of \$125,000.

6 25. The names, hours worked, hourly billing rates, and total fees of all H&K
7 professionals who have billed time to this matter, excluding the Receiver, are listed in the
8 attached **Exhibit B**. Standard H&K hourly billing rates have been discounted by 15%.
9 Travel time has been billed at 50% of H&K's standard hourly billing rates in accordance
10 with the Billing Instructions, and those reduced rates have been further discounted by
11 15%. In accordance with the Fee Cap, H&K's actual fees for the First Application Period
12 have been further reduced by \$91,541.03.

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

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

19 28. An itemization of reasonable and reimbursable expenses incurred by H&K at
20 the levels set forth in accordance with the Billing Instructions, including a copy of the
21 Kroll invoice included among those expenses, is attached hereto as **Exhibit E**.

22 **VII. ARGUMENTS AND AUTHORITIES IN**
23 **SUPPORT OF FEE APPLICATION**

24 29. The district court's "power to supervise an equity receivership and to
25 determine the appropriate action to be taken in the administration of the receivership is
26 extremely broad." *S.E.C. v. Hardy*, 803 F.2d 1034, 1037 (9th Cir. 1986). That broad
27 authority "arises out of the fact that most receiverships involve multiple parties and
28

1 complex transactions.” *Id.*⁵ This “extremely broad” discretion “includes awards of
2 receivership fees, including attorneys’ fees.” *Securities and Exchange Commission v.*
3 *Wang*, 2015 WL 12656904, at *3 (C.D. Cal., Feb. 17, 2015, No. CV 13-7553 JAK (SS)),
4 citing *In re San Vincente Medical Partners Ltd.*, 962 F.2d 1402, 1409 (9th Cir. 1992)
5 (“The award of receivership fees in an SEC action is analogous to the award of
6 receivership fees in bankruptcy proceedings, and we review the district court’s award for
7 an abuse of discretion.”).

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

18 31. An award of interim fees may be appropriate where, like here, a receiver or
19 the professionals employed by the receiver “regularly devote[] a portion of his time, either
20 daily or weekly, to the administration of the estate[.]” *In Re McGann Mfg. Co.*, 188 F.2d
21 110, 112 (3d Cir. 1951) (interim fees to bankruptcy trustee or his counsel).

22 32. In allowing fees, a court should consider “the time, labor and skill required,
23 but not necessarily that actually expended, in the proper performance of the duties imposed
24 by the court upon the receiver[], the fair value of such time, labor and skill measured by
25 conservative business standards, the degree of activity, integrity and dispatch with which
26 the work is conducted and the result obtained.” *United States v. Code Prods. Corp.*, 362

27
28 ⁵ *See also Id.* at 1037 (Recognizing that “case law involving district court administration of an equity receivership (once the receivership is underway) is sparse...”).

1 F.2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms,
2 receiver and professional compensation thus ultimately rests upon the result of an
3 equitable, multi-factor balancing test involving the “economy of administration, the
4 burden that the estate may be able to bear, the amount of time required, although not
5 necessarily expended, and the overall value of the services to the estate.” *In re Imperial*
6 *400 Nat’l, Inc.*, 432 F.2d 232, 237 (3d Cir. 1970). Regardless of how this balancing test is
7 formulated, no single factor is determinative and “a reasonable fee is based [upon] all
8 circumstances surrounding the receivership.” *SEC v. W.L. Moody & Co.*, Bankers
9 (Unincorporated), 374 F.Supp. 465, 480 (S.D. Tex. 1974). Generally, the starting point is
10 to multiply the number of hours expended by an hourly rate. *Southwestern Media, Inc. v.*
11 *Rau*, 708 F.2d 419, 427 (9th Cir. 1983) (bankruptcy case). The hourly rate is based on the
12 rate the professional would charge for comparable service in other matters. *Id.*

13 33. “As a general rule, the expenses and fees of a receivership are a charge upon
14 the property administered.” *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994). These
15 expenses include the fees and expenses of the Receiver’s professionals, including H&K.

16 34. In support of the application, H&K submits the above-referenced Exhibits A-
17 D for the Court’s review, along with the Certification of Jose Casal addressing the
18 reasonableness of the rates charged and hours billed by professionals at H&K.

19 35. H&K has charged fees that are 15% less than the standard billing rates for
20 the professionals working on this matter, and those fees are at or below customary fees
21 charged by like professionals in their respective markets. H&K has billed all reimbursable
22 expenses at their actual costs with no mark-up added, and they are not seeking overhead
23 charges. Further, pursuant to the Fee Cap, H&K’s actual fees for the First Application
24 Period have been further reduced by \$91,541.03—which is an additional 63% discount.

25 36. As set forth above and in the Initial Status Report, H&K has assisted the
26 Receiver in performing various tasks that have added value to the Receivership Entities.
27 Each task was staffed and performed as efficiently as possible. The fees and expenses
28

1 sought in this Application are reasonable and were necessary for the proper administration
2 of the Receiver's duties.

3 **VIII. CONCLUSION**

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

- 5 (i) Allowing, on an interim basis, fees in the amount of \$52,828.49 and
6 reimbursement of expenses in the amount of \$72,171.51, for total
7 compensation of \$125,000 pursuant to the Fee Cap;
- 8 (ii) Authorizing and directing the Receiver to make payment to H&K in the
9 amount of \$125,000; and
- 10 (iii) Directing such other and further relief as the Court deems appropriate.

11
12 Dated: February 28, 2019

Respectfully submitted,

13 /s/ Jose Casal

14 Jose Casal (*pro hac vice*)

15 Kristina S. Azlin (SBN 235238)

16 Holland & Knight LLP

17 Counsel for Josias N. Dewey, Court-appointed
18 permanent receiver for Defendant Titanium
19 Blockchain Infrastructure Services, Inc.

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

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

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26 ALAN STOLLERY aka MICHAEL
27 STOLLAIRE,

28 Defendants.

Case No. 18-4315 DSF (JPRx)

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

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

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

- 7 (a) I have read the Application;
- 8 (b) to the best of my knowledge, information and belief formed after reasonable
9 inquiry, the application and all fees and expenses in it are true and accurate and
10 comply with the SEC Billing Instructions;
- 11 (c) all fees contained in the application are reasonable, necessary and commensurate
12 with the skill and experience required for the activity performed;
- 13 (d) the amount for which reimbursement is sought does not include the amortization
14 of the cost of any investment, equipment, or capital outlay; and
- 15 (e) the requests for reimbursement of services that were justifiably purchased or
16 contracted for from third parties (such as copying, imaging, bulk mail,
17 messenger service, overnight courier, computerized research, or title and lien
18 searches) include only the amount billed to Holland & Knight LLP by the third-
19 party vendor and paid by Holland & Knight LLP to such vendor.

20
21 Dated: February 28, 2019

22 /s/ Jose Casal

23 Jose 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*

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

SECURITIES AND EXCHANGE
COMMISSION,

 Plaintiff,

 vs.

TITANIUM BLOCKCHAIN
INFRASTRUCTURE SERVICES,
INC.; EHI INTERNETWORK AND
SYSTEMS MANAGEMENT, INC.
aka EHI-INSM, INC.; and MICHAEL
ALAN STOLLERY aka MICHAEL
STOLLAIRE,

 Defendants.

Case No. 18-4315 DSF (JPRx)

**[PROPOSED] ORDER GRANTING
FIRST INTERIM FEE APPLICATION
OF HOLLAND & KNIGHT LLP, AS
COUNSEL TO RECEIVER, FOR
ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF
EXPENSES**

1 **[PROPOSED] ORDER GRANTING FIRST INTERIM FEE**
2 **APPLICATION OF HOLLAND & KNIGHT LLP, AS COUNSEL**
3 **TO RECEIVER, FOR ALLOWANCE OF COMPENSATION**
4 **AND REIMBURSEMENT OF EXPENSES**

5 The First Interim Fee Application of Holland & Knight LLP, as Counsel to
6 Receiver, for Allowance of Compensation and Reimbursement of Expenses (the
7 “Application” filed by Holland & Knight LLP (“H&K”), counsel to Josias Dewey, as
8 Court-appointed Receiver (the “Receiver”) for the estates of Defendant Titanium
9 Blockchain Infrastructure Services, Inc. and its subsidiaries and/or affiliates (collectively,
10 the “Receivership Entities”), came on for hearing on Monday, April 1, 2019. Appearances
11 were as noted on the record.

12 The Court having received and read the Application, including any supporting
13 declarations filed therewith and objections filed thereto, and being so advised in the matter
14 and finding good cause, orders as follows:

15 IT IS ORDERED that the Application of H&K is granted.

16 IT IS FURTHER ORDERED that H&K’s fees and expenses for the First
17 Application Period are allowed and approved, on an interim basis, in the amounts of
18 \$52,828.49 and \$72,171.51 respectively.

19 IT IS FURTHER ORDERED that the Receiver is authorized and directed to pay
20 H&K \$125,000 in fees and expenses from assets of the Receivership Entities, which
21 amount reflects the fee cap applicable to the first thirty (30) days of the receivership.

22 **SO ORDERED.**

23
24 _____, 2019

25
26 _____
27 **DALE S. FISCHER**
28 **UNITED STATES DISTRICT JUDGE**

**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 - 5/30/2018 to 12/31/2018

Fund Accounting:		Reporting Period	Subtotal Prior Periods	Grand Total
Line 1	Beginning Balance (as of 3/31/2018)	\$ -	\$0.00	\$310,791.83
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	\$0.00	\$0.00	\$0.00
Line 3	Cash and Securities	\$310,791.83	\$0.00	\$0.00
Line 4	Interest/Dividends Income	\$0.00	\$0.00	\$0.00
Line 5	Business Asset Liquidation	\$0.00	\$0.00	\$0.00
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)	\$310,791.83	\$0.00	\$310,791.83
	<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	<i>Disbursements to Receiver or Other Professionals</i>	\$0.00	\$0.00	\$0.00
Line 10b	<i>Business Asset Expenses</i>	\$195,225.13	\$0.00	\$195,225.13
Line 10c	<i>Personal Asset Expenses</i>	\$0.00	\$0.00	\$0.00
Line 10d	<i>Investment Expenses</i>	\$0.00	\$0.00	\$0.00
Line 10e	<i>Third-Party Litigation Expenses</i>			
	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	<i>Tax Administrator Fees and Bonds</i>	\$0.00	\$0.00	\$0.00
Line 10g	<i>Federal and State Tax Payments</i>	\$0.00	\$0.00	\$0.00
	Total Disbursements for Receivership Operations	\$195,225.13	\$0.00	\$195,225.13
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	<i>Distribution Plan Development Expenses:</i>			
	1. Fees			
	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			
	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			
	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	<i>Investment Expenses/Court Registry Investment System (CRIS) Fees</i>	\$0.00	\$0.00	\$0.00
Line 12b	<i>Federal Tax Payments</i>	\$0.00	\$0.00	\$0.00
	Total Disbursements to Court/Other:	\$0.00	\$0.00	\$0.00
	Total Funds Disbursed (Line 9-11):	\$195,225.13	\$0.00	\$195,225.13
Line 13	Ending Balance (As of 12/18/2018):	\$115,566.70	\$0.00	\$0.00

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	\$0.00	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	193	0	193
Line 18b	# of Claims Received Since Inception of Fund	193	0	193
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 12/31/2018)**	Aggregate Value (as of 12/31/2018)
	Bitcoin (BTC)	151.78	\$ 3,819.74	\$ 579,760.14
	Bitcoun Cash (BTH)	95.12103983	\$ 159.89	\$ 15,208.90
	Bitcoin SV	95.12103983	\$ 87.45	\$ 8,318.33
	Ether (ETH)	2156.288899	\$ 136.82	\$ 295,023.45
	Litecoin (LTC)	4972.997747	\$ 31.34	\$ 155,853.75
	Zcash (ZEC)	7.9046	\$ 58.60	\$ 463.21
	Dash (DASH)	66.59959886	\$ 81.61	\$ 5,435.19
	Electroneum (ETN)	21035513.98	\$ 0.0074860	\$ 157,471.86
	Computer equipment, televisions, phones			\$5,000.00 (est)
		Total		\$ 1,217,534.83

*The total approximate value of the cryptocurrencies listed above, as of the date of this filing, is \$1,217,534.83. 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
Joaquin J. Alemany	Partner	Miami/ Ft. Lauderdale	\$615.00	0.5	\$307.50
Kristina S. Azlin	Partner	Los Angeles	\$720.00	2.5	\$1,800.00
Jose A. Casal	Partner	Miami	\$850.00	51.5	\$43,775.00
David J. Elkanich	Partner	Portland	\$525.00	0.1	\$52.50
Vince Farhat	Partner	Los Angeles	\$875.00	1.6	\$1,400.00
Wilfredo A. Ferrer	Partner	Miami	\$875.00	0.5	\$437.50
Matthew A. Grosack	Partner	Miami	\$675.00	7.7	\$5,197.50
Mitchell E. Herr	Partner	Miami	\$850.00	7.8	\$6,630.00
Nicholas B. Melzer	Partner	Denver	\$700.00	28.0	\$19,600.00
Kevin E. Packman	Partner	Miami	\$850.00	2.3	\$1,955.00
Allison D. Rhodes	Partner	Portland/ Los Angeles	\$575.00	14.7	\$8,452.50
Allison D. Rhodes	Partner	Portland/ Los Angeles	\$287.50 (Travel Rate)	4.0	\$1,150.00
Matthew P. Vafidis	Partner	San Francisco	\$925.00	0.2	\$185.00
Benjamin R. Wilson	Partner	New York	\$650.00	4.2	\$2,730.00
Shawn S. Amuial	Associate	Miami	\$450.00	105.9	\$47,655.00
Jessica M. Brown	Associate	Anchorage	\$290.00	2.5	\$725.00
John A. Canale	Associate	Boston	\$520.00	0.2	\$104.00
Esther D. Clovis	Associate	New York	\$435.00	2.4	\$1,044.00
Juan M. Rodriguez	Associate	Los Angeles	\$440.00	14.3	\$6,292.00
Dayme B. Sanchez	Associate	San Francisco	\$395.00	4.5	\$1,777.50
Trisha M. Thompson	Associate	Portland	\$325.00	23.4	\$7,605.00
Trisha M. Thompson	Associate	Portland	\$162.50 (Travel Rate)	8.0	\$1,300.00
Andrew W. Balthazor	Law Clerk	Miami	\$330.00	20.0	\$6,600.00
Esmi Diazdon	Paralegal	Miami	\$345.00	0.8	\$276.00
Delia M. Hayes	Paralegal	Miami	\$260.00	1.9	\$494.00
Sylvia D. Pedersen	Paralegal	Austin	\$205.00	0.4	\$82.00
Charles J. Pentis	Paralegal	Boston	\$430.00	1.8	\$774.00

¹ Before application of 15% discount.

Name	Title	H&K Office Location	Hourly Billing Rate¹	Total Hours	Total Fees
Glenn Huzinec	Special Assistant	New York	\$245.00	0.3	\$73.50
Elvin Ramos	Special Assistant	New York	\$295.00	1.6	\$472.00
Gustavo Manuela Cruz	Docket Clerk	New York	\$125.00	1.2	\$150.00
Jerome E. Wills	Docket Clerk	New York	\$150.00	1.8	\$270.00
Melody A. Grafals	Misc. Assistant	Miami	\$40.00	12.0	\$480.00
Subtotal:				328.6	\$169,846.50
<i>(Less 15% Discount)</i>					<i>(\$25,476.98)</i>
TOTAL:				328.6	\$144,369.52²

Overall Total: \$144,369.52
Attorney Fees: \$136,148.75
Total Attorney Hours: 287.4
Attorneys' Blended Rate: \$473.73³

² In accordance with the Fee Cap, this amount has been further discounted by \$91,541.03 for a revised total of \$52,828.49 in fees for purposes of this Application.

³ Calculated prior to the \$91,541.03 discount in accordance with the Fee Cap.

EXHIBIT C**SUMMARY OF FEES BY TASK CATEGORY**

Task Code	Description	Total Hours	Total Fees
B110	Case Administration	67.1	\$39,117.00
B120	Asset Analysis and Recovery	169.0	\$94,082.00
B130	Asset Disposition	12.3	\$5,920.00
B150	Creditor Communications	26.4	\$7,515.00
B195	Travel Time	12.0	\$2,450.00
B210	Business Operations	30.6	\$14,402.50
B220	Employee Issues	3.4	\$1,970.00
B240	Tax Issues	7.8	\$4,390.00
	Subtotal:	328.6	\$169,846.50
	<i>(Less 15% Discount)</i>		<i>(\$25,476.98)</i>
	TOTAL:	328.6	\$144,369.52⁴

⁴ In accordance with the Fee Cap, this amount has been further discounted by \$91,541.03 for a revised total of \$52,828.49 in fees for purposes of this Application.

EXHIBIT D

DAILY TIME RECORDS

Holland & Knight

P.O. Box 864084 | Orlando, FL 32886-4084
Email accountservices@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

October 5, 2018
Invoice: 5730218

TERMS: DUE ON RECEIPT

REMITTANCE COPY

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

FEES FOR PROFESSIONAL SERVICES:	\$	169,846.50
Less 15% Courtesy Fee Discount	\$	<u>-25,476.98</u>
PROFESSIONAL FEES:	\$	144,369.52
REIMBURSABLE COSTS:	\$	5,720.26

TOTAL DUE THIS INVOICE:	(U.S. Dollar)	\$	<u>150,089.78</u>
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To expedite processing of your payment, please return remittance page(s) or include your Matter number(s) or invoice number(s) with your payment.

WIRE TRANSFER INFORMATION:

Domestic and International Wires

Please indicate our Invoice Number as reference in your wire transfer

Wells Fargo Bank NA
420 Montgomery Street, San Francisco, CA 94104-1207
ABA # 121000248
Account # 2090002390441

Swift Routing Number: WFBIUS6S (for international wires)

For Credit to: Holland & Knight, LLP

PLEASE REMIT TO:

**Holland & Knight LLP
PO Box 864084
Orlando, FL 32886-4084**

If You Wish to Overnight Payment:

Holland & Knight LLP, Suite 864084
11050 Lake Underhill Road
Orlando, FL 32825-5016

Holland & Knight

P.O. Box 864084 | Orlando, FL 32886-4084
Email accountservices@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

October 5, 2018
Invoice: 5730218
Page 1

TERMS: DUE ON RECEIPT

For professional services rendered through June 22, 2018 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>
5/28/18	Shawn S. Amual	Meeting with Joe Dewey and Jose Casal to prepare agenda for week and plan for trip to Titanium's office.	2.80	450.00	1,260.00
5/29/18	Trisha M. Thompson	Call with client and J. Casal and prepare for 5/30 visit to Springfield with B. Miles.	0.60	325.00	195.00
6/1/18	Sylvia D. Pedersen	Discussion with O. Segura re: filing at US Western District Court; research; print documents; follow-up discussion with O. Segura; scan filed copy; copy and assemble filed document; prepare mail out for same.	0.40	205.00	82.00
6/1/18	Elvin Ramos	Review and finalize for submission to the Court: Miscellaneous filing of Notice of Filing the Complaint and order for appointing receiver against EHI Internetwork and Systems Management, Inc. aka EHI-INSM, INC., Infrastructure Services, Inc., Michael Alan Stollery, Titanium Blockchain, filed by Josias N. Dewey. (Attachments: # (1) Complaint, # (2) TRO & Temporary Receiver Order, # (3) Preliminary Injunction Orders) Also, serve by mail all documents and prepared proof of service.	0.70	295.00	206.50

Holland & Knight

October 5, 2018
 Invoice: 5730218
 Page 2

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>
6/21/18	Shawn S. Amuial	Meeting with Joe Dewey and Jose Casal to discuss next steps, including, summary report	0.50	450.00	225.00
Total:	B110 A101	Case Administration Plan and Prepare for	5.00		1,968.50

B110 - Case Administration
A102 - Research

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/22/18	Delia M. Hayes	PACER research and document retrieval regarding receivership in Northern District of Texas.	1.90	260.00	494.00
5/30/18	Mitchell E. Herr	Attention to order making receivership permanent.	0.20	850.00	170.00
6/1/18	Esther D. Clovis	Used Westlaw and Pacer to identify a filing of a notice of receivership in any of the federal districts in New York (1.5); Prepared civil cover sheets (0.9).	2.40	435.00	1,044.00
Total:	B110 A102	Case Administration Research	4.50		1,708.00

B110 - Case Administration
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/22/18	Jose A. Casal	Review and comment on proposed receivership order.	0.80	850.00	680.00
5/22/18	Mitchell E. Herr	Review and comment on draft TRO, asset freeze and receivership order.	1.00	850.00	850.00
5/23/18	Jose A. Casal	Review and confer on Kroll Cybersecurity engagement letter.	0.40	850.00	340.00
5/24/18	Matthew D. Grosack	Review and revise motion to appoint Holland and Knight as counsel (.4); review and revise motion to appoint Kroll as cyber consultant (.5); review and revise notice of asset freeze (.4); review TRO (.3).	1.60	675.00	1,080.00

Holland & Knight

October 5, 2018
Invoice: 5730218
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>
5/31/18	Allison D. Rhodes	Review and approve Oregon and Northern California district filings, Washington for TRO, injunction and order.	1.20	575.00	690.00
5/31/18	Kristina S. Azlin	Revisions to draft motions to the Court regarding the retention of Kroll and H&K (0.7); attention to status of Court's unsealing of case and impact of same on filing procedures (0.5).	1.20	720.00	864.00
5/31/18	Jessica M. Brown	Confer with N. Melzer re: filing preparation for SEC Notice of Receiver in N.D. Cal.; review treatise re: jurisdictional issues; draft notice to conform with N.D. Cal. requirements; call with N.D. Cal. clerk to confirm process for miscellaneous case number; confer with T. Thompson re: proof of service; confer with J. Casal re: all necessary documents; call with M. Vafidis to advise re: filing execution and procedure to accomplish sam; confirm with A. Rhodes re: attorney filer.	2.50	290.00	725.00
5/31/18	Trisha M. Thompson	Research, draft, and coordinate filings of notice of receivership pursuant to 28 U.S.C. 754 in the federal courts for the District of Oregon, Western District of Washington, and Northern District of California.	3.50	325.00	1,137.50
5/31/18	Dayme B. Sanchez	Review J. Brown email re: filing notice of receivership in northern district of california; review notice of receivership, certificate of service, attachments; review northern district local rules and filing procedures re: miscellaneous filings; discussion w/ T. Thompson re: background of case and filing; discussion w/ M. Vafidis re: case and filing.	1.00	395.00	395.00
6/1/18	Benjamin R. Wilson	Engage review and analysis of receivership notices and consider operative statute (.9); consider New York and New Jersey federal practice for filing of notices (.8); prepare draft notices for EDNY, SDNY, and DNJ (1.6);	3.90	650.00	2,535.00

Holland & Knight

October 5, 2018
 Invoice: 5730218
 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>
		engage strategy conference re: location and timing of filings (.5); coordinate SDNY filing and strategy for EDNY and DNJ filings (.1).			
6/4/18	Benjamin R. Wilson	Attention to court queries re: receiver notice filings and confer w/ E. Ramos on sealing issues.	0.30	650.00	195.00
6/4/18	Trisha M. Thompson	Follow up re: case numbers in notice of receivership filings and update notice of filing re: same.	0.10	325.00	32.50
6/21/18	Kristina S. Azlin	Work on preparation of Notice to Court of Filing of Notices of Receivership and Pro Hac Vice Applications of J. Casal and M. Herr.	1.30	720.00	936.00
Total:	B110 A103	Case Administration Draft/Revise	18.80		10,460.00

B110 - Case Administration

A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/22/18	Jose A. Casal	Review application for counsel and fee guidelines.	0.50	850.00	425.00
5/23/18	Jose A. Casal	Review temporary restraining order and appointment of receiver.	0.40	850.00	340.00
5/24/18	Mitchell E. Herr	Review executed receivership order; review and comment on draft motions to retain Holland & Knight and Kroll.	0.60	850.00	510.00
5/25/18	Mitchell E. Herr	Attention to sealed status of case and consider appropriate manner to advise court of retention of professionals.	0.50	850.00	425.00
5/29/18	Mitchell E. Herr	Review and comment on report re US Bank and SEC press release.	0.30	850.00	255.00
5/30/18	Nicholas B. Melzer	Review email from Jose Casal re: notices of appointment; call with Jose Casal re: receivership status.	0.30	700.00	210.00
5/31/18	Mitchell E.	Attention to 28 USC 754 notice of filings.	0.50	850.00	425.00

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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>
	Herr				
5/31/18	Matthew P. Vafidis	Review and analyze pleadings to be filed in N.D.Cal. and confirm procedure.	0.20	925.00	185.00
5/31/18	Jose A. Casal	Review template for 28 USC sec. 754 filings.	0.30	850.00	255.00
5/31/18	David J. Elkanich	Review Notice of Receivership for filing and related emails.	0.10	525.00	52.50
5/31/18	Nicholas B. Melzer	Email with Kristina Azlin re: notice of receivership; email with Jose Casal and Jesse Brown re: notice of receivership; review draft notice of receivership.	0.40	700.00	280.00
6/1/18	Jose A. Casal	Review status and confer with Receiver litigation teams on 28 U.S.C sec. 754 filings.	0.60	850.00	510.00
6/4/18	Nicholas B. Melzer	Review emails from Jose Casal and Kristina Azlin re: notices of appointment of counsel; review preliminary injunction and receivership order.	0.50	700.00	350.00
6/6/18	Jose A. Casal	Review DOJ production requirements and confer with Receiver team on production of records and property responsive to subpoena.	1.10	850.00	935.00
6/13/18	Jose A. Casal	Review Coinbase production and related memoranda.	1.00	850.00	850.00
6/19/18	Jose A. Casal	Review memorandum on data to be produced to DOJ pursuant to subpoena.	0.20	850.00	170.00
6/20/18	Jose A. Casal	Review status of M. Stollaire legal representation and exchange memoranda.	0.20	850.00	170.00
Total:	B110 A104	Case Administration Review/Analyze	7.70		6,347.50

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>
5/24/18	Joaquin J. Alemany	Conference and correspondence with J. Casal re receivership issues and case status.	0.20	615.00	123.00

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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>
5/25/18	Nicholas B. Melzer	Email with Vince Farhat, Kristina Azlin, Mitch Herr, and Jose Casal re: motion filing procedures.	0.30	700.00	210.00
5/31/18	Jose A. Casal	Exchange multiple memoranda and telephone conferences with litigation teams in California, Oregon, Texas and New York with regard to 28 USC sec. 754 filings.	2.40	850.00	2,040.00
5/31/18	Joaquin J. Alemany	Conference with J. Casal re jurisdiction issues and case status.	0.30	615.00	184.50
6/1/18	Nicholas B. Melzer	Email with Jose Casal re: preliminary injunction; review emails from Joe Dewey re: receivership website; review emails from Kristina Azlin and Mitch Herr re: notices of receivership and filing.	0.30	700.00	210.00
6/1/18	Trisha M. Thompson	Coordinate filings and answer questions regarding filings of Notice of Receivership in relevant jurisdictions.	0.50	325.00	162.50
6/3/18	Nicholas B. Melzer	Review emails from Jose Casal; Kristina Azlin, and Joe Dewey re: notices of receivership.	0.20	700.00	140.00
6/4/18	John A. Canale	Monitor court calender re order to show cause hearing; draft summary re status of hearing for J. Casal.	0.20	520.00	104.00
6/5/18	Nicholas B. Melzer	Review draft notice of filings; email with Kristina Azlin and Trisha Thompson re: draft notice of filings.	0.30	700.00	210.00
6/21/18	Jose A. Casal	Conference with receiver regarding enforcement against HitBTC.	0.30	850.00	255.00
Total:	B110 A105	Case Administration Communicate (in firm)	5.00		3,639.00

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>
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Josias N. Dewey as Receiver
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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/19/18	Jose A. Casal	Review and exchange memoranda with J. Dewey on proposed receivership.	0.50	850.00	425.00
5/21/18	Mitchell E. Herr	Initial planning calls with SEC staff and J. Dewey and J. Casal.	1.50	850.00	1,275.00
5/25/18	Jose A. Casal	Strategy and update calls with J. Dewey.	0.70	850.00	595.00
5/31/18	Trisha M. Thompson	Communicate with client re: TBIS Springfield visit on 5/30.	0.50	325.00	162.50
6/4/18	Jose A. Casal	Exchange memoranda on preparation of receiver's initial report.	0.20	850.00	170.00
6/18/18	Jose A. Casal	Exchange memoranda on initial status report.	0.30	850.00	255.00
6/19/18	Jose A. Casal	Conference with receiver on HitBTC claim and US Bank issues.	0.60	850.00	510.00
Total:	B110 A106	Case Administration Communicate (with client)	4.30		3,392.50

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>
5/22/18	Jose A. Casal	Various telephone conferences with D. Brown - SEC counsel.	1.00	850.00	850.00
6/1/18	Jose A. Casal	Telephone conference with D. Brown (SEC) regarding sec. 754 filings, creditor inquiries and status of asset recoveries.	0.40	850.00	340.00
6/4/18	Jose A. Casal	Review and exchange memoranda and telephone conference with SEC counsel regarding retention motions.	0.40	850.00	340.00
6/5/18	Jose A. Casal	Prepare for and participate in all hands conference call with Receiver, SEC and DOJ.	1.00	850.00	850.00
6/5/18	Jose A. Casal	Follow up telephone conference with D. Drown (SEC) regarding status of electronic devices with law enforcement and investigations.	0.30	850.00	255.00
6/6/18	Jose A. Casal	Telephone conference with A. Tyler regarding	0.30	850.00	255.00

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Josias N. Dewey as Receiver
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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		compliance with subpoena and production requirements.			
6/7/18	Jose A. Casal	Telephone conference with D. Brown regarding Ethereum investigation.	0.30	850.00	255.00
6/8/18	Jose A. Casal	Prepare memorandum to A. Tyler regarding subpoena compliance and production of records.	0.30	850.00	255.00
6/11/18	Jose A. Casal	Exchange memoranda and telephone conference with A. Tyler (DOJ) regarding subpoena compliance.	0.60	850.00	510.00
6/14/18	Jose A. Casal	Telephone conference with A. Tyler (DOJ) and prepare memorandum for Kroll production of ESI.	0.70	850.00	595.00
6/19/18	Jose A. Casal	Telephone conference with D. Brown (SEC) regarding HitBTC issues and US Bank.	0.40	850.00	340.00
6/20/18	Jose A. Casal	Telephone conference with D. Brown (SEC) regarding US Bank and status of hack investigation.	0.40	850.00	340.00
6/20/18	Jose A. Casal	Review and revise letter to A. Tyler regarding subpoena production.	0.30	850.00	255.00
6/21/18	Jose A. Casal	Telephone conference with D. Brown (SEC) regarding multiple issues.	0.40	850.00	340.00
6/22/18	Jose A. Casal	Exchange memoranda and telephone conference with D. Brown regarding US Bank.	0.40	850.00	340.00
Total:	B110 A107	Case Administration Communicate (other outside counsel)	7.20		6,120.00

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>
6/13/18	Jose A. Casal	Exchange memoranda with A. Tyler regarding subpoena compliance and ESI collection spreadsheets.	0.90	850.00	765.00

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Josias N. Dewey as Receiver
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Total:	B110	Case Administration		
	A108	Communicate (other external)	0.90	765.00

B110 - Case Administration
A109 - Appear for/Attend

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/31/18	Shawn S. Amuiat	Plan, prepare for and attend meetings and calls with Michael Stollaire, Secret Service, and Daniel Berescky.	5.00	450.00	2,250.00
6/1/18	Dayme B. Sanchez	Finalize documents for filing notice of receivership and attend to filing and service of same.	3.50	395.00	1,382.50
Total:	B110	Case Administration			
	A109	Appear for/Attend	8.50		3,632.50

B110 - Case Administration
A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/4/18	Jerome E. Wills	Commenced the action in the U.S.D.C., Eastern District of New York by filing the Notice of Receivership on behalf of Josias N. Dewey.	1.80	150.00	270.00
6/4/18	Glenn M. Huzinec	Review and record the Notice of Receivership and filed documents by e-mail to the court's miscellaneous clerk.	0.30	245.00	73.50
6/4/18	Gustavo Manuela Cruz	Filing and service of Notice of Receivership with Complaint, Temporary Restraining Order and Orders, Preliminary Injunction and Orders, and Civil Cover Sheet.	1.20	125.00	150.00
6/4/18	Elvin Ramos	Review and finalize for submission to the Eastern District of NY: Miscellaneous filing of Notice of Filing the Complaint and order for appointing receiver against EHI Internetwork and Systems Management, Inc. aka EHI-INSM, INC., Infrastructure Services, Inc., Michael Alan Stollery, Titanium	0.40	295.00	118.00

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Josias N. Dewey as Receiver
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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Blockchain, filed by Josias N. Dewey. (Attachments: # (1) Complaint, # (2) TRO & Temporary Receiver Order, # (3) Preliminary Injunction Orders) Also, serve by mail all documents and prepared proof of service.			
6/4/18	Elvin Ramos	Review and finalize for submission to the District Court of New Jersey: Miscellaneous filing of Notice of Filing the Complaint and order for appointing receiver against EHI Internetwork and Systems Management, Inc. aka EHI-INSM, INC., Infrastructure Services, Inc., Michael Alan Stollery, Titanium Blockchain, filed by Josias N. Dewey. (Attachments: # (1) Complaint, # (2) TRO & Temporary Receiver Order, # (3) Preliminary Injunction Orders) Also, prepared cover sheet and cover letter and serve by mail all documents.	0.50	295.00	147.50
6/5/18	Trisha M. Thompson	Finalize notice of filing; Review final report of 5/24 seizure; Respond to inquiry from B. Wilson on behalf D.N.J. re: unsealed order.	1.00	325.00	325.00
Total:	B110 A111	Case Administration Other	5.20		1,084.00

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>
5/21/18	Nicholas B. Melzer	Email with Joe Dewey and review SEC blockchain enforcement, TBIS website and promotional materials.	0.70	700.00	490.00
5/22/18	Jose A. Casal	Review and exchange memoranda on cell phone seizure and review of information.	0.60	850.00	510.00
5/22/18	Nicholas B. Melzer	Coordinate teams for multiple locations in Sherman Oaks and Springfield in advance of FBI questioning, including call with A. Rhodes re: Oregon ground team staffing.	1.90	700.00	1,330.00

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Josias N. Dewey as Receiver
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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/23/18	Mitchell E. Herr	Attention to securing JP Morgan safe deposit box; advise Receiver re use of new accounts; coordination re Thursday take over of premises.	0.90	850.00	765.00
5/23/18	Nicholas B. Melzer	Coordinate with team and prepare for morning takeover of TBIS Sherman Oaks location.	5.90	700.00	4,130.00
5/23/18	Trisha M. Thompson	Preparation of materials for seizure, including discussion with J. Casal, N. Meltzer, and A. Rhodes re: FBI raid and review of TRO and receivership order.	1.30	325.00	422.50
5/24/18	Vince Farhat	Review court order granting SEC's application for TRO and appointing temporary receiver (0.4), participate in pre-operation conference call with receiver and legal team (0.6), attention to draft motions to engage law firm and ediscovery vendor (0.6).	1.60	875.00	1,400.00
5/30/18	Shawn S. Amual	Plan, prepare for and attend meetings with Michael Stollaire, Secret Service, Kazem Hadi and Sherman Oaks bank branch.	3.50	450.00	1,575.00
6/19/18	Andrew W. Balthazor	Updating cryptocurrency investigation documents and preparing for presentation to either white collar crime or SEC.	2.20	330.00	726.00
Total:	B120 A101	Asset Analysis and Recovery Plan and Prepare for	18.60		11,348.50

B120 - Asset Analysis and Recovery
A102 - Research

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/19/18	Jose A. Casal	Review Titanium white papers.	0.70	850.00	595.00
5/22/18	Mitchell E. Herr	Multiple conferences and emails re taking possession of premises and digital media, potential FRCrimP 6(e) issues and related issues.	1.50	850.00	1,275.00
5/31/18	Andrew W. Balthazor	Researching and preparing for blockchain tasks.	0.10	330.00	33.00

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Josias N. Dewey as Receiver
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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/6/18	Andrew W. Balthazor	Investigating disposition of certain cryptocurrencies.	2.50	330.00	825.00
6/7/18	Andrew W. Balthazor	Compiling visualization of significant Ethereum accounts and identifying exchanges used.	1.80	330.00	594.00
6/10/18	Andrew W. Balthazor	Determining cryptocurrency exchange endpoints for stolen Ethereum.	0.80	330.00	264.00
6/12/18	Andrew W. Balthazor	Updating partner on investigation.	0.20	330.00	66.00
6/14/18	Andrew W. Balthazor	Preparing supporting documentation for subpoena relating to stolen Ethereum.	2.20	330.00	726.00
6/15/18	Andrew W. Balthazor	Updating cryptocurrency investigation documents.	0.20	330.00	66.00
6/18/18	Andrew W. Balthazor	Updating cryptocurrency investigation documents.	1.00	330.00	330.00
6/20/18	Andrew W. Balthazor	Updating cryptocurrency investigation documents.	1.30	330.00	429.00
6/22/18	Andrew W. Balthazor	Creating investment balances for crypto and researching Shapeshift.	2.60	330.00	858.00
Total:	B120 A102	Asset Analysis and Recovery Research	14.90		6,061.00

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>
5/22/18	Matthew D. Grosack	Coordinate with outside crypto exchange re: trust capabilities (1.1); coordinate internally re: the same (.5); review SEC proceedings for motion to appoint law firm as counsel for receiver (.6); coordinate drafting of motion to appoint law firm (.6).	2.80	675.00	1,890.00
5/23/18	Jose A. Casal	Prepare status report for Receiver team following discussions with SEC and DOJ.	0.50	850.00	425.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/23/18	Matthew D. Grosack	Draft and revise motion to appoint Kroll as cyber consultant (.8); draft and revise notice correspondence regarding asset freeze (1.2).	2.00	675.00	1,350.00
5/25/18	Jose A. Casal	Prepare notice and demand letter to Coinbase.	0.40	850.00	340.00
5/25/18	Jose A. Casal	Prepare notice and demand letter to R. Silver.	0.30	850.00	255.00
5/25/18	Trisha M. Thompson	Emails between team members and draft report of TBIS seizure.	1.90	325.00	617.50
5/29/18	Trisha M. Thompson	Draft report of 5/24 seizure.	1.70	325.00	552.50
6/1/18	Trisha M. Thompson	Draft and revise report of 5/24 seizure of TBIS Springfield's assets.	1.60	325.00	520.00
6/1/18	Shawn S. Amuial	Continue inputting assets, liabilities and notes into consolidated workbook.	0.50	450.00	225.00
6/4/18	Shawn S. Amuial	Compile assets and records into consolidated spreadsheet.	4.00	450.00	1,800.00
6/5/18	Allison D. Rhodes	Draft, review and complete report on Springfield.	1.20	575.00	690.00
6/5/18	Shawn S. Amuial	Continue to update consolidated spreadsheet of assets and liabilities.	1.50	450.00	675.00
6/14/18	Jose A. Casal	Review memoranda and prepare demand letter to HitBTC.	1.00	850.00	850.00
6/15/18	Shawn S. Amuial	Further work on revised hitBTC letter and incorporate wallet analysis to letter.	1.10	450.00	495.00
Total:	B120 A103	Asset Analysis and Recovery Draft/Revise	20.50		10,685.00

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>
5/25/18	Jose A. Casal	Review and exchange internal memoranda on Coinbase strategy.	0.60	850.00	510.00
5/25/18	Jose A. Casal	Review communications with Austin-based	0.30	850.00	255.00

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Josias N. Dewey as Receiver
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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		officers.			
5/29/18	Jose A. Casal	Exchange memoranda on Oregon assets and disposition.	0.30	850.00	255.00
5/29/18	Jose A. Casal	Exchange internal memoranda and telephone conferences regarding strategy to recover R. Silver laptop.	0.60	850.00	510.00
5/29/18	Shawn S. Amuial	Organize information on wallets and pull and track information re individual balances of each wallet into a spreadsheet.	5.30	450.00	2,385.00
6/1/18	Shawn S. Amuial	Review patents sent by Perkins Coie and GitLab pages.	2.30	450.00	1,035.00
6/6/18	Jose A. Casal	Review and confer on Coinbase response regarding frozen accounts.	0.30	850.00	255.00
6/7/18	Shawn S. Amuial	Review updated analysis of Ethereum trail through exchanges, including Kraken; discuss with Joe Dewey and Jose Casal	0.60	450.00	270.00
6/11/18	Shawn S. Amuial	Several calls and correspondences with U.S. Bank re current operating account and review reversed payments.	1.40	450.00	630.00
6/12/18	Shawn S. Amuial	Work with Joe Dewey to analyze tokens stored pursuant to paper wallet with objective to move tokens to Gemini.	2.10	450.00	945.00
6/13/18	Shawn S. Amuial	Discussion with Jose Casal re Coinbase account information received from SEC; review content of sent information.	0.80	450.00	360.00
6/14/18	Shawn S. Amuial	Review and revise Jose Casal's proposed letter to HitBTC include public addresses.	1.50	450.00	675.00
6/19/18	Shawn S. Amuial	Review Andrew Balthazor's analysis of ether trail.	0.70	450.00	315.00
6/19/18	Andrew W. Balthazor	Analyzing remaining D-level Ether accounts.	2.40	330.00	792.00
6/20/18	Shawn S. Amuial	Review logs from Coinbase for Richard Silver and Michael Stollaire to analyze how and when certain amounts of bitcoin were	1.20	450.00	540.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		withdrawn from accounts, and discuss findings with Joe Dewey and Jose Casal.			
Total:	B120 A104	Asset Analysis and Recovery Review/Analyze	20.40		9,732.00

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>
5/24/18	Wifredo A. Ferrer	Conference call re: Receivership take down strategy.	0.50	875.00	437.50
5/24/18	Jose A. Casal	Prepare for and conduct kick-off/coordination call with Receiver team.	1.50	850.00	1,275.00
5/25/18	Mitchell E. Herr	Confer with J. Casal re obtaining compliance from Coinbase with freeze order.	0.50	850.00	425.00
5/26/18	Nicholas B. Melzer	Email with Jose Casal and Joe Dewey re: accounting of wallets and freeze of personal assets.	0.30	700.00	210.00
5/28/18	Allison D. Rhodes	Review updates, draft email to Jose Casal and receiver regarding Springfield materials.	0.50	575.00	287.50
5/29/18	Nicholas B. Melzer	Email with Mitch Herr, Joe Dewey, and Jose Casal re: bank account freezes; review email from Allison Rhodes re: Oregon location and seizures; review SEC press release; email Joe Dewey, Jose Casal, Mitch Herr, and Allison Rhodes re: SEC press release.	0.50	700.00	350.00
5/30/18	Jose A. Casal	Various telephone conferences and email exchanges with Portland team regarding recovery of R. Silver laptop and other assets.	1.50	850.00	1,275.00
6/4/18	Andrew W. Balthazor	Researching and preparing to investigate disposition of certain cryptocurrency assets.	2.70	330.00	891.00
6/5/18	Allison D. Rhodes	Review and analyze Springfield list with real estate partner.	0.50	575.00	287.50
6/14/18	Jose A. Casal	Confer and exchange memoranda regarding C. Snook and continued investigation.	0.40	850.00	340.00

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Josias N. Dewey as Receiver
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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/14/18	Shawn S. Amuial	Call with Jose Casal to discuss role of former CTO; outline thoughts in email in efforts to attain additional information from agencies.	0.60	450.00	270.00
6/15/18	Jose A. Casal	Exchange memoranda and revise demand to HitBTC.	1.00	850.00	850.00
6/20/18	Shawn S. Amuial	Correspondences with Joe Dewey and Andrew Balthazor regarding the trail of stolen cryptocurrency.	0.60	450.00	270.00
Total:	B120 A105	Asset Analysis and Recovery Communicate (in firm)	11.10		7,168.50

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>
5/21/18	Jose A. Casal	Review and confer with J. Dewey on receiver logistics and securing mobile devices.	0.60	850.00	510.00
5/23/18	Jose A. Casal	Prep meeting with J. Dewey.	0.60	850.00	510.00
5/24/18	Jose A. Casal	Multiple conference calls with J. Dewey and Receiver teams in Sherman Oaks and Oregon regarding asset recovery issues and status.	2.50	850.00	2,125.00
5/24/18	Jose A. Casal	Telephone conference and review demand notice with J. Dewey regarding Coinbase and proposed freeze of R. Silver account.	0.70	850.00	595.00
5/29/18	Jose A. Casal	Debrief meetings with J. Dewey regarding status of asset recovery and strategies.	1.50	850.00	1,275.00
6/11/18	Jose A. Casal	Confer with receiver on US Bank issues.	0.40	850.00	340.00
6/20/18	Jose A. Casal	Review and confer with receiver regarding HitBTC and Hong King strategies.	0.30	850.00	255.00
Total:	B120 A106	Asset Analysis and Recovery Communicate (with client)	6.60		5,610.00

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

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/22/18	Jose A. Casal	Prepare memorandum on telephone conference with D. Brown and coordination issues with SEC and FBI.	0.80	850.00	680.00
5/23/18	Jose A. Casal	Exchange multiple memoranda with D. Brown (SEC) on Los Angeles and Oregon contacts and status.	1.00	850.00	850.00
5/23/18	Jose A. Casal	Various conference calls with SEC and DOJ on scope of receiver order, coordination and logistics for asset location and recovery.	1.20	850.00	1,020.00
5/24/18	Jose A. Casal	Multiple conference calls and exchange of emails with SEC counsel regarding status of Sherman Oaks and Oregon asset seizures and recoveries.	1.60	850.00	1,360.00
5/24/18	Jose A. Casal	Extensive telephone conferences with D. Brown (SEC) regarding Coinbase and R. Silver account.	0.80	850.00	680.00
5/25/18	Jose A. Casal	Various update telephone calls with D. Brown on Coinbase, Chase safe deposit box and other affiliated exchanges.	0.80	850.00	680.00
5/25/18	Jose A. Casal	Various telephone conferences with A. Tyler (DOJ) and FBI regarding storage devices.	0.60	850.00	510.00
5/29/18	Jose A. Casal	Various telephone conferences with D. Brown at SEC regarding R. Silver laptop.	0.50	850.00	425.00
5/29/18	Jose A. Casal	Review and exchange memoranda with D. Brown of SEC regarding R. Silver laptop.	0.40	850.00	340.00
5/29/18	Jose A. Casal	Review and exchange memoranda with A. Tyler of DOJ regarding R. Silver laptop.	0.40	850.00	340.00
5/30/18	Jose A. Casal	Email exchanges with D. Brown regarding recovery of R. Silver laptop.	0.30	850.00	255.00
5/30/18	Shawn S. Amuial	Correspondences with Perkins Coie re the current state of patent filings and applications.	0.50	450.00	225.00
6/4/18	Jose A. Casal	Review and exchange memoranda with SEC counsel regarding asset seizure notices.	0.20	850.00	170.00
6/7/18	Jose A. Casal	Prepare and review memoranda exchange	1.00	850.00	850.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		with D. Brown regarding status of stolen Ethereum and receiver's investigation.			
6/12/18	Jose A. Casal	Review and exchange memoranda with D. Brown (SEC) regarding US Bank and turnover of funds.	0.70	850.00	595.00
6/19/18	Shawn S. Amuial	Call with Jose Casal and David Brown to discuss HitBTC and proposed response to an investor.	0.50	450.00	225.00
6/21/18	Jose A. Casal	Prepare status memorandum to D. Brown (SEC) regarding US Bank and recovery of funds.	0.30	850.00	255.00
Total:	B120 A107	Asset Analysis and Recovery Communicate (other outside counsel)	11.60		9,460.00

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>
5/23/18	Jose A. Casal	Initial conference call with Kroll Cybersecurity to discuss possible engagement.	0.50	850.00	425.00
5/24/18	Jose A. Casal	Telephone conference with M. Cianfrani of Coinbase regarding proposed freeze of R. Silver account.	0.40	850.00	340.00
5/25/18	Jose A. Casal	Review email and telephone conference with M. Cianfrani of Coinbase regarding status and freezing of R. Silver account.	0.60	850.00	510.00
5/29/18	Jose A. Casal	Exchange memoranda on Coinbase account and telephone conference with M. Cianfrani (Coinbase) and D. Brown (SEC) regarding account status.	0.80	850.00	680.00
5/29/18	Allison D. Rhodes	Telephone calls from Becky Miles regarding property and work on preparing inventory for transmission of documents from Springfield site.	1.20	575.00	690.00
5/30/18	Shawn S.	Monitor e-mails to receiver account and	2.00	450.00	900.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amuial	correspond with senders.			
6/5/18	Jose A. Casal	Exchange memoranda with Coinbase regarding account addresses and identifiers.	0.20	850.00	170.00
6/6/18	Shawn S. Amuial	Calls and correspondences with U.S. Bank re gaining control of operating account and discussing re'reversing of payroll payments with branch manager.	1.30	450.00	585.00
6/7/18	Shawn S. Amuial	Additional calls and correspondences with U.S. Bank re gaining control of operating account and discussing re'reversing of payroll payments with branch manager.	1.30	450.00	585.00
6/8/18	Shawn S. Amuial	Several calls and correspondences with U.S. Bank re current operating account and review reversed payments.	1.80	450.00	810.00
6/15/18	Shawn S. Amuial	Further communication with U.S. Bank and correspondences with Dewey to discuss next steps	0.50	450.00	225.00
Total:	B120 A108	Asset Analysis and Recovery Communicate (other external)	10.60		5,920.00

B120 - Asset Analysis and Recovery
A109 - Appear for/Attend

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/24/18	Nicholas B. Melzer	Implementation of receivership and asset seizure, including meeting with Joe Dewey, Juan Rodriguez, and Kroll team re: preparation for receivership, work on site at Titanium to impose receivership and control assets, meeting with Joe Dewey and Juan Rodriguez re: receivership and strategy, email with receivership team re: strategy, and email with Vince Farhat and Kristina Azlin re: notice of appointment of Holland & Knight as receiver counsel.	14.80	700.00	10,360.00
5/24/18	Allison D.	Serve and administer receivership order.	6.50	575.00	3,737.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Rhodes				
5/24/18	Juan M. Rodriguez	Work on implementation of receivership order, including planning, preparatation, and securing of Titanium Blockchain's assets at the bank and at their office and drafting memorandum re: same.	14.30	440.00	6,292.00
5/24/18	Trisha M. Thompson	Deliver TRO and seize assets of TBS and communicate with team re: same.	6.50	325.00	2,112.50
5/30/18	Trisha M. Thompson	Work on inventory of seized assets and coordinate transfer of assets to Kroll and client, including meeting with B. Miles and other TBIS employees and communications with client and H&K team.	2.60	325.00	845.00
5/31/18	Shawn S. Amuial	Calls and meeting with Sherman Oaks Chase bank branch.	2.50	450.00	1,125.00
5/31/18	Shawn S. Amuial	Visit office in Sherman Oaks and work on recovering information from cold storage devices.	2.00	450.00	900.00
Total:	B120 A109	Asset Analysis and Recovery Appear for/Attend	49.20		25,372.00

B120 - Asset Analysis and Recovery
A110 - Manage Data/Files

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/24/18	Shawn S. Amuial	Assist with research regarding token transactions and prepare descriptions of token storage devices	3.50	450.00	1,575.00
Total:	B120 A110	Asset Analysis and Recovery Manage Data/Files	3.50		1,575.00

B120 - Asset Analysis and Recovery
A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/23/18	Allison D.	Review documents, prepare plan and	2.00	575.00	1,150.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Rhodes	coordinate Springfield service of order.			
Total:	B120 A111	Asset Analysis and Recovery Other	2.00		1,150.00

B130 - Asset Disposition
A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/12/18	Shawn S. Amual	Correspondence with landlord regarding Ventura lease; discussion with Joe Dewey re steps forward; correspondences with CORT re rented furniture; review log of rented furniture	0.90	450.00	405.00
Total:	B130 A101	Asset Disposition Plan and Prepare for	0.90		405.00

B130 - Asset Disposition
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/18/18	Shawn S. Amual	Draft termination of lease for lease for LA office and communication with landlord's representative regarding same.	1.90	450.00	855.00
Total:	B130 A103	Asset Disposition Draft/Revise	1.90		855.00

B130 - Asset Disposition
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/30/18	Jose A. Casal	Review and confer on scope of receiver's powers and asset liquidation issues.	0.40	850.00	340.00
Total:	B130 A104	Asset Disposition Review/Analyze	0.40		340.00

B130 - Asset Disposition
A105 - Communicate (in firm)

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/18/18	Nicholas B. Melzer	Email with Shawn Amuial re: collection of property from TBIS offices.	0.20	700.00	140.00
6/18/18	Shawn S. Amuial	Correspondences with partners in LA and Oregon offices re coordinating terminating leases of offices in respective jurisdictions and coordinating the pick up and release of personal property.	0.60	450.00	270.00
6/19/18	Allison D. Rhodes	Conference regarding Springfield lease and property.	0.80	575.00	460.00
6/19/18	Shawn S. Amuial	Call with Allison Rhodes to discuss winding down Springfield office; discussion with Receiver regarding same.	0.50	450.00	225.00
6/22/18	Nicholas B. Melzer	Email with Shawn Amuial re: collection of property from TBIS offices; email with Elena Zyalukova re: collection of property from TBIS offices; email with office services re: collection of property from TBIS offices.	0.80	700.00	560.00
6/22/18	Trisha M. Thompson	Confer with A. Rhodes re: closure of TBIS Springfield office; Communications with client and H&K attorneys re: same.	0.80	325.00	260.00
Total:	B130 A105	Asset Disposition Communicate (in firm)	3.70		1,915.00

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>
6/15/18	Shawn S. Amuial	Coordinate with Kroll and H&K LA and Portland offices to account for personal property belonging to company and company employees.	1.40	450.00	630.00
6/18/18	Shawn S. Amuial	Calls and correspondences with CORT furniture to coordinate pickup of rented furniture.	0.70	450.00	315.00
6/20/18	Shawn S. Amuial	Communications with landlord's rep in LA, communications with team in Oregon re	0.50	450.00	225.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Oregon lease.			
6/22/18	Shawn S. Amuial	Communication and coordination with attorneys in LA and Portland, along with the respective landlords, regarding removal and storage of personal property from locations.	2.30	450.00	1,035.00
6/22/18	Shawn S. Amuial	Correspondences with Dave Stairs and representatives from CORT furniture to pick up office furniture and coordinate with Landlord's rep in LA.	0.30	450.00	135.00
6/22/18	Trisha M. Thompson	Coordinate with TBIS employees re: closure of TBIS Springfield office and pick up of personal items.	0.20	325.00	65.00
Total:	B130 A108	Asset Disposition Communicate (other external)	5.40		2,405.00

B150 - Meetings of and Communications with Creditors
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/7/18	Shawn S. Amuial	Draft comprehensive response and update for creditor/investors; send message to inquiring investors	0.90	450.00	405.00
Total:	B150 A103	Meetings of and Communications with Creditors Draft/Revise	0.90		405.00

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>
6/6/18	Jose A. Casal	Review creditor/investor inquiries.	0.20	850.00	170.00
6/7/18	Jose A. Casal	Review and confer on proposed response to creditors/investors.	0.40	850.00	340.00
Total:	B150	Meetings of and Communications with Creditors			

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A104	Review/Analyze	0.60	510.00
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B150 - Meetings of and Communications with Creditors

A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/21/18	Nicholas B. Melzer	Email with Joe Dewey and John Haney re: termination of TBIS employees.	0.30	700.00	210.00
Total:	B150	Meetings of and Communications with Creditors			
	A105	Communicate (in firm)	0.30		210.00

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>
6/6/18	Shawn S. Amuial	Communication with third-party claimants, including former employees and investors, and circulate questionnaire.	2.20	450.00	990.00
6/7/18	Shawn S. Amuial	Communication with third-party claimants, including former employees and investors, and circulate questionnaire.	2.20	450.00	990.00
6/8/18	Shawn S. Amuial	Communication with third-party claimants, including former employees and investors, and circulate questionnaire.	2.40	450.00	1,080.00
6/11/18	Shawn S. Amuial	Correspondences with investors; information intake.	0.30	450.00	135.00
6/12/18	Shawn S. Amuial	Correspondences with investors/potential creditors	1.20	450.00	540.00
6/14/18	Shawn S. Amuial	Review and respond to correspondences from former employees and investors.	1.10	450.00	495.00
6/18/18	Shawn S. Amuial	Correspondences with investors; further update TBIS notice page on website/	0.40	450.00	180.00
6/19/18	Jose A. Casal	Review and respond to demand from alleged investor B. Floren.	0.60	850.00	510.00
6/19/18	Shawn S.	Monitor and reply to emails sent to receiver	0.50	450.00	225.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amuial	account			
6/21/18	Shawn S. Amuial	Calls and correspondences with past investors, employees and landlord's rep in LA.	0.60	450.00	270.00
Total:	B150	Meetings of and Communications with Creditors			
	A108	Communicate (other external)	11.50		5,415.00

B150 - Meetings of and Communications with Creditors
A110 - Manage Data/Files

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/10/18	Shawn S. Amuial	Review new email inquiries from both potential creditors and Richard Silver.	1.10	450.00	495.00
Total:	B150	Meetings of and Communications with Creditors			
	A110	Manage Data/Files	1.10		495.00

B150 - Meetings of and Communications with Creditors
A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/14/18	Melody A. Grafals	Answered emails and updated the spreadsheets for Investor, Invoice and Employee Intake.	2.00	40.00	80.00
6/15/18	Melody A. Grafals	Answered emails and updated the spreadsheets for Investor, Invoice and Employee Intake.	2.00	40.00	80.00
6/18/18	Melody A. Grafals	Answered emails and updated the spreadsheets for Investor, Invoice and Employee Intake.	2.00	40.00	80.00
6/19/18	Melody A. Grafals	Answered emails and updated the spreadsheets for Investor, Invoice and Employee Intake.	2.00	40.00	80.00
6/21/18	Melody A. Grafals	Updating the spreadsheets and replying back to emails.	2.00	40.00	80.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/22/18	Melody A. Grafals	Answering emails and updating multiple spreadsheets.	2.00	40.00	80.00
Total:	B150 A111	Meetings of and Communications with Creditors Other	12.00		480.00

B160 - Fee / Employment Applications
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/1/18	Mitchell E. Herr	Attention to billing structure to conform to SEC guidelines.	0.30	850.00	No Charge
Total:	B160 A104	Fee / Employment Applications Review/Analyze	0.30		No Charge

B195 - Non-Working Travel
A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/24/18	Allison D. Rhodes	Travel to and from Springfield for service and administration of receivership order.	4.00	287.50	1,150.00
5/24/18	Trisha M. Thompson	Travel to and from Springfield, Oregon.	4.00	162.50	650.00
5/30/18	Trisha M. Thompson	Travel to and from Springfield for service and administration of receivership order.	4.00	162.50	650.00
Total:	B195 A111	Non-Working Travel Other	12.00		2,450.00

B210 - Business Operations
A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/21/18	Shawn S. Amui	Coordinate receipt and deposit of cashier's check from U.S. Bank into Wells Fargo; work with Wells Fargo to attain online banking privileges.	0.60	450.00	270.00

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Total:	B210	Business Operations		
	A101	Plan and Prepare for	0.60	270.00

B210 - Business Operations
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/8/18	Matthew D. Grosack	Draft and revise e-mails to Gemini (.3); participate in call with Gemini (.6); review institutional account application (.4).	1.30	675.00	877.50
6/11/18	Shawn S. Amuial	Draft documents necessary to open Gemini account for sale of crypto once read to sell assets.	1.50	450.00	675.00
Total:	B210	Business Operations			
	A103	Draft/Revise	2.80		1,552.50

B210 - Business Operations
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/8/18	Shawn S. Amuial	Review requirements for Gemini institutional account; call with Gemini to discuss case	0.60	450.00	270.00
6/11/18	Shawn S. Amuial	Review/analyze different scenarios for dealing with Ventura blvd lease; call with landlord's management company to discuss scenarios.	0.90	450.00	405.00
6/19/18	Shawn S. Amuial	Review payroll against latest statements from U.S. Bank to reconcile how much can be paid out to cover reversed payroll.	1.30	450.00	585.00
Total:	B210	Business Operations			
	A104	Review/Analyze	2.80		1,260.00

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>
5/27/18	Nicholas B. Melzer	Email with Joe Dewey re: receivership email addresses.	0.30	700.00	210.00

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Total:	B210	Business Operations			
	A105	Communicate (in firm)	0.30		210.00

B210 - Business Operations
A106 - Communicate (with client)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/30/18	Jose A. Casal	Review and confer with receiver on preservation of Telegram data.	0.30	850.00	255.00

Total:	B210	Business Operations			
	A106	Communicate (with client)	0.30		255.00

B210 - Business Operations
A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/30/18	Jose A. Casal	Participate in conference call with receiver and Kroll team regarding status of data collection and strategies.	0.60	850.00	No Charge
5/30/18	Shawn S. Amuial	Calls and online engagement with the IRS to attain EIN for new, receivership, bank account	2.50	450.00	1,125.00
5/31/18	Allison D. Rhodes	Work on property manager Springfield location re: access issues. Conference with receiver and counsel regarding same.	0.80	575.00	460.00
6/1/18	Shawn S. Amuial	Review/analyze correspondences directed to receiver email address.	0.80	450.00	360.00
6/4/18	Trisha M. Thompson	Call with B. Miles re: window replacement in Springfield site.	0.10	325.00	32.50
6/5/18	Shawn S. Amuial	Calls and correspondences with U.S. Bank to discuss current operating account and formation of new account for receivership.	1.20	450.00	540.00
6/7/18	Shawn S. Amuial	Correspondences and call with Moss Company--property manager for office on Ventura Blvd.	0.40	450.00	180.00
6/11/18	Shawn S. Amuial	Several calls and correspondences with Bank of America in efforts to open new receivership	0.70	450.00	315.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		account			
6/12/18	Shawn S. Amuial	Several calls and correspondences with U.S. Bank re current operating account and review reversed payments.	2.30	450.00	1,035.00
6/13/18	Shawn S. Amuial	Continued calls and correspondences with Bank of America to open bank account; correspondences with Wells Fargo	0.90	450.00	405.00
6/13/18	Shawn S. Amuial	Correspondences with Landlord of Ventura Blvd office space.	0.30	450.00	135.00
6/13/18	Shawn S. Amuial	Correspondence with Gemini exchange	0.40	450.00	180.00
6/14/18	Shawn S. Amuial	Continue dealing with issues surrounding opening a bank account for the receivership	0.80	450.00	360.00
6/18/18	Shawn S. Amuial	Several calls and correspondences with U.S. Bank; meeting with Wells Fargo to coordinate opening of receivership account.	0.70	450.00	315.00
6/19/18	Shawn S. Amuial	Correspondences with Wells Fargo; call and correspondences with U.S. Bank	0.90	450.00	405.00
6/20/18	Shawn S. Amuial	Calls and correspondences with Wells Fargo, Ocean Bank, U.S. Bank and Chase Bank in connection with existing bank accounts and the establishment of receivership accounts.	1.30	450.00	585.00
6/22/18	Shawn S. Amuial	Calls and correspondences with Wells Fargo and U.S. Bank to finalize opening of account and transfer of funds.	1.70	450.00	765.00
Total:	B210 A108	Business Operations Communicate (other external)	16.40		7,197.50

B210 - Business Operations
A110 - Manage Data/Files

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/26/18	Mitchell E. Herr	Attention to securing email domain.	0.30	850.00	255.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/5/18	Shawn S. Amuial	Navigate issues surrounding hosting of tbis.io receivership website.	2.20	450.00	990.00
6/6/18	Shawn S. Amuial	Work with IT specialists to maintain and re-launch company website with receivership notice page and re-launch tbis.io email	1.30	450.00	585.00
6/7/18	Shawn S. Amuial	Continue work with IT specialists to maintain and re-launch company website with receivership notice page and re-launch tbis.io email	1.30	450.00	585.00
6/8/18	Shawn S. Amuial	Continue work with IT specialists to maintain and re-launch company website with receivership notice page and re-launch tbis.io email	0.90	450.00	405.00
6/20/18	Shawn S. Amuial	Continue setting up Gemini account to allow for direct withdrawal into receivership's bank account	0.30	450.00	135.00
Total:	B210 A110	Business Operations Manage Data/Files	6.30		2,955.00

B210 - Business Operations
A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/7/18	Trisha M. Thompson	Review lease and coordinate rent payment for Springfield site; Communications with landlord.	0.40	325.00	130.00
6/8/18	Trisha M. Thompson	Coordinate payment of rent for TBIS Springfield office location.	0.10	325.00	32.50
6/8/18	Shawn S. Amuial	Communication with Bank of America to open new operating account, including visit to local branch and discussion of account with small business accounts manager.	1.20	450.00	540.00
Total:	B210 A111	Business Operations Other	1.70		702.50

B220 - Employee Benefits / Pensions

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A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/10/18	Shawn S. Amual	Begin drafting termination letter for company executives and employees.	0.40	450.00	180.00
6/11/18	Shawn S. Amual	Draft form termination letter for employees.	1.10	450.00	495.00
Total:	B220 A103	Employee Benefits / Pensions Draft/Revise	1.50		675.00

B220 - Employee Benefits / Pensions

A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/29/18	Jose A. Casal	Review and confer on termination of employees.	0.30	850.00	255.00
6/11/18	Shawn S. Amual	Review payroll and determine payroll owed for June 1 to June 8th pay period; draft excel spreadsheet showing analysis.	0.80	450.00	360.00
6/20/18	Jose A. Casal	Review payroll issues.	0.20	850.00	170.00
Total:	B220 A104	Employee Benefits / Pensions Review/Analyze	1.30		785.00

B220 - Employee Benefits / Pensions

A107 - Communicate (other outside counsel)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/20/18	Jose A. Casal	Telephone conference with M. Stollaire's counsel regarding payroll and company operations and prepare update memorandum.	0.60	850.00	510.00
Total:	B220 A107	Employee Benefits / Pensions Communicate (other outside counsel)	0.60		510.00

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>
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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/4/18	Shawn S. Amuial	Meeting with Joe Dewey and Kevin Packman for tax planning purposes.	1.50	450.00	675.00
Total:	B240 A101	Tax Issues Plan and Prepare for	1.50		675.00

B240 - Tax Issues
A102 - Research

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/7/18	Charles J. Pentis	Confer with Attorney Packman regarding tax issues (.3); review documents and company information (.5); telephone conference with IRS regarding tax matters (.4).	1.20	430.00	516.00
Total:	B240 A102	Tax Issues Research	1.20		516.00

B240 - Tax Issues
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/4/18	Shawn S. Amuial	Prepare form 2848.	0.50	450.00	225.00
6/4/18	Shawn S. Amuial	Draft ss-4 form and submit to IRS.	0.30	450.00	135.00
Total:	B240 A103	Tax Issues Draft/Revise	0.80		360.00

B240 - Tax Issues
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/4/18	Kevin E. Packman	Prepare power of attorney and coordinate with team re: transcript and wage/income report.	1.40	850.00	1,190.00
6/4/18	Esmi Diazdon	Make arrangements to submit application for employer identification number to the IRS for Titanium Blockchain Infrastructure Services	0.30	345.00	103.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Inc. In Receivership.			
6/5/18	Kevin E. Packman	Review Complaint and attend to employment tax issues.	0.90	850.00	765.00
Total:	B240 A104	Tax Issues Review/Analyze	2.60		2,058.50

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>
6/2/18	Jose A. Casal	Exchange memoranda on tax compliance issues.	0.20	850.00	170.00
6/4/18	Esmi Diazdon	Confer with S. Amuial re SS-4 for Titanium Blockchain Infrastructure Services Inc. Inc. Receivership; review/analyze SS-4; prepare comments re same.	0.30	345.00	103.50
6/4/18	Charles J. Pentis	Confer with Attorney Packman regarding case tax issues.	0.20	430.00	86.00
6/5/18	Charles J. Pentis	Confer with Attorney Packman and review tax forms.	0.40	430.00	172.00
6/7/18	Shawn S. Amuial	Attain EIN and correspondences with Kevin Packman re correct company information for form 8288.	0.40	450.00	180.00
Total:	B240 A105	Tax Issues Communicate (in firm)	1.50		711.50

B240 - Tax Issues
A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/7/18	Esmi Diazdon	Review/analyze employer identification number from the IRS for Titanium Blockchain Infrastructure Services Inc. In Receivership; prepare communication re same.	0.20	345.00	69.00
Total:	B240	Tax Issues			

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A111	Other	0.20	69.00
	Less 15% Courtesy Fee Discount	\$	<u>-25,476.98</u>
	TOTAL FEES FOR PROFESSIONAL SERVICES:	\$	144,369.52

Professional Summary through June 22, 2018:

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jose A. Casal	Partner	52.10	850.00	43,775.00
Kevin E. Packman	Partner	2.30	850.00	1,955.00
Matthew P. Vafidis	Partner	0.20	925.00	185.00
Mitchell E. Herr	Partner	7.80	850.00	6,630.00
Wifredo A. Ferrer	Partner	0.50	875.00	437.50
Allison D. Rhodes	Partner	14.70	575.00	8,452.50
Allison D. Rhodes	Partner	4.00	287.50	1,150.00
Benjamin R. Wilson	Partner	4.20	650.00	2,730.00
David J. Elkanich	Partner	0.10	525.00	52.50
Joaquin J. Alemany	Partner	0.50	615.00	307.50
Kristina S. Azlin	Partner	2.50	720.00	1,800.00
Matthew D. Grosack	Partner	7.70	675.00	5,197.50
Nicholas B. Melzer	Partner	28.00	700.00	19,600.00
Vince Farhat	Partner	1.60	875.00	1,400.00
Dayme B. Sanchez	Associate	4.50	395.00	1,777.50
Jessica M. Brown	Associate	2.50	290.00	725.00
John A. Canale	Associate	0.20	520.00	104.00
Juan M. Rodriguez	Associate	14.30	440.00	6,292.00
Shawn S. Amuial	Associate	105.90	450.00	47,655.00
Trisha M. Thompson	Associate	23.40	325.00	7,605.00

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<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Trisha M. Thompson	Associate	8.00	162.50	1,300.00
Esther D. Clovis	Associate	2.40	435.00	1,044.00
Andrew W. Balthazor	Law Clerk	20.00	330.00	6,600.00
Charles J. Pentis	Paralegal	1.80	430.00	774.00
Delia M. Hayes	Paralegal	1.90	260.00	494.00
Esmi Diazdon	Paralegal	0.80	345.00	276.00
Sylvia D. Pedersen	Paralegal	0.40	205.00	82.00
Elvin Ramos	Spec Asst	1.60	295.00	472.00
Glenn M. Huzinec	Spec Asst	0.30	245.00	73.50
Gustavo Manuela Cruz	Doc. Clerk	1.20	125.00	150.00
Jerome E. Wills	Doc. Clerk	1.80	150.00	270.00
Melody A. Grafals	Miscellaneous	12.00	40.00	480.00
				169,846.50

TASK SUMMARY CURRENT INVOICE

FEE TASK SUMMARY

<u>Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B110	Case Administration	67.10	39,117.00
B120	Asset Analysis and Recovery	169.00	94,082.00
B130	Asset Disposition	12.30	5,920.00
B150	Meetings of and Communications with Creditors	26.40	7,515.00
B160	Fee / Employment Applications	0.00	0.00
B195	Non-Working Travel	12.00	2,450.00
B210	Business Operations	31.20	14,402.50
B220	Employee Benefits / Pensions	3.40	1,970.00
B240	Tax Issues	7.80	4,390.00

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<u>Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
TOTAL:		329.20	169,846.50

Reimbursable costs through June 22, 2018:

<u>Date</u>	<u>Description</u>	<u>Amount</u>
5/24/18	VENDOR: Nicholas B. Melzer INVOICE#: 2536202106120908 DATE: 6/4/2018 Nicholas B Melzer; Miscellaneous; SEC takeover in Sherman Oaks - cost to secure premises by lock change; 05/24/2018	99.00
5/24/18	VENDOR: Nicholas B. Melzer INVOICE#: 2536202106120908 DATE: 6/4/2018 Nicholas B Melzer; Hotel - Meeting Room; SEC takeover in Sherman Oaks; 05/24/2018	370.38
5/24/18	VENDOR: Allison D. Rhodes INVOICE#: 2596805407120903 DATE: 6/29/2018 Allison D Rhodes; Miscellaneous; Rekey office building after seizer; 05/24/2018	117.50
5/30/18	VENDOR: Shawn S. Amuial INVOICE#: 2538677206080905 DATE: 6/5/2018 Shawn S Amuial; Taxi; Uber ride to Ft. Lauderdale Airport; 05/30/2018	77.04
5/30/18	VENDOR: Thompson, Trisha M. INVOICE#: 2553140206180909 DATE: 6/12/2018 Trisha M Thompson; Lunch; Lunch on road to Springfield; 05/30/2018	19.68
5/30/18	VENDOR: Thompson, Trisha M. INVOICE#: 2553140206180909 DATE: 6/12/2018 Trisha M Thompson; Car Rental; Car rental for trip Springfield for client matter; 05/30/2018	80.80
5/30/18	VENDOR: Thompson, Trisha M. INVOICE#: 2553140206180909 DATE: 6/12/2018 Trisha M Thompson; Fuel; Gas for car rental for trip Springfield for client matter; 05/30/2018	31.17
6/1/18	VENDOR: Clerk of the Court; INVOICE#: SFO4414; DATE: 6/1/2018 - Notice of receivership	47.00

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<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/1/18	Lexis-ONLINE TIME-2018-06-01	373.29
6/1/18	VENDOR: Shawn S. Amuial INVOICE#: 2538677206080905 DATE: 6/5/2018 Shawn S Amuial; Taxi; Uber ride from Ft. Lauderdale Airport; 06/01/2018	46.15
6/1/18	VENDOR: Dayme B. Sanchez INVOICE#: 2542283706110901 DATE: 6/6/2018 Dayme B. Sanchez; Court Fees; Filing a receivership in court; 06/01/2018	16.00
6/1/18	VENDOR: Rae Linda McDaniel INVOICE#: 2547918106120908 DATE: 6/8/2018 Rae L McDaniel; Court Fees; USDC, Washington - Notice of Receivership Filing Fee; 06/01/2018	47.00
6/1/18	VENDOR: Shawn S. Amuial INVOICE#: 2538677206120908 DATE: 6/5/2018 Shawn S Amuial; Hotel - Lodging; Hotel stay at Beverly Wilshire Four Seasons Hotel, California re representation of Receiver in Receivership; 06/01/2018	687.70
6/1/18	VENDOR: Orlando Segura, Jr. INVOICE#: 2534500806120908 DATE: 6/4/2018 Orlando Segura; Court Fees; Filed Notice of Receivership in Western District - filing fees; 06/01/2018	47.00
6/1/18	VENDOR: Elvin Ramos INVOICE#: 2577061506250901 DATE: 6/21/2018 Elvin Ramos; Court Fees; Fee to file Misc Action #18-236 pursuant to 28 U.S.C. 754; 06/01/2018	47.00
6/1/18	VENDOR: Tampa Firmwide Petty Cash; INVOICE#: JUL1718POR; DATE: 7/17/2018 - District Court of Oregon	47.00
6/4/18	VENDOR: Clerk of the Court INVOICE#: 500-1405-3213 DATE: 6/4/2018 Notice of Filing Pursuant to 28 U.S.C. # 754	47.00
6/4/18	Federal Express - Invoice # 6-207-13024 - David S. Brown - 06/04/18	27.31

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<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/4/18	Federal Express - Invoice # 6-207-13024 - Michael A. Stollaire - 06/04/18	31.79
6/4/18	VENDOR: Tampa Firmwide Petty Cash; INVOICE#: JUN2618NYC; DATE: 6/26/2018 - Filing fee for miscellaneous & Action at the USDC Eastern District of New York	47.00
6/7/18	VENDOR: Hyland Business Park, LLC INVOICE#: 205515 DATE: 6/7/2018 Balance of rent due re Titanium Blockchain Infrastructure Services, Inc.	975.00
6/7/18	UPS-Tracking number:1Z97057X0197547176-Date:2018-06-07-Receiver Name:Tiffani Noah-Receiver Company Name:John Hyland Construction, Inc.-Service Description:Next Day Air Commercial	8.98
6/8/18	VENDOR: Hyland Business Park, LLC INVOICE#: 205549 DATE: 6/8/2018 Balance of rent due for Titanium Blockchain Infrastructure Services, Inc. as check 5011 was declined by the bank due to the account being frozen/blocked	2,025.00
6/8/18	UPS-Tracking number:1Z97057X0199549983-Date:2018-06-08-Receiver Name:Tiffani Noah-Receiver Company Name:John Hyland Construction, Inc.-Service Description:Next Day Air Commercial	8.98
6/9/18	VENDOR: Legal Support Network LLC INVOICE#: 99447 DATE: 6/9/2018 E-file CC Filing	55.50
6/20/18	Federal Express - Invoice # 6-230-26525 - Department of Justice - 06/20/18	21.36
6/22/18	Federal Express - Invoice # 6-230-26525 - Moss & Company - 06/22/18	17.30
	Photocopy	15.75
	Westlaw	285.58

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<u>Date</u>	<u>Description</u>		<u>Amount</u>
	TOTAL REIMBURSABLE COSTS:	\$	<u>5,720.26</u>
	FEEES FOR PROFESSIONAL SERVICES:	\$	169,846.50
	Less 15% Courtesy Fee Discount	\$	<u>-25,476.98</u>
	TOTAL PROFESSIONAL FEES:	\$	144,369.52
	REIMBURSABLE COSTS:	\$	5,720.26
	TOTAL DUE THIS INVOICE:	(U.S. Dollar)	<u>\$ 150,089.78</u>

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>
Filing Fees	\$400.50
Forensic Services ⁵	\$66,451.25
Online Research	\$658.87
Overnight Delivery	\$115.72
Photocopies	\$15.75
Rent paid on behalf of estate	\$3,000.00
Securing of premises	\$216.50
Travel (Long Distance)	\$1,312.92
TOTAL:	\$72,171.51

⁵ See attached invoice from Kroll Cyber Security, LLC.



July 16, 2018

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

Matter No. 0003343-0017
 Invoice No. 19803183
 Kroll Contact: Benedetto Demonte

PRIVILEGED & CONFIDENTIAL
Invoice

Through June 30, 2018

RE: Holland & Knight LLP

Fees for Hourly Professional Services Rendered

B. Demonte	1.25 hrs @ US\$ 600.00 per hr	750.00
D. Fletcher	12.00 hrs @ US\$ 215.00 per hr	2,580.00
D. Fletcher	13.50 hrs @ US\$ 430.00 per hr	5,805.00
J. Jasinski	10.00 hrs @ US\$ 430.00 per hr	4,300.00
D. Ackerman	9.00 hrs @ US\$ 550.00 per hr	4,950.00
J. Valentine	12.00 hrs @ US\$ 275.00 per hr	3,300.00
J. Valentine	14.50 hrs @ US\$ 550.00 per hr	7,975.00
I. Jensen	10.50 hrs @ US\$ 430.00 per hr	4,515.00
P. Clair	2.00 hrs @ US\$ 262.50 per hr	525.00
P. Clair	19.00 hrs @ US\$ 525.00 per hr	9,975.00
A. Moreno	13.75 hrs @ US\$ 240.00 per hr	3,300.00
A. Moreno	15.25 hrs @ US\$ 480.00 per hr	7,320.00
M. Flicek	0.50 hrs @ US\$ 430.00 per hr	215.00
J. Irizarry	4.25 hrs @ US\$ 375.00 per hr	1,593.75
C. Manaster	9.50 hrs @ US\$ 215.00 per hr	2,042.50
C. Manaster	18.50 hrs @ US\$ 430.00 per hr	7,955.00

10% Discounts (6,710.13)

Billed Hourly Professional Services Rendered US\$ 60,391.12

Other Professional Services Rendered

Media Preservation/Replication	4,400.00	
Media Preservation/Replication Discount	<u>(4,400.00)</u>	0.00

Out-of-Pocket Disbursements

Air Transportation	3,248.44
Ground Transportation	644.72
Hotel Charges	1,410.65
Meals	202.13
Mileage Reimbursement	63.26

2 Emerson Lane, Suite 200 Secaucus, NJ 07094
 T 952.852.7118
 www.kroll.com

State licensing information can be found at www.kroll.com/licensing.

Postage & Courier	126.11	
Office Supplies	364.82	
	<hr/>	6,060.13
Total Due:	US\$	<u><u>66,451.25</u></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
05/22/18	DA	Internal team coordination; calls with counsel; Resource management for onsite preparation	1.00	550.00	550.00
05/23/18	BD	Internal and external calls with counsel	0.75	600.00	450.00
05/23/18	ASM	Travel Time - 50% Rate Reduction for Consulting Work. From Downey to LAX to Eugene, OR, to Springfield.	8.50	240.00	2,040.00
05/23/18	CJM	Travel - Travel from Los Angeles, CA to Springfield, OR.	4.50	215.00	967.50
05/23/18	DA	Internal team coordination; Calls with counsel; Resource management for onsite preparation	3.00	550.00	1,650.00
05/23/18	DRF	Travel from Dallas to Los Angeles Travel Time - 50% Rate Reduction for Consulting Work	6.00	215.00	1,290.00
05/23/18	IJ	Secure Laptop Setup, Configuration and Wallet Generation	4.00	430.00	1,720.00
05/23/18	JAV	Travel Time - 50% Rate Reduction for Consulting Work	6.00	275.00	1,650.00
05/23/18	MRF	Call with internal team	0.50	430.00	215.00
05/23/18	PC	Call/Meeting with Project Kickoff	1.00	525.00	525.00
05/24/18	BD	Coordination call with counsel	0.50	600.00	300.00
05/24/18	ASM	General analysis and reporting - Onsite Acquisition and Documentation	15.00	480.00	7,200.00
05/24/18	CJM	General analysis and reporting - Onsite device collection and data triage.	15.00	430.00	6,450.00
05/24/18	DA	Team coordination, updates, Office 365 and GSuite data acquisition	3.00	550.00	1,650.00
05/24/18	DRF	Onsite in Sherman Oaks, CA.	13.50	430.00	5,805.00
05/24/18	IJ	Preparation call	0.50	430.00	215.00
05/24/18	IJ	Cryptocurrency transfer preparation and configuration	6.00	430.00	2,580.00
05/24/18	JAJ	General analysis and reporting - Inbox Preservation	2.00	430.00	860.00

Date	Init.	Description	Hours	Unit Price	Amount
05/24/18	JAJ	General analysis and reporting - Inbox Preservation	3.50	430.00	1,505.00
05/24/18	JAV	On-site acquisitions and documentation.	13.50	550.00	7,425.00
05/24/18	PC	General analysis and reporting - Onsite Forensic Imaging	10.50	525.00	5,512.50
05/24/18	PC	Travel Time - 50% Rate Reduction for Consulting Work - Travel to Sherman Oaks TBIS Office	1.00	262.50	262.50
05/24/18	PC	Travel Time - 50% Rate Reduction for Consulting Work - Travel from Sherman Oaks TBIS Office	1.00	262.50	262.50
05/24/18	PC	General analysis and reporting - Equipment/Evidence Handling	1.00	525.00	525.00
05/25/18	ASM	Travel Time - 50% Rate Reduction for Consulting Work From Springfield to Eugene, OR to LAX to Downey, CA	5.25	240.00	1,260.00
05/25/18	CJM	Travel Time - 50% Rate Reduction for Consulting Work - Travel from Springfield, OR to Los Angeles, CA.	5.00	215.00	1,075.00
05/25/18	CJM	General analysis and reporting - On-site documentation and data preparation for lab shipment.	3.00	430.00	1,290.00
05/25/18	JAV	Travel home after on-site.	6.00	275.00	1,650.00
05/25/18	PC	Call/Meeting with Internal Team Communication	1.00	525.00	525.00
05/25/18	PC	General analysis and reporting - Evidence Preparation for Shipment	1.00	525.00	525.00
05/25/18	PC	Call/Meeting with Internal Call with Team	1.00	525.00	525.00
05/29/18	ASM	General analysis and reporting - reviewed inventory report and forwarded to EM.	0.25	480.00	120.00
05/29/18	CJM	General analysis and reporting - Prepare and ship evidence to lab.	0.50	430.00	215.00
05/29/18	DA	Email preservation and internal team/evidence management	1.00	550.00	550.00
05/29/18	DRF	Travel home from onsite	6.00	215.00	1,290.00
05/29/18	JAJ	General analysis and reporting - Google Environment Collection	3.00	430.00	1,290.00

Date	Init.	Description	Hours	Unit Price	Amount
05/29/18	Jl	General analysis and reporting -- Received and checked-in evidence.	0.25	375.00	93.75
05/29/18	PC	General analysis and reporting Evidence Combination & Prep for Shipment	2.00	525.00	1,050.00
05/29/18	PC	General analysis and reporting - Evidence Shipping	1.00	525.00	525.00
05/30/18	JAJ	General analysis and reporting - Data acquisition and review	1.50	430.00	645.00
05/30/18	JAV	Client/counsel call in the morning, and then evidence tracking sent to counsel.	1.00	550.00	550.00
05/30/18	Jl	General analysis and reporting - received, checked-in, imaged, and replicated images to forensic network.	3.00	375.00	1,125.00
05/30/18	PC	Call/Meeting with Internal Team Communication	0.50	525.00	262.50
05/31/18	DA	Internal team discussions and evidence coordination	1.00	550.00	550.00
05/31/18	Jl	General analysis and reporting - Received, checked-in, imaged, and replicated images to forensic network.	1.00	375.00	375.00
Total:			165.50		67,101.25

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age
3 of 18 and not a party to the within action. My business address is 400 South Hope St., 8th
4 Floor, Los Angeles, California 90071.

5 On March 1, 2019, I served the document described as **FIRST INTERIM FEE**
6 **APPLICATION OF HOLLAND & KNIGHT LLP, AS COUNSEL TO RECEIVER,**
7 **FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF**
8 **EXPENSES; CERTIFICATION OF COUNSEL IN SUPPORT THEREOF;**
9 **[PROPOSED] ORDER** on the interested parties in this action as follows:

10
11 **[X] (BY Electronic Transfer to the CM/ECF System)** In accordance
12 with Federal Rules of Civil Procedure 5(d)(3) and Local Rule 5-4, I
13 uploaded via electronic transfer a true and correct copy scanned into an
14 electronic file in Adobe “pdf” format of the above-listed document(s)
15 to the U.S. District Court Central District of California’s Electronic
Case Filing (CM/ECF) system on this date.

16 I declare under penalty of perjury under the laws of the United States of America that
17 the above is true and correct.

18
19 Executed on March 1, 2019, Los Angeles, California.

20 /s/
21 Kristina S. Azlin (SBN 235238)