

1 HOLLAND & KNIGHT LLP
Vince Farhat (SBN 183794)
2 vince.farhat@hklaw.com
Kristina S. Azlin (SBN 235238)
3 kristina.azlin@hklaw.com
400 South Hope Street, 8th Floor
4 Los Angeles, California 90071
Telephone 213.896.2400
5 Facsimile 213.896.2450

6 Jose A. Casal (*pro hac vice*)
jose.casal@hklaw.com
7 Mitchell E. Herr (*pro hac vice*)
8 mitchell.herr@hklaw.com
701 Brickell Avenue, Suite 3300
9 Miami, Florida 33131
Telephone 305.789.7736

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

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

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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)

REPLY IN SUPPORT OF

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

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

Date: Mon., April 1, 2019
Time: 1:30 pm
Ctrm: 7D
Judge: Hon. Dale S. Fischer

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

4 On March 1, 2019, Holland & Knight LLP (“Counsel” or “H&K”), counsel to Josias
5 Dewey, the Court-appointed Receiver (the “Receiver”) for the estates of Defendant
6 Titanium Blockchain Infrastructure Services, Inc. and its subsidiaries and/or affiliates
7 (collectively, the “Receivership Entities”), applied to this Court for an order approving
8 and authorizing payment of attorneys’ fees and expenses to H&K for the period of May
9 23, 2018 through June 22, 2018, pursuant to the fee cap applicable to the first thirty (30)
10 days of the receivership (the “Application”). See Docket No. 76.

11 Since then, no Party has filed any papers in opposition to the Application, nor
12 otherwise given any indication of an intent to oppose the requested fees and expenses.
13 Accordingly, H&K respectfully requests that this Court enter the submitted [*Proposed*]
14 Order:

- 15 (i) Allowing, on an interim basis, fees in the amount of \$52,828.49 and
16 reimbursement of expenses in the amount of \$72,171.51,¹ for total
17 compensation of \$125,000 pursuant to the Fee Cap;
18 (ii) Authorizing and directing the Receiver to make payment to H&K in the
19 amount of \$125,000; and
20 (iii) Directing such other and further relief as the Court deems appropriate.

21
22 Dated: March 18, 2019

Respectfully submitted,

23 /s/ Jose Casal

24 Jose Casal (*pro hac vice*)

25 Kristina S. Azlin (SBN 235238)

26 Holland & Knight LLP

27 Counsel for Josias N. Dewey, Court-appointed
28 permanent receiver for Defendant Titanium

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

Blockchain Infrastructure Services, Inc.

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

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PROOF OF SERVICE

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

On March 18, 2019, I served the document described as **REPLY IN SUPPORT OF FIRST INTERIM FEE APPLICATION OF HOLLAND & KNIGHT LLP, AS COUNSEL TO RECEIVER, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES** on the interested parties in this action as follows:

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

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

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

/s/
Kristina S. Azlin (SBN 235238)