

<p>DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202 303.606.2433</p>	<p>DATE FILED: November 11, 2021 10:57 AM STAMP ID: 51BB23612030F CASE NUMBER: 2018CV33011</p>
<p>Plaintiff: Tung Chan, Securities Commissioner for the State of Colorado</p> <p>v.</p> <p>Defendants: Gary Dragul; GDA Real Estate Services, LLC; and GDA Real Estate Management, LLC</p>	<p>▲ COURT USE ONLY ▲</p>
<p>Attorneys for Receiver: Patrick D. Vellone, #15284 Michael T. Gilbert, #15009 Rachel A. Sternlieb, #51404 ALLEN VELLONE WOLF HELFRICH & FACTOR P.C. 1600 Stout St., Suite 1900 Denver, Colorado 80202 (303) 534-4499 pvellone@allen-vellone.com mgilbert@allen-vellone.com rsternlieb@allen-vellone.com</p>	<p>Case Number: 2018CV33011</p> <p>Division/Courtroom: 424</p>
<p>SIXTH APPLICATION FOR PROFESSIONAL FEES AND EXPENSES</p>	

Harvey Sender, the duly-appointed receiver (“Receiver”) for the assets of Gary Dragul (“Dragul”), GDA Real Estate Services, LLC, GDA Real Estate Management, LLC, and related entities (collectively, “Dragul and the GDA Entities”), submits this Sixth Application for Professional Fees and Expenses (the “Application”), which covers the period from March 1, 2021, through October 31, 2021.

1. On August 15, 2018, Gerald Rome, Securities Commissioner for the State of Colorado (the “Commissioner”), filed his Complaint for Injunctive and Other Relief against Dragul and the GDA Entities.

2. On August 30, 2018, the Court entered its Order Appointing Receiver (“Receivership Order”), which appointed Harvey Sender Receiver for Dragul and the GDA Entities and related businesses.

3. The Receivership Order gives the Receiver the authority to “hire and pay general counsel, accounting, and other professionals as may be reasonably necessary to the proper discharge of the Receiver’s duties, and to hire, pay and discharge the personnel necessary to fulfill the obligations of the Receiver hereunder, including the retention of . . . other third parties to assist the Receiver in the performance of its duties hereunder, all within the Receiver’s discretion[.]” Receivership Order at 9, ¶ 13(l). The Receivership Order further authorizes the Receiver to retain counsel on a contingent fee basis after consultation with the Commissioner. *Id.* at 10, ¶ 13(o).

4. The Receiver hired Allen Vellone Wolf Helfrich & Factor P.C. (“Allen & Vellone”) as counsel in this and all related matters to provide legal services on an hourly fee-for-services basis, and notice thereof was provided on September 7, 2018. Effective November 1, 2019, the Receiver and Allen & Vellone agreed to modify its existing fee agreement so that Allen & Vellone would thereafter be compensated on a contingent fee basis for work performed in the Insider Case, the Family Case, and ancillary litigation, on the following terms: 25% of any recovery obtained before September 5, 2020; 38% of amounts recovered after September 5, 2020, through the filing of any appeal; and 45% of amounts recovered after any appeal; the Receivership Estate to pay the expenses incurred in litigation matters subject to the contingent fee agreement. The Commissioner approved the agreement, notice of which was provided to the Court and all parties-in-interest on May 11, 2020.

5. This Application covers the period from February 28, 2021, through October 31, 2021, and requests the following fees and expenses, which are specifically set forth in **Exhibits 1-4**:

PROFESSIONAL FEES AND EXPENSES INCURRED			
MARCH 1, 2021 – OCTOBER 31, 2021			
EX.	PROVIDER	DESCRIPTION	AMT. SOUGHT
1	Harvey Sender	Receiver	\$12,840.00 ¹
	Allen & Vellone	Counsel for the Receiver	
2		Hourly Fees - Main Receivership Case	\$31,166.05 ²
3		Costs	\$7,373.02 ³
		Total	\$38,539.07
4	RubinBrown LLP		\$14,258.50 ⁴
Total			\$65,637.57

6. Effective February 28, 2021, the Estate had paid the following professional fees and expenses as detailed in the Receiver’s first five fee applications: **First Application:** submitted December 6, 2018 (for the period August 30, 2018, through November 30, 2018); **Second Application:** submitted April 19, 2019 (for the period December 1, 2018, through March 31, 2019); **Third Application:** submitted November 14, 2019 (for the period April 1, 2019, through October 31, 2019); **Fourth Application,** submitted May 11, 2019 (for the period November 1, 2019, through March 31, 2020); and **Fifth Application:** submitted March 9, 2021 (for the period April 1, 2020, through February 28, 2021):

¹ The Receiver has not billed for paralegal time spent on this case, effectively discounting fees by up to 25%.

² This reflects an 18% discount of Allen & Vellone’s hourly time cost of \$38,184.50 during the application period and does not include any time worked on contingency fee matters.

³ This includes costs of \$977.37 incurred in the main Receivership Case and costs of \$6,395.65 in the Insider Case, which includes \$5,000 paid to the mediator for the unsuccessful Kahn mediation.

⁴ RubinBrown billed fees during the current application period were \$16,305.80; this application reflects a 13% discount. In addition, as a matter of practice, RubinBrown does not bill for significant time spent addressing administrative and operational matters or supervising junior staff.

PROFESSIONAL FEES AND EXPENSES PAID AUGUST 30, 2018 – FEBRUARY 28, 2021		
Provider	Description	Amount Paid
Harvey Sender	Receiver	\$522,208.36
Allen Vellone Wolf Helfrich & Factor P.C.	Counsel for the Receiver	\$1,773,519.47
RubinBrown LLP	Accountants (forensic accounting, expert witness, and tax preparation)	\$876,040.36
Waldrep LLP	North Carolina local counsel for the Receiver	\$10,611.85
Frost Brown Todd, LLC	Ohio local counsel for the Receiver	\$71,190.56
Revesco Property Services	Property manager (commercial and residential)	\$325,355.32
Kelly Reinhart	Accountant (former GDA accountant; tax preparation)	\$41,200.00
Total Professional Fees and Expenses		\$3,620,125.92

7. Pursuant to paragraph 10 of the Receivership Order, Court approval of any motion filed by the Receiver shall be given as a matter of course unless a party objects within ten days after service. This Application and its Exhibits are available at www.dragulreceivership.com.

Dated: November 11, 2021.

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.



By: /s/ Michael T. Gilbert

Patrick D. Vellone
Michael T. Gilbert
Rachel A. Sternlieb
1600 Stout Street, Suite 1900
Denver, Colorado 80202
Tel: (303) 534-4499
pvellone@allen-vellone.com
mgilbert@allen-vellone.com
rsternlieb@allen-vellone.com

ATTORNEYS FOR THE RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2021, a true and correct copy of the foregoing **Sixth Application for Professional Fees and Expenses** was filed and served via the Colorado Courts E-Filing system on all counsel of record and to the following:

Robert W. Finke
Janna K. Fischer
Ralph L. Carr Judicial Building
1300 Broadway, 8th Floor
Denver, Colorado 80203
Robert.Finke@coag.gov
Janna.Fischer@coag.gov

Paul L. Vorndran
Christopher S. Mills
JONES & KELLER, P.C.
1999 Broadway, Suite 3150
Denver, CO 80202
pvorndran@joneskeller.com
cmills@joneskeller.com

***Tung Chan, Securities Commissioner
for the State of Colorado***

Counsel for Defendant Gary Dragul

Bart H. Williams
(admitted *pro hac vice*)
Jennifer L. Roche
(admitted *pro hac vice*)
Shawn S. Ledingham Jr.,
(admitted *pro hac vice*)
Proskauer Rose LLP
2029 Century Park East, 24th Floor
Los Angeles, California 90067
bwilliams@proskauer.com
jroche@proskauer.com
sledingham@proskauer.com

and

Michael C. Van (admitted *pro hac vice*)
Shumway Van
8985 S. Eastern Ave. Ste. 100
Las Vegas, NV 89123
Michael@shumwayvan.com

Counsel for Defendants, Gary Dragul

***Counsel for Brownstein Hyatt
Farber Schreck, LLP***

CERTIFICATION OF E-SERVICE ON KNOWN CREDITORS

In accordance with this Court's February 1, 2019 Order clarifying notice procedures for this case, I also certify that a copy of the foregoing is being served by electronic mail on all currently known creditors of the Receivership Estate to the addresses set forth on the service list maintained in the Receiver's records.

By: /s/ Terri M. Novoa 
Allen Vellone Wolf Helfrich & Factor, P.C.

Trustee: HARVEY SENDER, RECEIVER

Time Worksheet

Entries From 03/01/21 To 10/31/21

Case Number: 2018CV33011
Case Status: OPEN
Petition Date: 08/15/18

Case Name: GARY DRAGUL; GDA REAL ESTATE
Judge: SERVICES, LLC
Original 341a Meeting: BLANK - NO JUDGE

DATE FILED: November 11, 2021 10:57 AM
 FILING ID: 518B23612030F
 CASE NUMBER: 2018CV33011

Date	Description	Hours/UB	Rate	Total
Matter Code: Receiver Time				
03/09/21	Review draft of report and fee application. Review and respond to emails regarding Brownstein issues.	1.00	400.00	400.00
03/11/21	Review Shelly Dragul schedules. Email comments to counsel.	1.00	400.00	400.00
03/17/21	Review and respond to emails regarding SSC02 tax issues. Telephone conference with Rachel regarding Conerstar. Review emails regarding above.	0.50	400.00	200.00
03/22/21	Review Order regarding interlocutory appeal. Review Hurst motion for stay. Review Cornerstar complaints. Emails comments and questions regarding all of the above.	1.50	400.00	600.00
03/23/21	Emails and attachments regarding Shelly Dragul 341 meeting	0.50	400.00	200.00
03/24/21	Conference call with counsel regarding case litigation issues.	0.50	400.00	200.00
03/25/21	Review and respond to emails regarding Shelly Dragul bankruptcy.	0.30	400.00	120.00
03/29/21	Review new Fox complaint. Email position to Rachel.	0.50	400.00	200.00
03/31/21	Prepare for and attend Shelly's 341 meeting. Telephone conference with Rachel regarding above.	1.70	400.00	680.00
04/15/21	Review various pleadings filed by Hurst and Dragul. Review and respond to emails regarding criminal trial.	1.00	400.00	400.00
04/16/21	Review subpoenas from Dragul. Email comments to counsel.	0.50	400.00	200.00
04/19/21	Telephone conference with Michael and Rachel regarding subpoena.	0.50	400.00	200.00
05/04/21	Review response of appeal motion. Email comments.	1.00	400.00	400.00
05/12/21	Review mediation and related documents. Emails to counsel regarding comments.	0.50	400.00	200.00
05/17/21	Review reply appellate brief. Email comments.	0.50	400.00	200.00
05/18/21	Conference call with counsel regarding Kahn issues.	0.50	400.00	200.00
06/03/21	Review order from Division of Labor. Review and respond to emails regarding appeal issues.	0.50	400.00	200.00
06/15/21	Review response to motion to reconsider. Email comments.	0.50	400.00	200.00
06/23/21	Review and consider various replies filed by Dragul.	1.00	400.00	400.00
06/25/21	Review and consider Cornerstar complaint regarding Dragul. Telephone conference with Michael regarding above.	0.50	400.00	200.00
07/02/21	Review pleadings from Clearwater case.	0.50	400.00	200.00
07/27/21	Review and respond to email regarding mediation, Rule 69 and response.	0.80	400.00	320.00
08/20/21	Review and respond to emails regarding Kansas City issues and regarding settlement offer from Dragul.	0.40	400.00	160.00
08/25/21	Review and respond to email regarding mediation. Review and respond to emails regarding settlement offer from Markush .6; Review emails regarding Fox activity. Email comments .4	1.00	400.00	400.00

Ex. 1 to Receiver's Sixth Fee Application

08/28/21	Review and respond to emails regarding Marchush and regarding Dragul.	0.40	400.00	160.00
08/30/21	Telephone conference with Michael Gilbert regarding various settlement offers .4; Telephone conference with realtor regarding Knoxville property .2	0.60	400.00	240.00
08/31/21	Review and respond to emails regarding Dragul offer. Review and respond to emails regarding Fairway credit.	0.60	400.00	240.00
09/14/21	Review materials for mediation with Kahn. Attend mediation.	9.50	400.00	3,800.00
09/15/21	Telephone conference with Rachel and Pat regarding mediation results. Review and execute four tax returns for Dragul entities.	1.00	400.00	400.00
09/22/21	Review and respond to emails regarding Kahn settlement offer.	0.30	400.00	120.00
10/19/21	Initial review of expert report.	1.00	400.00	400.00
10/22/21	Review emails regarding Kahn response. Email comments to counsel.	0.50	400.00	200.00
10/26/21	Review and respond to telephone conferences and emails from investor and regarding Yale and Monaco. Review and respond to emails regarding next report .6	0.60	400.00	240.00
10/28/21	Review and respond to emails from creditor regarding case status and site issues.	0.40	400.00	160.00
	Totals for Receiver Time		<u>32.10</u>	<u>12,840.00</u>
	Report Totals	32.10		12,840.00

Client	Trans Date	Tkpr	Rate	Hours Worked	Hours Billed	Amount	
Client ID 19461.103	SENDER/HARVEY						
19461.103	06/11/2021	KDA	385.00	1.25	1.25	481.25	Review claim; materials re: Sterner wage claim issues; telephone conference with Attorney J. Schlatter discussing approaches, possible, likely outcomes.
19461.103	06/21/2021	KDA	385.00	0.20	0.20	77.00	Telephone conference with Attorney J. Schlatter re: approaches process from other UI independent contractor audit (Sterner Wage Complaint).
19461.103	06/23/2021	KDA	385.00	0.25	0.25	96.25	Communication with Attorney J. Schlatter re: approaches to appeal, all agreements to make (Sterner Wage Complaint).
19461.103	06/26/2021	KDA	385.00	1.50	1.50	577.50	Review, revise, edit Appeal; review status re: Statement for Appeal; memorandum to Attorney J. Schlatter re: same.
19461.103	06/28/2021	KDA	385.00	0.50	0.50	192.50	Various communications with Attorney J. Schlatter re: necessity of appeal, real party in interest, attacking order (Sterner Wage Complaint).
19461.103	06/29/2021	KDA	385.00	0.35	0.35	134.75	Review changes of Attorney R. Sternlieb; comment on appeal necessity, other issues (Sterner Wage Complaint).
19461.103	06/30/2021	KDA	385.00	1.00	1.00	385.00	Review, revise, edit appeal (Sterner Wage Complaint).
19461.103	07/01/2021	KDA	385.00	0.20	0.20	77.00	Review comments re: final changes for filing (Sterner Wage Complaint).
19461.103	07/14/2021	KDA	385.00	0.35	0.35	134.75	Review state rescission of prior order, trade secret notification letter (Sterner Wage Complaint).
Subtotal for Timekeeper KDA		Billable		5.60	5.60	2,156.00	KEVIN D. ALLEN
19461.103	06/07/2021	PDV	550.00	0.50	0.50	275.00	Review and revise post judgment collection writs.
Subtotal for Timekeeper PDV		Billable		0.50	0.50	275.00	PATRICK D. VELLONE
19461.103	06/01/2021	JES	295.00	1.70	1.70	501.50	[Sterner Wage] Review DOL Notice of Determination; conference with Attorney R. Sternlieb re: same.
19461.103	06/02/2021	JES	295.00	0.10	0.10	29.50	[Sterner Wage] Review Attorney R. Sternlieb email to Attorney M. Gilbert re: Determination of Wage Complaint.
19461.103	06/03/2021	JES	295.00	0.20	0.20	59.00	[Sterner Wage] Review email from Sender re: Wage Complaint; email exchange with Attorney R. Sternlieb re: same.
19461.103	06/08/2021	JES	295.00	3.60	3.60	1,062.00	[Sterner Wage] Research re: appeals in DOL; research re: real party in interest and receiverships.
19461.103	06/10/2021	JES	295.00	4.20	4.20	1,239.00	[Sterner Wage] Continue research re: real party in interest; review/analyze cases cited in Determination and shepardize same.
19461.103	06/11/2021	JES	295.00	4.60	4.60	1,357.00	[Sterner Wage] Conference with Attorney K. Allen re: complaint and appeal; follow-up research re: additional grounds for appeal per discussion with Attorney K. Allen.
19461.103	06/23/2021	JES	295.00	1.30	1.30	383.50	[Sterner Wage] Conference with Attorney K. Allen re: strategy for appeal; draft outline for same.
19461.103	06/24/2021	JES	295.00	2.90	2.90	855.50	[Sterner Wage] Begin drafting appeal; review Softrack standards for argment.
19461.103	06/25/2021	JES	295.00	4.40	4.40	1,298.00	[Sterner Wage] Continue drafting appeal
19461.103	06/28/2021	JES	295.00	1.80	1.80	531.00	[Sterner Wage] Review Attorney K. Allen revisions; revise/edit .appeal; email exchanges and conferences with Attorney K. Allen re: issues re: appeal; conference with Attorney R. Sternlieb re: same; contact Attorney M. Gilbert; email to Attorney R. Sternlieb and Attorney M. Gilbert.
19461.103	06/29/2021	JES	295.00	4.30	4.30	1,268.50	[Sterner Wage] Review Attorney R. Sternlieb revisions to appeal; conference with Attorney M. Gilbert and Attorney R. Sternlieb re: same; email exchanges with Attorney K. Allen; further revisions to appeal based on discussions; email Attorney R. Sternlieb.
19461.103	06/30/2021	JES	295.00	2.00	2.00	590.00	[Sterner Wage] Email exchanges with Attorney R. Sternlieb re: revisions to appeal; review Attorney R. Sternlieb email and revisions; prepare exhibits to appeal; prepare form for appeal; review Attorney M. Gilbert revisions; review final versions.
19461.103	07/14/2021	JES	295.00	0.50	0.50	147.50	[Sterner Wage Complaint] Review Order on Appeal; email exchange with Attorney K. Allen, Attorney R. Sternlieb and Attorney M. Gilbert re: same.

Client	Trans Date	Tkpr	Rate	Hours Worked	Hours Billed	Amount	
Subtotal for Timekeeper JES			Billable	31.60	31.60	9,322.00	JENNIFER E. SCHLATTER
19461.103	03/08/2021	MTG	450.00	2.50	2.50	1,125.00	Review and revise 5th Fee Application and 5th Receiver Report.
19461.103	03/09/2021	MTG	450.00	1.00	1.00	450.00	Review, revise, and finalize 5th Fee application and 5th Receiver Report for filing.
19461.103	03/11/2021	MTG	450.00	0.20	0.20	90.00	Confer with Ms. Drew re: investor inquiry re: taxes; respond to investor inquiry re: same; review SSC 02 issue.
19461.103	04/19/2021	MTG	450.00	1.10	1.10	495.00	Review subpoenas served on Commissioner/AG, RubinBrown, and Mr. Sender; communicate with AG Office re: responses; emails internally re: same.
19461.103	06/25/2021	MTG	450.00	0.80	0.80	360.00	Review and edit Rule 69 papers and motion for order re Greenlight One.
19461.103	06/29/2021	MTG	450.00	2.30	2.30	1,035.00	Review and revised draft appeal of Sterner Wage Claim; confer with Attorney J. Schlatter and Attorney R. Sternlieb re: same.
19461.103	06/30/2021	MTG	450.00	1.40	1.40	630.00	Review and revise Sterner appeal statement.
19461.103	09/03/2021	MTG	450.00	0.80	0.80	360.00	Review and revise proposed Dragul settlement agreement.
Subtotal for Timekeeper MTG			Billable	10.10	10.10	4,545.00	MICHAEL T. GILBERT
19461.103	03/09/2021	SK	180.00	1.00	1.00	180.00	Review and finalize 5th Fee Application with exhibits and 5th Report with exhibits; file same.
19461.103	03/10/2021	SK	180.00	0.50	0.50	90.00	Download and save filed copy of Receiver's 5th application for fees and 5th report; email out to creditor matrix; send document(s) to client and internal parties, scan/save/add to index, and review docket/calendar appropriately.
19461.103	03/26/2021	SK	180.00	0.30	0.30	54.00	Review file and emails re: matrix per Attorney R. Sternlieb request.
19461.103	07/20/2021	SK	180.00	0.10	0.10	18.00	Prepare request for service of Writ of Garnishment.
19461.103	07/23/2021	SK	180.00	0.20	0.20	36.00	Review Affidavit of Service for writ of garnishment and file.
Subtotal for Timekeeper SK			Billable	2.10	2.10	378.00	SALOWA KHAN
19461.103	08/25/2021	CAC	180.00	0.20	0.20	36.00	Download and save Affidavit of Service from Greenlight subpoena; serve and circulate.
Subtotal for Timekeeper CAC			Billable	0.20	0.20	36.00	CHRISTINA A. CLERIHUE
19461.103	07/01/2021	SBC	180.00	0.50	0.50	90.00	Deliver wage claim appeal to Colorado Division of Labor; send same via email; mail same to Greg Sterner.
Subtotal for Timekeeper SBC			Billable	0.50	0.50	90.00	SAVANNA B. CHAVEZ
19461.103	03/09/2021	RAS	295.00	1.50	1.50	442.50	Emails to/from Attorney P. Vellone, Attorney M. Gilbert and Mr. Sender re: open items re: Brownstein Order; review draft of Fifth Fee Application and Receiver's Fifth Report; emails to/from Legal Assistant T. Novoa re: updating Certificate of Service; telephone conference with Attorney M. Gilbert re: same.
19461.103	04/16/2021	RAS	295.00	1.80	1.80	531.00	Conference with Attorney M. Gilbert re: Dragul's Subpoena to the Receiver; review emails in outlook and on eclipse for responsive documents; emails to/from Paralegal C. Clerihue re: email search on hard drive.
19461.103	04/19/2021	RAS	295.00	1.20	1.20	354.00	Review Subpoena from Dragul to Receiver; Zoom conference with Mr. Sender and Attorney M. Gilbert re: same and strategy; emails to/from Attorney Generals re subpoenas to Receiver and RubinBrown; review subpoena served on Division of Securities and conference with Attorney M. Gilbert re: same.
19461.103	04/23/2021	RAS	295.00	0.80	0.80	236.00	Review Motion to Quash filed by Attorney General in Dragul criminal case; conf Attorney M. Gilbert re: same; email to Mr. Vorndran re: Receiver's response to subpoena in light of Motion to Quash.
19461.103	06/01/2021	RAS	295.00	0.80	0.80	236.00	Conference with Attorney J. Schlatter re: Sterner Wage Complaint determination and disputed issues/appeal and strategy.

Client	Trans Date	Tkpr	Rate	Hours Worked	Hours Billed	Amount	
19461.103	06/03/2021	RAS	295.00	0.50	0.50	147.50	Emails to/from Mr. Sender and Attorney J. Schlatter re: Department of Revenue's determination re: Sterner wage complaint.
19461.103	06/07/2021	RAS	295.00	1.20	1.20	354.00	Telephone conference with Attorney B. Gragg re: Writs to GreenlightOne and background re: Shelly's 341 testimony; emails to/from Attorney B. Gragg and Attorney P. Vellone re: same and providing documents and information for same; telephone conference with Attorney M. Gilbert re: same.
19461.103	06/09/2021	RAS	295.00	0.60	0.60	177.00	Review and edit Attorney B. Gragg's draft to Writ of Garnishment to Greenlight One; email same with comments.
19461.103	06/11/2021	RAS	295.00	1.20	1.20	354.00	Emails to/from Attorney B. Gragg re: Rule 69 discovery to Dragul and Greenlight One; emails to/from Attorney M. Gilbert re: same; telephone conference with Attorney J. Schlatter re: response and appeal re: Department of Labor's findings re: Sterner Complaint.
19461.103	06/14/2021	RAS	295.00	0.60	0.60	177.00	Review and redline draft Rule 69 Discovery to Greenlight One.
19461.103	06/24/2021	RAS	295.00	1.70	1.70	501.50	Review, edit and redline Motion for Issuance of Rule 69 Discovery to GreenLight One, Proposed Order, Subpoena and Writ of Garnishment; email same to Attorney B. Gragg and Attorney M. Gilbert for review and comment.
19461.103	06/25/2021	RAS	295.00	1.00	1.00	295.00	Emails to/from Attorney M. Gilbert and Attorney B. Gragg re: Rule 69 Discovery and Motion re: same to Greenlight and Dragul; review Attorney M. Gilbert's edits to Motion.
19461.103	06/28/2021	RAS	295.00	4.20	4.20	1,239.00	Telephone conference with Attorney J. Schlatter re: appeal response to Department of Labor re: Sterner wage complaint; review, redline and comment on response and review file materials in connection with same; email same to Attorney J. Schlatter and Attorney M. Gilbert.
19461.103	06/29/2021	RAS	295.00	1.50	1.50	442.50	Accept all redlines and email clean version of Sterner appeal response to Attorney M. Gilbert; telephone conference with Attorney J. Schlatter and Attorney M. Gilbert re: Sterner wage claim appeal and strategy; emails to/from Attorney K. Allen and Attorney J. Schlatter re: same.
19461.103	06/30/2021	RAS	295.00	2.80	2.80	826.00	Review, redline and revise updated Sterner wage complaint appeal; email same to Attorney J. Schlatter and Attorney K. Allen; review and update Sterner Wage Claim appeal form and email same to Attorney J. Schlatter; review Attorney M. Gilbert's comments and redlines and address same; add additional exhibit; email final to Attorney K. Allen, Attorney J. Schlatter and Attorney M. Gilbert.
19461.103	07/01/2021	RAS	295.00	0.70	0.70	206.50	Telephone conference with Attorney J. Schlatter re: finalizing Sterner wage claim appeal; review final version; emails to/from Attorney M. Gilbert, Attorney J. Schlatter and Attorney K. Allen re: same.
19461.103	07/14/2021	RAS	295.00	1.20	1.20	354.00	Review Division of Labor's Standard's opinion re: Sterner wage complaint appeal; emails to/from Attorney M. Gilbert, Attorney J. Schlatter, Attorney K. Allen and Mr. Sender re: same; emails to/from Attorney B. Gragg re: Greenlight One and Dragul Rule 69/Garnishment pleadings to be filed.
19461.103	07/20/2021	RAS	295.00	0.50	0.50	147.50	Emails to/from Attorney B. Gragg and Attorney M. Gilbert re: Rule 69 discovery issued to Dragul and Greenlight One and scheduling.
19461.103	07/29/2021	RAS	295.00	0.40	0.40	118.00	Emails to/from Attorney B. Gragg and Attorney M. Gilbert re: Rule 69 Subpoena on Greenlight One and request from Markusch for Extension of Time.
19461.103	08/02/2021	RAS	295.00	4.20	4.20	1,239.00	Review, edit and redline Attorney B. Gragg's draft reply in support of Rule 69 Subpoena to Greenlight One and supporting affidavit; emails to/from Attorney B. Gragg and Attorney M. Gilbert re: same.
19461.103	08/04/2021	RAS	295.00	0.30	0.30	88.50	Telephone conference with Attorney B. Gragg re: Rule 69 Subpoenas and scheduling.
19461.103	08/05/2021	RAS	295.00	0.60	0.60	177.00	Review Court's Order re: Rule 69 Subpoena to GreenLight One; email same to Attorney M. Gilbert,

Client	Trans Date	Tkpr	Rate	Hours Worked	Hours Billed	Amount	
19461.103	08/10/2021	RAS	295.00	0.30	0.30	88.50	Attorney B. Gragg and Attorney P. Vellone and emails re: same.
19461.103	08/11/2021	RAS	295.00	0.60	0.60	177.00	Emails to/from Attorney M. Gilbert and Attorney B. Gragg re: scheduling Rule 69 Exams of Dragul and Greenlight One.
19461.103	08/12/2021	RAS	295.00	0.90	0.90	265.50	Review notices of deposition served in Clearwater Florida State Court Litigation and save to file; emails to/from Attorney M. Gilbert re: same; review Dragul's motion to stay filed in Clearwater matter
19461.103	08/18/2021	RAS	295.00	0.50	0.50	147.50	Emails to/from Attorney B. Gragg and Attorney M. Gilbert re: various issues and rule 69 exam; telephone conference with Attorney M. Gilbert and Ms. Drew re: taxes.
19461.103	08/19/2021	RAS	295.00	1.50	1.50	442.50	Emails to/from Attorney B. Gragg and Attorney M. Gilbert re: Greenlight One Rule 69 hearing and other matters.
19461.103	08/20/2021	RAS	295.00	1.20	1.20	354.00	Emails to/from Attorney B. Gragg and Attorney M. Gilbert re: scheduling call with Dragul's Counsel and Rule 69 subpoena issues; review draft subpoenas, provide comments and edits and send to Attorney B. Gragg; respond to inquiry re: Dragul from California party with indictments and other information concerning Dragul's criminal proceedings and membership interests in ACF properties.
19461.103	08/23/2021	RAS	295.00	0.30	0.30	88.50	Telephone conference with C. Mills, Attorney M. Gilbert, Attorney B. Gragg re: Dragul's requests for tax documents and settlement offer on turnover judgment; telephone conference with Attorney M. Gilbert re: strategy; telephone conference with Attorney B. Gragg re: Rule 69 subpoena to Greenlight One.
19461.103	08/26/2021	RAS	295.00	0.80	0.80	236.00	Emails to/from Attorney B. Gragg and counsel for GreenLight One re: Rule 69 examination.
19461.103	09/02/2021	RAS	295.00	0.40	0.40	118.00	Review emails to/from Attorney M. Gilbert and counsel for Dragul re: settlement offer for Turnover Judgment; review emails to/from Attorney M. Gilbert and counsel for Markusch re: discussions concerning settlement offer; emails to/from Attorney M. Gilbert re: strategy; email to criminal District Attorney enclosing California appellate court opinion in Ross v. Fox.
19461.103	09/15/2021	RAS	295.00	0.20	0.20	59.00	Conference with Attorney B. Gragg re: Rule 69 exams and pending settlement re: Turnover Judgment collection efforts.
19461.103	09/15/2021	RAS	295.00	0.20	0.20	59.00	Review, edit and finalize notice to vacate Rule 69 hearings of Dragul and Greenlight One.
Subtotal for Timekeeper RAS			Billable	36.00	36.00	10,620.00	RACHEL A. STERNLIEB
19461.103	03/01/2021	MRD	150.00	0.20	0.20	30.00	Upload pleadings to website.
19461.103	03/10/2021	MRD	150.00	0.40	0.40	60.00	Upload pleadings to website; revise website language.
19461.103	03/19/2021	MRD	150.00	0.70	0.70	105.00	Upload pleadings to website; review incoming Cornerstar claim and update tracking log; email communication with S. Drew.
19461.103	03/23/2021	MRD	150.00	0.50	0.50	75.00	Upload multiple pleadings to website.
19461.103	03/24/2021	MRD	150.00	0.10	0.10	15.00	Telephone messages exchanged with claimant.
19461.103	03/31/2021	MRD	150.00	0.20	0.20	30.00	Upload pleading to website.
19461.103	04/12/2021	MRD	150.00	0.30	0.30	45.00	Upload multiple pleadings to website.
19461.103	04/14/2021	MRD	150.00	0.40	0.40	60.00	Upload multiple pleadings to website.
19461.103	04/26/2021	MRD	150.00	0.40	0.40	60.00	Upload multiple pleadings to website.
19461.103	04/27/2021	MRD	150.00	0.10	0.10	15.00	Email communication with claimant.
19461.103	05/05/2021	MRD	150.00	0.20	0.20	30.00	Update website regarding trial dates; upload pleading to website.
19461.103	05/19/2021	MRD	150.00	0.20	0.20	30.00	Upload pleadings to website.
19461.103	05/25/2021	MRD	150.00	0.10	0.10	15.00	Upload pleading to website.
19461.103	05/28/2021	MRD	150.00	0.30	0.30	45.00	Upload multiple pleadings to website.
19461.103	06/08/2021	MRD	150.00	0.30	0.30	45.00	Update language on website regarding trial.
19461.103	06/10/2021	MRD	150.00	0.20	0.20	30.00	Upload pleading to website; update mailing matrix.
19461.103	06/15/2021	MRD	150.00	0.50	0.50	75.00	Upload pleadings to website; telephone conversation with claimant.
19461.103	06/22/2021	MRD	150.00	0.30	0.30	45.00	Upload pleading to website.
19461.103	06/29/2021	MRD	150.00	0.20	0.20	30.00	Upload pleadings to website.
19461.103	07/06/2021	MRD	150.00	0.10	0.10	15.00	Upload pleadings to website.
19461.103	07/08/2021	MRD	150.00	0.10	0.10	15.00	Upload pleading to website.

Client	Trans Date	Tkpr	Rate	Hours Worked	Hours Billed	Amount	
19461.103	07/12/2021	MRD	150.00	0.10	0.10	15.00	Upload pleading to website.
19461.103	08/01/2021	MRD	150.00	0.20	0.20	30.00	Upload pleadings to website.
19461.103	08/04/2021	MRD	150.00	0.60	0.60	90.00	Upload multiple pleadings to website; telephone message to claimant.
19461.103	08/13/2021	MRD	150.00	0.30	0.30	45.00	Upload pleadings to website.
19461.103	08/23/2021	MRD	150.00	0.20	0.20	30.00	Upload pleadings to website.
19461.103	08/31/2021	MRD	150.00	0.10	0.10	15.00	Upload pleading to website.
19461.103	09/01/2021	MRD	150.00	0.30	0.30	45.00	Email communication with Attorney M. Gilbert regarding Judgement Agreement and website modification.
19461.103	09/07/2021	MRD	150.00	0.20	0.20	30.00	Email communication with Attorney M. Gilbert regarding Dragul's Judgment Agreement; download pleading for website.
19461.103	09/13/2021	MRD	150.00	0.90	0.90	135.00	Cleanse website of pleadings related to Greenlight One R.69 proceedings and Receiver v. Dragul Family case.
19461.103	09/15/2021	MRD	150.00	0.40	0.40	60.00	Upload pleading to website; review counties re: recording Judgment; email communication with Attorney M. Gilbert and Attorney R. Sternlieb.
19461.103	09/21/2021	MRD	150.00	0.20	0.20	30.00	Website account management.
19461.103	09/27/2021	MRD	150.00	0.10	0.10	15.00	Return telephone message for claimant.
19461.103	10/19/2021	MRD	150.00	0.10	0.10	15.00	Upload pleading to website.
19461.103	10/25/2021	MRD	150.00	0.10	0.10	15.00	Website maintenance.
19461.103	10/26/2021	MRD	150.00	0.10	0.10	15.00	Email communication with website master regarding issues.
19461.103	10/28/2021	MRD	150.00	0.10	0.10	15.00	Email communication with website master
19461.103	10/31/2021	MRD	150.00	0.10	0.10	15.00	Email communication with website master regarding continued issues.
Subtotal for Timekeeper MRD			Billable	9.90	9.90	1,485.00	MARILYN R. DAVIES
19461.103	06/07/2021	BLG	225.00	2.00	2.00	450.00	Telephone conference with Attorney R. Sternlieb re: case background and writs of garnishment on entity (0.3); review documents related to garnishment form Attorney R. Sternlieb (0.4); conduct brief factual research re: Greenlight One, LLC and draft writ of garnishment re: third-party Greenlight One, LLC (0.7); conduct legal research re: extraordinary collection actions and garnishee (0.3); exchange emails with Attorney R. Sternlieb and Attorney P. Vellone re: draft of garnishment, comments on the same, and Rule 69 proceeding options (0.3).
19461.103	06/09/2021	BLG	225.00	2.30	2.30	517.50	Review comments from Attorney R. Sternlieb re: writ; conduct legal research re: statutory interest rate and verify defendant's address; edit and revise writ to incorporate statutory interest; conduct legal research re: Rule 69; draft rule 69 interrogatories and requests for production; draft motion for third-party discovery re: GreenLight One, LLC.
19461.103	06/10/2021	BLG	225.00	3.20	3.20	720.00	Continue drafting Rule 69 discovery to G. Dragul; conduct legal research re: procedures; draft motion for examination of judgment debtor's debtor.
19461.103	06/11/2021	BLG	225.00	0.80	0.80	180.00	Edit and revise garnishment, interrogatories, and motion to examine; email Attorney R. Sternlieb re: the same; telephone conference with Attorney M. Gilbert re: interest and subpoena issues.
19461.103	06/14/2021	BLG	225.00	0.20	0.20	45.00	Exchange emails with Attorney R. Sternlieb re: transcript from S. Dragul's creditor meeting and post-judgment filings and discovery.
19461.103	06/21/2021	BLG	225.00	0.50	0.50	112.50	Edit motion for issuance of Rule 69 discovery of third-party; exchange emails with Attorney R. Sternlieb re: the same; draft proposed subpoena.
19461.103	06/23/2021	BLG	225.00	0.50	0.50	112.50	Finish draft proposed subpoena, collect documents re: subpoenas and writs of garnishment, and send the same to Attorney R. Sternlieb for review.
19461.103	06/25/2021	BLG	225.00	0.30	0.30	67.50	Exchange emails with Attorney R. Sternlieb and Attorney M. Gilbert re: Rule 69 proceedings.
19461.103	07/13/2021	BLG	225.00	0.20	0.20	45.00	Exchange emails with Attorney R. Sternlieb re: collection proceedings; telephone conference with Attorney M. Gilbert re: the same; draft Entry of Appearance.
19461.103	07/14/2021	BLG	225.00	1.90	1.90	427.50	Finalize documents for filing and double check calculations; telephone conference with court clerk re:

Client	Trans Date	Tkpr	Rate	Hours Worked	Hours Billed	Amount	
19461.103	07/15/2021	BLG	225.00	1.70	1.70	382.50	hearing dates and issuance of writ; email Attorney M. Gilbert and Attorney R. Sternlieb re: procedure and next steps; telephone conference with opposing counsel (for Dragul and for Commissioner) re: motion for subpoena.
19461.103	07/20/2021	BLG	225.00	2.20	2.20	495.00	Review correspondence from opposing counsel re: conferral and forward the same to Attorney M. Gilbert and Attorney R. Sternlieb; exchange emails with opposing counsel re: motion concerning Greenlight; draft notice to set; telephone conference with Paralegal C. Clerihue re: service of garnishment; finalize and file documents; exchange emails with opposing counsel re: filings.
19461.103	07/22/2021	BLG	225.00	0.10	0.10	22.50	Email Attorney M. Gilbert and Attorney R. Sternlieb re: garnishment; telephone conference with court clerk re: hearing and email Attorney R. Sternlieb and Attorney M. Gilbert re: the same; email Paralegal S. Khan re: service of garnishment; conduct legal research re: adverse inference for failing to answer in Rule 69 proceedings; summarize findings and email Attorney M. Gilbert and Attorney R. Sternlieb re: the same.
19461.103	07/26/2021	BLG	225.00	0.20	0.20	45.00	Email client re: Rule 69 hearing.
19461.103	07/27/2021	BLG	225.00	0.10	0.10	22.50	Review opposition to subpoena.
19461.103	07/28/2021	BLG	225.00	0.10	0.10	22.50	Email Attorney M. Gilbert and Attorney R. Sternlieb re: appearance times.
19461.103	07/29/2021	BLG	225.00	0.30	0.30	67.50	Email Attorney R. Sternlieb and Attorney M. Gilbert re: response concerning subpoena.
19461.103	07/30/2021	BLG	225.00	1.00	1.00	225.00	Exchange emails with Attorney R. Sternlieb and Attorney M. Gilbert re: request for more time from GreenLight One; email GreenLight one re: the same.
19461.103	08/01/2021	BLG	225.00	2.00	2.00	450.00	Draft reply re: motion for subpoena to GreenLight One.
19461.103	08/02/2021	BLG	225.00	3.70	3.70	832.50	Draft reply re: subpoena to GreenLight One.
19461.103	08/04/2021	BLG	225.00	0.20	0.20	45.00	Complete draft reply and affidavit and circulate to Attorney R. Sternlieb and Attorney M. Gilbert; incorporate Attorney R. Sternlieb comments and edits; conduct legal research re: standing; email Attorney R. Sternlieb re: the same; review court' order re: unserved request for extension of time by GreenLight One; finalize reply and affidavit; create exhibit B re: checks to GreenLight One; finalize all documents and submit the same.
19461.103	08/05/2021	BLG	225.00	0.20	0.20	45.00	Telephone conference with Attorney R. Sternlieb re: collections strategy; review court's order re: extending time to respond to garnishment.
19461.103	08/10/2021	BLG	225.00	0.40	0.40	90.00	Review court's order authorizing subpoena to GreenLight One; exchange emails with Attorney R. Sternlieb and Attorney M. Gilbert re: the same.
19461.103	08/11/2021	BLG	225.00	0.60	0.60	135.00	Telephone conference with Attorney R. Sternlieb and court clerk re: hearing dates; email opposing counsel re: exam dates.
19461.103	08/12/2021	BLG	225.00	0.60	0.60	135.00	Telephone conference with court clerk re: hearing times for GreenLight One; review filing from Attorney R. Sternlieb; telephone conference with opposing counsel re: exam dates; exchange emails with Attorney R. Sternlieb and Attorney M. Gilbert re: settlement and K-1s.
19461.103	08/17/2021	BLG	225.00	0.70	0.70	157.50	Draft notice to set per clerk's instructions; exchange emails with Attorney R. Sternlieb re: the same and Attorney M. Gilbert re: settlement and appearance dates.
19461.103	08/18/2021	BLG	225.00	0.70	0.70	157.50	Exchange emails with opposing counsel and Attorney R. Sternlieb re: pending issues; telephone conference with court clerk re: hearing dates (2x); email Attorney M. Gilbert and Attorney R. Sternlieb re: hearing and potential for termination.
19461.103	08/19/2021	BLG	225.00	1.40	1.40	315.00	Exchange emails with Attorney R. Sternlieb re: subpoena to GreenLight; telephone conference with clerk re: subpoena to GreenLight; exchange emails with opposing counsel re: settlement, taxes, and hearings.
							Draft notices of hearings for G. Dragul and GreenLight One; finalize subpoena for GreenLight and G. Dragul and send for service; exchange emails with opposing

Client	Trans Date	Tkpr	Rate	Hours Worked	Hours Billed	Amount	
19461.103	08/20/2021	BLG	225.00	0.60	0.60	135.00	counsel, Attorney R. Sternlieb, and Attorney M. Gilbert, re: call concerning settlement; finalize and submit documents.
19461.103	08/23/2021	BLG	225.00	0.20	0.20	45.00	Telephone conference with Attorney R. Sternlieb re: subpoena and production dates; telephone conference with opposing counsel, Attorney R. Sternlieb, and Attorney M. Gilbert re: settlement.
19461.103	08/25/2021	BLG	225.00	0.40	0.40	90.00	Exchange emails with Attorney R. Sternlieb and Paralegal C. Clerihue re: GreenLight One subpoena and correspondence from counsel for entity; email opposing counsel re: hearing dates.
19461.103	08/26/2021	BLG	225.00	0.50	0.50	112.50	Exchange emails with Attorney R. Sternlieb re: rescheduling GreenLight hearing; telephone conference with court clerk re: hearing dates; email opposing counsel re: the same.
19461.103	08/31/2021	BLG	225.00	0.10	0.10	22.50	Telephone conference with clerk re: hearing date; email opposing counsel re: the same; email counsel for G. Dragul re: waiver and acceptance of subpoena; draft amended notice re: GreenLight One and file the same; email courtesy copy to counsel for GreenLight One.
19461.103	09/02/2021	BLG	225.00	0.20	0.20	45.00	Exchange emails with Attorney M. Gilbert and opposing counsel re: extension for objecting to the subpoena.
19461.103	09/13/2021	BLG	225.00	0.10	0.10	22.50	Review correspondence between counsel re: settlement; confer with Attorney R. Sternlieb re: Rule 69 proceedings; email Paralegal S. Chavez re: subpoena waivers.
19461.103	09/15/2021	BLG	225.00	0.50	0.50	112.50	Exchange emails with opposing counsel re: Rule 69 proceedings.
19461.103	09/16/2021	BLG	225.00	0.40	0.40	90.00	Confer with Attorney M. Gilbert re: vacating hearings; draft motion to vacate hearings; email the same to Attorney R. Sternlieb for review.
19461.103	09/17/2021	BLG	225.00	0.20	0.20	45.00	Draft Proposed Order re: vacatur; finalize and file motion to vacate hearings; email opposing counsel re: the same.
19461.103	09/17/2021	BLG	225.00	0.20	0.20	45.00	Exchange emails with counsel for GreenLight One re: hearings; review order re: hearing and email opposing counsel re: the same.
Subtotal for Timekeeper BLG		Billable		31.30	31.30	7,042.50	BRENTON L. GRAGG
19461.103	08/30/2021	YMD	150.00	0.05	0.05	7.50	Review pleadings, calendar relevant deadlines, and circulate to team (Greenlight One Rule 69(f) appearance date).
Subtotal for Timekeeper YMD		Billable		0.05	0.05	7.50	YVONNE M. DAVIS
Total for Client ID 19461.103		Billable		127.85	127.85	35,957.00	SENDER/HARVEY SENDER-DRAGUL RECEIVERSHIP
GRAND TOTALS							
		Billable		135.92	135.92	38,184.50	

Detail Cost Transaction File List
Transaction File List - Costs
ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.

Client	Trans Date	C E/A T	Rate	Units	Amount	
Client ID 19461.103 SENDER/HARVEY						
19461.103	03/31/2021	E 2			139.24	Westlaw on-line database research.
19461.103	06/30/2021	E 2			130.37	Westlaw on-line database research.
19461.103	06/30/2021	E 2			39.60	Westlaw on-line database research.
19461.103	07/31/2021	E 2			20.11	Westlaw on-line database research.
19461.103	08/31/2021	E 2			5.41	Westlaw on-line database research.
19461.103	09/30/2021	E 2			4.43	Westlaw on-line database research.
19461.103	10/31/2021	E 2			8.68	Westlaw on-line database research.
Subtotal for Expense Type 2				Billable	347.84	ONLINE RESEARCH
19461.103	04/30/2021	A 0			24.95	WWW.APPS4RENT.COM - FEBRUARY 2021 SERVICES
19461.103	04/30/2021	A 0			24.95	WWW.APPS4RENT.COM - MARCH 2021 SERVICES
19461.103	05/31/2021	A 0			24.95	WWW.APPS4RENT.COM - APRIL 2021 SERVICES
19461.103	07/31/2021	A 0			24.95	APPS4RENT.COM - MAY 2021
19461.103	07/31/2021	A 0			24.95	APPS4RENT.COM, JUNE 2021
19461.103	08/31/2021	A 0			24.95	WWW.APPS4RENT.COM, 07/21 SERVICES
19461.103	09/30/2021	A 0			24.95	WWW.APPS4RENT.COM, AUGUST SERVICES
19461.103	10/31/2021	A 0			13.88	Conference call services AMERICAN TELECONFERENCING SERVICES, LTD.
Subtotal for Advance Type 0				Billable	188.53	MISCELLANEOUS
19461.103	04/30/2021	A 1			24.00	Filing fee - Colorado Courts E-filing system (CCE)
19461.103	07/31/2021	A 1			60.00	Filing fee - Colorado Courts E-filing system (CCE) COLORADO INTERACTIVE, LLC
19461.103	08/31/2021	A 1			108.00	Filing fee - Colorado Courts E-filing system (CCE) COLORADO INTERACTIVE, LLC
19461.103	08/31/2021	A 1			15.00	Colorado Courts E-filing system (CCE) - Case History Report
19461.103	09/30/2021	A 1			24.00	Filing fee - Colorado Courts E-filing system (CCE)
Subtotal for Advance Type 1				Billable	231.00	FILING FEE
19461.103	07/31/2021	A 6			110.00	Service of process fee - FRONT RANGE LEGAL PROCESS SERVICE INC. - 07/20/21, GREENLIGHT ONE, LLC
19461.103	08/31/2021	A 6			100.00	Service of process fee - FRONT RANGE LEGAL PROCESS SERVICE INC. - 08/20/21, GREENLIGHT ONE, LLC
Subtotal for Advance Type 6				Billable	210.00	SERVICE OF PROCESS
Total for Client ID 19461.103				Billable	977.37	SENDER/HARVEY SENDER-DRAGUL RECEIVERSHIP

DATE FILED: November 11, 2021 10:57 AM
FILING ID: 51BB23612030F
CASE NUMBER: 2018CV33011

Client ID 19461.106 SENDER/HARVEY						
19461.106	03/31/2021	E 2			162.34	Westlaw on-line database research.
19461.106	03/31/2021	E 2			24.00	Westlaw on-line database research.
19461.106	04/30/2021	E 2			7.49	Westlaw on-line database research.
19461.106	04/30/2021	E 2			12.01	Westlaw on-line database research.
19461.106	04/30/2021	E 2			225.75	Westlaw on-line database research.
19461.106	05/31/2021	E 2			43.23	Westlaw on-line database research.
19461.106	05/31/2021	E 2			70.46	Westlaw on-line database research.
19461.106	05/31/2021	E 2			84.40	Westlaw on-line database research.
19461.106	06/30/2021	E 2			59.63	Westlaw on-line database research.
19461.106	06/30/2021	E 2			85.76	Westlaw on-line database research.
19461.106	07/31/2021	E 2			51.40	Westlaw on-line database research.
19461.106	09/30/2021	E 2			18.43	Westlaw on-line database research.
19461.106	10/31/2021	E 2			5.68	Westlaw on-line database research.
Subtotal for Expense Type 2				Billable	850.58	ONLINE RESEARCH
19461.106	03/31/2021	A 0			97.47	ZEPS EPIQ SANDWICHES - HEARING LUNCH (02/19/21)
19461.106	03/31/2021	A 0	69.000	1.00	69.00	LawToolBox Court Docket Access - Account Set Up
19461.106	04/30/2021	A 0	69.000	1.00	69.00	LawToolBox Court Docket Access - Account Set Up

Detail Cost Transaction File List
Transaction File List - Costs
ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.

<u>Client</u>	<u>Trans Date</u>	<u>E/A</u>	<u>C T</u>	<u>Rate</u>	<u>Units</u>	<u>Amount</u>	
Client ID 19461.106 SENDER/HARVEY							
Subtotal for Advance Type 0					Billable	235.47	MISCELLANEOUS
19461.106	05/31/2021	A	1			172.00	Filing fee - Colorado Courts E-filing system (CCE) COLORADO INTERACTIVE, LLC
19461.106	05/31/2021	A	1			15.00	Colorado Courts E-filing system (CCE) - Case History Report
19461.106	05/31/2021	A	1	0.100	1.00	15.00	Colorado Courts E-filing system (CCE) - Case History Report
19461.106	05/31/2021	A	1			0.10	PACER Public Access to Court Electronic Records
19461.106	06/30/2021	A	1			72.00	Filing fee - Colorado Courts E-filing system (CCE)
19461.106	06/30/2021	A	1			15.00	Colorado Courts E-filing system (CCE) - Case History Report
19461.106	06/30/2021	A	1			15.00	Colorado Courts E-filing system (CCE) - Case History Report
19461.106	06/30/2021	A	1	0.100	4.00	0.40	PACER Public Access to Court Electronic Records
19461.106	06/30/2021	A	1	0.100	1.00	0.10	PACER Public Access to Court Electronic Records
19461.106	07/31/2021	A	1	0.100	34.00	3.40	PACER Public Access to Court Electronic Records
19461.106	09/30/2021	A	1	0.100	1.00	1.60	PACER Public Access to Court Electronic Records
Subtotal for Advance Type 1					Billable	309.60	FILING FEE
19461.106	08/31/2021	A	2			5,000.00	Professional services - SHERMAN & HOWARD, LLC Mediation Service Retainer Fee (re: 9/14/2021)
Subtotal for Advance Type 2					Billable	5,000.00	PROFESSIONAL SERVICE
Total for Client ID 19461.106					Billable	6,395.65	SENDER/HARVEY COCCA
GRAND TOTALS							
					Billable	7,373.02	



DATE FILED: November 11, 2021 10:57 AM
 FILING IDENTIFICATION NUMBER: 2018CV33011
 CASE NUMBER: 2018CV33011

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.
 ATTN: MR. PATRICK VELLONE, ESQ.
 1600 STOUT STREET
 SUITE 1100
 DENVER, CO 80202

Invoice No. 887470
 Client No. 32501.0005

Date 10/31/2021

RE: Harvey Sender, as Receiver for Gary Dragul, GDA Real Estate Services, LLC, and GDA Real Estate Management, Inc.

Date	Category	Name	Memo	Hours	Standard Rate	Standard Amount	Billed Rate	Billed Amount	Discount
3/2/2021	Administration	CICCOLO	Review and update receiver report.	0.50	\$218.00	\$109.00	\$180.00	\$90.00	(\$19.00)
3/9/2021	Tax Preparation	ONG	Tax Preparation	0.10	\$269.00	\$26.90	\$250.00	\$25.00	(\$1.90)
3/17/2021	Tax Preparation	CICCOLO	Update tax analysis.	2.00	\$218.00	\$436.00	\$180.00	\$360.00	(\$76.00)
3/17/2021	Tax Preparation	DREW	Review tax trial balances for open entities.	1.30	\$424.00	\$551.20	\$350.00	\$455.00	(\$96.20)
3/23/2021	Claim Analysis	CICCOLO	Update claims database and review Shelly Dragul investments.	1.50	\$218.00	\$327.00	\$180.00	\$270.00	(\$57.00)
4/15/2021	Family Dispute	CICCOLO	Gather documents used for the Dragul Family report.	0.60	\$218.00	\$130.80	\$180.00	\$108.00	(\$22.80)
4/16/2021	Family Dispute	CICCOLO	Gather documents used for the Dragul Family report.	0.30	\$218.00	\$65.40	\$180.00	\$54.00	(\$11.40)
4/22/2021	Administration	CICCOLO	Gather documents related to estate costs	0.20	\$218.00	\$43.60	\$180.00	\$36.00	(\$7.60)
5/12/2021	Administration	DREW	Review new documents.	0.80	\$424.00	\$339.20	\$350.00	\$280.00	(\$59.20)
5/25/2021	Administration	CICCOLO	Update damage disclosure exhibit.	0.70	\$218.00	\$152.60	\$180.00	\$126.00	(\$26.60)
6/16/2021	Administration	CICCOLO	Search for historical payroll information.	0.60	\$218.00	\$130.80	\$180.00	\$108.00	(\$22.80)
6/17/2021	Administration	TAFEL	Review of files/invoices from office.	3.00	\$175.00	\$525.00	\$150.00	\$450.00	(\$75.00)
6/18/2021	Administration	CICCOLO	Search for historical payroll records.	3.00	\$218.00	\$654.00	\$180.00	\$540.00	(\$114.00)
7/7/2021	Tax Preparation	DREW	Tax trial balance review.	3.00	\$424.00	\$1,272.00	\$350.00	\$1,050.00	(\$222.00)
7/8/2021	Tax Preparation	BRADSHAW	Tax Preparation	1.50	\$175.00	\$262.50	\$150.00	\$225.00	(\$37.50)
7/8/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
7/8/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
7/8/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
7/8/2021	Tax Preparation	BRADSHAW	Tax Preparation	1.70	\$175.00	\$297.50	\$150.00	\$255.00	(\$42.50)
7/9/2021	Tax Preparation	BRADSHAW	Tax Preparation	2.00	\$175.00	\$350.00	\$150.00	\$300.00	(\$50.00)
7/9/2021	Tax Preparation	BRADSHAW	Tax Preparation	1.30	\$175.00	\$227.50	\$150.00	\$195.00	(\$32.50)
7/9/2021	Tax Preparation	BRADSHAW	Tax Preparation	1.00	\$175.00	\$175.00	\$150.00	\$150.00	(\$25.00)
7/27/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.50	\$239.00	\$119.50	\$225.00	\$112.50	(\$7.00)
7/27/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.50	\$239.00	\$119.50	\$225.00	\$112.50	(\$7.00)
7/28/2021	Administration	DREW	Letter to IRS regarding 2018 payroll issues.	1.30	\$424.00	\$551.20	\$350.00	\$455.00	(\$96.20)

7/28/2021	Tax Preparation	BRADSHAW	Tax Preparation	2.50	\$175.00	\$437.50	\$150.00	\$375.00	(\$62.50)
7/28/2021	Tax Preparation	BRADSHAW	Tax Preparation	2.50	\$175.00	\$437.50	\$150.00	\$375.00	(\$62.50)
7/29/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.50	\$239.00	\$119.50	\$225.00	\$112.50	(\$7.00)
7/29/2021	Tax Preparation	BRADSHAW	Tax Preparation	2.50	\$175.00	\$437.50	\$150.00	\$375.00	(\$62.50)
7/29/2021	Tax Preparation	BRADSHAW	Tax Preparation	1.00	\$175.00	\$175.00	\$150.00	\$150.00	(\$25.00)
8/2/2021	Tax Preparation	BRADSHAW	Tax Preparation	3.30	\$175.00	\$577.50	\$150.00	\$495.00	(\$82.50)
8/4/2021	Tax Preparation	BRADSHAW	Tax Preparation	1.50	\$175.00	\$262.50	\$150.00	\$225.00	(\$37.50)
8/4/2021	Tax Preparation	BRADSHAW	Tax Preparation	0.50	\$175.00	\$87.50	\$150.00	\$75.00	(\$12.50)
8/4/2021	Tax Preparation	BRADSHAW	Tax Preparation	0.50	\$175.00	\$87.50	\$150.00	\$75.00	(\$12.50)
8/4/2021	Tax Preparation	ALEXANDER_M	Tax Preparation/Review.	0.30	\$195.00	\$58.50	\$180.00	\$54.00	(\$4.50)
8/5/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
8/5/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.80	\$239.00	\$191.20	\$225.00	\$180.00	(\$11.20)
8/5/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
8/5/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.80	\$239.00	\$191.20	\$225.00	\$180.00	(\$11.20)
8/5/2021	Tax Preparation	BRADSHAW	Tax Preparation	0.50	\$175.00	\$87.50	\$150.00	\$75.00	(\$12.50)
8/5/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	1.00	\$239.00	\$239.00	\$225.00	\$225.00	(\$14.00)
8/5/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.80	\$239.00	\$191.20	\$225.00	\$180.00	(\$11.20)
8/5/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
8/5/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.50	\$239.00	\$119.50	\$225.00	\$112.50	(\$7.00)
8/9/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	1.50	\$239.00	\$358.50	\$225.00	\$337.50	(\$21.00)
8/9/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	1.00	\$239.00	\$239.00	\$225.00	\$225.00	(\$14.00)
8/10/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	1.00	\$239.00	\$239.00	\$225.00	\$225.00	(\$14.00)
8/11/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
8/11/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
8/12/2021	Administration	CICCOLO	Pull Gary Dragul tax documents.	0.80	\$218.00	\$174.40	\$180.00	\$144.00	(\$30.40)
8/13/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.50	\$239.00	\$119.50	\$225.00	\$112.50	(\$7.00)
8/13/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.50	\$239.00	\$119.50	\$225.00	\$112.50	(\$7.00)
8/16/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.50	\$239.00	\$119.50	\$225.00	\$112.50	(\$7.00)
8/17/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.50	\$239.00	\$119.50	\$225.00	\$112.50	(\$7.00)
8/17/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.50	\$239.00	\$119.50	\$225.00	\$112.50	(\$7.00)
8/19/2021	Tax Preparation	ABRAMOVITZ	Tax Preparation/Review.	0.30	\$584.00	\$175.20	\$500.00	\$150.00	(\$25.20)
8/19/2021	Tax Preparation	ABRAMOVITZ	Tax Preparation/Review.	0.30	\$584.00	\$175.20	\$500.00	\$150.00	(\$25.20)
8/23/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	1.00	\$239.00	\$239.00	\$225.00	\$225.00	(\$14.00)
8/24/2021	Tax Preparation	COLOMBO	Tax Preparation	0.10	\$126.00	\$12.60	\$100.00	\$10.00	(\$2.60)
8/25/2021	Tax Preparation	REINDL	Tax Preparation/Review.	0.20	\$105.00	\$21.00	\$100.00	\$20.00	(\$1.00)
8/25/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.70	\$239.00	\$167.30	\$225.00	\$157.50	(\$9.80)
8/27/2021	Tax Preparation	BIRMINGHAM	Finalize tax return.	0.10	\$181.00	\$18.10	\$180.00	\$18.00	(\$0.10)
8/27/2021	Tax Preparation	NICHOLSON	Stuff K-1's and seal & meter, take to mail drop.	0.20	\$175.00	\$35.00	\$150.00	\$30.00	(\$5.00)
8/27/2021	Tax Preparation	BIRMINGHAM	Finalize tax return.	0.10	\$181.00	\$18.10	\$180.00	\$18.00	(\$0.10)
8/27/2021	Tax Preparation	NICHOLSON	Stuff K-1's and seal & meter, take to mail drop.	0.20	\$175.00	\$35.00	\$150.00	\$30.00	(\$5.00)
8/30/2021	Tax Preparation	REINDL	Tax Preparation/Review.	1.50	\$105.00	\$157.50	\$100.00	\$150.00	(\$7.50)
8/30/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
8/31/2021	Administration	DREW	Settlement Review.	0.80	\$424.00	\$339.20	\$350.00	\$280.00	(\$59.20)
8/31/2021	Tax Preparation	REINDL	Tax Preparation/Review.	1.70	\$105.00	\$178.50	\$100.00	\$170.00	(\$8.50)
9/1/2021	Tax Preparation	REINDL	Tax Preparation/Review.	2.50	\$105.00	\$262.50	\$100.00	\$250.00	(\$12.50)
9/1/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.50	\$239.00	\$119.50	\$225.00	\$112.50	(\$7.00)
9/7/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.70	\$239.00	\$167.30	\$225.00	\$157.50	(\$9.80)

9/8/2021	Tax Preparation	ABRAMOVITZ	Tax Preparation/Review.	0.30	\$584.00	\$175.20	\$500.00	\$150.00	(\$25.20)
9/8/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
9/8/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	1.00	\$239.00	\$239.00	\$225.00	\$225.00	(\$14.00)
9/8/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	0.30	\$239.00	\$71.70	\$225.00	\$67.50	(\$4.20)
9/13/2021	Tax Preparation	FYFE	Finalize tax return.	0.50	\$135.00	\$67.50	\$100.00	\$50.00	(\$17.50)
9/14/2021	Tax Preparation	ABRAMOVITZ	Tax Preparation/Review.	0.30	\$584.00	\$175.20	\$500.00	\$150.00	(\$25.20)
9/14/2021	Tax Preparation	WOODRUFF	Tax Preparation/Review.	1.50	\$239.00	\$358.50	\$225.00	\$337.50	(\$21.00)
9/17/2021	Tax Preparation	FYFE	Finalize tax return.	0.40	\$135.00	\$54.00	\$100.00	\$40.00	(\$14.00)
10/20/2021	Tax Preparation	GATLEY_L	Finalize tax return.	0.20	\$190.00	\$38.00	\$150.00	\$30.00	(\$8.00)
10/20/2021	Tax Preparation	GATLEY_L	Finalize tax return.	0.20	\$190.00	\$38.00	\$150.00	\$30.00	(\$8.00)
10/20/2021	Tax Preparation	GATLEY_L	Finalize tax return.	0.20	\$190.00	\$38.00	\$150.00	\$30.00	(\$8.00)
10/20/2021	Tax Preparation	GATLEY_L	Finalize tax return.	0.20	\$190.00	\$38.00	\$150.00	\$30.00	(\$8.00)

Total	72.70	\$16,305.80	\$17,615.00	(\$2,047.30)
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Summary By Project

Category	Original Hours	Standard Rate	Standard Amount	Billed Rate	Billed Amount	Discount
Administration	11.70		\$3,019.00		\$2,509.00	(\$510.00)
Claim Analysis	1.50		\$327.00		\$270.00	(\$57.00)
Family Dispute	0.90		\$196.20		\$162.00	(\$34.20)
Tax Preparation	58.60		\$12,763.60		\$11,317.50	(\$1,446.10)
Total	72.70		\$16,305.80		\$14,258.50	(\$2,047.30)

Summary By Name

Name	Original Hours	Standard Rate	Standard Amount	Billed Rate	Billed Amount	Discount
ABRAMOVITZ	1.20	\$584.00	\$700.80	\$500.00	\$600.00	(\$100.80)
ALEXANDER_M	0.30	\$195.00	\$58.50	\$180.00	\$54.00	(\$4.50)
BIRMINGHAM	0.20	\$181.00	\$36.20	\$180.00	\$36.00	(\$0.20)
BRADSHAW	22.30	\$175.00	\$3,902.50	\$150.00	\$3,345.00	(\$557.50)
CICCOLO	10.20	\$218.00	\$2,223.60	\$180.00	\$1,836.00	(\$387.60)
COLOMBO	0.10	\$126.00	\$12.60	\$100.00	\$10.00	(\$2.60)
DREW	7.20	\$424.00	\$3,052.80	\$350.00	\$2,520.00	(\$532.80)
FYFE	0.90	\$135.00	\$121.50	\$100.00	\$90.00	(\$31.50)
GATLEY_L	0.80	\$190.00	\$152.00	\$150.00	\$120.00	(\$32.00)
NICHOLSON	0.40	\$175.00	\$70.00	\$150.00	\$60.00	(\$10.00)
ONG	0.10	\$269.00	\$26.90	\$250.00	\$25.00	(\$1.90)
REINDL	5.90	\$105.00	\$619.50	\$100.00	\$590.00	(\$29.50)
TAFEL	3.00	\$175.00	\$525.00	\$150.00	\$450.00	(\$75.00)
WOODRUFF	20.10	\$239.00	\$4,803.90	\$225.00	\$4,522.50	(\$281.40)
Total	72.70		\$16,305.80		\$14,258.50	(\$2,047.30)

Total Fees Billed	\$16,305.80
Discount 13%	(\$2,047.30)
Amount Due	\$14,258.50

Current Amount Due \$ 14,258.50

Payment is due on receipt. A 1.5% per month service charge will be added to balances remaining unpaid 30 days or more after the invoice date.

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