

# **EXHIBIT 1**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff

v.

STANFORD INTERNATIONAL BANK,  
LTD., ET AL.,

Defendants.

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Cause No. 3:09-CV-0298-N

**DECLARATION OF MARK MURPHY IN SUPPORT OF APPLICATION FOR  
PAYMENT OF ATTORNEYS' FEES FROM KROLL SETTLEMENT**

Pursuant to 28 U.S.C. section 1746, I, Mark Murphy, hereby declare under penalty of perjury that I have personal knowledge of the following facts, which are true and correct:

**I. OVERVIEW**

**A. Curriculum Vitae**

1. My name is Mark Murphy and I am an attorney admitted to practice law in Texas since 1997. I am also admitted to practice before the United States District Courts for the Northern and Western Districts of Texas. I am a partner in the firm of Davis & Santos, P.C., a firm that concentrates on commercial and complex litigation. I have practiced exclusively in the area of civil litigation for 18 years.

2. Our firm has extensive experience in trials involving complex commercial disputes from both the plaintiff and defense perspectives, including prosecuting and defending claims against state and national banks for financial irregularities, and prosecuting and defending individuals and entities in cases involving financial misconduct. These cases include, but are not limited to, money laundering, fraudulent schemes, embezzlement schemes, Ponzi-type schemes,

fraud of government programs, fraudulent transfers, and complex financial fraud litigation. Our firm also has extensive experience in cases involving government enforcement actions, including the SEC, IRS, Export-Import Bank, FINRA, FDA, USDA, and other agencies.

3. Jason Davis is a founding partner with our firm. He was an equity partner at two national law firms and a former federal prosecutor, with over 19 years of experience handling, among other disputes, white collar crime and complex business and financial litigation. He has represented individuals, financial institutions, and business entities in complex business litigation, fraud disputes, parallel civil and criminal governmental investigations, white-collar criminal defense, and crime victim advocacy, among others. He has been admitted to practice law in Texas since 1995, and admitted to practice before the United States District Courts for the Northern, Western, Eastern and Southern Districts of Texas, the U.S. Court of Appeals for the Fifth Circuit, and the U.S. Supreme Court.

4. Sarah Santos is another founding partner with our firm. She was formerly in-house counsel with a global bank, with over 12 years of experience handling a variety of financial, cross-border, and complex business litigation. She has also represented financial institutions, business entities, and receivers in fraud-related litigation, insolvency litigation, fiduciary litigation and claims against third-parties in Ponzi-scheme cases. She has been admitted to practice law in Texas since 2003, and admitted to practice before the United States District Courts for the Western and Southern Districts of Texas, and the U.S. Bankruptcy Court for the Western and Southern Districts of Texas.

5. Overall, our firm has the type of specialized expertise and experience to serve as special litigation counsel in this case and to pursue, investigate, and had it been necessary, to prosecute and try, the claims against Kroll.

**B. The Kroll Settlement**

6. I am submitting this Declaration in support of the Application for Payment of Attorney's Fees from Kroll Settlement filed by the Receiver and the Official Stanford Investors Committee ("OSIC") (the "Fee Application"). The Fee Application was filed by the Receiver and OSIC in conjunction with their Motion for Order Approving Proposed Settlement with Kroll and for Ancillary Orders (the "Motion"), filed concurrently with the Fee Application. The settlement for which approval is sought in the Motion settles all claims asserted against Kroll for \$24 million (the "Kroll Settlement").

7. This Declaration and the statements contained herein are made without prejudice to the Receiver's and OSIC's position on the merits of any subsequent action in the event that the settlement is not approved by the Court.

**II. INVESTIGATION, PROSECUTION AND SETTLEMENT OF CLAIMS  
AGAINST KROLL**

**A. Overview**

8. Overall, our firm has so far collectively spent four and a half years and over 1,800 hours investigating, evaluating, and pursuing the claims against Kroll on behalf of the Stanford Receivership Estate and the Stanford investors prior to reaching the mediated settlement in May 2013. We then spent an additional two and a half years and a tremendous amount of attorney time negotiating and documenting the structure of the settlement and steering this settlement through the bankruptcy process in order to preserve and present the Kroll Settlement to this Court.

9. Our work included:

- a. Investigating and assessing the merits of the claims, and defenses to those claims;

- b. Investigating issues related to liability, causation, damages, and class certification;
- c. Investigating the underlying events and transactions relevant to potential claims against Kroll;
- d. Reviewing applicable legal issues in the U.S. and abroad;
- e. Serving a subpoena on Kroll to produce documents related to its involvement with Stanford;
- f. Filing a motion to compel with this Court to require Kroll to comply with the subpoena;
- g. Reviewing the large amount of documents potentially relevant to claims against Kroll, both produced by Kroll and otherwise;
- h. Valuing the claims;
- i. Preparing an original complaint;
- j. Preparing for litigation;
- k. Engaging in settlement negotiations, and attending a two-day mediation;
- l. Negotiating the terms and documents necessary to carry out the settlement;<sup>1</sup> and
- m. Researching and responding to the issues arising from Kroll's bankruptcy filing.

**B. The Investigation of Claims Against Kroll**

10. The OSIC and the Receiver have been working together to pursue certain third party claims, including the claims against Kroll. In October 2011, OSIC hired our firm as lead litigation counsel to pursue claims against Kroll on a 25 percent contingency fee. As lead counsel, we have investigated and pursued these claims against Kroll on behalf of both the Receiver and OSIC. Our firm researched, evaluated, and developed potential claims against Kroll, and aggressively pursued an investigation of Kroll activities and actors.

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<sup>1</sup> Our firm worked closely in conjunction with our co-counsel, the Attorneys, throughout this matter. Those lawyers are submitting their own declarations showing the time they spent on various tasks, so the work done by those lawyers will not be repeated here. References to "we" or "our firm" in this declaration are meant merely to show the work performed by our firm, without in any way discounting the work and efforts expended by the Attorneys.

11. In the process of investigating the potential claims and defenses, and the underlying events and transactions which give rise to claims against Kroll, we reviewed voluminous amounts documents, including over 23,000 pages of documents that Kroll produced in response to our subpoena, and tens of thousands of documents already in the possession of the Receiver and other firms collaborating as co-counsel, including Castillo Snyder, P.C., Strasburger & Price, LLP, Neligan Foley LLP, and Butzel Long LLP (collectively, the “Attorneys”).

12. We have worked closely with the Attorneys, who have been actively involved in investigating and prosecuting litigation against other third parties accused of aiding or assisting Stanford since the inception of the Stanford case in 2009.

13. After entering into several tolling agreements with Kroll, tolling the running of statutes of limitations for the Receiver, OSIC, and a putative class of Stanford investors, we spent hundreds of hours presenting, advocating, and arguing about the claims with Kroll’s attorneys, and then negotiating with them. The settlement negotiations were complex and lengthy.

14. During the tolling period, we continued aggressively pursuing our investigation. On behalf of the Receiver, we served a subpoena on Kroll for the production of its Stanford records. Kroll resisted, prompting us to draft and file a motion to compel. Once ordered by the Court to produce records, Kroll began to produce documents on a rolling basis, all of which were extensively reviewed by us and the Attorneys. Kroll’s production of documents began in late 2011 and continued into early 2013.

15. We and the Attorneys also continued to review voluminous documents from the Receivership Estate, and coordinated other investigative activities. In collaboration with the

Attorneys, we spent a considerable amount of time drafting a lengthy complaint against Kroll, which helped pave the way to discussions and settlement negotiations with Kroll.

16. We also thoroughly researched and analyzed the potential claims against Kroll, considering:

- a. claims available under both state and federal law;
- b. the viability and merit of those claims considering the facts underlying Kroll’s business dealings with Stanford and this Court’s previous rulings in similar matters;
- c. the viability and merit of anticipated defenses;
- d. the value of claims against Kroll; and
- e. the success of similar claims in other Ponzi scheme cases, both in the Fifth Circuit and elsewhere.

**B. Preparing the Complaint and Presenting the Claims to Kroll**

17. After a prolonged and thorough investigation, we spent a significant amount of time drafting a complaint against Kroll that included, among others, the following claims:

<b>Category</b>	<b>Claim</b>
Estate Claims	Negligence
	Aiding and Abetting Breach of Fiduciary Duty
	Breach of Contract
	Fraudulent Transfer / Unjust Enrichment
	Negligent Retention / Negligent Supervision
Class Claims	Aiding and Abetting Violations of the TSA
	Aiding and Abetting / Participating in Breach of Fiduciary Duty
	Aiding and Abetting / Participating in a Fraudulent Scheme
	Civil Conspiracy

18. As part of the investigation of the claims, we reviewed and evaluated voluminous amounts of documents, including thousands of pages of documents detailing Kroll’s relationship with and services provided to Stanford. The documents reviewed included documents from the

Receivership Estate, documents obtained from various law firms, and then documents produced by Kroll in response to the subpoena. We researched relevant case law to develop claims against Kroll, including claims under the TSA and other common law claims belonging to the Stanford investors, as well as claims that could be asserted by the Receiver and OSIC, to determine how the facts surrounding Kroll's conduct supported such claims. The investigation of claims further required formulation of viable damage models and causation theories for both the Receivership Estate claims and the Stanford investor claims.

19. We and the Attorneys presented our claims to Kroll in late 2011, and began preliminary settlement negotiations with Kroll in 2012. As part of the settlement negotiations in 2012, Kroll provided additional financial information regarding the financial condition of Kroll and its parent company, Altegrity, Inc. (n/k/a Corporate Risk Holdings, LLC). We and the Attorneys retained and worked with an experienced accountant to assist in analyzing Kroll and Altegrity's financial condition in order to evaluate the collectability of any potential judgment.

20. We also obtained and analyzed Kroll's applicable insurance policies. We learned that these two policies are depleting or "wasting" policies, under which defense costs reduce the amount of coverage. The total maximum amount of coverage was \$30 million, and had been eroded by defense costs.

### **C. Mediation**

21. The parties conducted a two-day mediation in New York in May 2013 before the Hon. Judge E. Leo Milonas, a former Chief Administrative Judge of the State of New York, Justice of the Appellate Division of the New York Supreme Court, and President of the Association of the Bar of the City of New York. From our firm, both Jason Davis and I attended the mediation. During the course of the negotiations, we learned that the remaining amount of



coverage left under the depleting insurance policies was approximately \$24 million. At the end of the second day of mediation, and after several apparent impasses, we were able to reach an agreement in principle with Kroll to settle all claims for all \$24 million, conditioned on Kroll being able to secure funding for the majority of the settlement payment from its insurance carriers.

22. Kroll subsequently conducted extensive negotiations with its insurance carriers and, several months later in September 2013, Kroll's counsel reported that Kroll was ready to proceed with the drafting of formal settlement documents. At that time, we began to structure and finalize this complicated settlement.

### **C. Analyzing, Researching, and Negotiating the Settlement Structure**

23. The preparation of settlement documents in this case has been difficult and complex. Because this was the first significant settlement of a Stanford-related third party case,<sup>2</sup> and because Kroll demanded a global release from all Stanford-related liability, we spent months researching authorities, negotiating the structure of the settlement, and consulting with foreign law experts. Eventually, the parties negotiated and agreed on a Receiver bar order structure. We then spent the majority of 2014 negotiating, revising, and re-drafting the settlement documents, which went through literally dozens of iterations.

24. Further, the settlement process was not without pitfalls. Negotiations broke down on multiple occasions, prompting us to return to preparations to file suit.

25. But by the end of 2014, the parties worked through the settlement structure and were close to being ready to sign the settlement documents.

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<sup>2</sup> While settlements in other cases were considered and approved by this Court before the Kroll settlement, such as BDO, and Adams and Reese, the Kroll settlement was negotiated and structured first. Kroll's bankruptcy substantially delayed finalizing the settlement documents.

**D. Kroll's Bankruptcy and Salvaging the Settlement**

26. In early 2015, Kroll and its parent company Altegrity, Inc. filed for bankruptcy in Delaware.<sup>3</sup> This obviously stopped all work on the settlement process and threatened the entire agreement. Through continued hard work, research, and contemplated filings within the bankruptcy, the settlement was salvaged. The Chapter 11 filing substantially delayed finalizing the settlement documents however, and resulted in another year of negotiations. We were also forced to seek, and ultimately obtain, approval of the settlement by the Bankruptcy Court.

27. After Kroll filed bankruptcy, we spent months analyzing the viability and value of our claims in the Chapter 11. We also researched and analyzed the effect of the bankruptcy proceedings, including working with the Attorneys to prepare and file a proof of claim.

28. We discussed with Kroll's counsel the possibility of salvaging the settlement in spite of the bankruptcy and then, when we determined it might be possible, spent much time determining how to address the bankruptcy issue in the settlement documents. We then spent additional time revising the settlement documents and ancillary documents to address the bankruptcy.

**III. ATTORNEYS' FEES**

**A. The Contingency Fee Agreement**

29. Our firm has been employed by OSIC in connection with the claims against Kroll pursuant to a 25 percent contingency fee agreement.

30. As stated in the Fee Application, the Movants seek Court approval to pay the Attorneys a fee equal to an aggregate of 25 percent of the Net Recovery of the Kroll settlement. The Net Recovery is the gross recovery minus reimbursed expenses. The Receiver has

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<sup>3</sup> *In re Altegrity, Inc.*, Case No. 15-10226 (Bankr. D. Del. Feb. 8, 2015).

reimbursed or will reimburse a total of \$22,947 to the Attorneys, so the Net Recovery is \$23,977,053. This means the requested Fee Award is \$5,994,263. *See* Exs. 1-3.

31. This is the fee agreed to be paid to our firm and the Attorneys by OSIC, and this is the amount of the fee for which approval is sought in the Fee Application.

**B. The Court Has Previously Approved 25% Contingency Fee Agreements**

32. This Court approved the 25 percent contingency fee in connection with the Receiver's agreement with OSIC regarding the joint prosecution of fraudulent transfer and other claims by the Receiver and OSIC (the "OSIC-Receiver Agreement"). *See* Doc. 1267, p. 2 ("The Court finds that the fee arrangement set forth in the Agreement is reasonable."); *see also* Agreement [Doc. 1208] p. 3 (providing a "contingency fee" of 25 percent of any Net Recovery in actions prosecuted by OSIC's designated professionals). The Court's order approving the OSIC-Receiver Agreement also provided that OSIC need not submit a fee application seeking an award of fees consistent with the percentage authorized under the Court's previous order unless required by Rule 23. *See* Doc. 1267, p. 2.

33. The OSIC-Receiver Agreement further provided that OSIC "would prosecute certain fraudulent transfer claims and other actions for the benefit of Stanford investors/creditors in cooperation with Ralph S. Janvey, as receiver." *See* Doc. 1208, p. 1 ¶ 1. The Agreement further provided that "this proposal will apply to the litigation of all fraudulent transfer and similar claims that may be brought under common law, statute . . . or otherwise" and "unless otherwise agreed, the terms of this agreement will likewise apply to the pursuit of any other claims and causes of action that the Receiver and [OSIC] determine to jointly pursue." *Id.* at pp. 1-2.

34. Our fee agreement similarly provides for a fee of 25 percent of the Net Recovery (defined as the total recovery after deducting allowable expenses and disbursements). This agreement was modeled after the OSIC-Receiver Agreement, because the parties knew that the Court had already approved a 25 percent contingency fee agreement.

35. This settlement is a matter the Receiver and OSIC determined to jointly pursue under the OSIC-Receiver Agreement, and therefore is covered under this agreement. We and the Attorneys are filing the Fee Application in an abundance of caution, and at the request of OSIC, the Examiner, and the Receiver.

36. For the same reasons the Court previously approved the 25 percent contingency fee in the OSIC-Receiver Agreement, the Court should also approve this 25 percent fee. The settlement of the Kroll matter has yielded a significant benefit to the Receivership Estate and the Stanford investors and is one of the largest settlements in the almost seven-year history of the Stanford receivership.

**C. The 25% Contingency Fee is Fair and Reasonable**

37. It is my opinion that the fee requested in the Fee Application is reasonable in comparison to the total net amount to be recovered for the benefit of the Stanford investors. The 25 percent contingency fee is substantially below the typical contingency fee percentage of 33 to 40 percent that most law firms (including ours) would receive to handle cases of this complexity and magnitude. The issues concerning Kroll are extraordinarily large and complex, involving voluminous records and electronic data and requiring over four years of investigation and negotiation.

38. Moreover, taking this case on a contingent fee involved significant financial outlay and risk by our firm. The investor class actions were dismissed following the Court's

SLUSA ruling, and motions to dismiss remained pending for years in the majority of the Stanford cases. At the time we agreed to the representation, we were not aware of any settlement with third parties in connection with the Stanford Receivership.

39. We bore a significant risk of loss through a lawsuit against Kroll and an almost certain appeal following any victory at trial. In fact, after Kroll filed bankruptcy, we were obviously concerned that there would be no recovery and therefore no fee to our firm after thousands of hours of work. A 25 percent contingency fee is reasonable given the time and effort required by our firm and the Attorneys, and given the considerable risk we took in taking on this representation.

**D. Time and Effort of the Attorneys**

40. We have spent a considerable amount of time in this matter, investigating, assessing, and pursuing claims against Kroll and effectuating the settlement.

41. The thousands of hours spent on this matter over several years have precluded other opportunities for us, and the amount of time and resources involved in investigating and evaluating the claims, presenting and discussing the claims with Kroll, preparing the complaint, and negotiating the settlement significantly reduced our ability to devote time and effort to other matters.

42. We have so far spent over 1,900 hours investigating, assessing, and pursuing claims against Kroll and effectuating the settlement. Our hourly rates are \$600 for Jason Davis, \$525 for me and Sarah Santos, \$325 for associates, and \$175 for paralegals. Had we agreed to take this case on an hourly basis, our fees would be over \$900,000, not including expenses, based on the hourly rates of our professionals. We have also been reimbursed a total of \$7,865.02 for

out-of-pocket expenses. We have also incurred over \$13,000 in expenses for which we are not seeking reimbursement.

43. Attached as Exhibit A to this declaration is a true and correct copy of our firm's billing records for this matter, reflecting attorney and paralegal time through February 29, 2016.

44. The proposed settlement is the result of many years of effort and thousands of hours of work by the Receiver, OSIC, Stanford investors, our firm, and the Attorneys. But for the efforts of these parties, and the efforts of myself and our firm, there would be no Kroll Settlement, which will net the Receivership estate and the Stanford investors approximately \$18 million they would not have otherwise had.

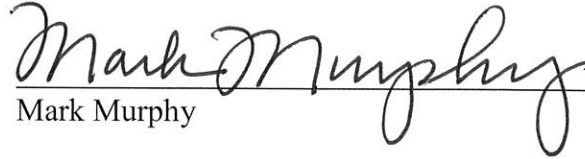
45. The work detailed above supports the requested fee award. Further, the fees and expenses were wholly contingent and entirely at risk if the case were not favorably resolved. We accepted the risk that we might spend years litigating the case at great expense to our firm, both in time and in actual expenses, with no guarantee of any recovery, with the expectation that we would be compensated according to the fee agreement if we were able to obtain a good result for our clients.

46. Our firm and the Attorneys put in a tremendous amount of time and effort in this case for the Stanford Receivership Estate and the Stanford investors, and we took a substantial risk we took in handling this case on a contingent fee. For these reasons, I believe the 25 percent fee to be paid to our firm and the Attorneys is very reasonable. Our firm has worked tirelessly for over four years to attempt to recover money for the benefit of Stanford investors for no compensation.

47. For the reasons stated above, I respectfully submit that the application for a 25 percent contingency fee in this case should be approved.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 7, 2016.

  
Mark Murphy

# **EXHIBIT 1-A**



**Davis & Santos, P.C.**  
**Time Activities by Client Detail - Stanford**  
 Activity: As of February 29, 2016

Activity Date	Employee	Product/Service	Memo/Description	Rates	Duration	Amount
11/29/2011	Jason M. Davis	Hours	Review comments on subpoena; confer with team on Request for Production to Kroll	600.00	1.2	720.00
11/30/2011	Jason M. Davis	Hours	Correspondence with receiver, subpoena to Kroll	600.00	0.3	180.00
12/05/2011	Jason M. Davis	Hours	Correspondence regarding subpoena; confer with team on status of report	600.00	0.3	180.00
12/05/2011	Mark Murphy	Hours	Draft demand letter, draft Kroll report	525.00	6.7	3,500.00
12/06/2011	Mark Murphy	Hours	Phone call with S. Spurling; continue drafting letter and report against Kroll	525.00	8.5	4,462.50
12/08/2011	Mark Murphy	Hours	Continue working on Kroll report	525.00	5.3	2,800.00
12/09/2011	Mark Murphy	Hours	Continue working on Kroll report	525.00	4.5	2,362.50
12/12/2011	Jason M. Davis	Hours	Review and revise report; review information and comments for E. Snyder	600.00	1.1	660.00
12/12/2011	Mark Murphy	Hours	Continue working on Kroll report; prepare exhibits	525.00	7.3	3,850.00
12/13/2011	Mark Murphy	Hours	Continue working on Kroll report; prepare exhibits	525.00	4.3	2,275.00
12/15/2011	Jason M. Davis	Hours	Final review of report and cover letter to Kroll	600.00	0.4	240.00
12/15/2011	Mark Murphy	Hours	Revise claim letter; phone calls with Ed Snyder regarding preliminary report and claim letter	525.00	4.2	2,187.50
12/15/2011	Jason M. Davis	Hours	Discussions with co-counsel regarding claims vs. law firms and adding Kroll to same	600.00	0.5	300.00
12/21/2011	Mark Murphy	Hours	Draft fact section for complaint	525.00	12.3	6,486.25
12/21/2011	Jason M. Davis	Hours	Review requests and response by Kroll regarding Stanford Preliminary Report; confer with M. Murphy regarding the same	600.00	1.1	660.00
12/27/2011	Jason M. Davis	Hours	Correspondence from Kroll counsel; confer with M. Murphy regarding tolling	600.00	0.3	180.00
12/28/2011	Jason M. Davis	Hours	Confer with team and confirm forms of tolling amendment	600.00	0.3	180.00
01/04/2012	Mark Murphy	Hours	Review memo to receiver regarding claims against third parties; phone call with E. Snyder regarding this memo and claims against Kroll	525.00	2.3	1,216.25
01/06/2012	Mark Murphy	Hours	Meet with Ed Snyder; phone call with other counsel regarding claims of receiver and class; review documents from Stanford files	525.00	8.2	4,287.50
01/09/2012	Mark Murphy	Hours	Phone call with S. Spurling and E. Snyder regarding possible meeting and Kroll's request for dropping certain document requests for now; review Kroll documents for those responsive to Spurling's request	525.00	2.5	1,312.50
01/10/2012	Sarah P. Santos	Hours	Review tolling agreement, letter to Kroll regarding potential claims, and preliminary report and supporting documents detailing potential claims	525.00	5.0	2,625.00
01/10/2012	Mark Murphy	Hours	Review documents to provide to Kroll; draft letter to Kroll counsel re: additional documents produced	525.00	3.8	2,003.75
01/17/2012	Jason M. Davis	Hours	Review Kroll response to subpoena; confer with counsel regarding the same	600.00	0.8	480.00
01/17/2012	Sarah P. Santos	Hours	Review responses to Kroll subpoena	525.00	0.5	262.50
01/17/2012	Mark Murphy	Hours	Review Kroll's response to our request for production and subpoena; phone call with E. Snyder regarding Kroll's response	525.00	1.7	875.00
01/19/2012	Mark Murphy	Hours	Review SocGen order regarding motion to compel; draft email to counsel for Kroll regarding reviewing documents	525.00	3.8	2,003.75
01/23/2012	Mark Murphy	Hours	Phone call with S. Spurling regarding possible motion to compel and Kroll's request to extend the tolling agreement	525.00	0.5	262.50
01/31/2012	Mark Murphy	Hours	Phone call with counsel for Kroll regarding possible meeting and possible extension of tolling agreement; phone call with E. Snyder regarding same	525.00	0.7	350.00
03/16/2012	Mark Murphy	Hours	Draft motion to compel; Review orders and other motions that relate to our motion	525.00	7.8	4,103.75
03/20/2012	Mark Murphy	Hours	Phone call with E. Snyder regarding his conversation with S. Spurling	525.00	0.3	175.00
03/28/2012	Mark Murphy	Hours	Phone call with counsel for Kroll regarding documents requested	525.00	0.5	262.50
03/29/2012	Mark Murphy	Hours	Phone call with E. Snyder and opposing counsel regarding Kroll documents	525.00	0.5	262.50
04/12/2012	Mark Murphy	Hours	Phone calls with opposing counsel and with Ed Snyder regarding request for Kroll documents and confidentiality concerns	525.00	0.5	262.50
04/25/2012	Mark Murphy	Hours	Review proposed fourth amended tolling agreement	525.00	0.5	262.50

05/09/2012	Mark Murphy	Hours	Phone calls with S. Spurling and E. Snyder regarding confidentiality agreement; Review confidentiality agreement drafted and proposed by Kroll	525.00	1.2	612.50
05/17/2012	Mark Murphy	Hours	Phone call with S. Spurling regarding insurance policy; Draft email to E. Snyder regarding this issue	525.00	1.2	612.50
05/21/2012	Mark Murphy	Hours	Draft motion to compel against Kroll	525.00	4.2	2,187.50
05/22/2012	Mark Murphy	Hours	Draft motion to compel against Kroll	525.00	4.8	2,537.50
05/23/2012	Mark Murphy	Hours	Draft motion to compel against Kroll	525.00	4.5	2,362.50
05/24/2012	Mark Murphy	Hours	Draft motion to compel against Kroll; Phone call with E. Snyder regarding this motion	525.00	6.3	3,325.00
05/29/2012	Mark Murphy	Hours	Research regarding receiver standing; Review other orders of the Court relevant to our motion	525.00	5.3	2,800.00
05/30/2012	Mark Murphy	Hours	Revise motion to compel; Research regarding receiver standing	525.00	4.3	2,275.00
06/05/2012	Mark Murphy	Hours	Review and respond to emails from Ed Snyder regarding conferring with S. Spurling; Phone call with Spurling regarding our motion to compel	525.00	1.5	787.50
06/05/2012	Mark Murphy	Hours	Continue work on complaint	525.00	3.5	1,837.50
06/12/2012	Mark Murphy	Hours	Phone call with S. Spurling regarding motion to compel and insurance policies; Draft email to E. Snyder regarding this call	525.00	0.7	350.00
06/13/2012	Mark Murphy	Hours	Draft complaint	525.00	4.7	2,450.00
06/14/2012	Mark Murphy	Hours	Phone call with E. Snyder regarding tolling agreement and filing of motion to compel; Review emails from S. Spurling regarding motion to compel	525.00	1.3	700.00
06/15/2012	Mark Murphy	Hours	Phone calls with E. Snyder and S. Spurling regarding motion to compel and insurance policy production	525.00	0.8	420.00
06/15/2012	Mark Murphy	Hours	Review amended responses to subpoena provided by Kroll	525.00	1.2	612.50
06/15/2012	Mark Murphy	Hours	Research regarding possible effects of finding violation of tolling agreements	525.00	3.2	1,662.50
06/19/2012	Mark Murphy	Hours	Draft complaint against Kroll	525.00	7.8	4,103.75
06/20/2012	Mark Murphy	Hours	Research regarding other cases involving Kroll; Review web articles about other cases involving Kroll	525.00	3.3	1,750.00
06/20/2012	Mark Murphy	Hours	Draft email to S. Spurling regarding document production and production of the insurance policies	525.00	0.8	428.75
06/21/2012	Mark Murphy	Hours	Phone call with counsel for Kroll and review his email on extending response date	525.00	0.3	166.25
06/21/2012	Mark Murphy	Hours	Draft class complaint against Kroll	525.00	3.3	1,741.25
06/25/2012	Mark Murphy	Hours	Review interim report filed by receiver	525.00	0.8	428.75
06/25/2012	Mark Murphy	Hours	Review emails from counsel for Kroll regarding tolling; Review proposed tolling agreement amendment	525.00	1.5	787.50
06/27/2012	Mark Murphy	Hours	Revise complaint	525.00	2.2	1,137.50
07/13/2012	Mark Murphy	Hours	Draft complaint; Revise section on class allegations, factual background	525.00	5.2	2,712.50
07/16/2012	Mark Murphy	Hours	Review emails regarding settlement demand	525.00	0.6	315.00
07/16/2012	Mark Murphy	Hours	Meet with E. Snyder regarding complaint	525.00	0.8	428.75
07/16/2012	Mark Murphy	Hours	Draft demand letter to Kroll	525.00	2.5	1,312.50
07/18/2012	Jason M. Davis	Hours	Review demand letter and draft suit; confer with M. Murphy regarding same;	600.00	0.8	500.00
07/18/2012	Sarah P. Santos	Hours	Review demand letter sent to Kroll	525.00	0.3	157.50
07/18/2012	Mark Murphy	Hours	Review changes to class complaint and begin work on revising complaint; confer with Jason Davis regarding complaint	525.00	2.8	1,470.00
07/19/2012	Sarah P. Santos	Hours	Review email from Mark Murphy regarding complaints; review similar complaints in other related litigation	525.00	2.0	1,050.00
07/19/2012	Jason M. Davis	Hours	Review materials from M. Murphy and draft Complaints; review comments from E. Snyder	600.00	1.5	900.00
07/22/2012	Mark Murphy	Hours	Revise class complaint	525.00	4.3	2,240.00
07/23/2012	Mark Murphy	Hours	Begin drafting index for reply	525.00	0.8	420.00
07/23/2012	Mark Murphy	Hours	Phone call with Strasburger regarding dividing up labor for reply to response to motion to compel	525.00	0.3	157.50
07/23/2012	Mark Murphy	Hours	Discussion with Sarah Santos regarding filing complaint	525.00	0.3	157.50
07/23/2012	Mark Murphy	Hours	Continue drafting class complaint	525.00	3.5	1,837.50
07/24/2012	Sarah P. Santos	Hours	Continue review draft complaint and other samples, and analyze causes of action asserted therein	525.00	4.0	2,100.00
07/24/2012	Sarah P. Santos	Hours	Confer with M. Murphy regarding complaint	525.00	0.3	157.50
07/25/2012	Mark Murphy	Hours	Draft motion and order to extend time	525.00	1.2	612.50

07/25/2012	Jason M. Davis	Hours	Meeting with G. Park and T. Rocco regarding possible investigative help in case;	600.00	1.3	800.00
07/25/2012	Sarah P. Santos	Hours	Prepare complaint by the receiver	525.00	5.5	2,887.50
07/26/2012	Mark Murphy	Hours	Phone call with Kroll counsel	525.00	0.3	140.00
07/26/2012	Jason M. Davis	Hours	Confer with S.Santos regarding complaint;	600.00	0.3	200.00
07/26/2012	Sarah P. Santos	Hours	Continue preparing receiver's complaint	525.00	4.5	2,362.50
07/26/2012	Mark Murphy	Hours	Revise motion and order to extend time	525.00	1.3	691.25
07/27/2012	Jason M. Davis	Hours	Calls with counsel and team regarding tolling agreement	600.00	0.6	360.00
07/27/2012	Jason M. Davis	Hours	Review from M. Murphy two Complaints and articles on Kroll; confer with S. Santos regarding complaints;	600.00	1.3	800.00
07/27/2012	Sarah P. Santos	Hours	Continue preparing receiver's complaint	525.00	8.0	4,200.00
07/30/2012	Sarah P. Santos	Hours	Review correspondence with co-counsel regarding Kroll investigation	525.00	0.2	105.00
07/30/2012	Jason M. Davis	Hours	Review information provided by reporter and T. Cash	600.00	0.4	240.00
08/01/2012	Jason M. Davis	Hours	Review complaints fact section and news for background for settlement talks;	600.00	0.5	300.00
08/03/2012	Mark Murphy	Hours	Continue work on reply to motion to compel	525.00	2.2	1,137.50
08/03/2012	Mark Murphy	Hours	Phone call with E. Valdespino regarding Receiver's reply to motion to compel response	525.00	0.3	166.25
08/04/2012	Mark Murphy	Hours	Continue drafting reply to motion to compel; Research orders in other receivership cases; Draft appendix to reply	525.00	3.7	1,925.00
08/05/2012	Jason M. Davis	Hours	Review reply and related documents regarding subpoena issued by receiver;	600.00	0.8	500.00
08/05/2012	Mark Murphy	Hours	Revise reply to motion to compel and appendix; Draft email to team for review and comments	525.00	2.3	1,225.00
08/06/2012	Mark Murphy	Hours	Revise reply to motion to compel based on ECS comments; Draft email to team	525.00	0.7	350.00
08/07/2012	Mark Murphy	Hours	Revise reply to motion to compel based on ECS comments; Draft email to team	525.00	0.7	350.00
08/08/2012	Mark Murphy	Hours	Phone call with K. Sproul of Strasburger regarding citations	525.00	0.3	157.50
08/08/2012	Mark Murphy	Hours	Draft letter to Kroll counsel regarding "confidential" designation of documents produced	525.00	1.1	577.50
08/08/2012	Mark Murphy	Hours	Revise reply on motion to compel	525.00	2.3	1,207.50
08/08/2012	Mark Murphy	Hours	Review her memo on citations	525.00	0.3	157.50
08/09/2012	Sarah P. Santos	Hours	Review correspondence from Mark Murphy regarding documents received from Kroll; review documents and consider modification to receiver's complaint	525.00	3.0	1,575.00
08/09/2012	Jason M. Davis	Hours	Review documents produced by Kroll, confer with M. Murphy on effect of designation for complaint	600.00	0.6	360.00
08/16/2012	Sarah P. Santos	Hours	Review and revise internal agreement	525.00	0.3	157.50
08/17/2012	Karissa Gonzalez	Hours	Office conference with M. Murphy regarding document review for references to "Kroll" and "Tom Cash".	325.00	0.5	162.50
08/22/2012	Jason M. Davis	Hours	Review reply filed by Kroll;	600.00	0.5	300.00
08/22/2012	Karissa Gonzalez	Hours	Conduct document review of Admitted Government Entity documents Exhibits 1 through 8.	325.00	1.5	487.50
08/23/2012	Jason M. Davis	Hours	Review reply filed by Kroll regarding Motion to Quash; confer with team regarding same	600.00	0.8	480.00
08/23/2012	Sarah P. Santos	Hours	Review Kroll's reply on the motion to compel	525.00	0.5	262.50
08/23/2012	Karissa Gonzalez	Hours	Conduct document review of Admitted Government Entities documents Exhibits 9 through 336.	325.00	5.3	1,733.33
08/27/2012	Sarah P. Santos	Hours	Review memorandum of law in support of motion to quash subpoena	525.00	0.6	315.00
08/27/2012	Karissa Gonzalez	Hours	Conduct document review of Admitted Government Entities documents Exhibits 337 through 672.	325.00	4.2	1,384.17
08/31/2012	Mark Murphy	Hours	Review order on motion to compel; Draft email to counsel regarding protective order; Phone call with Ed Snyder regarding order and impact on document production	525.00	2.2	1,137.50
09/05/2012	Mark Murphy	Hours	Draft proposed confidentiality order; Draft exhibit A to protective order; Draft email to E. Snyder regarding same	525.00	2.3	1,216.25
09/07/2012	Mark Murphy	Hours	Revise class complaint	525.00	4.7	2,450.00
09/07/2012	Mark Murphy	Hours	Phone call with Kroll lawyers and Ed Snyder regarding production of documents and possible settlement discussions;	525.00	0.6	315.00
09/09/2012	Sarah P. Santos	Hours	Review proposal regarding sharing of attorneys' fees and discuss with J. Davis	525.00	0.4	210.00
09/11/2012	Sarah P. Santos	Hours	Review correspondence regarding document production and agreement with Kroll regarding same	525.00	0.2	105.00
09/11/2012	Jason M. Davis	Hours	Confer with team on document production issues and response to same; logistics of review and scope issues raised by Kroll	600.00	0.6	360.00

09/11/2012	Mark Murphy	Hours	Phone call with Kroll counsel on documents to be produced and scope of production; Review Kroll changes to proposed protective order; Draft email to other Receiver counsel regarding this call and topics discussed	525.00	3.7	1,925.00
09/13/2012	Mark Murphy	Hours	Draft email to E. Snyder on protective order; Review proposed protective order and draft changes	525.00	4.7	2,450.00
09/14/2012	Mark Murphy	Hours	Draft email to Kroll counsel on protective order	525.00	1.1	577.50
09/14/2012	Mark Murphy	Hours	Revise protective order	525.00	1.8	945.00
09/14/2012	Mark Murphy	Hours	Phone call with Kroll counsel on protective order	525.00	0.4	210.00
09/23/2012	Mark Murphy	Hours	Review changes to protective order; Draft emails to E. Snyder regarding document production and proposed order	525.00	1.2	612.50
09/25/2012	Mark Murphy	Hours	Review documents from Stanford criminal trial	525.00	3.8	1,995.00
09/26/2012	Mark Murphy	Hours	Review documents from Stanford criminal trial	525.00	3.3	1,750.00
09/28/2012	Sarah P. Santos	Hours	Review correspondence regarding settlement offers and counteroffers	525.00	0.2	105.00
09/28/2012	Mark Murphy	Hours	Phone calls with Kroll counsel regarding settlement offer and protective order	525.00	0.4	210.00
09/28/2012	Mark Murphy	Hours	Review changes to protective order; Draft email to co-counsel regarding protective order	525.00	2.8	1,470.00
09/28/2012	Jason M. Davis	Hours	Review offer and research on prior settlement in Florida case;	600.00	0.3	200.00
10/01/2012	Mark Murphy	Hours	Phone calls regarding protective order with D. Buncher;	525.00	0.6	315.00
10/01/2012	Jason M. Davis	Hours	Review latest tolling agreement and materials from E. Snyder;	600.00	0.3	200.00
10/01/2012	Mark Murphy	Hours	Review proposed tolling agreement; Review proposed changes to protective order	525.00	0.9	490.00
10/01/2012	Jason M. Davis	Hours	Confer with co-counsel on tolling; review state court release on fraud suits	600.00	0.5	300.00
10/02/2012	Mark Murphy	Hours	phone calls regarding protective order with D. Arlington	525.00	0.4	210.00
10/02/2012	Mark Murphy	Hours	Phone call with E. Valdespino regarding Venezuelan class representative	525.00	0.4	210.00
10/02/2012	Mark Murphy	Hours	Revise proposed protective order	525.00	1.1	577.50
10/05/2012	Mark Murphy	Hours	Revise protective order and draft email to Kroll counsel	525.00	2.1	1,120.00
10/05/2012	Mark Murphy	Hours	Review emails regarding protective order	525.00	1.3	665.00
10/10/2012	Mark Murphy	Hours	Draft second motion to compel	525.00	5.2	2,712.50
10/10/2012	Mark Murphy	Hours	Phone call with Kroll counsel regarding protective order; Review changes to protective order	525.00	0.8	420.00
10/22/2012	Mark Murphy	Hours	Research regarding persons identified in the documents; Draft cast of characters based on these persons	525.00	1.4	735.00
10/22/2012	Mark Murphy	Hours	Review documents produced by Kroll	525.00	4.3	2,257.50
10/22/2012	Mark Murphy	Hours	Phone calls with Kroll counsel regarding document production and possible tolling	525.00	0.4	210.00
10/24/2012	Mark Murphy	Hours	Review changes to 8th Tolling Agreement Amendment; Draft email to counsel regarding the signed agreement	525.00	1.3	691.25
10/25/2012	Mark Murphy	Hours	Draft email to E. Snyder on preliminary findings	525.00	0.8	420.00
10/25/2012	Mark Murphy	Hours	Conduct investigation on people identified in these documents	525.00	0.8	420.00
10/25/2012	Jason M. Davis	Hours	Confer with team on DEA agent issue	600.00	0.3	180.00
10/25/2012	Mark Murphy	Hours	Review documents produced by Stanford	525.00	11.8	6,195.00
10/25/2012	Jason M. Davis	Hours	Review additional information from M. Murphy and additional web research on Toal;	600.00	0.3	200.00
10/29/2012	Mark Murphy	Hours	Working meeting with Erin Green on review and organization of both client documents and documents from Stanford	525.00	1.1	577.50
10/29/2012	Erin Green	Hours	Phone call with M. Murphy to discuss case and client documents; review client docs	175.00	2.0	350.00
10/30/2012	Erin Green	Hours	Continue to review client docs and prepare index in Casemap	175.00	3.0	525.00
11/01/2012	Mark Murphy	Hours	Phone call with S. Ruskay-Kidd on documents produced, and timeline and expectations for production	525.00	0.3	166.25
11/02/2012	Mark Murphy	Hours	Begin review of new documents provided by Kroll	525.00	8.1	4,252.50
11/02/2012	Jason M. Davis	Hours	Call with E. Snyder; conference with M. Murphy regarding strategy for counteroffer; review materials for possible investigative assignment;	600.00	0.7	400.00
11/02/2012	Mark Murphy	Hours	Phone call with E. Snyder regarding response to settlement offer	525.00	0.2	105.00
11/05/2012	Mark Murphy	Hours	Continue review of new documents provided by Kroll	525.00	6.8	3,570.00
11/06/2012	Jason M. Davis	Hours	Review investigative work regarding Kroll involvement in airline transaction for Stanford	600.00	0.5	300.00
11/07/2012	Jason M. Davis	Hours	Confer with team regarding investigative lead on wiretap issue	600.00	0.3	180.00

11/09/2012	Mark Murphy	Hours	Draft letter to Kroll counsel on document production	525.00	3.7	1,925.00
11/12/2012	Mark Murphy	Hours	Revise letter to counsel for Kroll	525.00	2.2	1,155.00
11/12/2012	Jason M. Davis	Hours	Review and revise correspondence to Kroll regarding document production	600.00	0.4	240.00
11/12/2012	Mark Murphy	Hours	Review additional documents provided by Stanford	525.00	6.5	3,412.50
11/12/2012	Jason M. Davis	Hours	Begin review of documents produced by Kroll; Confer with team on Motion to Compel	600.00	1.1	660.00
11/16/2012	Mark Murphy	Hours	Review Hunton/Greenberg complaint	525.00	2.8	1,470.00
11/16/2012	Sarah P. Santos	Hours	Review complaint filed against law firms; confer with counsel regarding strategy on filing Kroll complaint	525.00	1.5	787.50
11/16/2012	Jason M. Davis	Hours	Review complaint in related Hunton Williams/Suarez cases; confer with co-counsel regarding tolling	600.00	1.2	720.00
11/18/2012	Jason M. Davis	Hours	Prepare for and attend meeting with committee, receiver and examiner regarding legal claims and settlement status in Dallas;	600.00	8.5	5,100.00
11/21/2012	Jason M. Davis	Hours	Analyze public filings and financial data related to Kroll;	600.00	0.5	300.00
11/26/2012	Mark Murphy	Hours	Draft complaint	525.00	6.2	3,237.50
11/27/2012	Erin Green	Hours	Phone call with M. Murphy to discuss document production; review new production and organize in file	175.00	2.5	437.50
11/27/2012	Mark Murphy	Hours	Phone call with opposing counsel regarding possible tolling	525.00	0.4	210.00
11/27/2012	Mark Murphy	Hours	Draft complaint	525.00	6.7	3,500.00
11/28/2012	Jason M. Davis	Hours	Correspondence with Kroll counsel; review analysis of counter-offer; discussions with M. Murphy regarding same	600.00	0.8	480.00
11/28/2012	Mark Murphy	Hours	Continue drafting complaint	525.00	5.7	2,975.00
11/29/2012	Mark Murphy	Hours	Review additional documents provided by Kroll	525.00	4.8	2,520.00
11/29/2012	Mark Murphy	Hours	Continue drafting complaint	525.00	7.2	3,762.50
11/29/2012	Jason M. Davis	Hours	Correspondence with team regarding settlement negotiations and related strategy	600.00	0.4	240.00
11/30/2012	Sarah P. Santos	Hours	Search for potential investigators; correspond with J. Davis regarding same	525.00	2.0	1,050.00
11/30/2012	Sarah P. Santos	Hours	Discuss projects with M. Murphy; review articles regarding Kroll	525.00	0.5	262.50
11/30/2012	Mark Murphy	Hours	Review article on Stanford in McClatchy	525.00	0.4	210.00
11/30/2012	Mark Murphy	Hours	Working meeting with S. Santos regarding strategy and staffing for upcoming tasks	525.00	0.3	157.50
12/03/2012	Sarah P. Santos	Hours	Review documents received from Kroll	525.00	1.5	787.50
12/04/2012	Mark Murphy	Hours	Review materials relevant to question of scope of representation; Phone calls with E. Snyder on this issue and upcoming committee meeting	525.00	0.8	420.00
12/04/2012	Mark Murphy	Hours	Review new materials produced by Kroll	525.00	4.8	2,528.75
12/04/2012	Mark Murphy	Hours	Draft memo to firm regarding upcoming tasks	525.00	0.8	420.00
12/05/2012	Sarah P. Santos	Hours	Review memorandum regarding task list	525.00	0.1	52.50
12/06/2012	Erin Green	Hours	Organize batches of documents produced by Kroll	175.00	0.7	122.50
12/10/2012	Mark Murphy	Hours	Review pleadings in other "third party" cases, including BDO, Adams & Reese, etc.	525.00	2.0	1,050.00
12/10/2012	Sarah Weynand	Hours	Confer with M. Murphy regarding case background and strategy for drafting Settlement Agreement brief	325.00	1.2	379.17
12/10/2012	Mark Murphy	Hours	Working meeting with S. Weynand regarding background facts and starting our briefing on claims and defenses	525.00	1.2	612.50
12/14/2012	Sarah Weynand	Hours	Find, print, and begin to review Report and Draft Complaint	325.00	0.3	108.33
12/16/2012	Sarah Weynand	Hours	Read article to get background information on Stanford; read preliminary report on Kroll	325.00	1.3	433.33
12/17/2012	Sarah Weynand	Hours	Review draft complaint	325.00	0.9	292.50
12/17/2012	Sarah Weynand	Hours	Research and analyze elements of each cause of action asserted in complaint and incorporate into chart	325.00	2.8	899.17
12/17/2012	Sarah Weynand	Hours	Create chart of plaintiffs' claims and outline of facts related to Kroll's involvement in Stanford scheme	325.00	5.0	1,625.00
12/18/2012	Sarah Weynand	Hours	Continue to review draft complaint	325.00	0.8	243.75
12/18/2012	Sarah Weynand	Hours	Create chart of plaintiffs' claims and outline of facts related to Kroll's involvement in Stanford scheme	325.00	1.0	325.00
12/18/2012	Sarah Weynand	Hours	Continue to research and analyze elements of each cause of action asserted in complaint and incorporate into chart	325.00	0.6	184.17
12/21/2012	Sarah Weynand	Hours	Prepare to confer with M. Murphy regarding Stanford/Kroll arguments and causes of action	325.00	0.3	108.33
12/21/2012	Sarah Weynand	Hours	Listen to and take notes on phone conversation between M. Murphy and opposing counsel regarding settlement offer and mediation	325.00	0.2	54.17

12/21/2012	Mark Murphy	Hours	Working meeting with S. Weynand regarding other Stanford cases, including claims asserted and defenses raised in those cases Confer with M. Murphy about (1) analyzing Plaintiffs' and Defendant's arguments and (2) using motions for summary judgment from other cases against third parties involved in the Stanford Ponzi scheme to anticipate defenses Defendant will raise in the present action	525.00	0.8	420.00
12/21/2012	Sarah Weynand	Hours		325.00	0.7	216.67
12/21/2012	Mark Murphy	Hours	Phone call with counsel for Kroll regarding settlement discussions	525.00	0.4	210.00
12/21/2012	Sarah Weynand	Hours	search Pacer for latest Joint Report on Stanford litigation	325.00	0.3	108.33
12/21/2012	Sarah Weynand	Hours	Construct chart of other third-party actions related to Stanford's Ponzi scheme	325.00	1.5	487.50
12/28/2012	Erin Green	Hours	Continue to work on organizing documents produced by Kroll	175.00	2.0	350.00
01/01/2013	Sarah Weynand	Hours		325.00	5.2	1,679.17
01/02/2013	Erin Green	Hours	Continue to combine and organize documents produced by Kroll	175.00	1.5	262.50
01/02/2013	Sarah Weynand	Hours	Continue to construct chart of other Stanford third-party defendants' cases	325.00	1.7	541.67
01/02/2013	Sarah Weynand	Hours	Confer and strategize with M. Murphy regarding organizing and evaluating third-party defendants' defenses and Plaintiffs' responses to these defenses	325.00	0.5	162.50
01/02/2013	Mark Murphy	Hours	Review documents provided by Kroll	525.00	12.2	6,387.50
01/03/2013	Erin Green	Hours	Continue to combine and organize documents produced by Kroll	175.00	2.0	350.00
01/03/2013	Sarah Weynand	Hours	Continue to construct (1) chart of cases against other third-party defendants and (2) chart of other third-party defendants' defenses raised in their motions to dismiss	325.00	4.2	1,354.17
01/03/2013	Jason M. Davis	Hours	Review documents and prior draft complaint for purposes of meeting with Kroll counsel;	600.00	2.8	1,700.00
01/04/2013	Sarah Weynand	Hours	Continue to obtain and review other third-party defendants' motions to dismiss and construct chart of defendants' arguments Review authorities and draft Rule 12 motion for conference call with DC counsel; conference call with DC counsel and review revised Motion;	325.00	3.2	1,029.17
01/04/2013	Jason M. Davis	Hours	Obtain Plaintiffs' responses to defendants' motions to dismiss	600.00	1.2	700.00
01/04/2013	Sarah Weynand	Hours	Create hot documents chart	325.00	0.3	108.33
01/04/2013	Mark Murphy	Hours	Phone call with E. Snyder regarding upcoming meeting with Kroll's counsel	525.00	1.2	630.00
01/04/2013	Mark Murphy	Hours	Review documents produced by Kroll	525.00	0.2	105.00
01/05/2013	Mark Murphy	Hours	Begin revising causes of action	525.00	4.3	2,266.25
01/05/2013	Mark Murphy	Hours	Revise fact section of petition	525.00	2.0	1,050.00
01/05/2013	Mark Murphy	Hours	Review Plaintiffs' responses to other third-party defendants' motions to dismiss and incorporate into chart of third-party defendants' defenses	525.00	4.1	2,152.50
01/05/2013	Sarah Weynand	Hours	Continue to review Plaintiffs' responses to other third-party defendants' motions to dismiss and incorporate into chart of third-party defendants' defenses	325.00	2.8	920.83
01/06/2013	Sarah Weynand	Hours	Working meeting with S. Weynand regarding ongoing research related to possible claims and anticipated defenses	325.00	4.8	1,570.83
01/07/2013	Mark Murphy	Hours	Confer with M. Murphy regarding charts of third-party claims and defenses	525.00	0.5	262.50
01/07/2013	Mark Murphy	Hours	Research regarding class claims and applying facts to class criteria	325.00	0.5	162.50
01/07/2013	Jason M. Davis	Hours	Prepare for and attend meeting with Kroll counsel, meeting with co-counsel regarding settlement strategy; review materials in anticipation of white paper for claims and defenses;	600.00	3.7	2,200.00
01/07/2013	Mark Murphy	Hours	Meet with counsel for Kroll	525.00	1.1	577.50
01/07/2013	Sarah Weynand	Hours	Continue to review Plaintiffs' responses to other third-party defendants' motions to dismiss and incorporate into chart of third-party defendants' defenses	325.00	1.8	588.75
01/07/2013	Sarah Weynand	Hours	Review binders containing motions to dismiss and responses	325.00	0.4	135.42
01/08/2013	Sarah Weynand	Hours	Add case to chart of actions against third-party defendants	325.00	0.2	54.17
01/08/2013	Mark Murphy	Hours	Working meeting with paralegal E. Green regarding documents produced by Kroll and organizing them	525.00	0.3	175.00
01/09/2013	Mark Murphy	Hours	Review possible defenses of Kroll, asserted by defendants in other third party actions	525.00	2.4	1,260.00
01/09/2013	Jason M. Davis	Hours	Continue review of documents from Kroll, correspondence with team;	600.00	1.5	900.00
01/09/2013	Mark Murphy	Hours	Begin review of new documents produced by Kroll	525.00	5.0	2,625.00
01/10/2013	Mark Murphy	Hours	Research regarding Kroll financial situation	525.00	2.4	1,260.00
01/10/2013	Mark Murphy	Hours	Draft detailed email to Kroll's counsel regarding documents for our review and concerns over document production	525.00	1.4	735.00

01/10/2013	Jason M. Davis	Hours	Review additional documents from Kroll and correspondence from Kroll counsel;	600.00	1.7	1,000.00
01/10/2013	Jason M. Davis	Hours	Review investigation on Bartoli and Kroll; correspondence with team	600.00	0.4	240.00
01/10/2013	Jason M. Davis	Hours	Correspondence with Kroll counsel; confer with team on Kroll audits	600.00	0.4	240.00
01/10/2013	Mark Murphy	Hours	Review Kroll's latest production	525.00	5.4	2,835.00
01/10/2013	Mark Murphy	Hours	Research Refco Group and Eric Bartoli; Draft email to team regarding these documents	525.00	1.8	945.00
01/10/2013	Mark Murphy	Hours	Review new tolling agreement	525.00	0.2	105.00
01/11/2013	Erin Green	Hours	Research federal cases against Kroll entities on Pacer	175.00	2.5	437.50
01/12/2013	Mark Murphy	Hours	Draft research questions related to potential liability of Kroll's parents and subsidiaries; Begin research on this issue	525.00	2.4	1,260.00
01/14/2013	Mark Murphy	Hours	Draft memo for committee review	525.00	1.5	787.50
01/14/2013	Jason M. Davis	Hours	Review public filings related to Kroll and confer with investors regarding the same	600.00	0.7	420.00
01/14/2013	Mark Murphy	Hours	Continue preparing for upcoming meeting with committee	525.00	2.4	1,260.00
01/14/2013	Jason M. Davis	Hours	Continue document review and correspondence from Kroll counsel;	600.00	1.5	900.00
01/15/2013	Mark Murphy	Hours	Review results of corporate structure investigation into Kroll	525.00	0.8	420.00
01/15/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding researching parent/subsidiary/sibling liability	325.00	0.2	54.17
01/15/2013	Mark Murphy	Hours	Working meeting with S. Weynand on possible parent liability	525.00	0.2	87.50
01/15/2013	Sarah Weynand	Hours	Research parent/subsidiary/sibling liability	325.00	2.5	812.50
01/15/2013	Jason M. Davis	Hours	Review materials from G. Parks and calls with G. Parks and M. Murphy; prepare and review materials for meeting with examiner and co-counsel;	600.00	1.0	600.00
01/16/2013	Jason M. Davis	Hours	Review and prepare materials for meeting with examiner and co-counsel; confer with M. Murphy regarding same;	600.00	1.8	1,100.00
01/16/2013	Mark Murphy	Hours	Continue preparing for meeting with committee	525.00	4.7	2,450.00
01/16/2013	Sarah Weynand	Hours	Continue to research parent/subsidiary/sibling liability	325.00	6.0	1,950.00
01/17/2013	Mark Murphy	Hours	Prepare materials for investors committee review	525.00	2.8	1,470.00
01/17/2013	Mark Murphy	Hours	Phone calls with counsel for Kroll regarding document production, insurance policies	525.00	0.6	315.00
01/17/2013	Jason M. Davis	Hours	Correspondence with Kroll counsel; review information regarding invoices	600.00	0.5	300.00
01/17/2013	Jason M. Davis	Hours	Prepare for meeting with committee; prepare and revise status report and analyze financial data related to Kroll solvency;	600.00	3.2	1,900.00
01/17/2013	Mark Murphy	Hours	Draft memo for committee review	525.00	0.8	420.00
01/17/2013	Erin Green	Hours	Combine recently received document production from Kroll	175.00	0.3	52.50
01/17/2013	Jason M. Davis	Hours	Review and revise status report	600.00	1.6	960.00
01/17/2013	Mark Murphy	Hours	Phone call with E. Snyder regarding document production	525.00	0.2	105.00
01/18/2013	Jason M. Davis	Hours	Review article on Supreme Court SLUSA rules; confer with team regarding the same	600.00	0.4	240.00
01/18/2013	Mark Murphy	Hours	Meet with committee regarding status of claims against and negotiations with Kroll; Travel related to meeting with committee	525.00	4.2	2,187.50
01/21/2013	Mark Murphy	Hours	Review latest materials provided by Stanford related to work on Antigua government regulatory agency	525.00	3.4	1,785.00
01/21/2013	Mark Murphy	Hours	Phone call with investigator related to Kroll corporate structure	525.00	0.4	210.00
01/22/2013	Jason M. Davis	Hours	Confer with team regarding negotiations and effect of SLUSA issues	600.00	0.6	360.00
01/22/2013	Sarah P. Santos	Hours	Review update and consider SLUSA decisions	525.00	0.4	210.00
01/22/2013	Mark Murphy	Hours	Draft memorandum to our group regarding the discussions and implications of SLUSA preemption	525.00	1.7	875.00
01/22/2013	Mark Murphy	Hours	Phone call with Kroll's counsel regarding settlement negotiations and financial statements	525.00	0.4	210.00
01/22/2013	Jason M. Davis	Hours	Review and discuss effects of state court ruling on potential claims with S. Santos and M. Murphy and update on Kroll negotiations;	600.00	0.5	300.00
01/22/2013	Sarah Weynand	Hours	Discuss Kroll claims' status and strategy;	325.00	0.2	54.17
01/23/2013	Sarah P. Santos	Hours	Confer with team regarding status update	525.00	0.2	105.00
01/23/2013	Jason M. Davis	Hours	Review financials and other information from investigator for purposes of confirming claim for contribution to any settlement;	600.00	0.5	300.00
01/24/2013	Mark Murphy	Hours	Phone call with E. Valdespino regarding CPA review of Kroll financials; Draft email to E. Snyder regarding this call	525.00	0.3	175.00
01/28/2013	Mark Murphy	Hours	Phone call with E. Snyder regarding production	525.00	0.2	105.00

01/28/2013	Mark Murphy	Hours	revise hot docs and cast of characters	525.00	2.6	1,365.00
01/28/2013	Mark Murphy	Hours	Review additional Kroll production	525.00	4.7	2,450.00
01/29/2013	Mark Murphy	Hours	Continued investigation into whereabouts of Ivan Diaz; phone calls to potential contacts to locate Diaz; draft questions for Diaz	525.00	4.3	2,266.25
01/29/2013	Mark Murphy	Hours	Review objection to distribution of interim funds	525.00	0.2	105.00
01/30/2013	Jason M. Davis	Hours	Review correspondence with investigators regarding Kroll	600.00	0.3	180.00
01/30/2013	Mark Murphy	Hours	Review emails about Antiguan joint liquidators investigation into Kroll	525.00	3.3	1,732.50
01/30/2013	Mark Murphy	Hours	Continue attempts to reach Ivan Diaz, including drafting emails to potential contacts who know his whereabouts	525.00	1.0	525.00
01/30/2013	Jason M. Davis	Hours	Correspondence regarding financial condition of Kroll; review investigator work on same;	600.00	0.3	200.00
01/30/2013	Mark Murphy	Hours	Review emails about Antiguan joint liquidators investigation into Kroll;	525.00	3.3	1,732.50
02/01/2013	Jason M. Davis	Hours	Review filings - Amicus;	600.00	0.5	300.00
02/03/2013	Jason M. Davis	Hours	Review confirmation agreement and correspondence from Kroll counsel; review public filings regarding financial condition;	600.00	1.2	700.00
02/03/2013	Jason M. Davis	Hours	Review conference agreement and correspondence from Kroll counsel; review public filings regarding financial condition;	600.00	1.2	700.00
02/04/2013	Jason M. Davis	Hours	Correspondence with Kroll counsel regarding financial confidentiality agreement of Kroll; review confidential financials	600.00	0.5	300.00
02/07/2013	Sarah P. Santos	Hours	Review document production regarding debt obligations of Kroll	525.00	2.0	1,050.00
02/08/2013	Sarah Weynand	Hours	Review Receiver's Fifth Interim Report	325.00	0.4	130.00
02/08/2013	Mark Murphy	Hours	Review proposed confidentiality order and draft email comments to E. Snyder	525.00	1.3	700.00
02/08/2013	Mark Murphy	Hours	Draft email to team regarding case status	525.00	0.6	315.00
02/08/2013	Mark Murphy	Hours	Phone call with Kroll counsel regarding financial documents provided; prepare for same	525.00	0.3	175.00
02/08/2013	Mark Murphy	Hours	Phone calls with E. Valdespino and T. Burchett regarding review of financial documents	525.00	0.8	420.00
02/08/2013	Mark Murphy	Hours	Review email from Valdespino regarding Venezuelan class reps	525.00	0.2	105.00
02/12/2013	Jason M. Davis	Hours	Review financial data and confer with M. Murphy regarding strategy;	600.00	0.5	300.00
02/12/2013	Mark Murphy	Hours	Working meeting with J. Davis regarding Kroll financials	525.00	0.4	210.00
02/12/2013	Mark Murphy	Hours	Phone call with T. Burchett regarding review of financial documents	525.00	0.2	105.00
02/12/2013	Mark Murphy	Hours	Review confidentiality order signed by all parties	525.00	0.4	210.00
02/12/2013	Mark Murphy	Hours	review Kroll financials	525.00	2.2	1,137.50
02/12/2013	Mark Murphy	Hours	Draft emails regarding financials to E. Valdespino, J. Little, and R. Janvey	525.00	0.4	210.00
02/13/2013	Mark Murphy	Hours	Phone call with counsel for Kroll and E. Snyder	525.00	0.6	315.00
02/13/2013	Mark Murphy	Hours	Phone calls to possible contacts with Ivan Diaz	525.00	0.8	420.00
02/14/2013	Jason M. Davis	Hours	Review information related to Kroll insurance; confer with team regarding settlement	600.00	0.8	480.00
02/14/2013	Mark Murphy	Hours	Draft update email to J.Davis, S. Santos	525.00	0.4	210.00
02/14/2013	Sarah P. Santos	Hours	Review update from Mark Murphy regarding discussions with Kroll's counsel	525.00	0.2	105.00
02/14/2013	Jason M. Davis	Hours	Additional review of documents from Kidd;	600.00	0.7	400.00
02/14/2013	Mark Murphy	Hours	Review new documents provided	525.00	3.8	1,995.00
02/15/2013	Mark Murphy	Hours	Continue review of new documents provided	525.00	2.2	1,137.50
02/18/2013	Jason M. Davis	Hours	Review tolling agreement and financials given to CPA;	600.00	0.5	300.00
02/18/2013	Mark Murphy	Hours	Review email regarding this demand	525.00	0.2	105.00
02/18/2013	Jason M. Davis	Hours	Correspondence from E. Snyder; conference with M. Murphy regarding same;	600.00	0.3	200.00
02/18/2013	Mark Murphy	Hours	phone call with Ed Snyder on this issue and Antiguan liquidators? demand; review email regarding this demand	525.00	0.2	105.00
02/18/2013	Mark Murphy	Hours	Phone call with T. Burchett regarding Kroll financial documents	525.00	0.6	315.00
02/18/2013	Mark Murphy	Hours	Continue review of Kroll financial documents	525.00	3.3	1,732.50
02/21/2013	Mark Murphy	Hours	Continue review of new documents provided by Kroll	525.00	3.8	1,995.00
02/21/2013	Mark Murphy	Hours	Review Receiver's latest motion to approve fee application	525.00	0.7	350.00
02/21/2013	Mark Murphy	Hours	Phone call with T. Burchett about review of Kroll financial information	525.00	0.5	262.50



02/22/2013	Erin Green	Hours	Discuss document review strategy with M. Murphy	175.00	0.4	70.00
02/22/2013	Mark Murphy	Hours	Continue reviewing financial documents	525.00	2.2	1,137.50
02/22/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding researching factors that courts consider when deciding whether to approve a class action settlement; confer with M. Murphy regarding analyzing Allegri Credit Agreement to determine what Kroll assets are collateral under the Agreement	325.00	0.2	65.00
02/22/2013	Mark Murphy	Hours	Phone call with T. Burchett and trial team on Kroll financial documents	525.00	0.4	210.00
02/22/2013	Mark Murphy	Hours	Phone call with T. Burchett and trial team on Kroll financial documents	525.00	2.2	1,137.50
02/23/2013	Mark Murphy	Hours	Continue revising complaint, section on class representatives	525.00	3.8	1,995.00
02/23/2013	Mark Murphy	Hours	Review list of materials requested by T. Burchett; draft response email based on these items	525.00	0.7	350.00
02/25/2013	Jason M. Davis	Hours	Confer with M. Murphy on status of negotiations; financial analysis by CPA;	600.00	0.5	300.00
02/25/2013	Mark Murphy	Hours	Working meeting with J. Davis regarding financial documents from Kroll	525.00	0.5	262.50
02/25/2013	Mark Murphy	Hours	Review revised list of materials requested by Todd Burchett	525.00	0.5	262.50
02/25/2013	Mark Murphy	Hours	Phone call with Ed Snyder regarding documents requested by Todd Burchett, and strategy for settlement negotiations	525.00	0.3	175.00
02/25/2013	Jason M. Davis	Hours	Confer with M. Murphy regarding status of negotiations; financial analysis by CPA;	600.00	0.5	300.00
02/26/2013	Erin Green	Hours	Review documents produced by Kroll and prepare index based on investigations	175.00	6.5	1,137.50
02/26/2013	Mark Murphy	Hours	Review examiner's response to latest application for fees	525.00	0.3	166.25
02/26/2013	Mark Murphy	Hours	Review and respond to emails setting up phone conference with counsel for Kroll	525.00	0.2	105.00
02/26/2013	Sarah P. Santos	Hours	Review confidentiality agreement	525.00	0.4	210.00
02/28/2013	Sarah Weynand	Hours	Analyze USIS 2007 Credit Agreement to determine what Kroll assets it designates as collateral	325.00	0.8	260.00
03/01/2013	Mark Murphy	Hours	Draft email to Kroll counsel on this issue	525.00	1.8	945.00
03/01/2013	Mark Murphy	Hours	Phone call with T. Burchett regarding this issue and his requests for additional information	525.00	0.4	210.00
03/01/2013	Mark Murphy	Hours	Phone call with E. Valdespino regarding finalizing complaint	525.00	0.2	105.00
03/01/2013	Mark Murphy	Hours	Phone call with Kroll counsel and E. Snyder regarding Kroll financials	525.00	0.4	210.00
03/01/2013	Sarah Weynand	Hours	Continue to analyze USIS 2007 Credit Agreement to determine what Kroll assets it designates as collateral	325.00	2.8	910.00
03/02/2013	Mark Murphy	Hours	Review additional documents produced by Kroll	525.00	3.2	1,662.50
03/02/2013	Mark Murphy	Hours	Review memo from S. Weynand regarding Kroll's assets being pledged as collateral for Allegri debt; draft memo to trial team on this issue	525.00	3.8	1,995.00
03/02/2013	Mark Murphy	Hours	Continue drafting timeline and cast of characters based on Kroll document review	525.00	2.5	1,312.50
03/06/2013	Sarah Weynand	Hours	Find case law specifically supporting consideration of a defendant's financial condition and incorporate into memorandum	325.00	0.4	119.17
03/06/2013	Sarah Weynand	Hours	Find case law specifically supporting consideration of a defendant's financial condition and incorporate into memorandum	325.00	0.4	119.17
03/06/2013	Sarah Weynand	Hours	Research and compose memorandum on factors that a court may consider when deciding whether to approve a class action settlement	325.00	1.3	433.33
03/07/2013	Sarah Weynand	Hours	Continue to research and compose memorandum on factors that court considers when deciding whether to approve a class action settlement	325.00	1.9	617.50
03/07/2013	Sarah Weynand	Hours	Continue to find case law specifically supporting consideration of a defendant's financial condition and incorporate into memorandum	325.00	1.9	617.50
03/08/2013	Erin Green	Hours	Review documents produced by Kroll and prepare index based on investigations	175.00	1.4	245.00
03/12/2013	Heather L. Carroll	Hours	Review docket sheet	175.00	0.4	70.00
03/12/2013	Mark Murphy	Hours	Review documents produced by Kroll	525.00	4.2	2,205.00
03/12/2013	Heather L. Carroll	Hours	Ascertain docket sheet for The Heritage Organization, LLC bankruptcy case	175.00	0.4	70.00
03/18/2013	Sarah Weynand	Hours	Review class action settlement approval memorandum and cases	325.00	0.3	97.50
03/18/2013	Sarah Weynand	Hours	Confer and strategize with M. Murphy regarding class action settlement approval factors and drafting brief in support of settlement approval	325.00	0.2	65.00
03/18/2013	Sarah Weynand	Hours	Correspond with M. Murphy regarding class action settlement approval factor research	325.00	0.1	32.50
03/18/2013	Mark Murphy	Hours	Phone call with Kroll counsel	525.00	0.4	210.00
03/18/2013	Mark Murphy	Hours	Investigate possible mediators	525.00	1.1	577.50

03/19/2013	Jason M. Davis	Hours	Confer with M. Murphy regarding mediators and J. Ferguson for insurance mediation;	600.00	0.3	200.00
03/19/2013	Jason M. Davis	Hours	Confer with M. Murphy regarding mediators and J. Ferguson for insurance mediation;	600.00	0.3	200.00
03/19/2013	Sarah Weynand	Hours	Obtain and analyze Billitteri settlement approval brief and opponents' responses;	325.00	1.3	422.50
03/19/2013	Mark Murphy	Hours	Phone call with Judge Ferguson to discuss possible mediation	525.00	0.4	210.00
03/19/2013	Sarah Weynand	Hours	Compose memorandum regarding financial evidence that courts consider when deciding whether to approve a class action settlement	325.00	2.7	877.50
03/19/2013	Mark Murphy	Hours	Investigate other potential mediators	525.00	0.4	210.00
03/19/2013	Mark Murphy	Hours	Draft email to trial team	525.00	1.1	577.50
03/20/2013	Mark Murphy	Hours	Review insurance policies for liability issues	525.00	3.4	1,785.00
03/20/2013	Mark Murphy	Hours	Draft email to trial team on insurance issues	525.00	1.2	630.00
03/20/2013	Jason M. Davis	Hours	Review insurance documents for questions concerning excess application and diminishing raised by E. Snyder;	600.00	0.5	300.00
03/20/2013	Mark Murphy	Hours	Phone call with counsel for Kroll regarding the same	525.00	0.6	315.00
03/20/2013	Erin Green	Hours	Review documents produced by Kroll and prepare index based on investigations	175.00	2.0	350.00
03/21/2013	Erin Green	Hours	Review documents produced by Kroll and prepare index based on investigations	175.00	2.0	350.00
03/22/2013	Sarah Weynand	Hours	Continue to compose memorandum regarding financial evidence that courts consider when deciding whether to approve a class action settlement	325.00	4.0	1,300.00
03/22/2013	Mark Murphy	Hours	Review and compare latest tolling agreement with previous versions	525.00	0.2	105.00
03/22/2013	Sarah Weynand	Hours	Organize Billitteri materials for binder	325.00	1.0	325.00
03/22/2013	Sarah Weynand	Hours	Continue to obtain and analyze Billitteri settlement approval briefs and opponents' responses	325.00	1.6	520.00
03/22/2013	Erin Green	Hours	Review documents produced by Kroll and prepare index based on investigations	175.00	2.3	402.50
03/23/2013	Mark Murphy	Hours	Draft email to all counsel on mediation	525.00	0.8	420.00
03/24/2013	Sarah Weynand	Hours	Continue to conduct research and draft memorandum regarding financial evidence that courts analyze when determining whether to approve a class settlement	325.00	1.7	552.50
03/25/2013	Sarah Weynand	Hours	Review Billitteri binders	325.00	0.3	108.33
03/25/2013	Sarah Weynand	Hours	Continue to conduct research and draft memorandum regarding financial evidence that courts analyze when determining whether to approve a class settlement	325.00	2.2	704.17
03/25/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding financial information that courts consider when deciding whether to approve a class settlement, and confer and strategize regarding information requested from Kroll and Allegity	325.00	0.3	97.50
03/25/2013	Mark Murphy	Hours	Review Greenberg Traurig's objection to agreement with Antiguan Joint Liquidators	525.00	1.2	630.00
03/25/2013	Mark Murphy	Hours	Working meeting with S. Weynand regarding issue of solvency in class settlement approvals	525.00	0.4	210.00
03/27/2013	Erin Green	Hours	Continue to review documents produced by Kroll and create broad index	175.00	3.0	525.00
04/01/2013	Erin Green	Hours	Continue to review documents produced by Kroll and create broad index	175.00	1.0	175.00
04/08/2013	Mark Murphy	Hours	Review replies regarding motion to accept settlement offer with Antiguan liquidators	525.00	1.2	612.50
04/10/2013	Erin Green	Hours	Continue to review documents produced by Kroll and create broad index	175.00	1.5	262.50
04/10/2013	Mark Murphy	Hours	Draft email to team members regarding mediation discussions with Kroll counsel	525.00	0.8	420.00
04/10/2013	Mark Murphy	Hours	Phone call with counsel for Kroll regarding possible mediation; phone call with office of Deborah Hankinson regarding possible mediation; draft and review emails with Hankinson's office	525.00	1.2	612.50
04/11/2013	Erin Green	Hours	Continue to work on preparing broad index of documents produced by Kroll; prepare chart of all invoices from Kroll to Stamford prior to 2000	175.00	2.0	350.00
04/12/2013	Erin Green	Hours	Continue to work on preparing broad index of documents produced by Kroll; prepare chart of all invoices from Kroll to Stamford prior to 2000	175.00	4.8	840.00
04/13/2013	Jason M. Davis	Hours	Review summary of documents and Kroll/Stamford invoices	600.00	0.4	240.00
04/15/2013	Mark Murphy	Hours	Phone call with D. Hankinson assistant regarding mediation dates	525.00	0.2	105.00
04/15/2013	Mark Murphy	Hours	Review Kroll invoice spreadsheet and draft email to Kroll counsel about amounts Kroll received for Stamford work	525.00	2.2	1,137.50
04/15/2013	Mark Murphy	Hours	Phone call with counsel for Kroll regarding mediation	525.00	2.2	1,137.50
04/17/2013	Mark Murphy	Hours	Review several emails and respond to them, regarding mediation, mediators and possible mediation dates	525.00	0.8	437.50
04/18/2013	Jason M. Davis	Hours	Update from team on mediation and position from Kroll on document production; confer with M. Murphy;	600.00	0.3	200.00

04/18/2013	Mark Murphy	Hours	Draft email to trial team regarding financial issues of Kroll	525.00	0.8	420.00
04/18/2013	Mark Murphy	Hours	Phone call with Kroll regarding financial materials	525.00	0.4	210.00
04/18/2013	Mark Murphy	Hours	Meeting with T. Burchett on these materials and additional questions	525.00	2.2	1,137.50
04/19/2013	Jason M. Davis	Hours	Confer with team regarding mediators and mediation; Confirm availability of retired judges	600.00	0.5	300.00
04/23/2013	Sarah Weynand	Hours	Investigate potential mediator L. Milonas	325.00	0.9	281.67
04/23/2013	Sarah Weynand	Hours	Review recently filed motions to dismiss and replies in other third-party cases	325.00	1.2	390.00
04/23/2013	Sarah Weynand	Hours	Incorporate relevant arguments from motions to dismiss into Third-Party Defenses Chart	325.00	1.0	325.00
04/23/2013	Sarah Weynand	Hours	Review Receiver's Fourth Joint Report for relevant updates	325.00	0.5	162.50
04/24/2013	Jason M. Davis	Hours	Correspondence with team and Kroll counsel regarding mediation and Tolling Agreement	600.00	0.5	300.00
04/24/2013	Sarah Weynand	Hours	Continue to investigate potential mediator L. Milonas's connections to Kroll and his legal experience	325.00	3.6	1,170.00
04/25/2013	Mark Murphy	Hours	Phone call with counsel for Kroll regarding mediation	525.00	0.4	210.00
04/25/2013	Jason M. Davis	Hours	Correspondence with counsel regarding Tolling Agreement	600.00	0.4	240.00
04/25/2013	Jason M. Davis	Hours	Correspondence with opposing counsel and confer with M. Murphy on mediation and strategy related to same;	600.00	0.3	200.00
04/25/2013	Mark Murphy	Hours	Draft email to co-counsel regarding mediation	525.00	0.8	420.00
04/26/2013	Jason M. Davis	Hours	Correspondence with Kroll counsel	600.00	0.3	180.00
04/28/2013	Mark Murphy	Hours	Research regarding same, including Texas Securities Act claims	525.00	3.1	1,627.50
04/28/2013	Mark Murphy	Hours	Review Court's order on SEC's motion for summary judgment	525.00	0.6	315.00
04/28/2013	Mark Murphy	Hours	Review emails related to mediation	525.00	0.4	210.00
04/28/2013	Mark Murphy	Hours	Review chart regarding possible claims and defense	525.00	0.8	420.00
05/01/2013	Jason M. Davis	Hours	Correspondence with team and mediators; review correspondence from Kroll	600.00	0.8	480.00
05/02/2013	Mark Murphy	Hours	continue work on complaint	525.00	2.8	1,470.00
05/02/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding (1) preparing Complaint and (2) creating new chart of existing and potential claims	325.00	0.3	97.50
05/02/2013	Mark Murphy	Hours	Review claims/defenses chart prepared by S. Weynand; conference with her regarding revising Kroll complaint	525.00	1.3	691.25
05/02/2013	Sarah Weynand	Hours	Prepare to confer with M. Murphy about third-party claims chart	325.00	0.3	97.50
05/03/2013	Sarah Weynand	Hours	Review draft Complaint based on other third-party complaint and modify where appropriate; create chart organizing claims made against third-party defendants, including Kroll	325.00	2.0	650.00
05/03/2013	Jason M. Davis	Hours	Review research from S. Weynand for mediation purposes;	600.00	1.2	700.00
05/03/2013	Sarah Weynand	Hours	Research whether Class may bring a conversion claim against Kroll	325.00	2.2	715.00
05/03/2013	Sarah Weynand	Hours	Research whether Class may bring a tortious interference with contract claim against Kroll	325.00	2.4	780.00
05/05/2013	Sarah Weynand	Hours	Draft Class claim for negligence	325.00	0.8	260.00
05/05/2013	Sarah Weynand	Hours	Draft Class claim for negligence	325.00	0.8	260.00
05/05/2013	Sarah Weynand	Hours	Research whether Kroll owed the Class a duty of care, and what such duty might be	325.00	0.8	260.00
05/06/2013	Sarah Weynand	Hours	Continue to draft Class negligence and gross negligence claims; revise Receiver negligence claim and add gross negligence claim; draft Class negligent retention/supervision claim	325.00	0.8	260.00
05/06/2013	Sarah Weynand	Hours	Format index to reflect amendments to Complain	325.00	0.3	81.25
05/06/2013	Sarah Weynand	Hours	Research whether Kroll can be liable as Stanford's agent	325.00	0.3	108.33
05/06/2013	Sarah Weynand	Hours	Research whether Plaintiffs can bring a fraud claim	325.00	1.0	325.00
05/06/2013	Sarah Weynand	Hours	Determine whether Plaintiffs can bring a negligent misrepresentation claim	325.00	0.5	162.50
05/06/2013	Sarah Weynand	Hours	Draft Receiver conspiracy claim	325.00	0.5	162.50
05/09/2013	Sarah Weynand	Hours	Amend Third-Party Claims Comparison Chart to reflect latest version of Kroll Complaint	325.00	0.6	195.00
05/10/2013	Sarah Weynand	Hours	Research and analyze what Defendant's counterargument might be to a negligence claim by the Class	325.00	0.4	130.00
05/10/2013	Sarah Weynand	Hours	Research whether punitive damages may be awarded for tortious interference with contract	325.00	0.4	130.00
05/10/2013	Sarah Weynand	Hours	Research and analyze the distinctions among (a) aiding and abetting a fraudulent scheme, (b) aiding and abetting fraud, and (c) fraud	325.00	1.0	325.00

05/10/2013	Sarah Weynand	Hours	Review and update claims and notes in preparation for meeting with M. Murphy	325.00	0.3	97.50
05/10/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding proposed claims and modifications to existing claims in Kroll Complaint	325.00	0.6	195.00
05/10/2013	Mark Murphy	Hours	Working meeting with S. Weynand regarding complaint against Kroll; review and revise complaint	525.00	1.7	875.00
05/12/2013	Mark Murphy	Hours	Draft email to trial team on upcoming mediation and conference call with mediator last week	525.00	0.7	350.00
05/13/2013	Sarah Weynand	Hours	Continue to research and analyze (1) what Defendant's counterargument might be to a negligence claim by the Class; and (2) the distinctions among (a) aiding and abetting a fraudulent scheme, (b) aiding and abetting fraud, and (c) fraud;	325.00	3.0	975.00
05/13/2013	Sarah Weynand	Hours	Modify Complaint based on research findings and discussion with M. Murphy	325.00	1.5	487.50
05/14/2013	Sarah Weynand	Hours	Continue to research third-party defendants' arguments regarding lack of duty to plaintiffs	325.00	1.9	617.50
05/14/2013	Mark Murphy	Hours	Draft confidential settlement memorandum to mediator	525.00	7.3	3,832.50
05/15/2013	Sarah Weynand	Hours	Continue to research third-party defendants' arguments regarding lack of duty to plaintiffs	325.00	0.9	292.50
05/16/2013	Sarah Weynand	Hours	Confer and strategize with M. Murphy regarding Kroll Complaint and preparing memorandum on newly considered claims	325.00	0.2	65.00
05/16/2013	Sarah Weynand	Hours	Organize notes regarding drafting memorandum on newly considered claims	325.00	0.1	32.50
05/17/2013	Mark Murphy	Hours	Draft confidential settlement memorandum to mediator	525.00	3.3	1,732.50
05/17/2013	Jason M. Davis	Hours	Review and revise mediation statement and related record	600.00	1.1	660.00
05/19/2013	Sarah Weynand	Hours	Review and edit M. Murphy's letter to Judge Milonas;	325.00	0.5	162.50
05/19/2013	Sarah Weynand	Hours	Draft memorandum to E. Snyder regarding recently considered claims against Kroll	325.00	1.1	357.50
05/20/2013	Jason M. Davis	Hours	Review and revise mediation statement and document referenced in same (complaint draft);	600.00	1.3	800.00
05/20/2013	Mark Murphy	Hours	Continue drafting confidential settlement memorandum to mediator	525.00	1.7	875.00
05/20/2013	Sarah Weynand	Hours	Continue to draft memorandum to E. Snyder regarding recently considered claims against Kroll	325.00	0.5	162.50
05/21/2013	Jason M. Davis	Hours	Review and revise mediation statement	600.00	0.6	360.00
05/22/2013	Mark Murphy	Hours	Continue drafting confidential mediation memorandum	525.00	2.8	1,470.00
05/22/2013	Mark Murphy	Hours	Phone call with counsel for Kroll regarding upcoming mediation	525.00	3.2	1,662.50
05/23/2013	Sarah Weynand	Hours	Organize memoranda and charts for mediation preparation binders	325.00	0.5	162.50
05/23/2013	Jason M. Davis	Hours	Confer with team regarding additional points for negotiation and compliance issue	600.00	0.8	480.00
05/23/2013	Mark Murphy	Hours	Phone call with E. Snyder regarding mediation memorandum	525.00	0.4	210.00
05/23/2013	Mark Murphy	Hours	Continue drafting confidential mediation memorandum	525.00	1.2	630.00
05/23/2013	Sarah Weynand	Hours	Confer with M. Murphy and E. Green about creating mediation preparation binders	325.00	0.2	65.00
05/23/2013	Sarah Weynand	Hours	Update charts for mediation preparation binders	325.00	1.0	325.00
05/23/2013	Mark Murphy	Hours	Phone calls with counsel for Kroll regarding upcoming mediation	525.00	0.6	315.00
05/23/2013	Erin Green	Hours	Conference with M. Murphy and S. Weynand re preparation of mediation binders and begin gathering documents for same	175.00	0.9	157.50
05/23/2013	Mark Murphy	Hours	Prepare notebook and materials for upcoming mediation	525.00	2.8	1,470.00
05/24/2013	Sarah Weynand	Hours	Continue to organize memoranda and charts for mediation preparation binders	325.00	0.1	32.50
05/24/2013	Mark Murphy	Hours	Phone call with counsel for Kroll regarding mediation materials	525.00	0.2	105.00
05/24/2013	Erin Green	Hours	Continue to prepare notebook for mediation	175.00	2.3	402.50
05/24/2013	Mark Murphy	Hours	Prepare materials to provide to Kroll regarding mediation	525.00	2.8	1,470.00
05/27/2013	Mark Murphy	Hours	Prepare for mediation; prepare mediation notebook on claims and defenses, and hot documents	525.00	1.7	875.00
05/27/2013	Jason M. Davis	Hours	Review mediation statement	600.00	0.5	300.00
05/28/2013	Mark Murphy	Hours	Prepare for mediation	525.00	6.8	3,570.00
05/28/2013	Sarah Weynand	Hours	Review Kroll's Mediation Statement	325.00	0.4	130.00
05/28/2013	Sarah Weynand	Hours	List Kroll's legal arguments; list Plaintiffs' best responses to Kroll's legal arguments	325.00	0.5	162.50
05/28/2013	Sarah Weynand	Hours	Research what qualifies as "substantial assistance" for purposes of the Texas Securities Act and search for authority supporting Plaintiffs' Texas Securities Act claim	325.00	2.0	650.00
05/28/2013	Sarah Weynand	Hours	Research statutes of limitations and applicability of discovery rule to various causes of action	325.00	0.8	260.00
05/28/2013	Mark Murphy	Hours	Prepare mediation notebook	525.00	0.8	420.00

05/28/2013	Jason M. Davis	Hours	Review and prepare materials for mediation;	600.00	3.3	2,000.00
05/28/2013	Sarah Weynand	Hours	Research Kroll's conspiracy scienter case and search for authority supporting Plaintiffs' conspiracy claim against Kroll	325.00	1.5	487.50
05/29/2013	Mark Murphy	Hours	Travel to New York and attend mediation	525.00	11.0	5,775.00
05/29/2013	Jason M. Davis	Hours	Travel to New York and attend mediation in New York;	600.00	11.0	6,600.00
05/30/2013	Mark Murphy	Hours	Attend mediation	525.00	7.2	3,762.50
05/30/2013	Jason M. Davis	Hours	Attend Day 2 of mediation;	600.00	8.0	4,800.00
05/31/2013	Mark Murphy	Hours	Travel from mediation	525.00	4.5	2,362.50
06/02/2013	Jason M. Davis	Hours	Review and revise proposed letter agreement memorializing settlement;	600.00	0.5	300.00
06/03/2013	Jason M. Davis	Hours	Review and revise settlement LOI; confer with co-counsel regarding the same	600.00	1.0	600.00
06/03/2013	Mark Murphy	Hours	Draft letter agreement related to settlement reached at mediation	525.00	3.2	1,662.50
06/04/2013	Mark Murphy	Hours	Review emails from co-counsel regarding proposed terms	525.00	0.8	420.00
06/04/2013	Jason M. Davis	Hours	Confer with co-counsel regarding claims and timing of filing in event settlement fails	600.00	7.5	4,500.00
06/04/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding strategy to get settlement offer approved by court	325.00	0.2	65.00
06/04/2013	Mark Murphy	Hours	Draft and revise term sheet with Kroll	525.00	2.3	1,216.25
06/04/2013	Mark Murphy	Hours	Phone call with E. Snyder regarding term sheet revisions	525.00	0.5	262.50
06/06/2013	Mark Murphy	Hours	Draft and respond to emails regarding settlement term sheet	525.00	1.2	612.50
06/10/2013	Sarah Weynand	Hours	Review Order Approving Receiver's Interim Distribution Plan in Stamford case to determine what courts consider when deciding whether to approve distributions	325.00	0.2	65.00
06/13/2013	Jason M. Davis	Hours	Review correspondence from client regarding insurance; review current tolling agreement and memo regarding aiding and abetting claim;	600.00	0.7	400.00
06/14/2013	Mark Murphy	Hours	Phone call with counsel for Kroll on term sheet and meetings with carriers; draft email to E. Snyder on this call and next steps	525.00	1.0	525.00
06/19/2013	Jason M. Davis	Hours	Review correspondence from Kroll counsel regarding tolling and disclosure in fee application; confer with M. Murphy regarding mediation;	600.00	0.3	200.00
06/20/2013	Jason M. Davis	Hours	Correspondence related to redaction issue and confer with team regarding same and remediation;	600.00	0.5	300.00
06/25/2013	Jason M. Davis	Hours	Review red-lines of tolling agreement and settlement document;	600.00	0.5	300.00
06/26/2013	Mark Murphy	Hours	Review proposed changes to term sheet suggested by Kroll	525.00	0.8	437.50
06/26/2013	Mark Murphy	Hours	Phone call with counsel for Kroll on term sheet and next steps with carrier negotiations	525.00	0.4	210.00
06/26/2013	Mark Murphy	Hours	Review latest proposed tolling agreement amendment	525.00	0.5	262.50
06/27/2013	Mark Murphy	Hours	Working meeting with S. Weynand and research regarding whether class actions do or can encompass previously-filed claims, and whether previous orders in Stamford would affect this issue	525.00	0.9	472.50
06/27/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding researching (1) whether a class may include already-filed claims and (2) whether failure to seek Receiver's approval precludes claims against Kroll related to the Stamford matter	325.00	0.1	32.50
07/03/2013	Sarah Weynand	Hours	Review recent Pacer filings in main Stamford case	325.00	0.5	162.50
07/03/2013	Sarah Weynand	Hours	Research and compose memorandum on (1) whether and how a class may include already-filed claims and (2) whether failure to seek Receiver's approval precludes claims against Kroll related to the Stamford matter	325.00	3.1	1,007.50
07/08/2013	Sarah Weynand	Hours	Research and compose memorandum on (1) how to include Louisiana plaintiffs in class if they refuse to willingly join the settlement and (2) how to preclude Louisiana plaintiffs from pursuing their existing claims after the class settlement is entered	325.00	1.8	585.00
08/02/2013	Mark Murphy	Hours	Phone call with S. Spatling regarding negotiations with insurers; phone call with E. Snyder regarding this call	525.00	2.3	1,216.25
08/02/2013	Mark Murphy	Hours	Draft letter to Kroll counsel regarding end of tolling and negotiations with insurers	525.00	1.8	945.00
08/05/2013	Mark Murphy	Hours	Review and revise complaint	525.00	3.2	1,680.00
08/05/2013	Mark Murphy	Hours	Review emails to team regarding possible filing of complaint on 8/16	525.00	0.2	105.00
08/05/2013	Mark Murphy	Hours	Phone calls with E. Snyder and R. Janvey regarding these issues	525.00	0.4	210.00
08/05/2013	Sarah P. Santos	Hours	Review correspondence to Kroll's counsel	525.00	0.2	105.00
08/05/2013	Mark Murphy	Hours	Review revisions to letter to Kroll's counsel review and revise complaint; draft email to team on this letter	525.00	0.8	420.00
08/05/2013	Sarah Weynand	Hours	Review and annotate Complaint	325.00	3.4	1,105.00
08/05/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding reviewing draft of Complaint and preparing for filing	325.00	0.2	65.00

08/05/2013	Jason M. Davis	Hours	Review correspondence and confer with team about complaint and settlement failure;	600.00	0.5	300.00
08/05/2013	Erin Green	Hours	Phone call with M. Murphy and S. Weynand to discuss possibility of filing complaint	175.00	0.3	52.50
08/06/2013	Mark Murphy	Hours	Phone call with trial team regarding upcoming complaint filing	525.00	0.2	105.00
08/06/2013	Mark Murphy	Hours	Review letter from Kroll counsel	525.00	0.2	105.00
08/06/2013	Mark Murphy	Hours	Draft complaint; revise fact section and class representative section	525.00	6.2	3,237.50
08/06/2013	Sarah Weynand	Hours	Continue to review and annotate Complaint	325.00	1.7	552.50
08/06/2013	Sarah Weynand	Hours	Confer and strategize with M. Murphy regarding (1) substance of the Complaint and (2) filing requirements	325.00	0.6	195.00
08/06/2013	Sarah P. Santos	Hours	Review requested modification to term sheet and correspondence with co-counsel regarding same	525.00	0.3	157.50
08/07/2013	Jason M. Davis	Hours	Correspondence to and from Kroll counsel; review complaint for filing;	600.00	1.2	700.00
08/07/2013	Mark Murphy	Hours	Phone call with counsel for Kroll re: discussions with Kroll's insurers; draft email to trial team regarding this call	525.00	0.3	175.00
08/07/2013	Mark Murphy	Hours	Revise complaint	525.00	9.7	5,075.00
08/07/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding Complaint's formatting	325.00	0.1	32.50
08/07/2013	Erin Green	Hours	Prepare spreadsheet of calculation of payments made from Stanford to Kroll between Feb. 06 ? Feb. 09	175.00	0.3	52.50
08/07/2013	Mark Murphy	Hours	phone call with E. Snyder	525.00	0.3	175.00
08/07/2013	Sarah Weynand	Hours	Review Complaint's formatting and review M. Murphy's substantive changes	325.00	0.6	195.00
08/07/2013	Mark Murphy	Hours	Phone call with counsel for Kroll; draft email to trial team regarding this call; phone call with E. Snyder	525.00	0.8	420.00
08/08/2013	Mark Murphy	Hours	Research regarding class claims v. receiver claims and elements of each	525.00	2.2	1,137.50
08/08/2013	Sarah Weynand	Hours	Determine what items have been filed with complaints in other Stanford-related suits against third-party defendants	325.00	1.6	520.00
08/09/2013	Mark Murphy	Hours	Working meeting with S. Weynand regarding additional documents to prepare for complaint filing	525.00	0.3	157.50
08/09/2013	Mark Murphy	Hours	Review memo on this issue, as well as initial documents filed in other 3rd party cases	525.00	2.7	1,400.00
08/09/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding (1) drafting documents to be filed with Complaint and (2) effect that Protective Order has on items in Complaint	325.00	0.3	97.50
08/09/2013	Sarah Weynand	Hours	Draft Notice of Related Case; fill out Civil Cover Sheet; draft Certificate of Interested Persons	325.00	1.2	390.00
08/09/2013	Sarah Weynand	Hours	Review Protective Order entered in estate case against Kroll and analyze how it might affect information included in Complaint	325.00	0.6	195.00
08/12/2013	Sarah Weynand	Hours	Review Complaint for information that may be covered by protective order; incorporate E. Snyder's revisions into Complaint; address E. Snyder's comments regarding Complaint	325.00	2.0	650.00
08/12/2013	Sarah Weynand	Hours	Research whether risk consulting firms owe fiduciary duties to their clients	325.00	0.9	292.50
08/12/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding incorporating E. Snyder's revisions into Complaint and addressing E. Snyder's comments regarding Complaint	325.00	0.2	65.00
08/12/2013	Mark Murphy	Hours	Revise complaint; revise fact section and causes of action section; working meeting with S. Weynand regarding revising complaint	525.00	3.2	1,662.50
08/12/2013	Jason M. Davis	Hours	Calls with Kroll counsel; review complaint;	600.00	0.8	500.00
08/12/2013	Sarah Weynand	Hours	Research Northern District of Texas's local rules for filing a complaint	325.00	0.3	97.50
08/13/2013	Mark Murphy	Hours	Working meeting with S. Weynand regarding revising complaint; causes of action	525.00	0.6	315.00
08/13/2013	Mark Murphy	Hours	Phone call with counsel for Kroll; phone call with co-counsel E. Snyder	525.00	0.2	87.50
08/13/2013	Mark Murphy	Hours	Revise complaint	525.00	2.2	1,137.50
08/13/2013	Jason M. Davis	Hours	Multiple calls with Kroll counsel; review memorandum;	600.00	1.2	700.00
08/13/2013	Sarah Weynand	Hours	Confer and strategize with M. Murphy regarding factual and legal issues in Complaint	325.00	0.6	195.00
08/13/2013	Sarah Weynand	Hours	Continue to amend Complaint based on E. Snyder's comments	325.00	1.5	487.50
08/13/2013	Sarah Weynand	Hours	Search for legal authority establishing that Kroll may have owed Stanford a fiduciary duty as its consultant	325.00	1.2	390.00
08/14/2013	Mark Murphy	Hours	Review tolling agreement proposed by Kroll	525.00	0.5	262.50
08/14/2013	Mark Murphy	Hours	Draft email to co-counsel regarding term sheet and tolling agreement	525.00	0.5	262.50
08/14/2013	Sarah Weynand	Hours	Continue to draft Complaint	325.00	0.2	65.00
08/14/2013	Mark Murphy	Hours	Review term sheet proposed by Kroll; compare to previous proposed term sheets	525.00	0.7	350.00
08/14/2013	Jason M. Davis	Hours	Continue review of Kroll proposed tolling agreement and settlement document; review memorandum;	600.00	0.8	500.00

08/14/2013	Mark Murphy	Hours	Working meeting with S. Weynand on this issue	525.00	0.3	157.50
08/14/2013	Sarah Weynand	Hours	Confer with M. Murphy about Complaint issues	325.00	0.3	97.50
08/14/2013	Mark Murphy	Hours	Phone call with Ed Snyder regarding term sheet and tolling agreement	525.00	0.2	87.50
08/14/2013	Mark Murphy	Hours	Continue work on finalizing complaint	525.00	2.2	1,137.50
08/14/2013	Mark Murphy	Hours	Review and research fiduciary duty claim	525.00	0.8	420.00
08/15/2013	Jason M. Davis	Hours	Correspondence regarding settlement terms	600.00	0.5	300.00
08/15/2013	Mark Murphy	Hours	Review emails from team on term sheet and possible comments or revisions	525.00	0.5	262.50
08/16/2013	Mark Murphy	Hours	Working meeting with S. Weynand regarding these issues	525.00	0.3	157.50
08/16/2013	Mark Murphy	Hours	Perform initial research regarding no-opt-out classes, cramdown possibilities for objectors	525.00	1.2	612.50
08/16/2013	Mark Murphy	Hours	Phone call with E. Snyder regarding next steps on negotiating term sheet, research regarding no-opt-out classes, cramdown possibilities for objectors	525.00	0.7	350.00
08/19/2013	Sarah Weynand	Hours	Review and update memorandum on including Louisiana plaintiffs in the settlement class	325.00	0.2	65.00
08/19/2013	Sarah Weynand	Hours	Confer with M. Murphy about researching (1) no-opt-out classes and (2) cramdowns and channeling injunctions in the receivership context	325.00	0.3	97.50
08/19/2013	Sarah Weynand	Hours	Enter and organize notes regarding researching (1) no-opt-out classes and (2) cramdowns and channeling injunctions in the receivership context	325.00	0.2	65.00
08/21/2013	Mark Murphy	Hours	Review emails regarding docket sheet in Louisiana cases	525.00	0.3	175.00
08/21/2013	Mark Murphy	Hours	Research mandatory class actions/no opt-out classes	525.00	1.2	612.50
08/21/2013	Mark Murphy	Hours	Phone call with T. Burchett regarding status of settlement discussions, financial analysis and possible applicability to class approval process	525.00	0.2	87.50
08/21/2013	Mark Murphy	Hours	Phone call with New Orleans lawyer regarding lawyer representing Plaintiffs in Louisiana suits	525.00	0.2	87.50
08/21/2013	Mark Murphy	Hours	Review email and order from Ed Snyder regarding possible preclusion of opt-outs based on committee orders	525.00	0.5	262.50
08/24/2013	Sarah Weynand	Hours	Research and compose memorandum on no-opt-out classes	325.00	2.0	650.00
08/24/2013	Sarah Weynand	Hours	Continue to research and compose memorandum on no-opt-out classes	325.00	3.1	1,007.50
08/26/2013	Sarah Weynand	Hours	Continue to research and compose memorandum on no-opt-out classes	325.00	0.5	162.50
08/28/2013	Sarah Weynand	Hours	Continue to research and compose memorandum on no-opt-out classes	325.00	2.2	715.00
08/29/2013	Mark Murphy	Hours	Phone call with counsel for Kroll regarding discussions with Antiguan JLS and Louisiana counsel, and next steps in settlement approval process	525.00	0.8	420.00
08/29/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding no-opt-out class memorandum	325.00	0.3	97.50
08/29/2013	Sarah Weynand	Hours	Continue to compose memorandum on no-opt-out classes	325.00	1.5	487.50
08/29/2013	Jason M. Davis	Hours	Review research on class action and correspondence related to same;	600.00	0.5	300.00
08/29/2013	Sarah Weynand	Hours	Research and compose memorandum on cramdowns and channeling injunctions	325.00	0.8	260.00
08/29/2013	Mark Murphy	Hours	Research regarding no-opt-out classes, availability in this instance and elements needed	525.00	2.7	1,400.00
08/30/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding determining whether Committee can settle with Kroll on behalf of all investors and the Receiver	325.00	0.2	65.00
08/30/2013	Sarah Weynand	Hours	Continue to research and analyze whether a channeling injunction can be approved outside the bankruptcy context	325.00	1.3	422.50
08/30/2013	Sarah Weynand	Hours	Analyze whether Committee can settle with Kroll on behalf of all investors and the Receiver	325.00	2.8	910.00
08/30/2013	Sarah Weynand	Hours	Analyze law review article on opt-out rights	325.00	1.2	390.00
09/03/2013	Mark Murphy	Hours	Review research and memo regarding Kroll settlement with committee v. settlement with receiver and ramifications for opt-outs	525.00	1.2	612.50
09/04/2013	Mark Murphy	Hours	Research regarding opt-outs in class settlements; review law review article concerning offensive issue preclusion asserted by opt-outs, and how it may affect our settlement; draft memo to co-counsel on these issues	525.00	3.7	1,925.00
09/05/2013	Mark Murphy	Hours	Research regarding how assignment of claims from receiver to committee might affect settlement order	525.00	1.8	945.00
09/05/2013	Mark Murphy	Hours	Working meetings with S. Weynand regarding these issues	525.00	1.0	525.00
09/05/2013	Mark Murphy	Hours	Research on authority of receiver to settle with no opt-outs or to use bankruptcy provisions of cramdowns	525.00	3.7	1,925.00
09/05/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding (1) the Committee's authority to settle on behalf of the Receiver and the Class, (2) whether some of the settlement funds will need to be allocated to the Receiver, and (3) whether the Court can give the Receiver the authority to prevent opt-outs	325.00	0.6	195.00

09/05/2013	Sarah Weynand	Hours	Review and analyze (1) letter assigning Receiver's claims to Class and (2) Committee Order to determine whether settlement funds will need to be allocated to the Receiver	325.00	1.0	325.00
09/05/2013	Sarah Weynand	Hours	Record notes from conversation regarding whether the Court can give the Receiver the authority to prevent opt-outs	325.00	0.4	130.00
09/05/2013	Sarah Weynand	Hours	Incorporate analysis of same into memorandum	325.00	0.8	260.00
09/06/2013	Sarah Weynand	Hours	Research and compose memorandum on Receiver's ability to enjoin investors' actions against Kroll	325.00	3.0	975.00
09/06/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding various issues related to no-opt-out settlement entered by Committee or Receiver	325.00	1.0	325.00
09/06/2013	Sarah Weynand	Hours	Draft memorandum consolidating memoranda on no-opt-out settlement issues	325.00	1.4	455.00
09/09/2013	Mark Murphy	Hours	Incorporate all this research and analysis into memorandum for co-counsel	525.00	2.0	1,050.00
09/09/2013	Mark Murphy	Hours	Research on authority of receiver to settle with no opt-outs or to use bankruptcy provisions of cramdowns	525.00	4.2	2,205.00
09/09/2013	Mark Murphy	Hours	Review Kaleta opinion	525.00	1.8	945.00
09/09/2013	Mark Murphy	Hours	Research regarding receivership powers	525.00	1.2	630.00
09/10/2013	Mark Murphy	Hours	Review proposed term sheet from Kroll counsel	525.00	0.7	350.00
09/11/2013	Mark Murphy	Hours	Continue research on potential availability of including all investors in any order approving settlement	525.00	0.6	315.00
09/11/2013	Mark Murphy	Hours	Phone call with E. Snyder regarding settlement structure	525.00	0.2	105.00
09/16/2013	Mark Murphy	Hours	Research regarding Kaleta and effects on settlement structure	525.00	1.3	700.00
09/16/2013	Sarah Weynand	Hours	Review updated Settlement Scenarios memorandum;	325.00	0.4	130.00
09/16/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding analyzing Kaleta briefs	325.00	0.2	65.00
09/16/2013	Sarah Weynand	Hours	Review Kaleta case approving Bar Order barring litigation by individual investors against company in receivership	325.00	0.5	162.50
09/16/2013	Sarah Weynand	Hours	Research whether settlement agreements including provisions prohibiting or discouraging opt-outs were approved by courts	325.00	1.6	520.00
09/16/2013	Sarah Weynand	Hours	Review and analyze Kaleta filings related to Bar Order	325.00	0.5	162.50
09/17/2013	Jason M. Davis	Hours	Correspondence with team and receiver about term sheet and expense for class notice issue;	600.00	0.3	200.00
09/17/2013	Sarah Weynand	Hours	Continue to review and analyze Kaleta filings related to Bar Order	325.00	5.6	1,820.00
09/17/2013	Mark Murphy	Hours	Continue research regarding Kaleta and effects on settlement structure	525.00	2.7	1,400.00
09/18/2013	Jason M. Davis	Hours	Review revised Agreement and Term Sheet;	600.00	0.5	300.00
09/18/2013	Mark Murphy	Hours	Review emails from E. Snyder regarding term sheet	525.00	0.6	315.00
09/18/2013	Sarah Weynand	Hours	Review and analyze Vioxx settlement agreement with poison pill clauses	325.00	2.9	942.50
09/18/2013	Sarah Weynand	Hours	Continue to review and analyze Kaleta filings related to Bar Order	325.00	4.0	1,300.00
09/18/2013	Mark Murphy	Hours	Research regarding Kaleta and settlement structure	525.00	2.2	1,137.50
09/19/2013	Sarah Weynand	Hours	Continue to review and analyze strategies to prevent class settlement opt-outs, including (1) poison pill clauses and (2) most-favored nation clauses	325.00	1.9	617.50
09/19/2013	Mark Murphy	Hours	Phone call with counsel for Kroll regarding revised term sheet and provision regarding notice costs; phone call with E. Snyder regarding these issues	525.00	0.3	175.00
09/20/2013	Sarah Weynand	Hours	Research deadline for appealing to U.S. Supreme Court; keycite Kaleta case	325.00	0.2	65.00
09/20/2013	Mark Murphy	Hours	Phone call with counsel for Kroll regarding term sheet	525.00	0.4	210.00
09/20/2013	Mark Murphy	Hours	Begin review of Kaleta briefing materials and memo on Kaleta decision	525.00	0.8	428.75
09/20/2013	Sarah Weynand	Hours	Confer with M. Murphy regarding Kaleta settlement	325.00	0.3	97.50
09/30/2013	Jason M. Davis	Hours	Review correspondence from counsel; confer with M. Murphy regarding options for opt-outs in settlement;	600.00	0.3	200.00
10/04/2013	Jason M. Davis	Hours	Correspondence from Kroll counsel and final agreement;	600.00	0.3	200.00
10/04/2013	Mark Murphy	Hours	Review revised term sheet and redline changes; draft email to E. Snyder on these changes; review email to receiver on these changes	525.00	1.5	787.50
10/07/2013	Jason M. Davis	Hours	Correspondence with E. Snyder; review letter agreement and prior class pleadings settlement/notice issues;	600.00	0.3	200.00
10/10/2013	Mark Murphy	Hours	Phone call with counsel for Kroll regarding Kaleta	525.00	0.2	105.00
10/10/2013	Mark Murphy	Hours	Review briefing from Kaleta regarding settlement with receiver and including permanent injunction	525.00	1.7	875.00
10/21/2013	Mark Murphy	Hours	Exchange emails with E. Snyder regarding formal settlement agreement and Kroll's request for more information on investors	525.00	0.7	350.00
10/21/2013	Mark Murphy	Hours	Review previous emails on this subject	525.00	0.4	210.00



10/21/2013	Mark Murphy	Hours	Phone call with S. Ruskay Kidd regarding revisions to settlement structure	525.00	0.4	210.00
10/23/2013	Mark Murphy	Hours	Review and respond to emails regarding country of residence for claimants and breakdown of this data	525.00	1.3	691.25
10/23/2013	Mark Murphy	Hours	Review report on monthly claims process	525.00	0.8	420.00
10/29/2013	Jeff Benavides	Hours	Review parties and facts of the case;	325.00	3.0	975.00
10/30/2013	Jeff Benavides	Hours	Review complaint, facts, parties, and causes of action; research factual background on Stanford and Kroll	325.00	2.0	650.00
11/05/2013	Mark Murphy	Hours	Working meeting with J. Benavides regarding ?limited fund? class settlement and receiver settlement under Kaleta	525.00	0.4	210.00
11/05/2013	Jeff Benavides	Hours	Confer with M. Murphy regarding research assignment for Kroll;	325.00	0.3	108.33
11/05/2013	Mark Murphy	Hours	Continue research into Kaleta settlement	525.00	1.2	630.00
11/07/2013	Jeff Benavides	Hours	Research opting out of settlement	325.00	2.0	650.00
11/07/2013	Jeff Benavides	Hours	Review memos and research conducted concerning settlement theories	325.00	1.0	325.00
11/08/2013	Jeff Benavides	Hours	Review memos provided by M. Murphy	325.00	0.5	162.50
11/08/2013	Jeff Benavides	Hours	Review limited class action jurisprudence; read Ortiz case	325.00	1.0	325.00
11/11/2013	Jeff Benavides	Hours	Confer with M. Murphy regarding background facts	325.00	0.2	54.17
11/12/2013	Jason M. Davis	Hours	Correspondence regarding settlement;	600.00	0.5	300.00
11/13/2013	Jason M. Davis	Hours	Correspondence from settlement; confer with team regarding same;	600.00	0.5	300.00
11/15/2013	Mark Murphy	Hours	Draft email to opposing counsel regarding this issue	525.00	0.8	420.00
11/15/2013	Jeff Benavides	Hours	Review Kroll memos; attend conference call with M. Murphy and Kroll attorneys;	325.00	0.7	216.67
11/15/2013	Mark Murphy	Hours	Phone call with counsel for Kroll and co-counsel Snyder regarding settlement drafts	525.00	2.2	1,137.50
11/15/2013	Mark Murphy	Hours	Working meeting with J. Benavides regarding Kaleta and various settlement structures	525.00	0.2	105.00
11/19/2013	Jeff Benavides	Hours	Research on approving receivership settlements	325.00	1.4	455.00
11/19/2013	Jeff Benavides	Hours	Research Kaleta materials	325.00	0.6	195.00
11/20/2013	Jeff Benavides	Hours	Research receivership settlements with no-opt out provision	325.00	1.4	455.00
11/21/2013	Jason M. Davis	Hours	Review information related to information request from Kroll and receiver response for settlement;	600.00	0.3	200.00
11/22/2013	Mark Murphy	Hours	Participate in phone conference for committee meeting, regarding Kroll settlement and steps to implement it	525.00	0.5	262.50
11/25/2013	Jeff Benavides	Hours	Review internal correspondence	325.00	0.3	81.25
11/26/2013	Jeff Benavides	Hours	Reviewing M. Murphy's attachments; conduct additional research on Kaleta decision	325.00	1.2	379.17
12/02/2013	Jeff Benavides	Hours	Research receiver authority	325.00	2.0	650.00
12/02/2013	Jeff Benavides	Hours	Kaleta analysis and review Kaleta settlement agreements	325.00	7.0	2,275.00
12/02/2013	Jeff Benavides	Hours	Review filed Stanford documents	325.00	1.5	487.50
12/03/2013	Jeff Benavides	Hours	Meeting with M. Murphy; review documents provided	325.00	0.7	227.50
12/03/2013	Jeff Benavides	Hours	Research bar orders and international judgment effects	325.00	4.3	1,397.50
12/03/2013	Jeff Benavides	Hours	eResearch on comit;	325.00	3.0	975.00
12/04/2013	Jeff Benavides	Hours	Westlaw research on transactional class action	325.00	1.5	487.50
12/05/2013	Jeff Benavides	Hours	Kroll/Receiver conference call and communications with M. Murphy	325.00	0.6	195.00
12/05/2013	Jeff Benavides	Hours	Research transactional class actions and comity	325.00	4.9	1,592.50
12/06/2013	Jeff Benavides	Hours	Draft memo memorializing Kroll/Receiver conference call;	325.00	1.0	325.00
12/11/2013	Mark Murphy	Hours	Review memorandum prepared by J. Benavides regarding phone conference with Kroll counsel on status of settlement drafts	525.00	0.3	175.00
12/11/2013	Jeff Benavides	Hours	Review and research Latin American recognition of class action judgments;	325.00	2.0	650.00
12/16/2013	Jeff Benavides	Hours	Revise Kroll/Receivership meeting memo	325.00	1.6	520.00
12/16/2013	Jeff Benavides	Hours	Meeting with M. Murphy	325.00	0.5	162.50
12/16/2013	Mark Murphy	Hours	Continue researching effect of possible receivership settlement order on future foreign proceedings	525.00	2.5	1,312.50
12/16/2013	Jeff Benavides	Hours	Review and research class action judgments	325.00	2.2	715.00
12/17/2013	Jeff Benavides	Hours	Revise December 5 teleconference meeting memo;	325.00	0.5	162.50

12/20/2013	Jeff Benavides	Hours	Review latest receivership filing	325.00	0.3	97.50
12/20/2013	Jeff Benavides	Hours	Research transnational class action decisions	325.00	1.2	390.00
01/09/2014	Mark Murphy	Hours	Conference call with Kroll counsel regarding foreign proceedings	525.00	0.3	175.00
01/14/2014	Guillermo Benavides	Hours	Meeting with M. Murphy; find and review receiver filings	325.00	2.0	650.00
01/14/2014	Guillermo Benavides	Hours	Read through Stanford docket filings	325.00	1.5	487.50
01/15/2014	Guillermo Benavides	Hours	Research how to receive e-mail notification for filings	325.00	0.5	162.50
01/15/2014	Guillermo Benavides	Hours	Review docket filings	325.00	0.4	130.00
01/16/2014	Mark Murphy	Hours	Review objections to fee agreement with counsel regarding insurance proceeds	525.00	0.3	175.00
01/16/2014	Guillermo Benavides	Hours	Receive Receivership's most current update	325.00	0.6	195.00
01/20/2014	Guillermo Benavides	Hours	Review recent Receiver	325.00	0.3	97.50
02/19/2014	Mark Murphy	Hours	Draft motion to file settlement agreement	525.00	1.8	962.50
02/21/2014	Guillermo Benavides	Hours	Research caselaw related to binding mediated settlement agreements	325.00	0.4	130.00
02/22/2014	Guillermo Benavides	Hours	Research caselaw related to binding mediated settlement agreements	325.00	1.0	325.00
02/24/2014	Guillermo Benavides	Hours	Research caselaw related to binding mediated settlement agreements	325.00	0.6	195.00
02/26/2014	Mark Murphy	Hours	Review emails regarding upcoming status call; review Supreme Court SLUSA opinion	525.00	1.2	612.50
02/27/2014	Jason M. Davis	Hours	Calls with Kroll counsel regarding settlement;	600.00	1.2	700.00
02/27/2014	Mark Murphy	Hours	Phone call with counsel for Kroll; review emails and authorities sent by E. Snyder	525.00	1.7	875.00
02/28/2014	Guillermo Benavides	Hours	Review Rothstein court materials	325.00	0.2	65.00
02/28/2014	Jason M. Davis	Hours	Calls with co-counsel; review information related to opt-out question;	600.00	1.2	700.00
03/03/2014	Guillermo Benavides	Hours	Meet with M. Murphy regarding Rothstein papers	325.00	0.5	162.50
03/03/2014	Guillermo Benavides	Hours	Review Rothstein papers	325.00	1.5	487.50
03/03/2014	Mark Murphy	Hours	Research regarding Ponzi scheme settlements and orders involving foreign investors	525.00	2.7	1,400.00
03/05/2014	Guillermo Benavides	Hours	Review Rothstein materials and associated cases	325.00	3.3	1,072.50
03/06/2014	Guillermo Benavides	Hours	Review Rothstein papers and cases for settlement of foreign claims	325.00	1.2	390.00
03/11/2014	Guillermo Benavides	Hours	Review court filings for M. Murphy; email findings to M. Murphy	325.00	0.9	292.50
03/12/2014	Guillermo Benavides	Hours	Review proposed settlement agreement and make annotations	325.00	1.8	585.00
03/20/2014	Mark Murphy	Hours	Draft email to co-counsel regarding possible revisions; review emails from co-counsel regarding their review	525.00	1.2	630.00
03/20/2014	Mark Murphy	Hours	Review settlement draft provided by Kroll	525.00	1.8	945.00
03/24/2014	Guillermo Benavides	Hours	Review relevant docket filing related to attorney's fees	325.00	1.5	487.50
04/04/2014	Mark Murphy	Hours	Revise complaint	525.00	3.3	1,750.00
04/05/2014	Mark Murphy	Hours	Research regarding negligence and gross negligence, tortious interference with contract, and these claims applicability to our fact scenario	525.00	2.2	1,155.00
04/05/2014	Mark Murphy	Hours	Revise complaint	525.00	4.2	2,187.50
04/06/2014	Mark Murphy	Hours	Research regarding negligence and duty for failing to take action for dangers partially created by the defendant	525.00	2.2	1,137.50
04/07/2014	Erin Green	Hours	Obtain information on third-party suits against banks in Madoff case	175.00	0.6	105.00
04/08/2014	Guillermo Benavides	Hours	Review Fairfield Settlement documents; create memo summarizing Fairfield documents	325.00	2.8	910.00
04/08/2014	Guillermo Benavides	Hours	Attend conference call	325.00	0.8	260.00
04/08/2014	Erin Green	Hours	Obtain copy of complaint in suit against HSBC, et al. filed by Picard	175.00	0.2	35.00
04/08/2014	Mark Murphy	Hours	Research regarding including Latin American countries in class action	525.00	4.7	2,450.00
04/08/2014	Mark Murphy	Hours	Phone calls with E. Snyder and Kroll's counsel, along with receiver and examiner regarding structuring Kroll settlement; review settlement in another Ponzi case	525.00	0.8	420.00
04/09/2014	Guillermo Benavides	Hours	Supplement review of Fairfield class action documents	325.00	1.3	422.50
04/10/2014	Mark Murphy	Hours	Review Anwar settlement and class order; phone call with E. Snyder regarding Anwar	525.00	1.7	875.00
04/10/2014	Guillermo Benavides	Hours	Research tolling of limitations under the American Pipe doctrine	325.00	3.0	975.00

04/11/2014	Mark Murphy	Hours	Review 17th tolling agreement	525.00	0.5	262.50
04/14/2014	Mark Murphy	Hours	Research regarding bar order language from Kalela	525.00	1.2	612.50
04/15/2014	Mark Murphy	Hours	Review Kalela bar order and settlement agreement; review Kalela opinion	525.00	2.8	1,487.50
04/15/2014	Guillermo Benavides	Hours	Review Fairfield court documents and determine mechanics of the class action settlement	325.00	1.0	325.00
04/15/2014	Mark Murphy	Hours	Draft email to E. Snyder regarding bar order and other issues to consider	525.00	0.8	420.00
04/15/2014	Mark Murphy	Hours	Draft bar order for Receiver settlement	525.00	4.4	2,310.00
04/21/2014	Mark Murphy	Hours	Review receiver's motion for release of holdback funds	525.00	1.2	612.50
04/22/2014	Mark Murphy	Hours	Begin drafting motion to approve settlement agreement with receiver	525.00	3.5	1,837.50
05/13/2014	Mark Murphy	Hours	Phone call with counsel for Kroll regarding status of settlement agreement and tolling amendment	525.00	0.3	175.00
05/22/2014	Jason M. Davis	Hours	Review and revise proposed settlement agreement	600.00	0.8	480.00
05/27/2014	Mark Murphy	Hours	Review settlement draft from Kroll counsel; begin drafting our revisions	525.00	4.2	2,187.50
05/28/2014	Mark Murphy	Hours	Continue making revisions to Kroll's Kalela bar settlement agreement; draft letter to Kroll's counsel regarding these changes; draft email to team	525.00	4.2	2,187.50
05/30/2014	Mark Murphy	Hours	Phone call with ECS regarding settlement agreement; review comments from Baker Botts; review emails from Kroll counsel regarding settlement agreement	525.00	2.2	1,137.50
05/31/2014	Mark Murphy	Hours	Revise settlement agreement; review S. Powers' comments and questions to Kroll draft agreement; revise letter to Kroll counsel regarding our concerns	525.00	4.2	2,187.50
06/03/2014	Mark Murphy	Hours	Review email from E. Snyder to receiver regarding Kroll demand for release from claimants; review emails from P. Morgenstern and S. Powers regarding Kroll's request for releases and indemnity	525.00	1.3	700.00
06/03/2014	Mark Murphy	Hours	Phone conference with Kroll counsel regarding Kalela bar settlement agreement	525.00	0.3	175.00
06/06/2014	Mark Murphy	Hours	Phone call with Receiver co-counsel regarding Kroll's demands for release forms and indemnification	525.00	0.5	262.50
06/09/2014	Mark Murphy	Hours	Phone call with Kroll counsel regarding releases on Kalela bar settlement	525.00	0.3	175.00
06/10/2014	Mark Murphy	Hours	Review new draft of Kalela-bar settlement agreement from Kroll	525.00	2.2	1,137.50
06/10/2014	Guillermo Benavides	Hours	Review and outline Kalela documents	325.00	1.5	487.50
06/12/2014	Jason M. Davis	Hours	Review tolling agreement and materials from Kroll on settlement redline	600.00	0.4	240.00
06/12/2014	Mark Murphy	Hours	Review latest settlement draft	525.00	3.3	1,750.00
06/13/2014	Jason M. Davis	Hours	Review tolling agreement; continue review of red-line from Kroll counsel	600.00	0.4	240.00
06/13/2014	Mark Murphy	Hours	Continue review of latest settlement draft; review and respond to email from ECS regarding release provisions	525.00	4.2	2,187.50
06/13/2014	Guillermo Benavides	Hours	Review settlement agreement from Kroll	325.00	0.9	292.50
06/16/2014	Mark Murphy	Hours	Review and revise settlement agreement; phone call with counsel for Kroll regarding Receiver motion to approve; review Receiver motion to approve in Kalela	525.00	5.3	2,800.00
06/16/2014	Guillermo Benavides	Hours	Review Kalela settlement documents	325.00	1.4	455.00
06/17/2014	Jason M. Davis	Hours	Review revised settlement agreement	600.00	0.4	240.00
06/17/2014	Mark Murphy	Hours	Revise settlement draft sent by Kroll; review suggestions from E. Snyder and incorporate them into redline version; review response from E. Snyder regarding my changes	525.00	5.8	3,062.50
06/17/2014	Mark Murphy	Hours	Draft Receiver's motion to approve settlement and enter bar order	525.00	2.2	1,137.50
06/18/2014	Guillermo Benavides	Hours	Research docket information for pleadings regarding third-party litigation	325.00	0.4	130.00
06/18/2014	Mark Murphy	Hours	Revise settlement draft sent by Kroll; revise section on contribution and exception for finality of judgment	525.00	4.7	2,450.00
06/19/2014	Mark Murphy	Hours	Draft motion of receiver to approve the settlement	525.00	4.2	2,187.50
06/23/2014	Guillermo Benavides	Hours	Meeting on status of settlement with Kroll and upcoming tasks	325.00	0.3	97.50
06/23/2014	Mark Murphy	Hours	Continue drafting motion to approve settlement by receiver	525.00	1.7	875.00
06/24/2014	Guillermo Benavides	Hours	Review Stanford filings for information on attorney's fees	325.00	1.2	390.00
06/24/2014	Guillermo Benavides	Hours	Draft and edit sections on motion to approve settlement with Kroll	325.00	2.1	682.50
06/24/2014	Jason M. Davis	Hours	Review proposed revisions by Kroll counsel on agreement	600.00	0.8	480.00
06/25/2014	Guillermo Benavides	Hours	Attend teleconference with Kroll regarding settlement agreement	325.00	0.5	162.50
06/25/2014	Guillermo Benavides	Hours	Edit and draft sections on motion to approve settlement with Kroll	325.00	4.0	1,300.00

06/25/2014	Mark Murphy	Hours	Review emails from Kroll counsel on identifying excluded people from the Kroll Released Parties and providing additional information about other suits against Kroll; draft email to team about issues arising from latest settlement draft from Kroll	525.00	3.3	1,750.00
06/25/2014	Guillermo Benavides	Hours	Review Kroll filings for motions and orders regarding attorney's fees	325.00	2.0	650.00
06/25/2014	Mark Murphy	Hours	Phone call with Kroll counsel regarding settlement issues, such as contribution bar and release form process; review settlement draft from Kroll	525.00	4.3	2,275.00
06/25/2014	Jason M. Davis	Hours	Continue review of Kroll red-line; confer with M. Murphy regarding contribution issues	600.00	0.9	540.00
06/26/2014	Mark Murphy	Hours	Review and revise Kroll drafts of bar order and scheduling order	525.00	3.2	1,662.50
06/26/2014	Mark Murphy	Hours	Working meeting with G. Benavides regarding Receiver motion to approve settlement, including authorities section and orders giving power and duties to Receiver	525.00	0.5	262.50
06/26/2014	Guillermo Benavides	Hours	Meet with M. Murphy regarding Motion to Approve Settlement	325.00	1.0	325.00
06/26/2014	Mark Murphy	Hours	Revise email to team regarding settlement draft from Kroll	525.00	1.7	875.00
06/26/2014	Guillermo Benavides	Hours	Research through Pacer for Kaleita pleadings	325.00	0.7	227.50
06/26/2014	Guillermo Benavides	Hours	Identify Kaleita arguments for and against bar orders	325.00	2.0	650.00
06/26/2014	Guillermo Benavides	Hours	Draft Motion to Approve Settlement	325.00	3.7	1,202.50
06/27/2014	Guillermo Benavides	Hours	Edit Motion to Approve Settlement	325.00	2.5	812.50
06/27/2014	Guillermo Benavides	Hours	Research through Pacer for MF Global pleadings to identify differences and similarities; create document highlighting similarities and differences between Kaleita, MF Global, and Kroll	325.00	2.6	845.00
06/30/2014	Guillermo Benavides	Hours	Meet with M. Murphy regarding edits to Motion to Approve Settlement	325.00	4.6	1,495.00
06/30/2014	Mark Murphy	Hours	Review emails from team regarding contribution bar and possible compromises, and draft responses	525.00	1.3	691.25
06/30/2014	Mark Murphy	Hours	Working meeting with G. Benavides regarding Receiver motion to approve settlement, and authorities for approving bar order	525.00	0.5	262.50
06/30/2014	Mark Murphy	Hours	Phone call with Kroll counsel Law regarding this issue and our suggestions	525.00	0.4	210.00
06/30/2014	Guillermo Benavides	Hours	Review MF Global pleadings and orders; revise Motion to Approve Settlement	325.00	1.4	455.00
07/01/2014	Guillermo Benavides	Hours	Identify likely objections from investors	325.00	1.5	487.50
07/01/2014	Guillermo Benavides	Hours	Research Westlaw for unfavorable cases regarding bar orders	325.00	1.8	585.00
07/01/2014	Guillermo Benavides	Hours	Review objections made in MF Global case	325.00	0.5	162.50
07/01/2014	Guillermo Benavides	Hours	Draft and revise motion to approve settlement agreement	325.00	1.0	325.00
07/02/2014	Mark Murphy	Hours	Continue revising settlement agreement, specifically sections on "other actions" and contribution bar	525.00	3.2	1,662.50
07/02/2014	Guillermo Benavides	Hours	Review Temme case docket sheet; read relevant Temme case pleadings; create chart on Temme objections	325.00	2.4	780.00
07/02/2014	Guillermo Benavides	Hours	Draft and edit motion to approve settlement	325.00	1.6	520.00
07/02/2014	Guillermo Benavides	Hours	Research Westlaw for requesting attorney's fees as part of settlement	325.00	2.2	715.00
07/02/2014	Mark Murphy	Hours	Phone calls with E. Snyder, S. Powers, and R. Roper regarding "other actions" and obtaining additional information to provide to Kroll on foreign liquidations and actions	525.00	1.2	612.50
07/02/2014	Mark Murphy	Hours	Working meeting with G. Benavides regarding motion to approve settlement, and other opinions approving bar order settlements;	525.00	1.2	612.50
07/03/2014	Jason M. Davis	Hours	Correspondence with co-counsel regarding settlement agreement and changes to same; confer with M. Murphy regarding settlement language and revisions	600.00	0.8	480.00
07/03/2014	Mark Murphy	Hours	Revise settlement agreement - contribution section	525.00	1.4	735.00
07/03/2014	Guillermo Benavides	Hours	Research Westlaw for cases regarding attorney's fee awards in settlements with receivers	325.00	3.0	975.00
07/03/2014	Mark Murphy	Hours	Draft email to Receiver team regarding these changes; draft email to Kroll counsel regarding these changes	525.00	0.4	210.00
07/03/2014	Mark Murphy	Hours	Revise bar order on contribution	525.00	2.1	1,102.50
07/03/2014	Guillermo Benavides	Hours	Draft and revise motion to approve settlement agreement	325.00	1.0	325.00
07/07/2014	Guillermo Benavides	Hours	Edit motion to approve settlement	325.00	2.5	812.50
07/07/2014	Guillermo Benavides	Hours	Research attorney's fees awards in settlement agreements	325.00	6.4	2,080.00
07/07/2014	Mark Murphy	Hours	Working meeting with G. Benavides regarding contribution bar and settlement credit issue; research regarding whether any such claim against Kroll would be timely or viable	525.00	3.3	1,750.00
07/07/2014	Guillermo Benavides	Hours	Research responsible third parties, contribution, and third-party claims with respect to settling parties	325.00	2.6	834.17
07/08/2014	Guillermo Benavides	Hours	Research limitations for third-party claims and designating responsible third parties	325.00	1.6	520.00

07/08/2014	Guillermo Benavides	Hours	Draft and revise motion to approve settlement agreement	325.00	2.0	650.00
07/08/2014	Mark Murphy	Hours	Working meeting with G. Benavides regarding these issues and motion to approve settlement	525.00	0.4	210.00
07/08/2014	Mark Murphy	Hours	Research regarding third-party practice, and possible conflicts with Texas state law, federal law and this agreement regarding third-party practice, responsible third-party practice, settlement credits and statute of limitations	525.00	4.7	2,467.50
07/08/2014	Mark Murphy	Hours	Revise settlement agreement, specifically sections on settlement credit	525.00	0.8	420.00
07/08/2014	Mark Murphy	Hours	Phone call with Kroll counsel regarding settlement agreement, and in particular, contribution bar and settlement credit provisions;	525.00	0.8	437.50
07/08/2014	Guillermo Benavides	Hours	Research Texas and Federal law on contribution claims and settlement credits; meet with M. Murphy regarding findings on contribution claims and settlement credits	325.00	4.0	1,300.00
07/09/2014	Mark Murphy	Hours	Phone call with E. Snyder regarding these changes; review emails to and from E. Snyder and S. Powers regarding questions related to these changes	525.00	1.1	577.50
07/09/2014	Mark Murphy	Hours	Phone call with R. Roper regarding Latin American proceedings; phone call with S. Powers regarding other proceedings; review emails from both regarding lists of other proceedings	525.00	0.8	437.50
07/09/2014	Mark Murphy	Hours	Review S. Powers' suggestions and revisions to settlement documents, including bar order and scheduling order; incorporate those changes into our latest draft	525.00	3.5	1,837.50
07/09/2014	Guillermo Benavides	Hours	Research cases regarding attorneys' fees awarded in securities settlements; draft request for attorneys' fees in motion to approve settlement with Kroll	325.00	6.1	1,982.50
07/10/2014	Guillermo Benavides	Hours	Research attorneys' fees given in common fund cases	325.00	1.5	487.50
07/10/2014	Guillermo Benavides	Hours	Draft and revise attorneys' fees section in motion to approve settlement	325.00	0.6	195.00
07/10/2014	Mark Murphy	Hours	Revise settlement agreement related to contribution and release forms; revise bar order regarding same; draft email to co-counsel regarding these issues	525.00	4.2	2,187.50
07/10/2014	Mark Murphy	Hours	Draft email to co-counsel regarding time entries and motion to approve fee award	525.00	0.5	262.50
07/11/2014	Guillermo Benavides	Hours	review and edit motion to approve settlement	325.00	1.0	325.00
07/11/2014	Mark Murphy	Hours	Phone call with R. Roper regarding Latin American actions; phone call with E. Snyder on this issue and finalizing revisions to settlement agreement; review S. Powers' revisions and incorporate them into settlement agreement and "other actions" letter	525.00	2.7	1,400.00
07/11/2014	Guillermo Benavides	Hours	Research attorneys' fees in common fund cases; research cases calculating fees using Iodestar method	325.00	1.4	455.00
07/15/2014	Mark Murphy	Hours	Phone call with S. Ruskay-Kidd; draft email to R. Roper regarding Latin American actions	525.00	0.3	175.00
07/21/2014	Mark Murphy	Hours	Draft receiver's motion to approve settlement	525.00	3.3	1,750.00
07/22/2014	Mark Murphy	Hours	Working meeting with G. Benavides regarding motion to approve settlement	525.00	0.8	420.00
07/22/2014	Mark Murphy	Hours	Revise motion	525.00	4.0	2,100.00
07/22/2014	Guillermo Benavides	Hours	Review M. Murphy's edits and comments for motion to approve settlement; draft and edit motion to approve settlement	325.00	1.8	585.00
07/23/2014	Mark Murphy	Hours	Revise motion and these sections	525.00	2.8	1,470.00
07/23/2014	Guillermo Benavides	Hours	Draft and edit motion to approve settlement; confer with M. Murphy regarding motion to approve	325.00	4.4	1,430.00
07/23/2014	Guillermo Benavides	Hours	Research Westlaw for authority on attorneys' fees and bar orders	325.00	4.0	1,300.00
07/23/2014	Mark Murphy	Hours	Working meeting with G. Benavides regarding revisions to motion to approve settlement, including sections on bar orders and authorities	525.00	0.4	210.00
07/24/2014	Guillermo Benavides	Hours	Draft and edit motion to approve settlement	325.00	2.7	877.50
07/24/2014	Guillermo Benavides	Hours	Research Westlaw for similar bar orders and settlement agreements	325.00	5.0	1,625.00
07/25/2014	Guillermo Benavides	Hours	Draft and revise motion to approve settlement	325.00	2.2	704.17
07/25/2014	Guillermo Benavides	Hours	Research other similar receivership settlement cases and motions	325.00	4.1	1,332.50
07/25/2014	Mark Murphy	Hours	Phone calls with Kroll counsel, S. Powers, and R. Roper counsel regarding "other actions"	525.00	2.7	1,400.00
07/25/2014	Mark Murphy	Hours	Working meeting with G. Benavides regarding motion to approve settlement, including attorneys' fees and receiver authority	525.00	2.0	1,050.00
07/26/2014	Guillermo Benavides	Hours	Draft and revise motion to approve settlement	325.00	2.0	650.00
07/28/2014	Guillermo Benavides	Hours	Revise motion to approve settlement	325.00	0.3	97.50
07/28/2014	Mark Murphy	Hours	Review and draft emails to S. Powers and S. Ruskay regarding conference call to discuss Antigua actions; review email from E. Snyder regarding this issue	525.00	0.3	175.00
07/28/2014	Mark Murphy	Hours	Revise motion to approve	525.00	1.7	875.00
07/29/2014	Mark Murphy	Hours	Phone call with S. Ruskay-Kidd and S. Powers regarding Antigua actions and delays in finalizing settlement agreement	525.00	0.3	157.50

07/29/2014	Mark Murphy	Hours	Review changes to motion to approve	525.00	1.0	525.00
07/30/2014	Mark Murphy	Hours	Draft and respond to emails from Kroll counsel regarding settlement agreement	525.00	0.4	210.00
07/30/2014	Mark Murphy	Hours	Review motion to approve	525.00	5.7	2,975.00
07/30/2014	Guillermo Benavides	Hours	Review M. Murphy's comments on motion to approve settlement; make suggested changes to motion to approve settlement	325.00	0.6	195.00
07/31/2014	Mark Murphy	Hours	Review motion to approve section on attorney fee award	525.00	3.2	1,662.50
07/31/2014	Mark Murphy	Hours	Review new Kroll changes to settlement agreement, including contribution bar, other settlements, and release form costs	525.00	2.7	1,400.00
07/31/2014	Guillermo Benavides	Hours	Confer with M. Murphy regarding changes to motion to approve settlement; draft and edit motion to approve settlement	325.00	4.6	1,495.00
08/01/2014	Mark Murphy	Hours	Draft email to S. Powers regarding settlement and Antigua questions from Kroll counsel; phone call with Kroll counsel	525.00	0.8	420.00
08/01/2014	Guillermo Benavides	Hours	Research caselaw on calculating attorney's fees	325.00	0.9	292.50
08/01/2014	Mark Murphy	Hours	Revise motion to approve settlement	525.00	2.7	1,400.00
08/01/2014	Guillermo Benavides	Hours	Review motion to approve settlement; create and organize table of contents for motion to approve	325.00	1.5	487.50
08/04/2014	Guillermo Benavides	Hours	Edit sections of motion to approve; attend teleconference with Kroll; update and edit table of contents; review Kroll's cases on contribution	325.00	4.3	1,397.50
08/04/2014	Mark Murphy	Hours	Phone call with counsel for Kroll regarding contribution provisions, definitions, taxes, and other changes from latest settlement draft	525.00	0.8	420.00
08/04/2014	Mark Murphy	Hours	Revise motion to approve settlement, including bar order authorities	525.00	4.0	2,100.00
08/07/2014	Guillermo Benavides	Hours	Prepare materials regarding bar orders and their applicability	325.00	1.0	325.00
08/08/2014	Guillermo Benavides	Hours	Research similar Ponzi scheme settlements in all jurisdictions	325.00	1.3	422.50
08/09/2014	Guillermo Benavides	Hours	Research types of relief federal courts may grant in receivership settlements	325.00	0.9	292.50
08/09/2014	Guillermo Benavides	Hours	Research differences in power of bankruptcy courts and federal district courts	325.00	0.9	292.50
08/11/2014	Guillermo Benavides	Hours	Research difference between federal court and bankruptcy courts	325.00	0.5	162.50
08/11/2014	Guillermo Benavides	Hours	Review current version of motion to approve	325.00	0.6	195.00
08/12/2014	Mark Murphy	Hours	Revise motion to approve; review E. Snyder changes and revise based on his changes and questions	525.00	3.3	1,750.00
08/12/2014	Guillermo Benavides	Hours	Review E. Snyder's comments on motion to approve settlement	325.00	0.6	195.00
08/12/2014	Mark Murphy	Hours	Review "other actions" requests from Kroll, including liquidations in other countries; phone call with R. Roper regarding Latin American actions	525.00	2.2	1,137.50
08/12/2014	Mark Murphy	Hours	Phone call with counsel for Kroll regarding latest settlement revisions, "other action" and proposed side letters; phone call with E. Snyder regarding this call and motion to approve	525.00	0.8	437.50
08/12/2014	Guillermo Benavides	Hours	Attend teleconference with Kroll and M. Murphy	325.00	0.8	260.00
08/13/2014	Jason M. Davis	Hours	Review Motion for Approval; confer with M. Murphy regarding the same	600.00	0.6	360.00
08/13/2014	Mark Murphy	Hours	Phone call with S. Powers and S. Ruskey-Kidd regarding "other actions" and additional information for side letter included with agreement; review current side letter	525.00	0.7	350.00
08/13/2014	Mark Murphy	Hours	Review rolling agreement; draft email to team regarding this agreement and why we recommend signing it	525.00	0.7	350.00
08/15/2014	Mark Murphy	Hours	Review emails from Kroll counsel regarding settlement drafts and foreign liquidators; draft responses	525.00	0.7	350.00
08/15/2014	Mark Murphy	Hours	Phone call with J. Little regarding settlement agreement and his suggestions	525.00	0.7	350.00
08/18/2014	Sarah P. Santos	Hours	Confer with J. Davis and M. Murphy regarding settlement, fee application and attorney agreement	525.00	1.0	525.00
08/18/2014	Guillermo Benavides	Hours	Research through dockets and internet to find cases brought against Andrews and Kurth	325.00	1.0	325.00
08/19/2014	Mark Murphy	Hours	Phone call with R. Roper, S. Powers and E. Snyder regarding "other actions" and possibility and wisdom of seeking signatures of other liquidators; phone call with S. Spurling and E. Snyder regarding same; review other actions letter for possible revision	525.00	1.7	875.00
08/25/2014	Mark Murphy	Hours	Review several emails regarding obtaining signatures or approval of other foreign entities and cost for doing so	525.00	0.7	350.00
08/26/2014	Mark Murphy	Hours	Phone call with D. Buncher regarding Kroll settlement and exhibits; review latest drafts of exhibits	525.00	0.7	350.00
08/27/2014	Guillermo Benavides	Hours	Research docket information for case filed against Andrews & Kurth in connection with Stamford case; confer with M. Murphy on retrieving case information regarding Andrews & Kurth	325.00	0.7	227.50
08/27/2014	Mark Murphy	Hours	Phone call with S. Spurling regarding settlement agreement and foreign liquidators	525.00	0.5	262.50
08/27/2014	Mark Murphy	Hours	Draft and review emails regarding attorneys' fees and time entries	525.00	0.3	175.00
08/27/2014	Mark Murphy	Hours	Continue review of settlement agreement exhibits	525.00	1.2	612.50

08/28/2014	Mark Murphy	Hours	Review "other action" materials sent by R. Roper and S. Powers, and incorporate them into draft email to S. Ruskay-Kidd; draft email to E. Snyder regarding these materials	525.00	1.7	875.00
08/29/2014	Mark Murphy	Hours	Review settlement exhibits (bar order, scheduling order, long form notice, publication notice and release form) and make revisions to them	525.00	6.2	3,237.50
09/02/2014	Sarah P. Santos	Hours	Confer with J. Davis regarding meeting with E. Snyder	525.00	0.5	262.50
09/02/2014	Mark Murphy	Hours	Draft emails to S. Powers and S. Ruskay-Kidd regarding settlement exhibits	525.00	0.7	350.00
09/02/2014	Mark Murphy	Hours	Review revisions to Antigua order	525.00	0.7	350.00
09/02/2014	Mark Murphy	Hours	Phone call with E. Snyder regarding time entries and motion to approve	525.00	0.2	87.50
09/03/2014	Sarah P. Santos	Hours	Review and revise contingency fee scenarios	525.00	0.2	87.50
09/04/2014	Mark Murphy	Hours	Phone call with S. Spaffing and S. Ruskay-Kidd regarding settlement draft and exhibits, release form length and contents, and timing of settlement documents	525.00	0.7	350.00
09/04/2014	Mark Murphy	Hours	Phone call with J. Little and S. Powers regarding call with S. Spaffing, and problems with exhibits, including timing and form of releases, procedure and case in which to file the settlement approval motion	525.00	1.2	612.50
09/05/2014	Mark Murphy	Hours	Phone call with E. Snyder, J. Little and co-counsel regarding procedure and motion to approve fee application; phone call with S. Spaffing about problems with release procedure	525.00	1.5	787.50
09/07/2014	Mark Murphy	Hours	Revise release form	525.00	2.2	1,137.50
09/07/2014	Mark Murphy	Hours	Review revisions to "side letter" on "other actions"	525.00	0.5	262.50
09/07/2014	Mark Murphy	Hours	Draft emails to J. Little, S. Powers and R. Roper regarding revised settlement agreement, revisions to release form section and "other actions"	525.00	1.2	612.50
09/08/2014	Mark Murphy	Hours	Phone call with all counsel regarding settlement agreement - revisions based on authority of Receiver on "other actions," as well as release form and process and timing for releases	525.00	0.7	350.00
09/08/2014	Guillermo Benavides	Hours	Attend teleconference with Kroll	325.00	0.7	227.50
09/08/2014	Mark Murphy	Hours	Draft frequently asked questions for settlement	525.00	1.5	787.50
09/08/2014	Mark Murphy	Hours	Revise all exhibits, including scheduling order, long form notice and publication notice	525.00	5.2	2,712.50
09/08/2014	Mark Murphy	Hours	Review and revise latest settlement draft from Kroll, including provisions on J.Ls "appearing" in this case	525.00	1.5	787.50
09/08/2014	Guillermo Benavides	Hours	Review motion to approve settlement as edited by Kroll	325.00	2.4	780.00
09/09/2014	Mark Murphy	Hours	Review expense report and reimbursements; draft email to team regarding gathering expense reports	525.00	1.3	700.00
09/09/2014	Mark Murphy	Hours	Phone call with S. Powers regarding "other actions" side letter and changes to settlement	525.00	0.3	175.00
09/09/2014	Mark Murphy	Hours	Review revisions to settlement agreement from E. Snyder and incorporate them into our redline	525.00	0.5	262.50
09/10/2014	Mark Murphy	Hours	Review Tolling Agreement and compare to previous versions; draft email to team regarding signing it	525.00	0.7	350.00
09/10/2014	Mark Murphy	Hours	Draft email to R. Roper regarding "other actions" and sections in settlement referring to Latin American actions	525.00	1.3	700.00
09/10/2014	Guillermo Benavides	Hours	Draft and revise attorneys' fee application for settlement with Kroll	325.00	1.4	455.00
09/11/2014	Guillermo Benavides	Hours	Review fee declarations from other attorneys to help draft attorneys' fee application	325.00	1.2	390.00
09/12/2014	Guillermo Benavides	Hours	Draft analysis of Johnson factors for attorneys' fees application; research caselaw on Johnson factors	325.00	2.8	910.00
09/14/2014	Mark Murphy	Hours	Revise motion to approve settlement; review suggestions and changes from E. Snyder and J. Little; draft email to co-counsel regarding redline version	525.00	3.2	1,662.50
09/15/2014	Guillermo Benavides	Hours	Review motion to approve settlement; draft attorneys' fees application	325.00	3.1	1,007.50
09/15/2014	Mark Murphy	Hours	Review and revise application for fee approval	525.00	2.5	1,312.50
09/15/2014	Guillermo Benavides	Hours	Research caselaw on Johnson factors	325.00	1.2	390.00
09/16/2014	Mark Murphy	Hours	Phone call with S. Powers regarding revisions to motion to approve and settlement exhibits; phone call with E. Snyder regarding these issues, as well as expenses and fee declarations	525.00	1.2	612.50
09/16/2014	Mark Murphy	Hours	Draft declaration for fee application; review declaration drafted by P. Morgenstern	525.00	3.2	1,662.50
09/16/2014	Guillermo Benavides	Hours	Draft and edit attorneys' fees application	325.00	0.9	292.50
09/16/2014	Sarah P. Santos	Hours	Review and revise declaration in support of attorneys' fees	525.00	2.0	1,050.00
09/18/2014	Mark Murphy	Hours	Review letter from R. Janvey regarding settlement structure; working meeting with J. Davis regarding issues raised in this letter	525.00	1.2	612.50
09/22/2014	Sarah P. Santos	Hours	Confer with M. Murphy regarding status of settlement and status of discussions with E. Snyder	525.00	1.0	525.00
09/22/2014	Mark Murphy	Hours	Working meeting with G. Benavides regarding drafting new notice provisions; review notice provisions from K. Sadler	525.00	0.5	262.50

09/22/2014	Mark Murphy	Hours	Conference call with Receiver, Examiner and counsel regarding settlement terms and new structure; working meeting with S. Santos regarding status of settlement discussions and settlement conference call	525.00	1.2	612.50
09/24/2014	Guillermo Benavides	Hours	Research Stanford case docket and related cases for settlement documents between the Receiver and Thacker/Aitken	325.00	0.6	195.00
09/24/2014	Mark Murphy	Hours	Phone call with S. Sparring regarding our material changes to settlement; draft email regarding these changes; draft email to team on this issue	525.00	3.5	1,837.50
09/24/2014	Mark Murphy	Hours	Phone call with S. Powers regarding changes to notice provisions and procedure for approval	525.00	0.3	157.50
10/22/2014	Jason M. Davis	Hours	Call with Kroll counsel; review response from Kroll; correspondence to team	600.00	1.0	600.00
10/28/2014	Jason M. Davis	Hours	Calls with team and client; confer with M. Murphy regarding strategy for filing suit and last attempt to revive settlement	600.00	1.2	720.00
10/28/2014	Mark Murphy	Hours	Working meeting with Jason Davis about status of settlement discussions with Kroll; phone call with counsel for the Receiver, the Examiner and other counsel regarding the negotiations	525.00	0.8	437.50
10/30/2014	Jason M. Davis	Hours	Review materials for call with Kroll counsel and E. Snyder; call with Kroll counsel and E. Snyder	600.00	1.2	720.00
10/31/2014	Guillermo Benavides	Hours	Research Examiner's application for attorney's fees and review Johnson factor analysis	325.00	0.6	195.00
11/07/2014	Mark Murphy	Hours	Draft changes to bar order and judgment, and changes to scheduling order	525.00	5.2	2,712.50
11/09/2014	Mark Murphy	Hours	Draft changes to settlement agreement; draft changes to long-form notice	525.00	4.2	2,187.50
11/10/2014	Mark Murphy	Hours	Draft changes to settlement agreement	525.00	4.3	2,275.00
11/11/2014	Mark Murphy	Hours	Draft changes to publication notice	525.00	3.5	1,837.50
11/11/2014	Mark Murphy	Hours	Continue drafting changes to settlement agreement	525.00	1.1	577.50
11/11/2014	Jason M. Davis	Hours	Correspondence with Kroll counsel regarding additional tolling; review proposed amendment; confer with M. Murphy regarding same; review prior tolling agreements; continue to review revised settlement agreement	600.00	1.8	1,080.00
11/11/2014	Mark Murphy	Hours	Review tolling agreement; draft email to co-counsel regarding tolling agreement	525.00	0.6	315.00
11/12/2014	Mark Murphy	Hours	Phone call with K. Sadler and S. Powers regarding settlement agreement with Kroll	525.00	0.3	157.50
11/12/2014	Mark Murphy	Hours	Draft changes to notice provisions and changes to settlement documents, including long-form notice	525.00	1.8	945.00
11/12/2014	John I. Moore	Hours	Meet with M. Murphy and J. Benavides to discuss publications regarding settlement	175.00	0.2	29.17
11/12/2014	John I. Moore	Hours	Research potential financial publications in the United Kingdom and Venezuela for publication of settlement	175.00	0.7	116.67
11/12/2014	John I. Moore	Hours	Coordinate meeting for 11/18/2014 and review case materials for meeting	175.00	0.8	145.83
11/13/2014	Mark Murphy	Hours	Phone call with S. Sparring about check release and notice procedures	525.00	0.7	350.00
11/13/2014	Mark Murphy	Hours	Draft email to S. Powers and R. Roper regarding 7 other actions? provisions and Representations and Warranties section	525.00	0.7	350.00
11/13/2014	Mark Murphy	Hours	Revise settlement agreement related to shortening notice, notice costs and scheduling order	525.00	0.4	210.00
11/17/2014	Jason M. Davis	Hours	Correspondence from Kroll counsel regarding pending issues; confer with M. Murphy regarding remaining disputes and strategy to resolve	600.00	0.5	300.00
11/17/2014	John I. Moore	Hours	Continue researching publications in settlement countries; review the same with J. Benavides, and confer with M. Murphy regarding 11/18/2014 case meeting	175.00	1.7	291.67
11/17/2014	John I. Moore	Hours	Contact The Economist regarding advertising details for publication of the settlement	175.00	0.3	58.33
11/18/2014	Jason M. Davis	Hours	Confer with M. Murphy regarding issues raised by Kroll counsel; review proposed release language and issues related to Bar Order	600.00	0.4	240.00
11/18/2014	John I. Moore	Hours	Meet with M. Murphy regarding settlement publication, then research alternative means of publication	175.00	0.8	145.83
11/18/2014	John I. Moore	Hours	Review pricing options for publishing settlement in The Economist with regional marketing representative	175.00	0.3	58.33
11/19/2014	Mark Murphy	Hours	Phone call with co-counsel regarding settlement, and Kroll response to our changes, including notice on back of checks and request for additional right to terminate	525.00	0.5	262.50
11/19/2014	Mark Murphy	Hours	Phone call with S. Sparring regarding release on the back of the checks, new termination provision and other settlement provisions; draft email to J. Davis on this call	525.00	1.7	875.00
11/20/2014	Mark Murphy	Hours	Phone call with Kroll and E. Snyder regarding additional termination trigger for foreign suits, side letter for release, and notice costs; draft email to Kroll counsel regarding notice costs; phone call with S. Powers regarding notice costs related to initial claims process	525.00	2.7	1,400.00
11/24/2014	Jason M. Davis	Hours	Review e-mail from Kroll; review issues related to termination letter with M. Murphy	600.00	0.3	180.00
11/25/2014	Mark Murphy	Hours	Draft email to Examiner and counsel for Receiver regarding extending tolling and latest settlement discussions, including side letter for termination and additional release	525.00	0.8	420.00
11/25/2014	Jason M. Davis	Hours	Confer with M. Murphy regarding various pending issues raised during teleconference with Kroll; correspond with team regarding additional tolling	600.00	0.6	360.00
11/25/2014	Mark Murphy	Hours	Draft email to counsel for Receiver regarding other actions provisions	525.00	0.4	210.00



11/25/2014	Mark Murphy	Hours	Review extension of tolling agreement	525.00	0.5	262.50
11/25/2014	Mark Murphy	Hours	Draft email to counsel for Kroll regarding remaining items to address	525.00	0.8	420.00
11/26/2014	Jason M. Davis	Hours	Correspondence with counsel; review final tolling agreement	600.00	0.3	180.00
12/02/2014	Guillermo Benavides	Hours	Review and calculate estimated mailing costs to provide notice to all investors	325.00	0.7	227.50
12/03/2014	Guillermo Benavides	Hours	Confer with M. Murphy on the estimated costs of mailing notice to investors	325.00	0.3	97.50
12/03/2014	Mark Murphy	Hours	Phone call with J. Little; phone calls with S. Powers and R. Roper regarding other actions	525.00	2.2	1,137.50
12/03/2014	Mark Murphy	Hours	Draft email to S. Spaulding regarding mailing costs	525.00	0.6	315.00
12/03/2014	Jason M. Davis	Hours	Confer with M. Murphy regarding response to Kroll's request for cost estimate; review correspondence related to same; correspond with team regarding same	600.00	0.7	420.00
12/09/2014	Jason M. Davis	Hours	Review correspondence and draft proposals from Kroll concerning publication/termination; confer with co-counsel regarding same	600.00	1.1	660.00
12/10/2014	Jason M. Davis	Hours	Review materials for call with co-counsel and counsel for Kroll; confer with M. Murphy regarding related issues; hold conference call with Kroll counsel	600.00	1.6	960.00
12/12/2014	Jason M. Davis	Hours	Review and discuss revised notice of settlement from E. Snyder; confer with co-counsel regarding same	600.00	0.9	540.00
12/13/2014	Jason M. Davis	Hours	Continue review of Kroll draft along with Snyder revision	600.00	0.3	180.00
12/16/2014	Mark Murphy	Hours	Draft changes to motion to approve	525.00	1.8	945.00
12/16/2014	Mark Murphy	Hours	Draft changes to long-form notice	525.00	1.5	787.50
12/19/2014	Jason M. Davis	Hours	Correspondence with Kroll counsel; review Kroll's revised exhibits to settlement agreement; confer with M. Murphy regarding release language	600.00	1.2	720.00
12/22/2014	Mark Murphy	Hours	Compile list of questions on settlement and exhibits, including on notice, cost of publication, other actions and additional topics	525.00	1.9	997.50
12/22/2014	Mark Murphy	Hours	Review email from Kroll counsel regarding revisions to side letter and settlement agreement section on releases	525.00	0.2	105.00
12/22/2014	Mark Murphy	Hours	Review all changes to all exhibits, including side letter on other actions, long notice, and short notice; draft email to Kroll counsel regarding other actions	525.00	1.8	945.00
12/29/2014	Jason M. Davis	Hours	Confer with M. Murphy regarding status and pending issues	600.00	0.3	180.00
01/05/2015	Jason M. Davis	Hours	Review revised notices from Kroll and our side; review remaining issues and cost estimates	600.00	0.8	480.00
01/05/2015	Mark Murphy	Hours	Revise motion to approve settlement; revise both long form and short form notices	525.00	3.8	1,995.00
01/05/2015	Mark Murphy	Hours	Phone calls with S. Spaulding regarding same issues	525.00	0.4	210.00
01/05/2015	Mark Murphy	Hours	Revise scheduling order	525.00	4.2	2,205.00
01/05/2015	Mark Murphy	Hours	Revise motion to approve settlement	525.00	0.4	210.00
01/05/2015	Mark Murphy	Hours	Phone call with K. Sadler and J. Little regarding notice costs and hearing on motion to approve	525.00	0.2	105.00
01/05/2015	Guillermo Benavides	Hours	Review docket sheet to determine how much has been paid to investors	325.00	0.4	130.00
01/07/2015	Mark Murphy	Hours	Review email from S. Ruskay/Kidd regarding other actions provisions, and revisions of settlement and side letter; draft email to our team on these changes	525.00	1.2	612.50
01/07/2015	Jason M. Davis	Hours	Correspondence from Kroll; review additional redlines from Kroll; discuss side letter issues with co-counsel	600.00	0.8	480.00
01/13/2015	Jason M. Davis	Hours	Correspondence with team regarding remaining issues; review additional proposed tolling agreement from Kroll; review and comment on our revisions and correspondence to Kroll	600.00	1.2	720.00
01/13/2015	Mark Murphy	Hours	Phone call with E. Snyder regarding cost issue and items remaining to do; revise long-form notice; draft email to S. Spaulding regarding revisions to various settlement exhibits, as well as cost issues; review email from D. Arlington regarding costs of mailing	525.00	5.3	2,800.00
01/14/2015	Jason M. Davis	Hours	Correspondence regarding Tolling Agreement	600.00	0.2	120.00
01/16/2015	Mark Murphy	Hours	Phone call with opposing counsel regarding notice costs; continue revisions of settlement documents, including notice provisions	525.00	3.7	1,925.00
01/16/2015	Jason M. Davis	Hours	Confer with M. Murphy regarding pending issues and strategy to finalize settlement; confer with team regarding same and notice issues	600.00	0.5	300.00
02/05/2015	Jason M. Davis	Hours	Update from co-counsel regarding status of Motion to Dismiss in related case; confer with M. Murphy regarding same	600.00	0.3	180.00
02/09/2015	Jason M. Davis	Hours	Review correspondence and materials related to Kroll's Chapter 11 filing; hold various teleconferences and review e-mails regarding effect of bankruptcy; begin research regarding non-dischargeability; review tolling agreement effect on Cash claim	600.00	2.4	1,440.00
02/09/2015	Sarah P. Santos	Hours	Review Kroll's bankruptcy and consider issues related to same	525.00	0.5	262.50
02/10/2015	Guillermo Benavides	Hours	Review complaint against Kroll and note the causes of action brought	325.00	0.9	292.50
02/10/2015	Jason M. Davis	Hours	Confer with co-counsel regarding effect of bankruptcy on settlement and tolling agreement; review information from P. Morgenstern along with bankruptcy proceeding	600.00	1.4	840.00

02/10/2015	Guillermo Benavides	Hours	Research exceptions to bankruptcy dischargeability	325.00	2.7	877.50
02/10/2015	Guillermo Benavides	Hours	Ascertain which causes of actions brought against Kroll could be excepted from dischargeability	325.00	0.6	195.00
02/11/2015	Jason M. Davis	Hours	Conferences with M. Murphy and co-counsel; calls and e-mails regarding bankruptcy filings in Proskauer/Sublom call	600.00	1.8	1,080.00
02/12/2015	Jason M. Davis	Hours	Update with team on status of bankruptcy filing and status of settlement; confirm status of tolling agreement	600.00	0.6	360.00
02/13/2015	Guillermo Benavides	Hours	Research bankruptcy dischargeability exceptions and determine whether the exceptions are applicable to claims asserted against Kroll	325.00	1.4	455.00
02/13/2015	Jason M. Davis	Hours	Review correct drafts of documents; discuss T. Cash and status of tolling	600.00	0.5	300.00
02/13/2015	Mark Murphy	Hours	Review changes to settlement agreement by Sparling related to notice costs; review changes to scheduling order related to deadlines to object; review other revisions to settlement documents	525.00	2.7	1,400.00
02/13/2015	Guillermo Benavides	Hours	Review Motion for Relief From Stay in Sjoblom case to determine requirements and criteria for relief from stays due to bankruptcy	325.00	0.5	162.50
02/16/2015	Jason M. Davis	Hours	Confer with M. Murphy regarding Kroll position on Cash and related effects of stay	600.00	0.4	240.00
02/17/2015	Guillermo Benavides	Hours	Research dischargeability of conspiracy claims asserted against a debtor	325.00	1.0	325.00
02/20/2015	Jason M. Davis	Hours	Update from Kroll; confer with M. Murphy regarding same	600.00	0.3	180.00
02/20/2015	Mark Murphy	Hours	Phone call with S. Sparling; review revised settlement documents; draft email to team on status update	525.00	3.2	1,662.50
02/23/2015	Jason M. Davis	Hours	Review comments from J. Little; discuss; discuss same with M. Murphy; review latest redlines	600.00	1.1	660.00
02/24/2015	Mark Murphy	Hours	Review comments and suggestions from Examiner regarding latest settlement drafts; review and revise drafts based on these comments	525.00	2.8	1,487.50
02/25/2015	Mark Murphy	Hours	Review and revise settlement agreement regarding notice provisions and receiver websites	525.00	2.4	1,260.00
02/25/2015	Jason M. Davis	Hours	Review redlines in response to Kroll	600.00	0.4	240.00
02/25/2015	Mark Murphy	Hours	Review and revise long and short form notices	525.00	1.8	945.00
02/25/2015	Mark Murphy	Hours	Review and revise motion to approve regarding other case cites and issues involving Examiner, as well as expedited request to enter scheduling order	525.00	1.5	787.50
02/27/2015	Guillermo Benavides	Hours	Review Kroll settlement and related documents to determine implementation dates and tasks; create chart on important dates and reminders to be set	325.00	3.4	1,105.00
02/27/2015	Guillermo Benavides	Hours	Attend conference call with M. Murphy	325.00	0.8	260.00
02/27/2015	Mark Murphy	Hours	Working meeting with G. Benavides regarding drafting chart of tasks necessary after settlement is signed and strategy for addressing each	525.00	1.1	577.50
02/27/2015	Mark Murphy	Hours	Phone call with Kroll counsel regarding bankruptcy filings needed to approve settlement, changes to settlement documents	525.00	0.8	420.00
02/27/2015	Jason M. Davis	Hours	Confer with M. Murphy regarding Kroll; comments to J. Little's revisions	600.00	0.5	300.00
02/27/2015	Guillermo Benavides	Hours	Confer with M. Murphy on logistics of implementing settlement agreement	325.00	1.1	357.50
03/02/2015	Guillermo Benavides	Hours	Review Kroll settlement documents and corresponding exhibits and attachments	325.00	1.0	325.00
03/02/2015	Guillermo Benavides	Hours	Create chart of deadlines for settlement implementation	325.00	0.7	227.50
03/03/2015	Guillermo Benavides	Hours	Call with Scott Ruskay Kidd on various concerns regarding the settlement agreement and deadlines	325.00	0.2	65.00
03/03/2015	Guillermo Benavides	Hours	Review and edit chart of settlement procedure and deadlines; confer with M. Murphy on settlement procedure and deadlines	325.00	0.7	227.50
03/06/2015	Jason M. Davis	Hours	Confer with team regarding status and next steps in bankruptcy and procedure for approval	600.00	0.3	180.00
03/06/2015	Mark Murphy	Hours	Phone call with counsel for Kroll; draft emails to team regarding status of settlement documents	525.00	1.7	875.00
03/18/2015	Mark Murphy	Hours	Phone call with S. Sparling regarding changes to settlement documents; review changes	525.00	1.3	700.00
03/26/2015	Jason M. Davis	Hours	Update from Kroll counsel on bankruptcy approval; discuss same with co-counsel	600.00	0.3	180.00
03/26/2015	Mark Murphy	Hours	Phone call with S. Ruskay Kidd; phone call with S. Powers regarding notice provisions for nominees	525.00	0.7	350.00
03/27/2015	Mark Murphy	Hours	Phone call with S. Ruskay Kidd regarding notice provisions for nominees	525.00	0.3	175.00
03/31/2015	Guillermo Benavides	Hours	Confer with M. Murphy on settlement implementation deadlines and tasks; edit Excel chart on deadlines and tasks concerning settlement with Kroll	325.00	1.5	487.50
04/13/2015	Jason M. Davis	Hours	Confer with M. Murphy regarding proof of claim issue along with status with Kroll counsel; review correspondence related to same	600.00	0.4	240.00
04/13/2015	Mark Murphy	Hours	Review email from P. Morgenstern regarding deadline to file proof of claim; draft reply; draft email to S. Sparling regarding this issue	525.00	1.2	612.50
04/14/2015	Mark Murphy	Hours	Phone call with S. Sparling regarding status of approval for final settlement drafts	525.00	0.2	87.50
04/27/2015	Guillermo Benavides	Hours	Review and revise task list for settlement implementation	325.00	0.5	162.50

04/28/2015	Mark Murphy	Hours	Review revisions from Kroll on settlement and exhibits	525.00	2.7	1,400.00
04/28/2015	Jason M. Davis	Hours	Correspond with team regarding Kroll response and proof of claim	600.00	0.3	180.00
04/29/2015	Mark Murphy	Hours	Review proof of claim and suggestions for changes	525.00	2.8	1,470.00
04/29/2015	Mark Murphy	Hours	Phone call with Kroll counsel regarding proof of claim and settlement changes; phone call with P. Morgenstern regarding proof of claim	525.00	0.5	262.50
04/29/2015	Jason M. Davis	Hours	Confer with Kroll counsel and confer with M. Murphy regarding bankruptcy issues; review revised settlement documents from Kroll	600.00	1.4	840.00
04/29/2015	Mark Murphy	Hours	Review and respond to numerous emails regarding effect of bankruptcy and our filing proof of claim on settlement and insurance proceeds	525.00	1.4	735.00
04/30/2015	Mark Murphy	Hours	Phone calls with P. Morgenstern and S. Spurling regarding proof of claim, addition of putative class; review draft proof of claim; review comments on draft proof of claim requested by Kroll; draft and review response emails from E. Snyder regarding draft proof of claim	525.00	3.3	1,750.00
05/01/2015	Mark Murphy	Hours	Review additional changes to long form notice and scheduling order; draft email to team regarding these changes and settlement schedule	525.00	3.3	1,750.00
05/01/2015	Jason M. Davis	Hours	Continue to review latest redline versions of settlement	600.00	0.5	300.00
05/01/2015	Mark Murphy	Hours	Phone call with S. Ruskay-Kidd regarding changes to the settlement agreement	525.00	0.3	175.00
05/05/2015	Mark Murphy	Hours	Review and respond to several emails among our team regarding most recent revisions to Stanford settlement	525.00	1.7	875.00
05/06/2015	Jason M. Davis	Hours	Review comments from S. Powers; confer regarding same with co-counsel	600.00	0.5	300.00
05/08/2015	Mark Murphy	Hours	Review S. Powers' proposed changes to settlement agreement; phone call with Powers on these issues	525.00	2.3	1,225.00
05/09/2015	Mark Murphy	Hours	Review S. Powers' changes and concerns; review previous versions of settlement	525.00	2.8	1,470.00
05/09/2015	Mark Murphy	Hours	Review settlement agreement with another third party; review and respond to emails related to that settlement	525.00	1.1	577.50
05/11/2015	Mark Murphy	Hours	Phone call with S. Powers and E. Snyder regarding changes to settlement agreement; phone call with S. Spurling regarding timing of sending him our changes and possible shortcuts to tie up remaining issues; draft emails to Powers and Snyder regarding these issues	525.00	2.2	1,137.50
05/14/2015	Mark Murphy	Hours	Revise settlement; draft redline version based on discussions with S. Powers	525.00	2.7	1,400.00
05/20/2015	Mark Murphy	Hours	Review motions to approve other settlements; phone call with S. Powers regarding his changes; draft short status email to team	525.00	1.7	875.00
05/20/2015	Jason M. Davis	Hours	Correspondence along with status with team	600.00	0.3	180.00
05/28/2015	Mark Murphy	Hours	Review and respond to emails from S. Spurling regarding our changes to settlement, P. Morgenstern regarding bankruptcy deadlines, and S. Powers regarding our changes and the changes from JLS	525.00	2.2	1,137.50
05/29/2015	Jason M. Davis	Hours	Confer with M. Murphy regarding Kroll position on collateral agreement; confer regarding provision concerning Louisiana litigation	600.00	0.3	180.00
05/29/2015	Mark Murphy	Hours	Review changes from Scott Powers on settlement and settlement exhibits/side letters; phone call with him related to these changes; draft email to S. Spurling regarding these changes	525.00	1.7	875.00
06/02/2015	Jason M. Davis	Hours	Confer with team regarding bankruptcy procedure and necessity to participate in confirmation hearing; multiple e-mails regarding same	600.00	1.1	660.00
06/02/2015	Mark Murphy	Hours	phone call with S. Spurling, E. Snyder and S. Powers regarding our changes and upcoming bankruptcy deadlines	525.00	0.2	105.00
06/02/2015	Mark Murphy	Hours	Review emails regarding our changes; review Word versions of our changes to settlement and exhibits	525.00	1.8	945.00
06/02/2015	Mark Murphy	Hours	Draft email to P. Morgenstern regarding bankruptcy deadlines and their affect on our timeline to finalize settlement	525.00	1.1	577.50
06/03/2015	Mark Murphy	Hours	Phone call with S. Spurling regarding follow up call on changes; phone call with P. Morgenstern regarding upcoming bankruptcy dates and possible arrangements to give time to finalize settlement	525.00	0.7	350.00
06/03/2015	Jason M. Davis	Hours	Continue to confer regarding options in bankruptcy proceeding; multiple e-mails regarding options and strategy for salvaging settlement	600.00	1.4	840.00
06/04/2015	Mark Murphy	Hours	Draft status update email to team	525.00	1.3	700.00
06/05/2015	Jason M. Davis	Hours	Update and correspondence to team regarding bankruptcy status	600.00	0.3	180.00
06/08/2015	Jason M. Davis	Hours	Correspondence with team regarding bankruptcy	600.00	0.2	120.00
06/08/2015	Sarah P. Santos	Hours	Confer with team regarding settlement status and upcoming tasks; review e-mails between counsel	525.00	0.5	262.50
06/10/2015	Jason M. Davis	Hours	Correspondence with counsel regarding bankruptcy	600.00	0.3	180.00
06/11/2015	Mark Murphy	Hours	Phone call with S. Spurling, B. Schmidt, P. Morgenstern regarding bankruptcy effect on timing of negotiations, and what we should do about it; phone call with P. Morgenstern regarding strategy in connection with bankruptcy proceedings	525.00	0.8	437.50
06/12/2015	Jason M. Davis	Hours	Review Disclosure Statement filed in bankruptcy; correspondence regarding same; confer with M. Murphy regarding same	600.00	0.5	300.00
06/15/2015	Sarah P. Santos	Hours	Confer with team regarding settlement discussions and necessity for Bankruptcy filings	525.00	0.2	87.50

06/15/2015	Jason M. Davis	Hours	Confer with team regarding procedure; impact of bankruptcy	600.00	0.3	180.00
06/15/2015	Mark Murphy	Hours	Review and respond to emails about Kroll changes; working meeting with J. Davis and S. Santos regarding status update	525.00	0.7	350.00
06/16/2015	Mark Murphy	Hours	Draft email to our team regarding my call with Spurling and Kroll changes to settlement materials	525.00	1.4	735.00
06/16/2015	Mark Murphy	Hours	Phone calls with E. Snyder, J. Little and P. Morgenstern regarding these dates and our strategy for pushing settlement negotiations forward	525.00	0.6	315.00
06/16/2015	Mark Murphy	Hours	Phone calls with Kroll counsel and Kroll bankruptcy counsel regarding status of changes, and bankruptcy dates affecting settlement deadlines	525.00	0.8	420.00
06/16/2015	Sarah P. Santos	Hours	Review draft motion for relief from stay; review Kroll's changes to settlement agreement and corresponding documents	525.00	2.0	1,050.00
06/16/2015	Jason M. Davis	Hours	Review Kroll's revisions to settlement documents; confer with co-counsel regarding same; multiple e-mails regarding same	600.00	1.3	780.00
06/17/2015	Sarah P. Santos	Hours	Review correspondence from co-counsel regarding concerns to draft of settlement and concerns regarding changes requested by Kroll; consider and evaluate same	525.00	0.5	262.50
06/17/2015	Mark Murphy	Hours	Draft status update to J. Davis and S. Santos	525.00	1.1	577.50
06/17/2015	Jason M. Davis	Hours	Confer with S. Santos and M. Murphy regarding S. Powers revisions and status of final settlement document; review J. Little comments; multiple e-mails with team regarding comments and settlement documents	600.00	1.4	840.00
06/17/2015	Mark Murphy	Hours	Draft email to P. Morgenstern regarding timing of any filings in bankruptcy	525.00	0.4	210.00
06/17/2015	Mark Murphy	Hours	Review Kroll changes to settlement materials; review numerous emails and respond to them regarding settlement changes	525.00	3.6	1,890.00
06/18/2015	Mark Murphy	Hours	Phone call with K. Sadler, E. Snyder and others regarding Kroll changes to settlement agreement; phone call with J. Davis regarding this call and upcoming call with Kroll counsel	525.00	1.8	962.50
06/18/2015	Jason M. Davis	Hours	Confer with M. Murphy regarding issues raised in call with co-counsel regarding revisions to settlement documents	600.00	0.8	480.00
06/19/2015	Mark Murphy	Hours	Phone calls with S. Spurling and his group, and our team, regarding definition of "Claimant," side letter on termination, future sale requirements, and other changes or concerns on settlement; draft and review numerous emails on these issues	525.00	3.3	1,750.00
06/19/2015	Jason M. Davis	Hours	Confer with team regarding remaining issues raised by Kroll; review draft and revisions to Agreement; e-mail regarding same	600.00	1.0	600.00
06/25/2015	Mark Murphy	Hours	Phone call with S. Spurling about obtaining the final approval on the settlement documents; review numerous emails from lawyers on our team about strategy for bankruptcy filings and other concerns if there is a delay in getting final approval	525.00	2.2	1,137.50
06/29/2015	Jason M. Davis	Hours	Discuss strategy options regarding bankruptcy/settlement issues with team	600.00	0.5	300.00
06/30/2015	Jason M. Davis	Hours	Correspondence with team regarding bankruptcy status	600.00	0.3	180.00
07/01/2015	Mark Murphy	Hours	Review numerous emails regarding potential bankruptcy motion	525.00	1.3	700.00
07/02/2015	Jason M. Davis	Hours	Confer with M. Murphy regarding status of settlement documents; research options/strategy for bankruptcy filing	600.00	0.5	300.00
07/06/2015	Jason M. Davis	Hours	Review memorandum and task list related to settlement and motions for approval; confer with team regarding same; review bankruptcy filings for precedent	600.00	1.2	720.00
07/07/2015	Jason M. Davis	Hours	Discussions with M. Murphy regarding bankruptcy issues and settlement	600.00	0.3	180.00
07/08/2015	Jason M. Davis	Hours	Call each co-counsel; e-mails regarding bankruptcy filing; lift stay motion	600.00	0.5	300.00
07/09/2015	Jason M. Davis	Hours	Correspondence from Kroll counsel regarding proposed lift stay motion	600.00	0.4	240.00
07/10/2015	Jason M. Davis	Hours	Correspond with co-counsel regarding Cash possible filing; related bankruptcy issues; multiple correspondence e-mails regarding same	600.00	0.9	540.00
07/14/2015	Sarah P. Santos	Hours	Review settlement agreement and drafts of all related documents; attend settlement conference call; prepare summary of call	525.00	6.5	3,412.50
07/14/2015	Jason M. Davis	Hours	Review Kroll proposals; correspond with team regarding same; status from S. Santos regarding same	600.00	1.4	840.00
07/17/2015	Jason M. Davis	Hours	Review revised Bar Order, Agreement, and Scheduling Order from Kroll counsel	600.00	0.8	480.00
07/20/2015	Jason M. Davis	Hours	Correspond with co-counsel and approval of documents from Kroll	600.00	0.3	180.00
07/20/2015	Sarah P. Santos	Hours	Review revised redlines of settlement documents and correspondence from other attorneys	525.00	0.5	262.50
07/21/2015	Mark Murphy	Hours	Review numerous emails about phone call last week discussing settlement; review latest drafts; phone call with S. Powers regarding latest drafts	525.00	1.8	945.00
07/22/2015	Jason M. Davis	Hours	Review of proposed final documents as revised incorporation all counsel's changes	600.00	1.1	660.00
07/22/2015	Sarah P. Santos	Hours	Review correspondence regarding settlement agreement	525.00	0.3	175.00
07/22/2015	Mark Murphy	Hours	Review changes to settlement agreement, scheduling order and bar order; review changes to notices; prepare chart regarding various versions and most-current versions, so all parties can review most current versions of all settlement materials; draft email regarding these issues	525.00	3.1	1,627.50
07/23/2015	Jason M. Davis	Hours	Confer with all counsel regarding final documents for execution	600.00	0.3	180.00

07/23/2015	Mark Murphy	Hours	Review emails from S. Ruskay Kidd and S. Powers regarding final settlement materials; review materials attached to those emails regarding most recent versions; draft email to them putting together all current versions in one folder	525.00	2.2	1,155.00
07/24/2015	Mark Murphy	Hours	Review emails from S. Powers and S. Ruskay regarding final drafts and Antiquan motions; review responses to objections to similar settlements; phone call with E. Valdespino regarding the Venezuelan release	525.00	2.8	1,470.00
07/29/2015	Jason M. Davis	Hours	Confer with counsel regarding status of settlement documents with Kroll	600.00	0.3	180.00
07/31/2015	Jason M. Davis	Hours	Review last drafts from Kroll; confer with counsel regarding last revisions and timing of approval	600.00	0.6	360.00
08/03/2015	Mark Murphy	Hours	Phone call with E. Valdespino and S. Spauling; draft email to our team regarding Spauling comments about finalizing agreement before corporate changeover	525.00	2.4	1,260.00
08/04/2015	Jason M. Davis	Hours	Correspondence from counsel regarding timing of bankruptcy approval	600.00	0.3	180.00
08/05/2015	Jason M. Davis	Hours	Correspondence from Kroll counsel with revised dismissal documents	600.00	0.4	240.00
08/14/2015	Guillermo Benavides	Hours	Confer with M. Murphy and J. Moore on tasks regarding Kroll settlement	325.00	0.2	65.00
08/14/2015	John I. Moore	Hours	Confer with J. Benavides and M. Murphy regarding settlement deadlines, note books of settlement documents and strategy going into settlement agreement; prepare notebook of settlement agreement and exhibits	175.00	0.8	145.83
08/14/2015	Mark Murphy	Hours	Working meeting with J. Benavides and J. Moore regarding strategy for implementing settlement agreement; review chart of items to do and plan strategy for efficiently implementing settlement if approved	525.00	1.8	945.00
08/17/2015	Jason M. Davis	Hours	Status with co-counsel; confirm Kroll bankruptcy confirmation of plan	600.00	0.4	240.00
08/17/2015	John I. Moore	Hours	Continue to prepare settlement document notebook and review of the same	175.00	1.7	297.50
08/18/2015	John I. Moore	Hours	Meet with M. Murphy and J. Benavides regarding solidifying deadlines re scheduling order	175.00	0.2	35.00
08/19/2015	Guillermo Benavides	Hours	Gather and review BDO settlement documents	325.00	2.1	682.50
08/19/2015	John I. Moore	Hours	Continue to review settlement documents	175.00	0.5	87.50
08/20/2015	John I. Moore	Hours	Confer with J. Benavides and M. Murphy regarding review of settlement deadlines; repopulate settlement document notebook with final versions, update scheduling order chart, and review the same with J. Benavides	175.00	0.9	157.50
08/20/2015	Mark Murphy	Hours	Phone call with J. Moore regarding complete and final set of settlement materials	525.00	0.4	210.00
08/20/2015	Guillermo Benavides	Hours	Meet with J. Moore on Kroll settlement implementation	325.00	0.2	65.00
08/21/2015	Mark Murphy	Hours	Review BDO response to objections; draft notes on application to our settlement	525.00	2.1	1,102.50
08/21/2015	John I. Moore	Hours	Prepare summary of evaluation of settlement documents and deadlines for M. Murphy and J. Benavides	175.00	0.3	52.50
08/23/2015	Mark Murphy	Hours	Review receiver response to objections on BDO settlement	525.00	2.4	1,260.00
08/24/2015	Guillermo Benavides	Hours	Review BDO settlement filings; draft attorney declaration to support attorney's fees	325.00	3.3	1,072.50
08/24/2015	Mark Murphy	Hours	Review fee declarations in BDO and Adams and Reese cases; draft emails to E. Snyder and rest of team regarding finalizing fee declarations	525.00	2.4	1,260.00
08/25/2015	Mark Murphy	Hours	Working meeting with J. Moore and J. Benavides regarding settlement items to do and calendar of events upcoming	525.00	0.4	210.00
08/25/2015	John I. Moore	Hours	Confer with M. Murphy and J. Benavides regarding settlement deadlines	175.00	0.4	70.00
08/25/2015	Guillermo Benavides	Hours	Review previous attorney declarations filed in the Stanford receivership case; confer with M. Murphy and J. Moore on Stanford settlement implementation deadlines; review Kroll settlement agreement terms and deadlines	325.00	1.2	390.00
08/26/2015	Guillermo Benavides	Hours	Confer with J. Moore on Kroll settlement deadlines	325.00	0.2	65.00
08/27/2015	Sarah P. Santos	Hours	Review orders in other cases and correspondence regarding status of approval of settlement by creditor's committee	525.00	0.5	262.50
08/27/2015	Mark Murphy	Hours	Phone call with S. Spauling regarding status of approval with the bankruptcy creditors; draft email to J. Davis and S. Santos regarding this call	525.00	0.4	210.00
08/27/2015	John I. Moore	Hours	Confer with M. Murphy then download and email A&R orders approving attorneys fees, approving settlement and Bar Order	175.00	0.2	35.00
08/27/2015	Mark Murphy	Hours	Review orders on Adams & Reese settlement; draft email to J. Davis and S. Santos regarding these orders	525.00	0.8	420.00
08/28/2015	Jason M. Davis	Hours	Correspondence from co-counsel regarding status; confer with M. Murphy regarding same	600.00	0.4	240.00
09/04/2015	John I. Moore	Hours	Revise settlement scheduling order spreadsheet and meet with J. Benavides and M. Murphy regarding the same	175.00	1.0	175.00
09/10/2015	Mark Murphy	Hours	Phone call with E. Snyder	525.00	0.3	157.50
09/15/2015	Mark Murphy	Hours	Review numerous emails regarding status of settlement agreement	525.00	0.4	210.00
09/23/2015	Jason M. Davis	Hours	Correspondence with co-counsel regarding status of Kroll agreement; discuss possible solutions, tolling agreements	600.00	0.5	300.00
10/20/2015	Mark Murphy	Hours	Phone call with S. Spauling regarding settlement changes from bankruptcy creditors; draft email to team on this call	525.00	0.6	315.00
10/22/2015	John I. Moore	Hours	Confer with M. Murphy and review filed pleadings in BDO case regarding judicial approval of attorney fees	175.00	0.6	105.00

10/23/2015	Sarah P. Santos	Hours	Confer with M. Murphy regarding status	525.00	0.2	105.00
10/23/2015	John I. Moore	Hours	Download Order approving attorney fees in BDO settlement and send the same to M. Murphy for review	175.00	0.1	17.50
10/30/2015	Mark Murphy	Hours	Review changes from Kroll to settlement documents on bankruptcy issues and based on comments and changes from bankruptcy creditors; draft email to team regarding these changes; reorganize settlement drafts to gather current versions of all drafts	525.00	3.2	1,680.00
10/30/2015	Jason M. Davis	Hours	Review Kroll; revisions to various settlement documents and exhibits	600.00	0.8	480.00
11/02/2015	Jason M. Davis	Hours	Correspond and confer with co-counsel regarding issues in Kroll revision	600.00	0.3	180.00
11/02/2015	Sarah P. Santos	Hours	Review correspondence regarding settlement and proposed changes	525.00	0.3	157.50
11/04/2015	Jason M. Davis	Hours	Continue correspondence regarding Kroll revisions	600.00	0.3	180.00
11/05/2015	Jason M. Davis	Hours	Confer with M. Murphy regarding revisions; review Kroll comments	600.00	0.4	240.00
11/05/2015	Sarah P. Santos	Hours	Review correspondence regarding settlement	525.00	0.2	105.00
11/06/2015	John I. Moore	Hours	Prepare notebook of settlement documents for execution	175.00	0.4	70.00
11/06/2015	Mark Murphy	Hours	Phone call with S. Ruskey Kidd about execution copies and minor corrections to settlement materials; review revisions; review emails from Kidd on revisions and final versions; draft emails to team regarding signatures	525.00	1.4	735.00
11/09/2015	Guillermo Benavides	Hours	Confer with M. Murphy and J. Moore on execution of settlement agreement with Kroll	325.00	0.8	260.00
11/09/2015	John I. Moore	Hours	Prepare charts of documents to compare in conference with M. Murphy and J. Benavides regarding the same; prepare chart of who is responsible for signing settlement documents	175.00	1.9	332.50
11/09/2015	Mark Murphy	Hours	Review final settlement documents and compare to versions we have previously reviewed	525.00	3.2	1,680.00
11/09/2015	John I. Moore	Hours	Call with M. Murphy and J. Benavides regarding settlement documents and scheduling order	175.00	0.2	35.00
11/10/2015	Jason M. Davis	Hours	Confer with co-counsel regarding status of execution and procedure following bankruptcy approval	600.00	0.4	240.00
11/10/2015	John I. Moore	Hours	Complete chart tracking receipt of executed settlement documents	175.00	0.3	52.50
11/10/2015	Mark Murphy	Hours	Review word and pdf versions of settlement documents; review emails between our team and Kroll lawyers regarding previous drafts, approvals and changes; draft and review several emails from our team regarding these drafts	525.00	4.2	2,205.00
11/11/2015	John I. Moore	Hours	Download and save final pdf versions of settlement documents; confer with M. Murphy and create copy of set doc signature checklist for circulation to counsel; save executed Valdespino release and update tracker regarding the same	175.00	0.4	70.00
11/11/2015	Jason M. Davis	Hours	Continue review and coordination for final review and execution of settlement	600.00	0.3	180.00
11/13/2015	Mark Murphy	Hours	Review email from Kroll counsel regarding signatures and agreement date; phone call with S. Powers regarding these issues; review emails from E. Snyder on P. Reed signature and deadline for returning signatures	525.00	1.4	735.00
11/13/2015	John I. Moore	Hours	Save P. Reed signature pages from release and update M. Murphy regarding settlement document status	175.00	0.2	35.00
11/16/2015	Mark Murphy	Hours	Phone call with E. Snyder regarding JL signatures; draft and review emails relating to this issue	525.00	0.4	210.00
11/17/2015	John I. Moore	Hours	Save executed settlement agreement of M. Wide, update settlement document tracker and confer with M. Murphy regarding the same	175.00	0.2	35.00
11/17/2015	Sarah P. Santos	Hours	Review correspondence regarding settlement	525.00	0.2	105.00
11/17/2015	Mark Murphy	Hours	Review several emails with our team regarding Baker Botis requesting additional changes to the settlement; draft email regarding obtaining all the necessary signatures	525.00	0.7	367.50
11/17/2015	Jason M. Davis	Hours	Confer with M. Murphy regarding status and collateral proceedings	600.00	0.3	180.00
11/18/2015	Mark Murphy	Hours	Phone calls with E. Snyder, S. Powers and S. Sparring regarding problems obtaining joint liquidator signatures and issues with settlement drafts; review issues with settlement drafts raised by Powers; review and respond to emails regarding JL signatures; review order regarding JL joint and several authority to sign	525.00	2.7	1,417.50
11/19/2015	Jason M. Davis	Hours	Confer with co-counsel concerning final comments for Kroll	600.00	0.3	180.00
11/19/2015	Mark Murphy	Hours	Phone calls with S. Sparring, S. Powers and J. Little regarding notice provisions, termination rights and JL signature issues; draft and review emails between our team on these issues	525.00	3.2	1,680.00
11/19/2015	Sarah P. Santos	Hours	Review correspondence regarding settlement	525.00	0.2	105.00
11/30/2015	Jason M. Davis	Hours	Confer with M. Murphy regarding status and client questions	600.00	0.3	180.00
11/30/2015	John I. Moore	Hours	Save H. Forbes signature page to Settlement Agreement, update signature tracker and confer with M. Murphy regarding the same	175.00	0.1	17.50
12/01/2015	Jason M. Davis	Hours	Confer with M. Murphy concerning Kroll response to last revision	600.00	0.3	180.00
12/01/2015	Mark Murphy	Hours	Review emails regarding changes requested by S. Powers; phone call with S. Sparring regarding these changes	525.00	2.2	1,155.00
12/02/2015	Jason M. Davis	Hours	Continue coordination of final approval client, co-counsel	600.00	0.2	120.00
12/02/2015	John I. Moore	Hours	Run comparison between drafts of Motion to Enjoin Scheduling Order and Motion to Approve Settlement Agreement then schedule meeting to discuss the same with M. Murphy and J. Benavides	175.00	0.2	35.00

12/03/2015	John I. Moore	Hours	Meet with M. Murphy and J. Benavides regarding settlement documents and attorney fees	175.00	0.5	87.50
12/03/2015	Guillermo Benavides	Hours	Confer with M. Murphy and J. Moore regarding finalizing attorney's fees and exhibits to attorney's fees motion	325.00	0.7	227.50
12/03/2015	John I. Moore	Hours	Prepare notebook of Motion to Approve Settlement exhibits for M. Murphy and J. Benavides review	175.00	0.7	122.50
12/03/2015	John I. Moore	Hours	Adjust time entries for final billing invoice	175.00	0.2	35.00
12/04/2015	Jason M. Davis	Hours	Confirm status of execution and pending items for bankruptcy proceeding	600.00	0.3	180.00
12/04/2015	Mark Murphy	Hours	Review emails on Wampold matters, including stay of litigation; draft emails to and review responses from Wampold lawyer, Steve Spurling	525.00	1.2	630.00
12/07/2015	Mark Murphy	Hours	Review emails and signed letter from J. Swanson	525.00	0.8	420.00
12/07/2015	John I. Moore	Hours	Confer with M. Murphy regarding pending settlement documents and settlement tracker	175.00	0.1	17.50
12/08/2015	John I. Moore	Hours	Update signature tracker, save signed Wampold/Marquette Side letter and confer with M. Murphy regarding the same regarding settlement and review response and signed settlement agreement	175.00	0.3	52.50
12/08/2015	Mark Murphy	Hours	Review and respond to emails with Snyder and J. Little regarding Swanson signatures on dismissals; draft email to R. Janvey	525.00	1.7	892.50
12/09/2015	John I. Moore	Hours	Revise executed settlement documents for M. Murphy review	175.00	0.9	157.50
12/09/2015	Mark Murphy	Hours	Phone call with S. Ruskay Kidd on Swanson signatures on dismissal orders; draft email sending signatures to Kidd and Spurling	525.00	0.4	210.00
12/09/2015	Jason M. Davis	Hours	Confer with M. Murphy on final settlement	600.00	0.2	120.00
12/27/2015	Guillermo Benavides	Hours	Review requirements for submitting attorney's fees request	325.00	0.3	97.50
12/29/2015	Jason M. Davis	Hours	Coordinate Motion for Approval and confer with counsel regarding procedure	600.00	0.3	180.00
12/30/2015	Mark Murphy	Hours	Review and respond to emails regarding attorneys fee declaration; review and respond to emails on bankruptcy order; review and revise fee declaration	525.00	0.9	472.50
01/04/2016	John I. Moore	Hours	Confer with M. Murphy regarding chart tracking receipt of attorney declarations and fee invoices for motion to enter settlement agreement; prepare tracker chart noting the same	175.00	0.3	52.50
01/04/2016	Guillermo Benavides	Hours	Confer with M. Murphy on attorney's fees declaration; review attorney's fees declarations from BDO settlement	325.00	1.5	487.50
01/05/2016	Guillermo Benavides	Hours	Review previous application to approve attorney's fees from Kroll settlement	325.00	0.5	162.50
01/06/2016	Guillermo Benavides	Hours	Draft and edit attorney's fees application; review motion to approve BDO settlement and analyze factors that courts review in approving attorney's fees	325.00	1.4	455.00
01/06/2016	Guillermo Benavides	Hours	Discuss fee application with M. Murphy; draft and edit motion to approve fee application from the Kroll settlement	325.00	1.7	552.50
01/07/2016	Guillermo Benavides	Hours	Draft and edit fee application from Kroll settlement; draft and edit attorney fee declaration	325.00	4.6	1,495.00
01/07/2016	Jason M. Davis	Hours	Confer with team regarding bankruptcy court approval; review draft of Motion for Approval and confer regarding procedure	600.00	0.4	240.00
01/08/2016	Guillermo Benavides	Hours	Draft and edit attorney's fees declaration for M. Murphy	325.00	1.7	552.50
01/11/2016	Jason M. Davis	Hours	Confer with counsel regarding issues in bankruptcy court and matters for Motion for Approval	600.00	0.4	240.00
01/11/2016	Guillermo Benavides	Hours	Attend conference call related to motion to approve settlement and request for attorney's fees	325.00	0.6	195.00
01/11/2016	Mark Murphy	Hours	Conference call with E. Snyder, J. Little, et al. regarding motion to enter, attorneys fee declarations, indemnification issues; review draft complaint against Kroll	525.00	1.2	630.00
01/11/2016	Sarah P. Santos	Hours	Review correspondence regarding Motion to Approve and application for attorneys fees; confer with J. Davis regarding application for attorneys fees and allocation of same	525.00	0.3	157.50
01/15/2016	Jason M. Davis	Hours	Review revisions from E. Snyder of Motion for Approval	600.00	0.4	240.00
02/02/2016	Sarah P. Santos	Hours	Confer with J. Davis regarding fee application	525.00	0.3	157.50
02/07/2016	Sarah P. Santos	Hours	Review declarations for fee application	525.00	1.0	525.00
02/08/2016	Sarah P. Santos	Hours	Review and revise fee application and correspond with J. Davis and M. Murphy regarding same; review other fee applications and ruling from court	525.00	3.5	1,837.50
02/09/2016	Mark Murphy	Hours	Draft declaration in support of fee application	525.00	4.1	2,152.50
02/09/2016	Mark Murphy	Hours	Review and revise application for award of fees	525.00	2.8	1,470.00
02/10/2016	Sarah P. Santos	Hours	Review and revise fee declaration and confer with J. Davis regarding same; review time reports	525.00	3.0	1,575.00
02/18/2016	Sarah P. Santos	Hours	Confer with team regarding fee application	525.00	0.5	262.50
02/19/2016	Mark Murphy	Hours	Review drafts and redlines of motion to approve; phone call with S. Spurling regarding their changes and our objections; review numerous emails about our objections to their changes; revise motion to approve	525.00	4.4	2,310.00
02/23/2016	Sarah P. Santos	Hours	Review and revise declaration with J. Davis revisions; revise and reorganize Application for Attorney's fees; review and research supporting cases	525.00	5.0	2,625.00

02/26/2016	Sarah P. Santos	Hours	Review correspondence regarding Motion to Approve and Application for Attorney's Fees Phone calls with S. Powers and S. Ruskey Kid about motion to approve settlement and motion to approve fees; draft email to co-counsel about expenses and reimbursements; revise my declaration; revise motion to approve fees; working meeting with J. Davis and S. Santos regarding motion to approve fees	525.00	0.3	157.50
02/29/2016	Mark Murphy	Hours	Review and revise and reconcile application for fees with comments from co-counsel and client; review correspondence between counsel re fee application and expenses; confer with M. Murphy and J. Davis; review expense issue	525.00	8.8	4,620.00
02/29/2016	Sarah P. Santos	Hours		525.00	2.5	1,312.50
			<b>TOTAL</b>		<b>1913.3</b>	<b>\$ 904,371.28</b>

Thursday, Mar 03, 2016 02:44:53 PM PST GMT-6



## **EXHIBIT 2**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 3:09-cv-0298-N
	§	
STANFORD INTERNATIONAL BANK, LTD., <i>et al.</i> ,	§	
	§	
Defendants.	§	

**DECLARATION OF EDWARD C. SNYDER  
IN SUPPORT OF RECEIVER AND OSIC’S MOTION FOR ORDER APPROVING  
PROPOSED SETTLEMENT WITH KROLL APPROVING ATTORNEYS’ FEES AND  
FOR ENTRY OF AGREED JUDGMENT AND BAR ORDER**

Pursuant to 28 U.S.C. § 1746, I, Edward C. Snyder, hereby declare under penalty of perjury that I have personal knowledge of the following facts:

**I. OVERVIEW**

I am submitting this Declaration in support of the Receiver and the Official Stanford Investors Committee (“OSIC”) (collectively, the “Plaintiffs”) Expedited Request for Entry of Scheduling Order and Motion to Approve Proposed Settlement with Kroll, LLC (fka Kroll, Inc.) and Kroll Associates, Inc., to Approve the Proposed Notice of Settlement with Kroll, LLC (fka Kroll, Inc.), to Enter the Final Judgment and Bar Order, and for Plaintiffs’ Attorneys’ Fees (the “Motion”).<sup>1</sup>

**A. Kroll, LLC (fka Kroll, Inc.)**

1. The settlement for which approval is sought in the Motion settles all claims against Kroll, LLC (fka Kroll, Inc.) and Kroll Associates, Inc. (collectively “Kroll”) in exchange

<sup>1</sup> Capitalized Terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

for payment of \$24 million by Kroll to the Receiver for ultimate distribution to the Stanford investor victims.

2. My law firm began investigating potential claims against Kroll in late 2009 and served as co-lead counsel for OSIC along with the law firm Davis & Santos (“Davis”) to investigate and pursue claims against Kroll. The OSIC investigated claims against Kroll and prepared, but never filed, a detailed lawsuit against Kroll on behalf of OSIC (pursuant to an assignment of all claims against Kroll from the Receiver to OSIC) as well as on behalf of a putative class of Stanford investors represented by Pam Reed. The other firms that have been involved in the investigation and prosecution of potential claims against Kroll include Strasburger & Price, LLP (“Strasburger”), Neligan Foley LLP (“Neligan”), and Butzel Long (“Butzel”) (together with my firm Castillo Snyder P.C. and the Davis firm, “Plaintiffs’ Counsel”), who also serve as co-counsel for the Plaintiffs.

**B. Curriculum Vitae**

3. I am a named shareholder of the law firm Castillo Snyder P.C., based in San Antonio, Texas, and have been practicing law for twenty one (21) years. I presently serve as Plaintiffs’ counsel with respect to claims against Kroll. I have actively participated in all material aspects regarding the Kroll matter.

4. I received my law degree from the University of Texas School of Law in 1994 and my law license also in 1994. After law school, I served as Legal Advisor to the former Chairman of the U.S. International Trade Commission in Washington, D.C. Since entering private practice in 1996, I have been involved principally in commercial litigation and trial work, and have handled major cases for both corporate and individual clients, as both plaintiff’s and defendant’s counsel. I am admitted to practice in the Western, Eastern, Northern and Southern federal

districts of the State of Texas as well as the Fifth and Ninth Circuit courts of appeal and the United States Supreme Court.

5. Castillo Snyder is a commercial litigation “boutique” firm based in San Antonio. My partner Jesse Castillo (who is a 30+ year trial lawyer and previously was a partner at Cox & Smith) and I concentrate our practice on complex commercial litigation, including everything from contract, corporate and partnership disputes, securities litigation, real estate litigation, oil and gas litigation and other commercial and business cases. We have tried dozens of complex commercial matters to verdict and judgment, including commercial cases tried in U.S. courts under foreign laws.

6. Since the 1990s, my partner and I have been involved on the plaintiffs’ side in numerous class action lawsuits involving allegations of fraud and securities fraud and aider and abettor liability. In the late 1990s, while an associate and, later, a partner at San Antonio-based law firm Martin, Drought & Torres, I (along with my current partner Jesse Castillo and other lawyers from that firm) served as lead or co-lead or second chair class counsel in roughly a dozen or more state-wide and nationwide class actions against life insurance companies based on allegations of fraud in the marketing and sale of “vanishing premium” life insurance products. In that capacity we litigated class action cases and certified various class actions, typically for settlement purposes although some were litigated to class certification hearings, and also handled class action administrative issues including class claims administration via settlement distribution procedures with class action administration agents we employed. Some of the defendant life insurance companies we brought (and resolved) class action litigation against include: Metlife, CrownLife, First Life Assurance, Manufacturers Life, Equitable Life, Sun Life, College Life, Jackson National Life, Great American Life, and John Hancock.

7. One of my specialized practice areas over the last 16 years has been in the area of pursuing third parties such as banks, accounting firms, law firms and others accused of aiding and abetting complex international (typically offshore) securities fraud schemes. From 1998 through 2006 I served as lead class counsel for Mexican investors who had been defrauded by a Dallas-based Investment Adviser firm named Sharp Capital Inc. (“Sharp”) that operated what amounted to an illegal offshore “fund” in the Bahamas but that was run from Dallas. The SEC intervened and filed suit against Sharp and appointed Ralph Janvey as the receiver for Sharp. Sharp lost over \$50 million of Mexican investor funds. Through various lawsuits we brought under the Texas Securities Act (“TSA”), we were able to eventually recover millions of dollars for the Sharp investors. See *Melo v. Gardere Wynne*, 2007 WL 92388 (N.D. Tex. 2007). I also represented Ralph Janvey, as receiver for Sharp, in litigation arising from the Sharp case, which was also settled. See *Janvey v. Thompson & Knight*, 2004 WL 51323 (N.D. Tex. 2004).

8. Beginning in late 1999, my prior law firm and I also served as lead and/or co-lead class counsel (along with the Diamond McCarthy law firm) for the Class of primarily Mexican investors of the InverWorld group of companies, which was an investment group based in San Antonio that operated what amounted to an offshore fund in the Cayman Islands. We filed class action lawsuits against several Defendants, including a French bank, New York law firm Curtis Mallet-Prevost, and accounting firm Deloitte & Touche. See *Nocando Mem Holdings v. Credit Comercial de France*, 2004 WL 2603739 (W.D. Tex. 2004); *Gutierrez v. the Cayman Islands Firm of Deloitte & Touche*, 100 S.W.3d 261 (Tex. App. – San Antonio 2002). Those class cases proceeded in tandem with estate litigation filed by the bankruptcy trustee for InverWorld, who was principally represented by the Neligan firm. All of those class cases were premised on TSA aider and abettor claims and all of them eventually settled, each for eight figure sums.

9. In 2003 I was retained by a group of Mexican investors who had been defrauded in yet another \$400 million offshore investment fraud committed by a Houston-based investment firm called InterAmericas that, like Stanford, ran an offshore bank (in Curacao, Netherlands Antilles) through which primarily Mexican investors invested. While not a class action, myself and my former law firm filed litigation under the TSA aider and abettor provisions against Deloitte & Touche and a few other Defendants, resulting in seven figure settlements. See *Deloitte & Touche Netherlands Antilles and Aruba v. Ulrich*, 172 S.W.3d 255 (Tex. App. – Beaumont 2005).

10. Besides the Stanford cases, I am currently involved in two other SEC Ponzi scheme cases. I serve as a Special Litigation Counsel to an SEC Receiver in the Central District of California in a Ponzi scheme case styled *Securities and Exchange Commission v. Westmoore Management LLC et al*, Case No. 08:10-CV-00849-AG-MLG. In that capacity I represent the Receiver with respect to all litigation activities. I also currently represent several foreign investors in an alleged Ponzi scheme case in McAllen, Texas styled *Securities & Exchange Commission v. Marco A. Ramirez, Bebe Ramirez, USA Now, LLC., USA Now Energy Capital Group, LLC., and Now. Co. Loan Services, LLC*; In the United States District Court for the Southern District of Texas – McAllen Division; Case No. 7:13-cv-00531.

11. Based on my experience in SEC receivership and offshore fraud cases generally, as well as my experience in the Stanford cases, I am often invited to speak at seminars on securities litigation issues (including liability under the TSA) by the Texas State Bar.

**C. Involvement with the Stanford Cases Since 2009**

12. I and my law firm have been heavily involved with the Stanford cases since February 2009.

13. As soon as Stanford collapsed in February 2009, I was retained by hundreds of investors from Mexico. I immediately began investigating claims against various third party potential defendants connected with the collapse of Stanford.

14. After the Official Stanford Investors Committee (“OSIC”) was created, I was asked to be a member of said Committee and continue to serve on said Committee today, without compensation. My service on OSIC has consumed hundreds if not thousands of hours of my time over the last few years including time spent communicating with other OSIC members on weekends and late at night.

15. My investigations and cooperation with the Receiver and his counsel eventually led myself and the other Plaintiffs’ Counsel to file multiple class action lawsuits on behalf of Stanford investors, as well as companion litigation on behalf of OSIC, including the following cases: *Troice v. Willis of Colorado et al*, Case No. 3:09-cv-01274; *Janvey v. Willis of Colorado, Inc.*, Case No. 3:13-cv-03980; *Troice v. Proskauer Rose et al.*, Case No. 3:09-cv-01600; *Janvey v. Proskauer Rose, LLP*, Case No. 3:13-cv-477; *Janvey v. Greenberg Traurig, LLP*, Case No. 3:12-cv-04641; *Philip Wilkinson, et al v. BDO USA, LLP, et al*, Case No. 3:11-cv-1115; *The Official Stanford Investors Committee v. BDO USA, LLP, et al*, Case No. 3:12-cv-01447; *Turk v. Pershing, LLC*, Case No. 3:09-cv-02199; *Wilkinson, et al. v. Breazeale, Sachse, & Wilson, LLP*, Case No. 3:11-cv-00329; and *Janvey v. Adams & Reese, LLP, et al.*, Case No. 3:12-cv-00495 (the “Stanford Cases”).

16. I am either lead counsel or co-lead counsel with the other Plaintiffs’ Counsel in all of the Stanford Cases and I have been actively involved in every facet of the cases, including the investigation of the facts and legal theories that form the bases for the suits and responding to motions to dismiss. I served as co-lead counsel in the successful appeal of the dismissal of the

related *Troice* class action cases under SLUSA to the Fifth Circuit and the U.S. Supreme Court (“SLUSA Appeal”).

17. In my view, my and my law firm’s involvement in all of the related Stanford Cases has proven invaluable to the successful resolution of the claims against Kroll. Given the inherent overlap of factual and legal issues in third party litigation arising from the Stanford fraud, much of the work performed by Plaintiffs’ Counsel in related Stanford litigation since 2009 laid the groundwork for the successful resolution of the claims against Kroll here. Indeed Kroll has admitted in pleadings filed in the bankruptcy court that it agreed to settle these claims based in large part on its monitoring of the other Stanford Cases prosecuted by Plaintiffs’ Counsel.

18. Plaintiffs’ Counsel have spent substantial time and energy since 2009 investigating Stanford’s business operations and relationships with third parties, including Kroll, which involved the review of hundreds of thousands if not millions of pages of documents (including spending literally weeks at the Receiver’s document warehouse in Houston), interviews of dozens of witnesses across the globe, coordination of efforts with the Receiver, Examiner, SEC and Department of Justice, and researching case law to establish viable theories of liability and damages and then defending those theories through dispositive motion practice before this Court in over a dozen separate lawsuits, including the SLUSA Appeal all the way to the U.S. Supreme Court. All of that work paved the way for the proposed settlement with Kroll, and, in my view, the proposed Settlement could not have been achieved without the substantial amount of time and effort expended by Plaintiffs’ Counsel and their tireless efforts in the Stanford Cases over all.



## **II. THE CLAIMS AGAINST KROLL AND SETTLEMENT**

### **A. Plaintiffs' Counsel's Investigation of Claims Against Kroll**

19. I began investigating claims against Kroll in late 2009 following the publication of an article about Stanford in the magazine Vanity Fair that mentioned Kroll. At that time I actually prepared a draft complaint against Kroll that was modelled after the complaints I had previously prepared and filed against Willis and Proskauer. Thereafter as I gained access to the Receivership records in 2010, I and other Plaintiffs' Counsel reviewed hundreds of boxes containing thousands of pages documents and began to compile records that pertained to Kroll.

20. This effort accelerated in early 2011 after Plaintiffs' Counsel gained access to records produced to the Receiver by Greenberg Traurig ("Greenberg") and Hunton & Williams ("Hunton"). Those firms had acted as Stanford's primary outside counsel since the late 1980s and had brought Kroll in to assist in providing services to Stanford in the 1990s. Our review of the massive quantity of Greenberg and Hunton records provided more detail of Kroll's involvement with Stanford, as did interviews we conducted of Stanford witnesses in 2010 and 2011.

21. The claims we investigated and would have filed against Kroll are the same claims we have pursued against Greenberg and Hunton, and some of the facts from the Greenberg/Hunton Complaint overlap with the facts that supported claims against Kroll. Thus the claims we would have filed against Kroll include the following:

<b>Category</b>	<b>Claim</b>
Estate Claims	Negligence
	Aiding and Abetting Breach of Fiduciary Duty
	Breach of Contract
	Fraudulent Transfer / Unjust Enrichment
	Negligent Retention / Negligent Supervision
Class Claims	Aiding and Abetting Violations of the TSA
	Aiding and Abetting / Participating in Breach of Fiduciary Duty
	Aiding and Abetting / Participating in a Fraudulent Scheme
	Civil Conspiracy

22. Some of the facts we discovered that would have supported such claims include that, along with Greenberg, Kroll served on the commission that Allen Stanford created in Antigua to help him re-write Antiguan banking laws. Kroll personnel also assisted Stanford by investigating and attacking Stanford's opponents and anyone that criticized Stanford, including U.S. and foreign government officials. Finally, Kroll endorsed and vouched for Stanford on repeated occasions, including with foreign governments and even investors.

23. The continuing investigation of Kroll (along with Greenberg and Hunton) and its involvement with Stanford eventually led to OSIC's retention in the summer of 2011 of the Davis law firm to assist me in the investigation of Kroll and to take the co-lead counsel role in the potential prosecution of claims against Kroll.

24. Our continued investigation of Kroll led me to reach out to Kroll's counsel in August 2011 and enter into a Tolling Agreement to toll the running of statutes of limitations for the Receiver, OSIC and a putative class of Stanford investors while we continued our investigation. On behalf of the Receiver we thereafter served a Subpoena on Kroll for the production of its Stanford records, which Kroll resisted and which required us to file a motion to compel. Once ordered by the Court to produce records, Kroll began to produce voluminous documents to us on a rolling basis over the course of a year, all of which were reviewed by myself and attorneys from the Davis firm. Kroll's rolling production of documents began in late

2011 and continued throughout 2012 and into early 2013.

25. In the meantime, myself and the Davis firm continued to review voluminous documents from the Receivership and to interview witnesses. We also began to prepare a detailed draft complaint against Kroll, modelled after the prior complaints I had prepared. In fact, initially Kroll was going to be a named Defendant in the massive 164 page complaint I eventually filed against Greenberg and Hunton. I only removed Kroll from that Complaint before its filing in November 2012 based on settlement discussions we had initiated with Kroll at that time.

26. While we engaged in preliminary settlement negotiations with Kroll in 2012 we continued to investigate and prepare the claims against Kroll for filing. As part of the settlement negotiations in 2012 Kroll provided us with confidential financial information evidencing the financial condition of Kroll and its parent company Altegrity, Inc.'s (now known as Corporate Risk Holdings, LLC) financial condition. We retained an accountant to assist us in analyzing Kroll and Altegrity's financial condition. We also received and reviewed Kroll's applicable insurance policies. Eventually we agreed with Kroll to hold a two-day mediation in New York in May, 2013 before the Hon. Judge E. Leo Milonas, a former Chief Administrative Judge of the State of New York, Justice of the Appellate Division of the New York Supreme Court, and President of the Association of the Bar of the City of New York. At the end of the second day of mediation we were able to reach a conditional agreement with Kroll to settle all claims against Kroll for \$24 million, conditioned on Kroll being able to secure funding for the settlement and final documentation of the settlement agreement. It was our understanding at that time that \$24 million was roughly the amount remaining on Kroll's existing insurance policies.

27. Kroll subsequently held a separate mediation with its insurance carriers and

several months later in September 2013 Kroll's counsel reported back to us that we could proceed to draft formal settlement documents. We therefore began an odyssey to structure and finalize this settlement that would take almost 3 years to conclude. Because this was the very first significant settlement of a Stanford-related third party case,<sup>2</sup> and because Kroll demanded global release from all Stanford-related liability, we spent months researching case law and negotiating the structure for this transaction. It took months of legal research, consultations with foreign law experts, negotiations and wrangling to eventually decide and agree on a Receiver Bar Order structure. We then spent the majority of 2014 negotiating and drafting, revising and re-drafting all of the settlement documents, which went through literally dozens of iterations. The Bar Order settlement structure we adopted for the Kroll settlement eventually became the structure we utilized for the subsequent settlement with BDO USA.

28. Throughout this roughly year-long process in 2014 of negotiating and documenting the structure of the settlement, the negotiations broke down on approximately a half dozen occasions, prompting Plaintiffs' Counsel to return to finalizing and preparing a new, stand-alone Complaint for filing against Kroll. But by the end of 2014 the structure was in place, and we had the settlement documents close to ready to sign. Then we received news in January 2015 that Kroll and its parent company Altegrity had filed for bankruptcy in Delaware. This shocking news obviously changed the dynamics, but through continued hard work and negotiations we were able to salvage the settlement with Kroll nonetheless. But this new development resulted in another year of negotiations and revisions to documents and the added hurdle of seeking approval of the settlement by the Bankruptcy Court.

29. In short, Plaintiffs' Counsel collectively spent roughly 3 years and thousands of

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<sup>2</sup> Although the BDO settlement was filed first for court approval, the Kroll Settlement was actually agreed to before the BDO settlement, but for the reasons set forth in this Declaration took much longer to document and finalize.

hours investigating and preparing the basis for claims against Kroll on behalf of the Stanford Receivership Estate and the Stanford investors prior to reaching the mediated settlement in May 2013. We then spent an additional 2½ years and thousands of hours of attorney time negotiating and documenting the structure of the settlement and steering this settlement through a bankruptcy process in order to be able to present the \$24 million settlement to this Court, intact.

30. As part of my investigation of the claims against Kroll, I reviewed voluminous documents, including thousands of pages of documents detailing Kroll's relationship with and services provided to Stanford. The documents reviewed included documents from the Receivership, documents obtained from Greenberg and Hunton, and then documents produced by Kroll in response to a Subpoena. I also interviewed in excess of a dozen witnesses. I researched relevant case law to develop claims against Kroll, including claims under the TSA and other common law claims belonging to the Stanford investors, as well as claims that could be asserted by the Receiver and OSIC, to determine how the facts surrounding Kroll's conduct supported such claims. The investigation of claims further required formulation of viable damage models and causation theories for both the Receivership Estate claims and the investor claims, and myself and Plaintiffs' Counsel spent considerable time researching and working up damage models for these cases.

31. Plaintiffs' Counsel could not have successfully prosecuted and resolved the claims asserted against Kroll without having spent thousands of additional hours investigating and understanding the background and history of the complex web of Stanford companies, the operations, financial transactions, interrelationship and dealings between and among the various Stanford entities, and the facts relating to the Ponzi scheme and how it was perpetrated through the various Stanford entities. Without a comprehensive investigation and understanding of this

background, it would not have been possible to formulate viable claims against Kroll, and prosecute them successfully to conclusion.

32. As part of our investigation, Plaintiffs' Counsel conducted a thorough analysis of the potential claims against Kroll, considering: claims available under both state and federal law; the viability of those claims considering the facts underlying Kroll's business dealings with Stanford and this Court's previous rulings; the success of similar claims in other Ponzi scheme cases, both in the Fifth Circuit and elsewhere; as well as defenses that we anticipated would be raised by Kroll via motions to dismiss and eventually motions for summary judgment, which defenses were identified in the mediation position papers Kroll presented.

**B. The Settlement is Fair and Reasonable and Should be Approved**

33. It is my opinion based upon years of experience prosecuting and settling complex investor class actions under the TSA, as well as complex receivership Ponzi scheme litigation, that the Kroll Settlement is fair and reasonable and in the best interests of the Stanford Receivership Estate and the Stanford investors and should be approved by the Court.

34. More importantly, I believe that the Kroll Settlement represents the best result that could be achieved given the limits of Kroll insurance and Kroll's extremely precarious financial condition as evidenced by its bankruptcy filing. Indeed, and given Kroll's bankruptcy, it is something close to miraculous that we were able to pull this settlement through intact. As a consequence, the result obtained is simply outstanding. In light of these practical considerations impacting the ability of Kroll to pay a settlement, the Kroll Settlement represents an extremely good result for the Stanford receivership estate and its investors. Therefore, I believe the Kroll Settlement is in the best interests of the Stanford receivership estate and its investors and should be approved.



### **III. ATTORNEYS' FEES**

#### **A. The Contingency Fee Agreement**

35. Plaintiffs' Counsel have been jointly handling all of the Stanford Cases referenced above, including the claims against Kroll pursuant to twenty-five percent (25%) contingency fee agreements with OSIC (in cases in which OSIC is a named Plaintiff) and the Investor Plaintiffs (in investor class action lawsuits).

36. As stated in the Motion, the Movants seek Court approval to pay Plaintiffs' Counsel a fee equal to an aggregate of twenty-five percent (25%) of the Net Recovery (*i.e.*, the settlement amount less allowable disbursements) in the Kroll Settlement. This is the fee agreed to be paid to Plaintiffs' Counsel by OSIC and the Investor Plaintiffs, and this is the amount of the fee for which approval is sought in the Motion.

#### **B. The 25% Contingency Fee is Fair and Reasonable**

37. It is my opinion that the fee requested in the Motion is reasonable in comparison to the total net amount to be recovered for the benefit of the Stanford investors. The twenty-five percent (25%) contingency fee was heavily negotiated between OSIC and Plaintiffs' Counsel, and is substantially below the typical market rate contingency fee percentage of 33% to 40% that most law firms would demand to handle cases of this complexity and magnitude. In certain instances, OSIC interviewed other potential counsel who refused to handle the lawsuits without a higher percentage fee. The claims against Kroll and the other third-party lawsuits are extraordinarily large and complex, involving voluminous records and electronic data and requiring many years of investigation, discovery and dispositive motions to get to trial.

38. Moreover, as described above, the investigation of claims against Kroll, and subsequent negotiation and documentation of the structure of the settlement, which structure and



documents were thereafter used for the BDO settlement, took years of hard work to achieve and were further complicated by Kroll and its parent company's bankruptcy filing in January 2015. As a result Plaintiffs' Counsel have collectively invested thousands of hours of time over a 5+ year period working on the Kroll matter, without compensation. Plaintiffs' Counsel has, for many years now, borne significant risk of loss throughout this process after years of work for no compensation. A twenty-five percent (25%) contingency fee is reasonable given the time and effort that was actually expended, the complexity of the matter and the risks involved.

**C. Time and Effort of Plaintiffs' Counsel**

39. Since February 2009, myself and my law firm have dedicated thousands of hours of time to the prosecution of Stanford litigation on a contingent fee basis. This includes time spent investigating and understanding the background and history of the complex web of Stanford companies, the operations, financial transactions, interrelationship and dealings between and among the various Stanford entities and the defendants we have sued, the facts relating to the Ponzi scheme and how it was perpetrated through the various Stanford entities, and the involvement of the third-party defendants in the foregoing cases with Stanford. Without a comprehensive investigation and understanding of this background, it would not have been possible to formulate viable claims against the third-party defendants and prosecute them successfully.

40. Even a cursory review of the Court's docket in all of these cases reveals the immense amount of work that Plaintiffs' Counsel have put into the prosecution of all of these lawsuits since 2009. However, the docket and pleadings only reveal the work that is filed with the Court. As discussed further herein, and as the Court is aware, the prosecution of lawsuits of this magnitude and complexity has required a tremendous amount of time and effort to

investigate the facts, research the relevant legal issues, coordinate and strategize with counsel and clients regarding the handling of the cases, conduct discovery, prepare the briefs and motions, attempt to negotiate settlements, and prepare cases for summary judgment and/or trial. Plaintiffs' Counsel have collectively spent thousands of hours since 2009 in their investigation and prosecution of Stanford-related claims, including the claims against Kroll.

41. Over the last 7 years, myself and other attorneys and paralegals from my law firm have spent thousands of hours in uncompensated time worth millions of dollars investigating and prosecuting the Stanford Cases, including the Kroll matter. On average, well in excess of 70% of my practice over the last 6 years (and more typically 80-100% of my time on any given week) has been dedicated to these Stanford cases. I personally have worked many late nights and virtually every weekend for the last 7 years on Stanford cases or Stanford-related matters without compensation. Basically my law practice over the last 7 years has been dedicated almost exclusively to the Stanford Cases, to the exclusion of other clients and work.

42. The total amount of attorney and paralegal time invested in the Stanford Cases by myself and other attorneys and paralegals at my Firm totals close to \$8 million at our hourly billing rates applicable to complex cases like these, all of which time has been uncompensated to date.

43. With specific reference to the Kroll matter, I recorded my own as well other attorneys and paralegals from my firm's time for work on the Kroll case separately from other Stanford cases. Given the length of time involved working on the Kroll matter since late 2009 (when I began the investigation) through today's date, my firm has invested over \$625,000 worth of time specifically on the Kroll matter alone. Because a lot of the time myself and my firm have spent working generally on the Stanford litigation, including e.g., the early 2009 investigative work and preparation of the various Complaints (including the one against Greenberg and

Hunton), was beneficial to all Stanford litigation including the claims against Kroll, I performed an analysis of my firms' time records in all of the Stanford litigation in order to (1) identify time my firm spent working on projects that provided a benefit across multiple Stanford cases (e.g., time spent investigating facts, interviewing witnesses and reviewing documents at the Receiver's warehouse; time spent researching and briefing case law to develop and defend viable claims) and then (2) divide and attribute that time amongst and between the different Stanford cases on a pro rata basis.

44. Thus for example I attributed time - depending on the project or category of work - my firm spent working on projects that in my view provided a benefit across multiple Stanford Cases to the Kroll matter, totaling roughly \$100,000. For the most part this time that I attributed to Kroll was a small percentage (roughly 5%) of time spent investigating the Stanford fraud generally, including the massive review of documents and interviewing of witnesses. Because at one time Kroll was included in the Complaint I eventually filed against Greenberg and Hunton, I also attributed roughly 10-15% of the time I had spent working on that Complaint to the Kroll matter. Other than that I did not attribute any other Stanford time to the Kroll matter, and specifically excluded time my firm spent responding to various Defendants' motions to dismiss in the other Stanford litigation as well as the time spent on the successful SLUSA appellate proceedings, despite the fact that all of that work - which Kroll's counsel has admitted they were constantly monitoring and which influenced their analysis of the claims for settlement purposes - provided benefit to the successful resolution of the claims against Kroll.

45. The result of that attribution analysis is that, as of January 1, 2016, my firm has spent over **1,055 hours** of attorney and paralegal time worth approximately **\$626,000.00** at our applicable hourly rates for complex cases of this nature consisting of time that was either

dedicated directly to the Kroll matter, or which I feel is rightfully and equitably attributable to the Kroll matter.

46. I attach hereto as Exhibit "1" true and correct copies of my Firm's fee billing statements for the Kroll matter, reflecting attorney and paralegal time dedicated to the Kroll matter up to March 1, 2016. The vast majority of the work on these cases has been performed by me, as can be seen in the chart below:

	<i><b>Biller</b></i>		<i><b>Hourly Rate</b></i>	<i><b>Hours Billed</b></i>	<i><b>Total</b></i>
ECS	Edward Snyder		\$600.00	957.5	\$574,500.00
JRC	Jesse Castillo		\$600.00	81.25	\$48,750.00
MC	Melanie Castillo		\$150.00	5	\$500.00
BC	Bianca Cantu		\$100.00	16.5	\$1,650.00
SR	Sandy Rivas		\$100.00	4	\$600.00

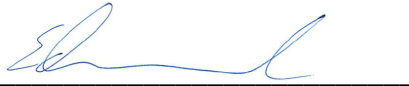
38. I obviously anticipate investing additional time dedicated to the finalization of the instant Settlement, including finalizing the motion for approval documents, monitoring and responding to any objections where applicable, and attending and arguing at the approval hearing. Therefore I believe that my law firm's total time dedicated to the Kroll matter will eventually exceed \$650,000.00.

39. My firm has also incurred and paid \$2,291.21 in unreimbursed expenses in the Kroll case.

40. The proposed settlement is the result of many years of effort and thousands of hours of work by the Receiver, OSIC, Investor Plaintiffs and Plaintiffs' Counsel as described herein. But for the efforts of these parties, and the efforts of myself and my law firm described herein, there would be no Kroll Settlement, which will net the Receivership estate and the Stanford investors approximately \$18 million (should the Court approve the attorneys' fee request) they would not have otherwise had.

41. In light of the tremendous time and effort myself and my law firm and the other Plaintiffs' Counsel have put into the overall effort to recover monies for the Stanford Receivership Estate and the investors, all of which was necessary to the successful prosecution and resolution of the Kroll matter, it is my opinion that the twenty-five percent (25%) fee to be paid to counsel for OSIC and the Investor Plaintiffs for the settlement of the Kroll matter is very reasonable. Myself and my laws firm and the other Plaintiffs' Counsel have worked tirelessly for six years to attempt to recover money for the benefit of Stanford's investors.

Dated: March 2, 2016



Edward C. Snyder

## **EXHIBIT 2-A**

Invoice submitted to:

S-29103.0 Kroll-IC

KROLL  
CLASS ACTION  
INVESTOR COMMITTEE ACTION

March 02, 2016

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
6/22/2009	ECS A111 Other WORKED ON PROTOTYPE COMPLAINT	1.00 600.00/hr	600.00
6/23/2009	ECS A111 Other WORKED ON PROTOTYPE COMPLAINT	1.00 600.00/hr	600.00
6/24/2009	ECS A111 Other WORKED ON PROTOTYPE COMPLAINT	1.00 600.00/hr	600.00
6/25/2009	ECS A111 Other WORKED ON COMPLAINT	1.00 600.00/hr	600.00
6/26/2009	ECS A111 Other WORKED ON COMPLAINT	1.00 600.00/hr	600.00
6/27/2009	ECS A111 Other WORKED ON COMPLAINT	1.00 600.00/hr	600.00
6/29/2009	ECS A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00

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KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
6/30/2009	ECS A111 Other WORKED ON COMPLAINT	1.50 600.00/hr	900.00
7/1/2009	ECS A111 Other WORKED ON COMPLAINT	1.00 600.00/hr	600.00
7/2/2009	ECS A111 Other WORKED ON COMPLAINT	1.00 600.00/hr	600.00
9/29/2009	ECS A111 Other REVIEW OF VARIOUS PLEADINGS FILED IN SEC CASE; EMAILS WITH SVC; TELEPHONE CONFERENCE WITH CLIENTS	1.00 600.00/hr	600.00
9/30/2009	ECS A111 Other WORKED ON FACT SUMMARY FOR LAWSUIT AGAINST KROLL	4.00 600.00/hr	2,400.00
10/1/2009	ECS A111 Other FINALIZED KROLL FACT SUMMARY	4.00 600.00/hr	2,400.00
10/26/2009	ECS A111 Other REVIEW OF ARTICLE ON KROLL; WORKED ON COMPLAINT VERSUS KROLL	1.00 600.00/hr	600.00
11/12/2009	ECS A111 Other LONG TELEPHONE CONFERENCE WITH SEC; TELEPHONE CONFERENCE WITH CO-COUNSEL AND OTHER CLASS COUNSEL; COMMUNICATION WITH TSSB; RESEARCH ON TSA CASE LAW	1.00 600.00/hr	600.00
	JRC A111 Other OFFICE CONFERENCE WITH MR. SNYDER REFERENCE STRATEGY.	0.50 600.00/hr	300.00
11/13/2009	ECS A111 Other RESEARCH ON TSA CLAIMS; TELEPHONE CONFERENCE WITH CO-COUNSEL; EMAIL MORGENSTEN	1.00 600.00/hr	600.00



KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
11/16/2009 ECS	A111 Other TELEPHONE CONFERENCE WITH TSSB; RESEARCH ON TSA AND REGISTRATION EXEMPTIONS; MEETING WITH CO-COUNSEL	0.50 600.00/hr	300.00
11/20/2009 ECS	A111 Other RESEARCH ON TSA CLAIMS	1.00 600.00/hr	600.00
11/23/2009 ECS	A111 Other PREPARED MEMO TO CO-COUNSEL REGARDING SECURITIES REGISTRATION ISSUES	0.50 600.00/hr	300.00
12/2/2009 ECS	A111 Other EMAILS TO PROSPECTIVE CLASS REPRESENTATIVES; CONTINUED RESEARCH ON TSA REGISTRATION CLAIMS	0.50 600.00/hr	300.00
12/3/2009 ECS	A111 Other RESEARCH LAW ON REGISTRATION REQUIREMENT FOR SECURITIES; MEETING WITH ANGIE KOGUTT OF SVC	0.50 600.00/hr	300.00
12/4/2009 ECS	A111 Other CONTINUED RESEARCH ON TSA; EMAILS WITH CLIENTS;	0.50 600.00/hr	300.00
12/7/2009 ECS	A111 Other TELEPHONE CONFERENCE WITH CO-COUNSEL; RESEARCH ON CLASS ACTION LAW	1.00 600.00/hr	600.00
12/14/2009 ECS	A111 Other RESEARCH CASE LAW	1.00 600.00/hr	600.00
12/19/2009 ECS	A111 Other CONTINUED REVIEW OF CASE LAW	1.00 600.00/hr	600.00
12/21/2009 ECS	A111 Other CONTINUED REVIEW AND RESEARCH OF CASE LAW	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
1/5/2010 ECS	A111 Other TELEPHONE CONFERENCE WITH COUNSEL FOR KROLL; OFFICE CONFERENCE WITH JESSE R. CASTILLO	1.00 600.00/hr	600.00
1/6/2010 ECS	A111 Other TELEPHONE CONFERENCE WITH KROLL COUNSEL	1.00 600.00/hr	600.00
1/24/2010 ECS	A111 Other TRAVEL TO D.C. FOR MEETING WITH SEC; MEETING WITH SVC	1.50 600.00/hr	900.00
1/25/2010 ECS	A111 Other MEETING IN D.C. WITH SEC AND OTHERS; RETURN TRAVEL TO SAN ANTONIO	1.50 600.00/hr	900.00
3/1/2010 ECS	A111 Other MEETING WITH CO-COUNSEL; TRAVEL TO MEXICO TO MEET WITH CLASS REPRESENTATIVES	1.00 600.00/hr	600.00
3/11/2010 ECS	A111 Other TRAVEL TO HOUSTON TO INTERVIEW WITNESSES; WORKED ON MOTION TO DISMISS STRATEGY; RETURN TO SAN ANTONIO; PREPARED MEMO TO CO-COUNSEL REGARDING DIVISION OF WORK	1.00 600.00/hr	600.00
3/12/2010 ECS	A111 Other TRAVEL TO DALLAS; INTERVIEW WITNESSES; WORKED ON AMENDED COMPLAINT	1.00 600.00/hr	600.00
3/18/2010 ECS	A111 Other TRAVEL TO HOUSTON; REVIEWED DOCUMENTS AT WAREHOUSE	1.00 600.00/hr	600.00
3/19/2010 ECS	A111 Other REVIEW OF DOCUMENTS AT HOUSTON WAREHOUSE	1.00 600.00/hr	600.00
3/25/2010 ECS	A111 Other TRAVEL TO HOUSTON; REVIEW DOCUMENTS; RETURN TRAVEL TO SAN ANTONIO	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
3/26/2010	ECS A111 Other REVIEW DOCUMENTS AT HOUSTON WAREHOUSE	1.00 600.00/hr	600.00
3/29/2010	ECS A111 Other COORDINATE TRIP TO STANFORD WAREHOUSE TO VIEW DOCUMENTS	1.00 600.00/hr	600.00
3/31/2010	ECS A111 Other REVIEW OF DOCUMENTS IN HOUSTON	1.50 600.00/hr	900.00
4/16/2010	ECS A111 Other REVIEW OF 150 PAGE SEC INSPECTOR GENERAL REPORT; VARIOUS EMAILS WITH CLIENTS; SVC; CO-COUNSEL, ETC.	1.00 600.00/hr	600.00
4/18/2010	ECS A111 Other DETAILED REVIEW OF SEC IG REPORT REGARDING EFFECT ON CASES	1.00 600.00/hr	600.00
4/24/2010	ECS A111 Other DETAILED REVIEW OF DOCUMENTS FROM RECEIVER;	1.50 600.00/hr	900.00
5/6/2010	ECS A111 Other MEETING WITH CO-COUNSEL; CONTINUED REVIEW OF DOCUMENTS.	1.00 600.00/hr	600.00
5/8/2010	ECS A111 Other REVIEW OF DOCUMENTS	1.00 600.00/hr	600.00
5/9/2010	ECS A111 Other WORKED ON AMENDED COMPLAINT.	1.00 600.00/hr	600.00
5/10/2010	ECS A111 Other WORKED ON AMENDED COMPLAINT.	1.00 600.00/hr	600.00
5/12/2010	ECS A111 Other WORKED ON AMENDED COMPLAINT.	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
5/13/2010 ECS	A111 Other WORKED ON AMENDED COMPLAINT	1.00 600.00/hr	600.00
5/14/2010 ECS	A111 Other WORKED ON RESPONSES TO MOTIONS TO DISMISS.	1.00 600.00/hr	600.00
5/17/2010 ECS	A111 Other WORKED ON AMENDED COMPLAINT.	1.00 600.00/hr	600.00
5/18/2010 ECS	A111 Other WORKED ON AMENDED COMPLAINT.	1.00 600.00/hr	600.00
8/10/2010 ECS	A111 Other MEETING WITH CO-COUNSEL; ATTENDED HEARING BEFORE JUDGE GODBEY; RETURN TRAVEL TO SAN ANTONIO	1.00 600.00/hr	600.00
9/21/2010 ECS	A111 Other WORKED ON AMENDED COMPLAINT	1.00 600.00/hr	600.00
10/11/2010 ECS	A111 Other TRAVEL TO DALLAS TO ATTEND MEETING OF INVESTOR COMMITTEE	1.00 600.00/hr	600.00
10/20/2010 ECS	A111 Other TRAVEL TO AUSTIN; EMAIL TO CLIENT REGARDING HUNTON WILLIAMS DOCUMENTS; EMAIL TO COMMITTEE; TELEPHONE CONFERENCE WITH CO-COUNSEL	1.00 600.00/hr	600.00
10/21/2010 ECS	A111 Other REVIEW OF HUNTON WILLIAMS DOCUMENTS AT BAKER BOTTS AUSTIN;	2.00 600.00/hr	1,200.00
10/22/2010 ECS	A111 Other DOCUMENT REVIEW IN AUSTIN; RETURN TRAVEL TO SAN ANTONIO; TELEPHONE CONFERENCE WITH INVESTOR COMMITTEE	2.00 600.00/hr	1,200.00
11/10/2010 ECS	A111 Other ATTENDED INVESTOR COMMITTEE MEETING. TELEPHONE CONFERENCE WITH SEC LAWYER.	1.00 600.00/hr	600.00

KROLL

REVIEW OF OIG REPORT EXHIBITS.

		<u>Hrs/Rate</u>	<u>Amount</u>
11/15/2010 ECS	A111 Other TRAVEL TO HOUSTON. REVIEW OF DOCUMENTS AT RECEIVER WAREHOUSE.	1.50 600.00/hr	900.00
11/16/2010 ECS	A111 Other REVIEW OF DOCUMENTS AT RECEIVER WAREHOUSE. RETURN TRAVEL TO SAN ANTONIO.	1.00 600.00/hr	600.00
11/17/2010 ECS	A111 Other REVIEW OF STANFORD LEGAL DEPARTMENT INVENTORY INDEX.	1.00 600.00/hr	600.00
11/18/2010 ECS	A111 Other TRAVEL TO AUSTIN; MEETING OF LITIGATION SUB-COMMITTEE OF INVESTOR COMMITTEE. RETURN TO SAN ANTONIO	1.50 600.00/hr	900.00
11/20/2010 ECS	A111 Other REVIEW OF STANFORD LAW DEPARTMENT FILE INVENTORY LIST.	2.00 600.00/hr	1,200.00
11/22/2010 ECS	A111 Other REVIEW OF LEGAL DEPARTMENT INVENTORY LIST.	1.00 600.00/hr	600.00
11/23/2010 ECS	A111 Other TELEPHONE CONFERENCE WITH CO-COUNSEL AND BILL REID; CONTINUED REVIEW OF STANFORD LEGAL DEPARTMENT INVENTORY LIST	1.00 600.00/hr	600.00
12/14/2010 ECS	A111 Other REVIEW OF DOCUMENTS; EMAILS WITH INVESTOR COMMITTEE	2.00 600.00/hr	1,200.00
12/15/2010 ECS	A111 Other REVIEW OF DOCUMENTS; EMAIL TO RECEIVER; TELEPHONE CONFERENCE WITH BILL REID	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
12/17/2010 ECS	A111 Other TELEPHONE CONFERENCE WITH COMMITTEE	0.50 600.00/hr	300.00
12/19/2010 ECS	A111 Other REVIEW OF DOCUMENTS	1.50 600.00/hr	900.00
12/20/2010 ECS	A111 Other TRAVEL TO HOUSTON; REVIEW DOCUMENTS AT WAREHOUSE	1.00 600.00/hr	600.00
12/21/2010 ECS	A111 Other TRAVEL TO HOUSTON; REVIEW DOCUMENTS AT WAREHOUSE	1.00 600.00/hr	600.00
12/22/2010 ECS	A111 Other TRAVEL TO HOUSTON; REVIEW DOCUMENTS AT WAREHOUSE	1.00 600.00/hr	600.00
12/23/2010 ECS	A111 Other REVIEW OF DOCUMENTS	1.50 600.00/hr	900.00
12/27/2010 ECS	A111 Other TRAVEL TO HOUSTON; REVIEW OF DOCUMENTS	1.00 600.00/hr	600.00
12/28/2010 ECS	A111 Other CONTINUED REVIEW OF DOCUMENTS IN HOUSTON; RETURN TRAVEL TO HOUSTON	1.00 600.00/hr	600.00
12/29/2010 ECS	A111 Other CONTINUED REVIEW OF DOCUMENTS IN HOUSTON	1.00 600.00/hr	600.00
12/30/2010 ECS	A111 Other REVIEW OF DOCUMENTS IN HOUSTON	1.00 600.00/hr	600.00
12/31/2010 ECS	A111 Other CONTINUED REVIEW OF DOCUMENTS	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
1/1/2011	ECS A111 Other REIEW OF DOCUMENTS FROM RECEIVER	1.00 600.00/hr	600.00
1/4/2011	ECS A111 Other VARIOUS EMAILS WITH CO-COUNSEL AND TELEPHONE CONFERENCE WITH RECEIVER AND COMMITTEE	0.50 600.00/hr	300.00
1/5/2011	ECS A111 Other VARIOUS EMAILS AND TELEPHONE CONFERENCES	0.50 600.00/hr	300.00
1/7/2011	ECS A111 Other VARIOUS TELEPHONE CONFERENCES	0.50 600.00/hr	300.00
1/8/2011	ECS A111 Other VARIOUS TELEPHONE CONFERENCES	0.50 600.00/hr	300.00
1/10/2011	ECS A111 Other REVIEW OF DOCUMENTS	1.00 600.00/hr	600.00
1/11/2011	ECS A111 Other REVIEW DOCUMENTS	1.00 600.00/hr	600.00
1/12/2011	ECS A111 Other REVIEW OF DOCUMENTS	1.50 600.00/hr	900.00
1/13/2011	ECS A111 Other REVIEW AND SORT DOCUMENTS; TRAVEL TO DALLAS	1.50 600.00/hr	900.00
1/15/2011	ECS A111 Other REVIEW OF DOCUMENTS	1.00 600.00/hr	600.00
1/17/2011	ECS A111 Other CONTINUED REVIEW OF DOCUMENTS	1.50 600.00/hr	900.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
1/18/2011	ECS A111 Other PREPARED TOLLING AGREEMENT	2.00 600.00/hr	1,200.00
1/23/2011	ECS A111 Other REVIEW OF BOXES DOCUMENTS	1.50 600.00/hr	900.00
1/24/2011	ECS A111 Other REVIEW OF DOCUMENTS	1.00 600.00/hr	600.00
1/25/2011	ECS A111 Other REVIEW OF DOCUMENTS	2.00 600.00/hr	1,200.00
1/26/2011	ECS A111 Other WORKED ON TOLLING AGREEMENT	1.00 600.00/hr	600.00
1/27/2011	ECS A111 Other WORKED ON GREENBERG/KROLL COMPLAINT	1.00 600.00/hr	600.00
1/29/2011	ECS A111 Other WORKED ON GREENBERG/KROLL COMPLAINT	1.50 600.00/hr	900.00
2/1/2011	ECS A111 Other WORKED ON GREENBERG/KROLL COMPLAINT	2.00 600.00/hr	1,200.00
2/2/2011	ECS A111 Other FINALIZED TOLLING AGENT; TELEPHONE CONFERENCE WITH RECEIVERS COUNSEL	1.00 600.00/hr	600.00
2/7/2011	ECS A111 Other RESEARCH CASE LAW FOR CAUSES OF ACTION; WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
2/8/2011	ECS A111 Other REVIEW OF DOCUMENTS	2.00 600.00/hr	1,200.00



KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
2/9/2011	ECS A111 Other REVIEW OF DOCUMENTS; WORKED ON GREENBERG/KROLL COMPLAINT; RESEARCH	2.50 600.00/hr	1,500.00
2/10/2011	ECS A111 Other REVIEW OF DOCUMENTS AND WORKED ON GREENBERG/KROLL COMPLAINT	1.50 600.00/hr	900.00
2/12/2011	ECS A111 Other REVIEW OF DOCUMENTS; RESEARCHED LAW; WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
2/13/2011	ECS A111 Other WORKED ON WORKED ON GREENBERG/KROLL COMPLAINT COMPLAINT	2.00 600.00/hr	1,200.00
2/14/2011	ECS A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
2/15/2011	ECS A111 Other WORKED ON GREENBERG/KROLL COMPLAINT COMPLAINT	2.00 600.00/hr	1,200.00
2/22/2011	ECS A111 Other EMAILS WITH CO-COUNSEL AND OPPOSING COUNSEL REGARDING DOCUMENT REVIEW IN MIAMI; REVIEW OF DOCUMENTS	2.00 600.00/hr	1,200.00
2/24/2011	ECS A111 Other REVIEW OF DOCUMENTS IN MIAMI	2.00 600.00/hr	1,200.00
2/25/2011	ECS A111 Other REVIEW OF DOCUMENTS	2.00 600.00/hr	1,200.00
2/26/2011	ECS A111 Other REVIEW OF DOCUMENTS	2.00 600.00/hr	1,200.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
2/28/2011	ECS A111 Other REVIEW OF HUNTON DOCUMENTS	2.00 600.00/hr	1,200.00
3/1/2011	ECS A111 Other REVIEW OF DOCUMENTS	2.00 600.00/hr	1,200.00
3/3/2011	ECS A111 Other REVIEW OF DOCUMENTS	1.00 600.00/hr	600.00
3/4/2011	ECS A111 Other TELEPHONE CONFERENCE WITH CO-COUNSEL; REVIEW OF DOCUMENTS	1.50 600.00/hr	900.00
3/5/2011	ECS A111 Other REVIEW OF DOCUMENTS	1.50 600.00/hr	900.00
3/16/2011	JRC A111 Other TRAVEL TO MIAMI.	2.00 600.00/hr	1,200.00
3/20/2011	ECS A111 Other TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING VARIOUS MATTERS	1.00 600.00/hr	600.00
3/21/2011	ECS A111 Other PREPARE FOR TRIP TO MIAMI	1.50 600.00/hr	900.00
3/22/2011	JRC A111 Other TO OFFICES OF GREENBERG; REVIEW DOCUMENTS.	2.00 600.00/hr	1,200.00
	ECS A111 Other TRAVEL TO MIAMI; REVIEW OF GREENBERG TRAUIG DOCUMENTS	2.00 600.00/hr	1,200.00
3/23/2011	JRC A111 Other REVIEW DOCUMENTS.	2.00 600.00/hr	1,200.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
3/23/2011	ECS A111 Other REVIEW OF DOCUMENTS ON MIAMI	2.00 600.00/hr	1,200.00
3/24/2011	JRC A111 Other REVIEW DOCUMENTS.	2.50 600.00/hr	1,500.00
	ECS A111 Other FINISHED REVIEW OF DOCUMENTS IN MIAMI	2.50 600.00/hr	1,500.00
3/25/2011	JRC A111 Other RETURN TRAVEL TO SAN ANTONIO.	2.00 600.00/hr	1,200.00
	ECS A111 Other RETURN TRAVEL TO SAN ANTONIO	1.50 600.00/hr	900.00
4/2/2011	ECS A111 Other REVIEW OF DOCUMENTS RECEIVED FROM GREENBERG	2.00 600.00/hr	1,200.00
4/3/2011	ECS A111 Other REVIEW OF RECEIVER'S MASTER DOCUMENT INDEX	2.00 600.00/hr	1,200.00
4/4/2011	ECS A111 Other REVIEW OF RECEIVER'S MASTER DOCUMENT INDEX	1.00 600.00/hr	600.00
4/5/2011	ECS A111 Other REVIEW OF RECEIVER'S MASTER DOCUMENT INDEX.	1.00 600.00/hr	600.00
4/8/2011	ECS A111 Other REVIEW OF DOCUMENTS RECEIVED FROM GREENBERG; EMAILS WITH MR. GARRETT	2.00 600.00/hr	1,200.00
4/9/2011	ECS A111 Other DETAILED REVIEW AND ANALYSIS OF DOCUMENTS FROM GREENBERG; WORKED ON DRAFTING COMPLAINT VS. GREENBERG, HUTON & KROLL	2.00 600.00/hr	1,200.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
4/10/2011	ECS A111 Other REVIEW AND ANALYSIS OF DOCUMENTS FROM GREENBERG AND WORKED ON DRAFTING COMPLAINT	1.50 600.00/hr	900.00
4/12/2011	ECS A111 Other TRAVEL TO HOUSTON; REVIEW OF DOCUMENTS AT WAREHOUSE	2.00 600.00/hr	1,200.00
4/13/2011	ECS A111 Other REVIEW OF DOCUMENTS AT HOUSTON WAREHOUSE	1.50 600.00/hr	900.00
4/14/2011	ECS A111 Other REVIEW OF DOCUMENTS AT WAREHOUSE; RETURN TRAVEL TO SAN ANTONIO	2.00 600.00/hr	1,200.00
4/18/2011	ECS A111 Other REVIEW OF DOCUMENTS; EXECUTED EXTENSION OF TOLLING AGREEMENT; WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
4/19/2011	ECS A111 Other CONTINUED REVIEW OF DOCUMENTS; OFFICE CONFERENCE WITH JESSE R. CASTILLO; EMAILS WITH CO-COUNSEL; WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
4/20/2011	ECS A111 Other REVIEW OF GREENBERG DOCUMENTS	1.50 600.00/hr	900.00
4/25/2011	ECS A111 Other REVIEW OF GREENBERG DOCUMENTS	1.50 600.00/hr	900.00
4/26/2011	SRC A111 Other SORT GREENBERG HOT DOCUMENTS IN CHRONOLOGICAL ORDER.	3.00 100.00/hr	300.00
4/27/2011	ECS A111 Other REVIEW OF GREENBERG DOCUMENTS	3.00 600.00/hr	1,800.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
5/3/2011	ECS A111 Other REVIEW OF HOT DOCS; EMAIL TO GREENBERG TRAURIG'S GENERAL COUNSEL REGARDING EMAIL SEARCHES	1.50 600.00/hr	900.00
5/5/2011	ECS A111 Other WORKED ON WORKED ON GREENBERG/KROLL COMPLAINT	2.00 600.00/hr	1,200.00
	SRC A111 Other SORT ADDITIONAL GREENBERG HOT DOCUMENTS IN CHRONOLOGICAL ORDER.	2.00 100.00/hr	200.00
5/6/2011	ECS A111 Other WORKED ON GREENBERG/KROLL COMPLAINT	3.00 600.00/hr	1,800.00
5/8/2011	ECS A111 Other WORKED ON WORKED ON GREENBERG/KROLL COMPLAINT	2.50 600.00/hr	1,500.00
5/9/2011	ECS A111 Other TRAVEL TO DALLAS AND MEETING WITH INVESTOR COMMITTEE; TRAVEL TO WASHINGTON D.C.	2.00 600.00/hr	1,200.00
5/10/2011	ECS A111 Other MEETING WITH SEC AND INVESTOR COMMITTEE; RETURN TRAVEL TO SAN ANTONIO	2.00 600.00/hr	1,200.00
5/12/2011	ECS A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
5/16/2011	ECS A111 Other WORKED ON WORKED ON GREENBERG/KROLL COMPLAINT	2.00 600.00/hr	1,200.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
5/18/2011 ECS	A111 Other WORKED ON WORKED ON GREENBERG/KROLL COMPLAINT	2.00 600.00/hr	1,200.00
5/19/2011 ECS	A111 Other WORKED ON GREENBERG/KROLL COMPLAINT	2.00 600.00/hr	1,200.00
5/20/2011 ECS	A111 Other WORKED ON WORKED ON GREENBERG/KROLL COMPLAINT; TELEPHONE CONFERENCE WITH DOJ AND CO-COUNSEL	1.50 600.00/hr	900.00
5/21/2011 ECS	A111 Other DRAFTED COMPLAINT	2.00 600.00/hr	1,200.00
5/23/2011 ECS	A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
5/24/2011 ECS	A111 Other WORKED ON GREENBERG/KROLL COMPLAINT	1.50 600.00/hr	900.00
5/25/2011 ECS	A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
5/27/2011 ECS	A111 Other WORKED ON COMPLAINT	1.00 600.00/hr	600.00
5/30/2011 ECS	A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
6/1/2011 ECS	A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
6/2/2011	ECS A111 Other RESEARCH ON TEXAS OPEN COURTS AND SLUSA; EMAILS WITH CO-COUNSEL; WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
6/4/2011	ECS A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
6/6/2011	SRC A111 Other SEARCHED AND PRINTED REPORT FOR NELSON RAMIREZ.	2.50 100.00/hr	250.00
6/8/2011	ECS A111 Other REVIEW OF NEW EMAIL DOCUMENTS PRODUCED BY GREENBERG TRAURIG	2.00 600.00/hr	1,200.00
6/10/2011	ECS A111 Other WORKED ON COMPLAINT; REVIEW OF NEW EMAILS PRODUCED	2.00 600.00/hr	1,200.00
6/11/2011	ECS A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
6/13/2011	ECS A111 Other FINISHED REVIEW OF NEW EMAILS PRODUCED; REVIEW OF HUNTON WILLIAMS DOCUMENTS	2.00 600.00/hr	1,200.00
6/14/2011	ECS A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
6/15/2011	ECS A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
	SRC A111 Other PRINTED E-MAILS FROM REPORT - NELSON RAMIREZ.	2.00 100.00/hr	200.00
6/16/2011	ECS A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
6/17/2011	ECS A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
6/18/2011	ECS A111 Other WORKED ON COMPLAINT	1.50 600.00/hr	900.00
6/20/2011	ECS A111 Other VARIOUS TELEPHONE CONFERENCE WITH CO-COUNSEL AND INVESTORS COMMITTEE REGARDING EFFECT OF SIPC; WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
6/21/2011	ECS A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
6/22/2011	ECS A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
6/23/2011	ECS A111 Other WORKED ON COMPLAINT	1.50 600.00/hr	900.00
6/24/2011	ECS A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
	JRC A111 Other REVIEW REPORT REFERENCE GREENBURG; REVIEW DRAFT TOLLING AGREEMENT.	1.00 600.00/hr	600.00
6/25/2011	ECS A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
6/27/2011	ECS A111 Other FINALIZED COMPLAINT	2.50 600.00/hr	1,500.00
6/30/2011	ECS A111 Other MEETING WITH STANFORD WITNESS; TELEPHONE CONFERENCE WITH RECEIVER AND CO-COUNSEL	1.00 600.00/hr	600.00



KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
7/1/2011	ECS A111 Other MEETING WITH MARK MURPHY; VARIOUS EMAILS REGARDING KROLL	2.00 600.00/hr	1,200.00
7/5/2011	ECS A111 Other VARIOUS EMAILS WITH OPPOSING COUNSEL AND CO-COUNSEL; TELEPHONE CONFERENCE WITH CO-COUNSEL	2.00 600.00/hr	1,200.00
7/8/2011	ECS A111 Other VARIOUS MEETINGS, TELECONFERENCES, AND E-MAILS REGARDING KROLL	2.00 600.00/hr	1,200.00
7/11/2011	ECS A111 Other TELEPHONE CONFERENCE WITH CO-COUNSEL; REVIEW OF DOCUMENTS REGARDING KROLL	5.00 600.00/hr	3,000.00
7/14/2011	ECS A111 Other TRAVEL TO DALLAS; ATTENDED COMMITTEE MEETING IN DALLAS	2.00 600.00/hr	1,200.00
7/15/2011	ECS A111 Other ATTENDED COMMITTEE MEETING IN DALLAS WITH RECEIVER AND RETURN TRAVEL TO SAN ANTONIO	1.00 600.00/hr	600.00
7/18/2011	ECS A111 Other REVIEW OF HOT DOCS REGARDING KROLL	3.00 600.00/hr	1,800.00
	JRC A111 Other OFFICE CONFERENCE WITH MR. SNYDER.	1.50 600.00/hr	900.00
7/21/2011	ECS A111 Other OFFICE CONFERENCE WITH JESSE R. CASTILLO; LONG TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING STRATEGIES	3.00 600.00/hr	1,800.00
7/26/2011	ECS A111 Other MEETING WITH MARK MURPHY; REVIEW OF MATERIALS REGARDING KROLL; FOLLOW UP EMAILS AND TELEPHONE CONFERENCES	4.00 600.00/hr	2,400.00

KROLL

			<u>Hrs/Rate</u>	<u>Amount</u>
8/5/2011	ECS	A111 Other EMAILS WITH OPPOSING COUNSEL AND CO-COUNSEL REGARDING MEETING	0.50 600.00/hr	300.00
	ECS	A111 Other TELEPHONE CONFERENCE WITH CO-COUNSEL	0.50 600.00/hr	300.00
8/8/2011	ECS	A111 Other PREPARED TOLLING AGREEMENT FOR KROLL	2.00 600.00/hr	1,200.00
8/9/2011	ECS	A111 Other REVIEW DRAFT SUBPOENA FOR KROLL	2.00 600.00/hr	1,200.00
8/10/2011	ECS	A111 Other WORKED ON SUBPOENA OR KROLL	2.00 600.00/hr	1,200.00
8/11/2011	ECS	A111 Other OFFICE CONFERENCE WITH JESSE R. CASTILLO REGARDING KROLL	0.50 600.00/hr	300.00
8/17/2011	ECS	A111 Other REVIEW DOCUMENTS REGARDING KROLL	3.00 600.00/hr	1,800.00
8/19/2011	ECS	A111 Other FINALIZED SUBPOENA TO KROLL; RESEARCH LAW; VARIOUS EMAILS AND TELEPHONE CONFERENCES WITH CO-COUNSEL	3.00 600.00/hr	1,800.00
8/23/2011	ECS	A111 Other VARIOUS EMAILS AND TELEPHONE CONFERENCES WITH OPPOSING COUNSEL	1.00 600.00/hr	600.00
8/26/2011	ECS	A111 Other REVIEW OF CHANGES TO TOLLING AGREEMENT	0.50 600.00/hr	300.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
8/29/2011	ECS A111 Other REVIEW KROLL'S PROPOSALS REGARDING DOCUMENT PRODUCTION AND TOLLING	1.00 600.00/hr	600.00
8/30/2011	ECS A111 Other VARIOUS EMAILS WITH RECEIVER COUNSEL	0.50 600.00/hr	300.00
8/31/2011	ECS A111 Other TELEPHONE CONFERENCE WITH KROLL'S COUNSEL; VARIOUS EMAILS WITH INVESTOR COMMITTEE	1.00 600.00/hr	600.00
9/2/2011	ECS A111 Other PREPARED REPORT TO CLIENTS; VARIOUS EMAILS AND TELEPHONE CONFERENCES REGARDING SLUSA AND EFFECT ON CASES	1.00 600.00/hr	600.00
9/6/2011	ECS A111 Other VARIOUS EMAILS AND TELECONFERENCES; RESEARCH LIMITATIONS AND ISSUES REGARDING KROLL	3.50 600.00/hr	2,100.00
9/8/2011	ECS A111 Other TRAVEL TO AUSTIN; ATTEND STRATEGY MEETING REGARDING SLUSA; RETURN TRAVEL TO SAN ANTONIO	2.00 600.00/hr	1,200.00
9/13/2011	ECS A111 Other TELEPHONE CONFERENCE WITH OPPOSING COUNSEL; RESEARCH TOLLING OF INDIVIDUAL CLAIMS DURING CLASS ACTION; EMAILS WITH CO-COUNSEL; EMAIL TO OPPOSING COUNSEL	2.00 600.00/hr	1,200.00
9/14/2011	ECS A111 Other EMAILS AND TELEPHONE CONFERENCE WITH OPPOSING COUNSEL; EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00
9/15/2011	ECS A111 Other MEETING WITH MARK MURPHY; EMAILS WITH KROLL'S COUNSEL	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
9/16/2011	ECS A111 Other FINALIZED TOLLING AGREEMENT; EMAILS WITH COMMITTEE AND MARK MURPHY REGARDING RETENTION OF DAVIS FIRM	2.00 600.00/hr	1,200.00
9/20/2011	ECS A111 Other TRAVEL TO DALLAS AND MEET WITH RECEIVER AND JOINT LIQUIDATORS	1.50 600.00/hr	900.00
9/21/2011	ECS A111 Other REVIEW OF IN PARI DELICTO MEMO; FORWARD BRIEFING ON OWNERSHIP OF CLAIMS TO RECEIVER/COUNSEL AND REVIEW SAME; TELEPHONE CONFERENCE WITH INVESTOR COMMITTEE	2.00 600.00/hr	1,200.00
9/26/2011	ECS A111 Other TELEPHONE CONFERENCE WITH CO-COUNSEL; LONG TELEPHONE CONFERENCE WITH ANTIGUAN LIQUIDATORS	2.00 600.00/hr	1,200.00
9/28/2011	ECS A111 Other VARIOUS EMAILS WITH CO-COUNSEL AND RESEARCH REGARDING POTENTIAL ESTATE CLAIMS VS KROLL	3.00 600.00/hr	1,800.00
9/29/2011	ECS A111 Other TELEPHONE CONFERENCE WITH CO-COUNSEL AND COMMITTEE; OFFICE CONFERENCE WITH JESSE R. CASTILLO REGARDING STATUS;	1.50 600.00/hr	900.00
	JRC A111 Other REVIEW MATERIAL IN PREPARATION OF MEETING.	2.00 600.00/hr	1,200.00
10/1/2011	ECS A111 Other EMAILS TO COMMITTEE AND MARK MURPHY	0.50 600.00/hr	300.00
10/2/2011	JRC A111 Other REVIEW KROLL'S INSURANCE POLICIES; REVIEW COVERAGE/LIMITS; OFFICE CONFERENCE WITH MR. SNYDER.	2.00 600.00/hr	1,200.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
10/6/2011	ECS A111 Other RESEARCH ON RECEIVER/CLAIMS; EMAILS WITH CO-COUNSEL	2.00 600.00/hr	1,200.00
10/7/2011	ECS A111 Other REVIEW AND APPROVE AMENDED TOLLING AGREEMENT	0.50 600.00/hr	300.00
10/11/2011	ECS A111 Other TELEPHONE CONFERENCE WITH MARK MURPHY	0.50 600.00/hr	300.00
10/12/2011	JRC A111 Other OFFICE CONFERENCE WITH MR. SNYDER; TELEPHONE CONFERENCE WITH COMMITTEE.	0.50 600.00/hr	300.00
10/13/2011	ECS A111 Other TRAVEL TO DALLAS; ATTEND MDL HEARING; FOLLOW-UP MEETINGS IN DALLAS WITH I.C. AND CO-COUNSEL	2.00 600.00/hr	1,200.00
10/18/2011	ECS A111 Other EMAIL TO KROLL'S COUNSEL DEMANDING DOCUMENTS	0.50 600.00/hr	300.00
10/20/2011	ECS A111 Other VARIOUS EMAILS; REVIEW OF DOCUMENTS FROM KROLL	2.00 600.00/hr	1,200.00
10/29/2011	ECS A111 Other OFFICE CONFERENCE WITH JESSE R. CASTILLO REGARDING SETTLEMENT STATUS	0.50 600.00/hr	300.00
10/31/2011	ECS A111 Other TELEPHONE CONFERENCE WITH KROLL'S COUNSEL; EMAILS WITH COMMITTEE	0.75 600.00/hr	450.00
11/4/2011	ECS A111 Other OFFICE CONFERENCE WITH JESSE R. CASTILLO; PREPARED EMAIL STATUS REPORT UPDATE TO RECEIVER AND COMMITTEE	2.00 600.00/hr	1,200.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
11/7/2011	ECS A111 Other PREPARE FOR AND MEET WITH MARK MURPHY REGARDING KROLL	2.00 600.00/hr	1,200.00
11/9/2011	JRC A111 Other WORK ON INSURANCE COVERAGE ISSUE; REVIEW TOLLING AGREEMENT.	1.30 600.00/hr	780.00
12/1/2011	ECS A111 Other SERVED SUBPOENA ON KROLL; EMAILS WITH MARK MURPHY	1.00 600.00/hr	600.00
12/2/2011	ECS A111 Other TELEPHONE CONFERENCE WITH COMMITTEE	0.50 600.00/hr	300.00
12/7/2011	ECS A111 Other LONG TELEPHONE CONFERENCE WITH MARK MURPHY; EMAILS WITH RECEIVERCOUNSEL REGARDING KROLL	1.50 600.00/hr	900.00
12/12/2011	ECS A111 Other TRAVEL TO DALLAS; MEETING WITH RECEIVER; MEETING OF INVESTORS COMMITTEE	2.00 600.00/hr	1,200.00
12/13/2011	ECS A111 Other WORKED ON KROLL CLAIMS REPORT	5.00 600.00/hr	3,000.00
12/14/2011	ECS A111 Other FINALIZED KROLL REPORT AND CLAIM LETTER; TELEPHONE CONFERENCE WITH MARK MURPHY	3.00 600.00/hr	1,800.00
12/15/2011	ECS A111 Other VARIOUS TELEPHONE CONFERENCES WITH AND EMAILS REGARDING LAWSUITS; REVIEW IN PARI DELICITO MEMO; RESEARCH ESTATE DAMAGES THEORIES	3.00 600.00/hr	1,800.00
12/17/2011	ECS A111 Other REVIEW OF KROLL DOCUMENTS	6.00 600.00/hr	3,600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
12/18/2011	ECS A111 Other REVIEW OF KROLL DOCUMENTS	2.00 600.00/hr	1,200.00
12/27/2011	ECS A111 Other TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING STATUS AND TOLLING VS. FILING SUIT	1.00 600.00/hr	600.00
12/29/2011	ECS A111 Other FINALIZED TOLLING AGREEMENT EXTENSIONS; TELEPHONE CONFERENCE WITH CLIENT; EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00
1/3/2012	ECS A111 Other TELEPHONE CONFERENCE WITH CLIENT; EMAIL WITH DEPARTMENT OF JUSTICE	1.00 600.00/hr	600.00
1/4/2012	ECS A111 Other TELEPHONE CONFERENCE WITH MARK MURPHY	0.50 600.00/hr	300.00
1/6/2012	ECS A111 Other OFFICE CONFERENCE WITH MARK MURPHY	1.00 600.00/hr	600.00
	JRC A111 Other OFFICE CONFERENCE WITH MR. SNYDER; REVIEW EMAIL.	1.00 600.00/hr	600.00
1/9/2012	ECS A111 Other TELEPHONE CONFERENCE WITH BILL REID REGARDING ANTIGUAN LIQUIDATOR CLAIMS AGAINST GREENBERG TRAURIG AND KROLL; TELEPHONE CONFERENCE WITH RALPH JANVEY	1.00 600.00/hr	600.00
1/10/2012	ECS A111 Other TELEPHONE CONFERENCE WITH KROLL'S COUNSEL	1.00 600.00/hr	600.00
1/11/2012	ECS A111 Other REVIEW AND EDIT LETTER AND MEMO TO CLIENT REGARDING KROLL	2.00 600.00/hr	1,200.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
1/12/2012 ECS	A111 Other TELEPHONE CONFERENCE WITH AND EMAILS AND REVIEW AND EDIT LETTER AND BRIEF TO CLIENT REGARDING KROLL	2.00 600.00/hr	1,200.00
1/13/2012 ECS	A111 Other LONG TELEPHONE CONFERENCE WITH BILL REID; LONG TELEPHONE CONFERENCE WITH COMMITTEE COUNSEL; VARIOUS EMAILS WITH COMMITTEE COUNSEL	1.00 600.00/hr	600.00
1/17/2012 ECS	A111 Other REVIEW OF KROLL OBJECTIONS; TELEPHONE CONFERENCE WITH MARK MURPHY	1.00 600.00/hr	600.00
1/18/2012 ECS	A111 Other VARIOUS TELEPHONE CONFERENCES WITH COMMITTEE LAWYERS AND EMAILS	1.00 600.00/hr	600.00
1/19/2012 ECS	A111 Other VARIOUS TELEPHONE CONFERENCES WITH AND EMAILS AND WORKED ON ESTATE CLAIMS BRIEF	2.00 600.00/hr	1,200.00
1/20/2012 JRC	A111 Other OFFICE CONFERENCE WITH MR. SNYDER; TELEPHONE CONFERENCE WITH COMMITTEE COUNSEL; REVIEW EMAIL.	1.00 600.00/hr	600.00
1/24/2012 ECS	A111 Other WORKED ON ESTATE CLAIMS BRIEF	2.00 600.00/hr	1,200.00
2/14/2012 ECS	A111 Other TELECONFERENCE WITH ANTIGUAN JLs; TELECONFERENCE WITH COMMITTEE	1.00 600.00/hr	600.00
2/17/2012 ECS	A111 Other PREPARED ASSIGNMENT OF KROLL CLAIMS FROM RECEIVER TO COMMITTEE; EMAILS WITH CO-COUNSEL; FOLLOWED CRIMINAL TRIAL	2.00 600.00/hr	1,200.00



KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2012 ECS	A111 Other REVIEW OF ANTIGUAN LIQUIDATORS APPEAL TO 5TH CIRCUIT; TELECONFERENCE WITH COMMITTEE	1.00 600.00/hr	600.00
2/23/2012 ECS	A111 Other TELECONFERENCE WITH ANTIGUAN JL'S REGARDING POTENTIAL CLAIMS VS. KROLL	1.00 600.00/hr	600.00
2/28/2012 ECS	A111 Other VARIOUS TELECONFERENCES WITH AND EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00
3/2/2012 ECS	A111 Other EMAIL WITH OPPOSING COUNSEL; TELECONFERENCE WITH CO-COUNSEL	1.00 600.00/hr	600.00
3/7/2012 ECS	A111 Other VARIOUS EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00
3/19/2012 ECS	A111 Other REVIEW OF 5TH CIRCUIT OPINION; VARIOUS EMAILS AND TELECONFERENCES ALL DAY	1.00 600.00/hr	600.00
3/20/2012 ECS	A111 Other TELECONFERENCE WITH CO-COUNSEL AND OPPOSING COUNSEL	0.50 600.00/hr	300.00
3/21/2012 ECS	A111 Other VARIOUS TELECONFERENCES WITH CO-COUNSEL AND EMAILS	1.00 600.00/hr	600.00
3/22/2012 ECS	A111 Other VARIOUS EMAILS AND TELECONFERENCE WITH CO-COUNSEL AND REVIEW OF WITNESS STATEMENTS	2.00 600.00/hr	1,200.00
3/26/2012 ECS	A111 Other TELECONFERENCE WITH COUNSEL FOR KROLL; VARIOUS TELECONFERENCE WITH AND EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
3/27/2012	ECS A111 Other TELECONFERENCE WITH KROLL'S LAWYERS	0.75 600.00/hr	450.00
3/30/2012	ECS A111 Other REVIEW AND SIGNED TOLLING EXTENSION; EMAILS WITH KROLL'S COUNSEL	0.75 600.00/hr	450.00
4/9/2012	ECS A111 Other VARIOUS EMAILS WITH CO-COUNSEL; OFFICE CONFERENCE WITH JESSE R CASTILLO; EMAIL TO RECEIVER	1.00 600.00/hr	600.00
4/10/2012	ECS A111 Other TELECONFERENCE WITH RALPH JANVEY & COUNSEL; TELECONFERENCE WITH TEAM; VARIOUS EMAILS WITH CO-COUNSEL REGARDING ESTATE DAMAGES MODEL; REVIEW VAN TASSEL DECLARATION	3.00 600.00/hr	1,800.00
4/11/2012	ECS A111 Other TELECONFERENCE WITH CO COUNSEL; REVIEW JIM DAVIS TRIAL TESTIMONY	2.00 600.00/hr	1,200.00
4/12/2012	ECS A111 Other LONG TELECONFERENCE WITH KROLL COUNSEL; TELECONFERENCE WITH CO-COUNSEL; EMAILS WITH CO-COUNSEL	1.50 600.00/hr	900.00
4/16/2012	ECS A111 Other VARIOUS EMAILS AND TELECONFERENCES	1.00 600.00/hr	600.00
4/18/2012	ECS A111 Other EMAIL TO COMMITTEE TO FOLLOW UP REGARDING TALKS WITH KROLL	1.00 600.00/hr	600.00
4/20/2012	ECS A111 Other EMAILS WITH OPPOSING COUNSEL	0.25 600.00/hr	150.00
	ECS A111 Other WORKED ON ESTATE CLAIMS AND DAMAGES ISSUES	2.00 600.00/hr	1,200.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
4/24/2012 ECS	A111 Other WORKED ON SETTLEMENT DEMAND LETTER; VARIOUS TELECONFERENCES AND EMAILS	1.00 600.00/hr	600.00
4/25/2012 ECS	A111 Other TRAVEL TO DALLAS; ATTENDED HEARING AND ATTENDED COMMITTEE MEETING WITH RECEIVER; RETURN TRAVEL TO SAN ANTONIO	1.50 600.00/hr	900.00
4/26/2012 ECS	A111 Other EXECUTED TOLLING AGREEMENT; TELECONFERENCE WITH COMMITTEE REGARDING KROLL SETTLEMENT POTENTIAL	1.00 600.00/hr	600.00
4/27/2012 ECS	A111 Other TELECONFERENCE WITH CO-COUNSEL REGARDING DAMAGES AND CLASS ISSUES FOR CASES	1.00 600.00/hr	600.00
4/28/2012 ECS	A111 Other VARIOUS TELECONFERENCES WITH AND EMAILS WITH CO-COUNSEL; RESEARCH ON ESTATE DAMAGE MODEL	2.00 600.00/hr	1,200.00
5/1/2012 ECS	A111 Other TELECONFERENCE WITH KROLL'S COUNSEL; TELECONFERENCE WITH CO-COUNSEL	1.00 600.00/hr	600.00
5/2/2012 ECS	A111 Other VARIOUS EMAILS AND TELECONFERENCES	0.50 600.00/hr	300.00
5/4/2012 ECS	A111 Other REVIEW OF TRIAL TRANSCRIPT	1.00 600.00/hr	600.00
5/7/2012 ECS	A111 Other REVIEW OF EMAIL FROM REPORTER	0.25 600.00/hr	150.00
5/8/2012 ECS	A111 Other VARIOUS EMAILS AND TELECONFERENCES	0.50 600.00/hr	300.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
5/9/2012	ECS A111 Other TELECONFERENCE WITH CO COUNSEL REGARDING CONFIDENTIALITY	0.25 600.00/hr	150.00
5/11/2012	ECS A111 Other REVIEW OF CONFIDENTIALITY AGREEMENT;	1.00 600.00/hr	600.00
5/14/2012	ECS A111 Other LONG TELECONFERENCE WITH OPPOSING COUNSEL; TELECONFERENCES WITH AND EMAILS WITH CO-COUNSEL REGARDING MEDIATOR; INTERVIEW WITNESS	2.00 600.00/hr	1,200.00
5/21/2012	ECS A111 Other REPORT TO CLIENT; TELECONFERENCE WITH AND EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00
5/22/2012	ECS A111 Other EMAILS AND TELEPHONE CONFERENCES WITH CO-COUNSEL	1.00 600.00/hr	600.00
5/23/2012	ECS A111 Other VARIOUS EMAILS AND TELECONFERENCES; REPORT TO CLIENTS	2.00 600.00/hr	1,200.00
5/24/2012	ECS A111 Other ATTEND TELECONFERENCE WITH COMMITTEE; WORKED ON LITIGATION STATUS REPORT	1.00 600.00/hr	600.00
5/25/2012	ECS A111 Other VARIOUS TELECONFERENCES WITH AND EMAILS WITH COMMITTEE; OPPOSING COUNSEL AND CO-COUNSEL	1.50 600.00/hr	900.00
5/29/2012	ECS A111 Other WORKED ON MOTION TO COMPEL	3.00 600.00/hr	1,800.00
6/7/2012	ECS A111 Other TRAVELED TO DALLAS; ATTENDED MEETING BETWEEN COMMITTEE AND RECEIVER	1.50 600.00/hr	900.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
6/8/2012 ECS	A111 Other TELECONFERENCE WITH INVESTIGATORS; EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00
6/11/2012 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY REGARDING PENDING ISSUES	0.50 600.00/hr	300.00
6/14/2012 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY; VARIOUS EMAILS WITH OPPOSING COUNSEL	1.00 600.00/hr	600.00
6/15/2012 ECS	A111 Other VARIOUS TELECONFERENCES WITH MARK MURPHY; EMAILS WITH RECEIVER	1.00 600.00/hr	600.00
6/18/2012 ECS	A111 Other TELECONFERENCE WITH OPPOSING COUNSEL; TELECONFERENCE WITH COMMITTEE	1.00 600.00/hr	600.00
6/19/2012 ECS	A111 Other TELECONFERENCE WITH OPPOSING COUNSEL; EMAILS WITH OPPOSING COUNSEL; TELECONFERENCE WITH CO-COUNSEL	1.00 600.00/hr	600.00
6/20/2012 ECS	A111 Other VARIOUS EMAILS AND TELECONFERENCES	1.00 600.00/hr	600.00
JRC	A111 Other OFFICE CONFERENCE WITH MR. SNYDER; REVIEW EMAIL.	1.00 600.00/hr	600.00
6/21/2012 ECS	A111 Other VARIOUS EMAILS	0.50 600.00/hr	300.00
JRC	A111 Other REVIEW EMAIL; REVIEW REPORT BY MR. SNYDER	1.50 600.00/hr	900.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
6/27/2012	ECS A111 Other WORKED ON COMPLAINT; REVIEW OF KROLL DOCUMENTS	6.00 600.00/hr	3,600.00
6/28/2012	ECS A111 Other REVIEW OF DOCUMENTS; WORKED ON COMPLAINT; TELECONFERENCE WITH CO-COUNSEL	3.50 600.00/hr	2,100.00
6/29/2012	ECS A111 Other REVIEW DOCUMENTS; WORK ON COMPLAINT VS. GREENBERG, HUNTON & KROLL	3.00 600.00/hr	1,800.00
7/2/2012	ECS A111 Other REVIEW OF DOCUMENTS; WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
7/3/2012	ECS A111 Other WORK ON BRIEF OF LEGAL ISSUES	2.00 600.00/hr	1,200.00
	ECS A111 Other REVIEW OF DOCUMENTS; WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
7/16/2012	ECS A111 Other EMAILS WITH COMMITTEE REGARDING SETTLEMENT; MEETING WITH MARK MURPHY; REVIEW OF DRAFT SETTLEMENT LETTER	2.00 600.00/hr	1,200.00
7/17/2012	ECS A111 Other REVIEW OF KROLL'S RESPONSE TO MOTION TO COMPEL; EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00
7/18/2012	ECS A111 Other WORKED ON COMPLAINT; TELECONFERENCE WITH RECEIVER'S COUNSEL	3.00 600.00/hr	1,800.00
7/19/2012	ECS A111 Other EMAILS WITH MARK MURPHY	0.50 600.00/hr	300.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
7/30/2012 ECS	A111 Other TELECONFERENCE WITH COMMITTEE; VARIOUS EMAILS	1.00 600.00/hr	600.00
8/6/2012 ECS	A111 Other REVIEW AND REVISE REPLY ON RECEIVER SUBPOENA	1.50 600.00/hr	900.00
8/10/2012 ECS	A111 Other VARIOUS MEETINGS; EMAILS AND TELECONFERENCES; LEGAL RESEARCH	2.00 600.00/hr	1,200.00
8/13/2012 ECS	A111 Other VARIOUS EMAILS AND TELECONFERENCES; RESEARCH; TELECONFERENCE WITH WAYNE SECORE; REVIEW OF DOCUMENTS	2.00 600.00/hr	1,200.00
8/14/2012 ECS	A111 Other WORKED ON GREENBERG/KROLL COMPLAINT	3.00 600.00/hr	1,800.00
8/15/2012 ECS	A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
8/16/2012 ECS	A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
8/17/2012 ECS	A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
8/19/2012 ECS	A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
8/27/2012 ECS	A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
8/28/2012 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY	0.50 600.00/hr	300.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
8/29/2012 ECS	A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
8/31/2012 ECS	A111 Other WORKED ON COMPLAINT	1.50 600.00/hr	900.00
9/4/2012 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY; EMAILS WITH KROLL COUNSEL	0.50 600.00/hr	300.00
9/5/2012 ECS	A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
9/6/2012 ECS	A111 Other REVIEW OF DOCUMENTS; WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
9/10/2012 ECS	A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
9/11/2012 ECS	A111 Other REVIEW AND RESPOND TO EMAILS; TELECONFERENCE WITH MARK MURPHY	0.50 600.00/hr	300.00
9/13/2012 ECS	A111 Other TELECONFERENCE WITH KROLL COUNSEL; REVIEW OF DOCUMENTS	3.50 600.00/hr	2,100.00
9/14/2012 ECS	A111 Other REVIEW AND COMMENT ON PROTECTIVE ORDER	0.50 600.00/hr	300.00
9/17/2012 ECS	A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
9/18/2012 ECS	A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00



KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
9/19/2012 ECS	A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
9/20/2012 ECS	A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
9/24/2012 ECS	A111 Other TRAVEL TO DALLAS; ATTEND SUMITT MEETING WITH ANTIGUAN JLS, JANVEY AND DOJ	1.50 600.00/hr	900.00
9/25/2012 ECS	A111 Other WORKED ON COMPLAINT	2.00 600.00/hr	1,200.00
9/26/2012 ECS	A111 Other WORKED ON COMPLAINT	3.50 600.00/hr	2,100.00
9/27/2012 ECS	A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
9/28/2012 ECS	A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
10/1/2012 ECS	A111 Other WORKED ON COMPLAINT	2.50 600.00/hr	1,500.00
10/2/2012 ECS	A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
10/3/2012 ECS	A111 Other WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
10/4/2012 ECS	A111 Other WORKED ON COMPLAINT	3.50 600.00/hr	2,100.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
10/5/2012	ECS A111 Other EMAILS WITH MARK MURPHY AND DAVID ARLINGTON REGARDING PROTECTIVE ORDER	0.50 600.00/hr	300.00
10/8/2012	ECS A111 Other REVIEW OF MATERIALS FROM ANTIGUAN JL'S AND BILL REID; TELECONFERENCE WITH OPPOSING COUNSEL ; REVIEW OF BEN BARNES DOCUMENTS	1.00 600.00/hr	600.00
	JRC A111 Other OFFICE CONFERENCE WITH MR. SNYDER; REVIEW EMAIL.	0.40 600.00/hr	240.00
10/10/2012	ECS A111 Other WORKED ON COMPLAINT	1.50 600.00/hr	900.00
	JRC A111 Other REVIEW EMAIL; OFFICE CONFERENCE WITH MR. SNYDER.	0.60 600.00/hr	360.00
10/11/2012	ECS A111 Other EMAILS WITH MARK MURPHY	0.50 600.00/hr	300.00
10/12/2012	ECS A111 Other VARIOUS TELECONFERENCES AND EMAILS REGARDING EXTENDING TOLLING;WORKED ON COMPLAINT	3.00 600.00/hr	1,800.00
	JRC A111 Other REVIEW TOLLING AGREEMENT; OFFICE CONFERENCE WITH MR. SNYDER; REVIEW EMAIL REFERENCE FILING AND AGREEMENT TO CONTINUE TOLLING.	1.75 600.00/hr	1,050.00
10/13/2012	ECS A111 Other TELECONFERENCE WITH CO-COUNSEL; TELECONFERENCE WITH JOHN LITTLE REGARDING NEGOTIATIONS WITH JL'S	1.50 600.00/hr	900.00
10/15/2012	ECS A111 Other REVIEW OF NEWLY PRODUCED DOCUMENTS; EMAIL WITH RECEIVER AND COMMITTEE REGARDING SETTLEMENT	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
10/15/2012 JRC	A111 Other CONTINUE REVIEW OF TOLLING AGREEMENT; PREPARE COMMENTS.	0.75 600.00/hr	450.00
10/16/2012 JRC	A111 Other REVIEW EMAIL.	0.40 600.00/hr	240.00
10/17/2012 ECS	A111 Other EMAILS WITH RECEIVER AND BAKER BOTTS	0.25 600.00/hr	150.00
10/18/2012 ECS	A111 Other EMAILS WITH RECEIVER	0.50 600.00/hr	300.00
10/19/2012 ECS	A111 Other TRAVEL TO DALLAS; ATTEND MEETING WITH RECEIVER; ATTEND STATUS CONFERENCE IN COURT	1.00 600.00/hr	600.00
10/22/2012 ECS	A111 Other TELECONFERENCE WITH OPPOSING COUNSEL ; EMAILS TO CO-COUNSEL; TELECONFERENCE WITH R. JANVEY	0.75 600.00/hr	450.00
10/23/2012 ECS	A111 Other TELECONFERENCES WITH MARK MURPHY REGARDING STATUS	0.50 600.00/hr	300.00
10/24/2012 JRC	A111 Other REVIEW NUMEROUS EMAIL REFERENCE STRATEGY/RESOLUTION.	1.20 600.00/hr	720.00
10/30/2012 ECS	A111 Other VARIOUS EMAILS WITH CO-COUNSEL REGARDING STATUS	0.50 600.00/hr	300.00
11/1/2012 ECS	A111 Other EMAILS WITH CO-COUNSEL	0.25 600.00/hr	150.00
11/2/2012 ECS	A111 Other WORKED ON COMPLAINT	4.00 600.00/hr	2,400.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
11/2/2012 ECS	A111 Other WORKED ON STATUS REPORT TO CLIENTS; LONG TELECONFERENCE WITH JOHN LITTLE	2.00 600.00/hr	1,200.00
11/5/2012 ECS	A111 Other VARIOUS EMAILS AND TELECONFERENCE WITH INVESTOR COMMITTEE	1.00 600.00/hr	600.00
11/6/2012 ECS	A111 Other EMAILS WITH CO-COUNSEL	0.50 600.00/hr	300.00
11/7/2012 ECS	A111 Other TELECONFERENCE WITH KROLL'S LAWYER; EMAILS WITH CO-COUNSEL; PREPARED CLASS REPRESENTATIVE CONTRACTS; TELECONFERENCE WITH REPORTER	1.50 600.00/hr	900.00
11/8/2012 ECS	A111 Other TELECONFERENCE WITH COMMITTEE REGARDING REPRESENTATIVE PAM REED; TELECONFERENCE WITH CO-COUNSEL; EMAILS WITH OPPOSING COUNSEL	1.00 600.00/hr	600.00
11/12/2012 ECS	A111 Other REVIEW OF LETTER TO KROLL; EMAILS WITH CO-COUNSEL	0.50 600.00/hr	300.00
11/16/2012 ECS	A111 Other FOLLOW-UP EMAILS AND TELECONFERENCES	1.00 600.00/hr	600.00
11/19/2012 ECS	A111 Other TELECONFERENCE WITH REPORTER REGARDING KROLL	1.00 600.00/hr	600.00
11/20/2012 ECS	A111 Other REVIEW AND RESPOND TO EMAILS	0.50 600.00/hr	300.00
11/21/2012 ECS	A111 Other TELECONFERENCE WITH ANTIGUAN JL'S COUNSEL	0.50 600.00/hr	300.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
11/26/2012 JRC	A111 Other REVIEW EMAIL REFERENCE LAWSUITS; REVIEW ARTICLES.	0.40 600.00/hr	240.00
11/27/2012 ECS	A111 Other VARIOUS EMAILS	1.00 600.00/hr	600.00
11/28/2012 ECS	A111 Other TELECONFERENCE WITH MARK MURPPHY; LONG TELECONFERENCE WITH REPORTER REGARDING KROLL	2.00 600.00/hr	1,200.00
11/29/2012 ECS	A111 Other LONG TELECONFERENCE WITH KROLL; TELECONFERENCE WITH CO-COUNSEL; EMAILS WITH CLIENTS; REVIEW DOCUMENTS	5.00 600.00/hr	3,000.00
11/30/2012 ECS	A111 Other REVIEW OF DOCUMENTS; EMAILS WITH COMMITTEE; TELECONFERENCE WITH OPPOSING COUNSEL	4.00 600.00/hr	2,400.00
12/3/2012 ECS	A111 Other REVIEW OF NEW DOCUMENTS PRODUCED BY KROLL	4.00 600.00/hr	2,400.00
12/4/2012 ECS	A111 Other REVIEW OF KROLL DOCUMENTS	3.00 600.00/hr	1,800.00
12/5/2012 ECS	A111 Other REVIEW OF KROLL DOCUMENTS	7.00 600.00/hr	4,200.00
12/7/2012 ECS	A111 Other COMMITTEE/RECEIVER MEETING IN DALLAS; RETURN TRAVEL TO SAN ANTONIO	1.50 600.00/hr	900.00
JRC	A111 Other REVIEW MOTIONS; REVIEW EMAIL.	0.40 600.00/hr	240.00

## KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
12/13/2012	ECS A111 Other REVIEW OF FINANCIAL INFO REGARDING KROLL AND ALTEGRITY INVESTIGATION	5.00 600.00/hr	3,000.00
12/14/2012	ECS A111 Other CONTINUED REVIEW OF NEWLY PRODUCED KROLL RECORDS	6.00 600.00/hr	3,600.00
12/17/2012	ECS A111 Other REVIEW OF KROLL DOCUMENTS	5.00 600.00/hr	3,000.00
12/18/2012	ECS A111 Other TRAVEL TO HOUSTON TO INTERVIEW LENA STINSON REGARDING VARIOUS MATTERS INCLUDING KROLL	2.50 600.00/hr	1,500.00
12/21/2012	ECS A111 Other VARIOUS EMAILS REGARDING SETTLEMENT NEGOTIATIONS	0.50 600.00/hr	300.00
1/2/2013	ECS A111 Other REVIEW OF DOCUMENTS; TELECONFERENCE WITH KROLL COUNSEL	5.00 600.00/hr	3,000.00
	JRC A111 Other REVIEW EMAIL REFERENCE STATUS OF SETTLEMENT DISCUSSIONS.	0.40 600.00/hr	240.00
1/3/2013	JRC A111 Other REVIEW MATERIAL REFERENCE KROLL INVOLVEMENT WITH STANFORD.	4.00 600.00/hr	2,400.00
1/4/2013	ECS A111 Other REVIEW OF KROLL DOCUMENTS; TELECONFERENCE WITH CO-COUNSEL	3.00 600.00/hr	1,800.00
	JRC A111 Other OFFICE CONFERENCE WITH MR. SNYDER; REVIEW EMAIL REFERENCE SETTLEMENT CONFERENCE; REVIEW POSITION PAPER; REVIEW AND STUDY REFERENCE KROLL.	4.50 600.00/hr	2,700.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
1/7/2013	ECS A111 Other PREPARE FOR AND ATTEND MEETING WITH KROLL LAWYERS; FOLLOW UP EMAILS WITH COMMITTEE AND RECEIVER	4.50 600.00/hr	2,700.00
	JRC A111 Other PREPARE FOR MEETING; OUT OF OFFICE CONFERENCE WITH MESSRS. DAVIS, MURPHY, SNYDER; SPARLING AND BERKE; OUT OF OFFICE CONFERENCE WITH MESSRS. MURPHY, DAVIS AND SNYDER; REVIEW EMAIL.	3.25 600.00/hr	1,950.00
1/8/2013	ECS A111 Other REVIEW OF NEW OPINION ON AIDING AND ABETTING; REVIEW OF DOCUMENTS PRODUCED BY KROLL	4.00 600.00/hr	2,400.00
1/9/2013	ECS A111 Other EMAIL OPPOSING COUNSEL REGARDING SETTLEMENT	0.25 600.00/hr	150.00
	JRC A111 Other REVIEW EMAIL REFERENCE MEETING; REVIEW EMAIL REFERENCE STRATEGY.	0.35 600.00/hr	210.00
1/10/2013	ECS A111 Other TELECONFERENCE WITH MARK MURPHY REGARDING STATUS; TELECONFERENCE WITH RECEIVER	0.75 600.00/hr	450.00
	JRC A111 Other REVIEW EMAIL FROM MR. SPARLING.	0.20 600.00/hr	120.00
1/11/2013	ECS A111 Other TELECONFERENCE WITH INVESTIGATOR	0.50 600.00/hr	300.00
1/14/2013	ECS A111 Other VARIOUS EMAILS AND TELECONFERENCES WITH CO-COUNSEL AND COMMITTEE	1.00 600.00/hr	600.00
1/18/2013	ECS A111 Other ATTENDED COMMITTEE MEETING WITH RECEIVER - DISCUSS STATUS OF KROLL SETTLEMENT TALKS; VARIOUS EMAILS AND TELECONFERENCES REGARDING US SUPREME COURT GRANT OF	4.00 600.00/hr	2,400.00

KROLL		<u>Hrs/Rate</u>	<u>Amount</u>
CERT.			
1/22/2013	ECS A111 Other TELECONFERENCE WITH KROLL'S COUNSEL; EMAIL TO RECEIVER AND COMMITTEE	1.00 600.00/hr	600.00
1/23/2013	ECS A111 Other TELECONFERENCE WITH CO-COUNSEL; OFFICE CONFERENCE WITH JESSE R CASTILLO; EMAIL TO OPPOSING COUNSEL	1.00 600.00/hr	600.00
1/25/2013	ECS A111 Other FINALIZED REPORT TO CLIENTS; TELECONFERENCES AND VARIOUS EMAILS WITH CO-COUNSEL REGARDING SUPREME COURT	1.50 600.00/hr	900.00
JRC	A111 Other OFFICE CONFERENCE WITH MR. SNYDER; TELEPHONE CONFERENCE WITH MESSRS. SNYDER AND VALDESPINO; REVIEW EMAIL.	0.75 600.00/hr	450.00
1/28/2013	ECS A111 Other REVIEW OF NEWLY PRODUCED KROLL RECORDS; TELECONFERENCE WITH MARK MURPHY	3.50 600.00/hr	2,100.00
1/30/2013	ECS A111 Other TELECONFERENCE WITH INVESTIGATOR; EMAIL TO COUNSEL FOR ANTIGUAN JLs; EMAILS TO COMMITTEE REGARDING KROLL	1.00 600.00/hr	600.00
1/31/2013	ECS A111 Other TELECONFERENCE WITH INVESTIGATOR REGARDING KROLL	0.50 600.00/hr	300.00
2/4/2013	ECS A111 Other EMAILS WITH OPPOSING COUNSEL REGARDING SETTLEMENT STATUS; EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00
2/5/2013	ECS A111 Other REVIEW OF CONFIDENTIALITY AGREEMENT; PROVIDE COMMENTS TO OPPOSING COUNSEL	1.00 600.00/hr	600.00



KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
2/6/2013	ECS A111 Other TELECONFERENCE WITH ED DAVIS; COUNSEL TO ANTIGUAN JOINT LIQUIDATORS REGARDING KROLL	0.50 600.00/hr	300.00
2/8/2013	ECS A111 Other TELECONFERENCE WITH KROLL COUNSEL REGARDING FINANCIAL INFORMATION	0.50 600.00/hr	300.00
2/11/2013	ECS A111 Other REVIEW OF KROLL FINANCIAL INFORMATION; TELECONFERENCE WITH CO-COUNSEL; TELECONFERENCE WITH RALPH JANVEY & COUNSEL	3.00 600.00/hr	1,800.00
2/12/2013	ECS A111 Other TELECONFERENCE WITH KEVIN SADLER; TELECONFERENCE WITH JOHN LITTLE REGARDING KROLL	1.00 600.00/hr	600.00
2/13/2013	ECS A111 Other VARIOUS TELECONFERENCE WITH AND EMAILS WITH CO-COUNSEL AND COMMITTEE	1.50 600.00/hr	900.00
2/14/2013	ECS A111 Other TELECONFERENCE WITH OPPOSING COUNSEL REGARDING SETTLEMENT STATUS	0.50 600.00/hr	300.00
2/18/2013	ECS A111 Other REVIEW OF NEWLY PRODUCED DOCUMENTS FROM KROLL; TELECONFERENCE WITH ED DAVIS	3.00 600.00/hr	1,800.00
2/20/2013	ECS A111 Other DETAILED REVIEW AND COMMENT ON RECEIVER - JL SETTLEMENT; VARIOUS TELECONFERENCES AND EMAILS WITH CO-COUNSEL	2.00 600.00/hr	1,200.00
2/21/2013	ECS A111 Other REVIEW OF NEWLY PRODUCED DOCUMENTS FROM KROLL	3.00 600.00/hr	1,800.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
2/22/2013	ECS A111 Other TELECONFERENCE WITH CPA INVESTIGATOR REGARDING : KROLL'S FINANCIAL CONDITION	1.50 600.00/hr	900.00
2/25/2013	ECS A111 Other TELECONFERENCE WITH MARK MURPHY	0.50 600.00/hr	300.00
2/28/2013	ECS A111 Other TRAVEL TO DALLAS; ATTEND MEETING OF RECEIVER AND I.C.	1.00 600.00/hr	600.00
3/1/2013	ECS A111 Other TELECONFERENCE WITH KROLL'S LAWYERS	0.50 600.00/hr	300.00
3/4/2013	ECS A111 Other REVIEW OF MEMO REGARDING KROLL'S GUARANTY OF ALTEGRITY DEBT	1.00 600.00/hr	600.00
3/5/2013	ECS A111 Other TELECONFERENCE WITH CLASS REPRESENTATIVE PAM REED REGARDING STATUS	0.50 600.00/hr	300.00
3/7/2013	ECS A111 Other TELECONFERENCE WITH CO-COUNSEL; PREPARE FOR JIM DAVIS INTERVIEW	1.00 600.00/hr	600.00
3/18/2013	ECS A111 Other TELECONFERENCE WITH KROLL REGARDING SETTLEMENT STATUS	0.50 600.00/hr	300.00
3/20/2013	ECS A111 Other EMAIL TO CLIENTS REGARDING SETTLEMENT STATUS	1.00 600.00/hr	600.00
	ECS A111 Other VARIOUS EMAILS	0.50 600.00/hr	300.00
3/27/2013	ECS A111 Other TELECONFERENCE WITH CO-COUNSEL; REVIEW AND REVISE EMAIL	0.75 600.00/hr	450.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
4/1/2013 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY; TELECONFERENCE WITH CPA EXPERT; EMAIL OPPOSING COUNSEL	1.00 600.00/hr	600.00
4/2/2013 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY	0.25 600.00/hr	150.00
4/4/2013 ECS	A111 Other TELECONFERENCE WITH MICHAEL STANLEY REGARDING YOLANDA SUAREZ ASSISTING WITH CASE AGAINST GREENBERG AND KROLL	0.50 600.00/hr	300.00
4/11/2013 ECS	A111 Other ATTENDED HEARING ON RECEIVER JL SETTLEMENT; ATTENDED COMMITTEE MEETING; RETURN TRAVEL TO SAN ANTONIO	1.00 600.00/hr	600.00
4/12/2013 ECS	A111 Other MEETING WITH CO-COUNSEL	0.50 600.00/hr	300.00
4/15/2013 ECS	A111 Other TELECONFERENCE WITH OPPOSING COUNSEL REGARDING MEDIATION	0.50 600.00/hr	300.00
4/17/2013 ECS	A111 Other EMAILS WITH CO-COUNSEL AND WITH OPPOSING COUNSEL REGARDING MEDIATION	0.50 600.00/hr	300.00
4/24/2013 ECS	A111 Other TELECONFERENCE WITH STEVE SPARLING; TELECONFERENCE WITH RALPH JANVEY; VARIOUS EMAILS REGARDING MEDIATION	1.00 600.00/hr	600.00
4/29/2013 ECS	A111 Other EMAILS REGARDING MEDIATION LOGISTICS	0.25 600.00/hr	150.00
4/30/2013 ECS	A111 Other VARIOUS EMAILS REGARDING MEDIATION	0.75 600.00/hr	450.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
5/2/2013	ECS A111 Other EMAILS REGARDING MEDIATION	0.25 600.00/hr	150.00
5/3/2013	ECS A111 Other COORDINATED KROLL MEDIATION; PREPARE FOR KROLL MEDIATION	2.00 600.00/hr	1,200.00
5/11/2013	ECS A111 Other EMAILS WITH CO-COUNSEL	0.50 600.00/hr	300.00
5/14/2013	ECS A111 Other VARIOUS EMAILS	0.50 600.00/hr	300.00
5/16/2013	ECS A111 Other RESEARCH/UPDATE CASE LAW	3.00 600.00/hr	1,800.00
5/21/2013	ECS A111 Other REVIEW AND REVISE KROLL MEDIATION POSITION PAPER	5.00 600.00/hr	3,000.00
5/22/2013	ECS A111 Other TELECONFERENCE WITH COMMITTEE	0.50 600.00/hr	300.00
5/23/2013	ECS A111 Other EMAILS WITH CO-COUNSEL AND CLASS REPRESENTATIVES; REVIEW AND REVISE MEDIATION LETTER; TELECONFERENCE WITH MARK MURPHY	1.00 600.00/hr	600.00
5/24/2013	ECS A111 Other REVIEW AND REVISE LETTER TO KROLL'S COUNSEL	1.00 600.00/hr	600.00
	JRC A111 Other REVIEW MEDIATION MATERIAL; REVIEW MURRAY WAAS ARTICLE; REVIEW PRELIMINARY REPORT; OFFICE CONFERENCE WITH MR. SNYDER REFERENCE MEDIATION.	2.00 600.00/hr	1,200.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
5/24/2013	ECS A111 Other WORKED ON FACT SECTION FOR BRIEF	2.50 600.00/hr	1,500.00
5/28/2013	ECS A111 Other PREPARE FOR KROLL MEDIATION	6.00 600.00/hr	3,600.00
	JRC A111 Other PREPARE FOR MEDIATION; REVIEW MEDIATION STATEMENT.	3.00 600.00/hr	1,800.00
5/29/2013	ECS A111 Other TRAVEL TO NEW YORK; PREPARE FOR MEDIATION AND ATTEND MEDIATION WITH KROLL	12.00 600.00/hr	7,200.00
	JRC A111 Other TRAVEL TO NEW YORK (6:00 A.M. FLIGHT); OUT OF OFFICE CONFERENCE AT MEDIATION.	8.00 600.00/hr	4,800.00
5/30/2013	ECS A111 Other MEDIATION IN NEW YORK WITH KROLL	9.00 600.00/hr	5,400.00
	JRC A111 Other ATTEND MEDIATION.	6.50 600.00/hr	3,900.00
5/31/2013	ECS A111 Other RETURN TRAVEL TO SAN ANTONIO - KROLL MEDIATION	9.00 600.00/hr	5,400.00
	JRC A111 Other RETURN TRAVEL TO SAN ANTONIO (STRANDED IN ST. LOUIS).	6.00 600.00/hr	3,600.00
6/4/2013	ECS A111 Other REVIEW AND EDIT KROLL SETTLEMENT TERM SHEET; EMAIL TO CLASS REPRESENTATIVES	2.00 600.00/hr	1,200.00
6/12/2013	BC A111 Other REORDER STANFORD CRIMINAL TRIAL TRANSCRIPTS; CREATE INDEX OF TRANSCRIPTS; SEARCH CERTAIN PARTS OF	2.00 100.00/hr	200.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
	TRANSCRIPTS (PER ECS INSTRUCTION)		
6/13/2013 BC	A111 Other CONTINUE REORDER OF STANFORD CRIMINAL TRIAL TRANSCRIPTS; FINISH INDEX OF TRANSCRIPTS; CONTINUE TO SEARCH TRANSCRIPT (PER ECS INSTRUCTION)	1.50 100.00/hr	150.00
6/14/2013 BC	A111 Other SEARCH STANFORD CRIMINAL TRIAL TRANSCRIPTS (PER ECS INSTRUCTION)	1.50 100.00/hr	150.00
6/19/2013 ECS	A111 Other EMAIL WITH MARK MURPHY REGARDING KROLL	0.25 600.00/hr	150.00
6/20/2013 ECS	A111 Other EMAILS WITH MARK MURPHY, RALPH JANVEY AND KROLL'S COUNSEL REGARDING ALLEGED BREACH OF CONFIDENTIALITY	0.75 600.00/hr	450.00
6/25/2013 ECS	A111 Other REVIEW OF KROLL SETTLEMENT DRAFT	1.00 600.00/hr	600.00
7/1/2013 ECS	A111 Other TRAVEL TO AUSTIN, ATTEND JOINT MEETING OF COMMITTEE AND RECEIVER	1.50 600.00/hr	900.00
7/15/2013 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY	0.25 600.00/hr	150.00
7/31/2013 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY REGARDING STATUS	0.25 600.00/hr	150.00
8/2/2013 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY REGARDING STATUS	0.25 600.00/hr	150.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
8/5/2013 ECS	A111 Other REVIEW KROLL LETTER; EMAILS TO COMMITTEE; VARIOUS TELECONFERENCES	1.00 600.00/hr	600.00
8/6/2013 ECS	A111 Other REVIEW OF LETTER FROM KROLL; EMAIL WITH CLIENTS	0.50 600.00/hr	300.00
8/7/2013 ECS	A111 Other EMAILS REGARDING STATUS	0.25 600.00/hr	150.00
8/9/2013 ECS	A111 Other REVIEW AND COMMENT ON COMPLAINT VS. KROLL	3.00 600.00/hr	1,800.00
8/12/2013 ECS	A111 Other VARIOUS EMAILS	0.50 600.00/hr	300.00
8/18/2013 ECS	A111 Other VARIOUS EMAILS; TELECONFERENCE WITH MARK MURPHY	0.75 600.00/hr	450.00
8/20/2013 ECS	A111 Other TELECONFERENCE WITH REVIEW AND COUNSEL	0.25 600.00/hr	150.00
8/27/2013 ECS	A111 Other VARIOUS TELECONFERENCES AND EMAILS	0.75 600.00/hr	450.00
8/28/2013 ECS	A111 Other EMAILS	0.25 600.00/hr	150.00
8/29/2013 ECS	A111 Other REVIEW MEMO ON NON OPT OUT CLASS ACTION; TELECONFERENCE WITH KROLL COUNSEL	1.50 600.00/hr	900.00
8/30/2013 JRC	A111 Other REVIEW PLEADING; REVIEW EMAIL.	1.50 600.00/hr	900.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
8/31/2013	ECS A111 Other RESEARCH CASE LAW ON CLASS SETTLEMENTS FOR INTERNATIONAL PARTIES	6.00 600.00/hr	3,600.00
9/5/2013	ECS A111 Other EMAILS WITH KROLL'S COUNSEL; REVIEW OF MEMO ON INJUNCTIONS; EMAIL TO CO-COUNSEL ON FURTHER RESEARCH	1.00 600.00/hr	600.00
9/9/2013	ECS A111 Other TRAVEL TO DALLAS; ATTEND OSIC AND RECEIVER MEETING	2.50 600.00/hr	1,500.00
9/10/2013	ECS A111 Other REVIEW MEMOS ON SETTLEMENT MECHANISMS AND CASE LAW ON RECEIVER SETTLEMENT; TELECONFERENCE WITH JANVEY AND SADLER	4.00 600.00/hr	2,400.00
9/11/2013	ECS A111 Other TELECONFERENCE WITH MARK MURPHY	0.25 600.00/hr	150.00
9/17/2013	ECS A111 Other EMAILS WITH CO-COUNSEL; EMAILS WITH RECEIVER; TELECONFERENCE WITH JOHN LITTLE	1.50 600.00/hr	900.00
9/18/2013	ECS A111 Other TELECONFERENCE WITH RECEIVER; FORWARD REVISED TERM SHEET TO KROLL	1.00 600.00/hr	600.00
9/20/2013	ECS A111 Other TELECONFERENCE WITH CO-COUNSEL	0.25 600.00/hr	150.00
9/27/2013	ECS A111 Other TELECONFERENCE WITH STEVE SPARLING; EMAIL TO RECEIVER	0.25 600.00/hr	150.00
10/2/2013	ECS A111 Other TELECONFERENCE WITH KROLL COUNSEL; TELECONFERENCE WITH MARK MURPHY	0.25 600.00/hr	150.00



KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
10/10/2013 ECS	A111 Other PREPARE FOR AND ATTEND TELECONFERENCE WITH KROLL; EMAIL TO RECEIVER	0.75 600.00/hr	450.00
10/11/2013 ECS	A111 Other REVIEWED AND REVISED CLASS SETTLEMENT AND CLASS CERTIFICATION DOCUMENTS FROM PRIOR CASE; FORWARD TO KROLL COUNSEL	3.00 600.00/hr	1,800.00
10/14/2013 ECS	A111 Other TRAVEL TO DALLAS; ATTENDED MEETING WITH RECEIVER AND COMMITTEE	1.00 600.00/hr	600.00
10/23/2013 ECS	A111 Other EMAILS AND TELECONFERENCE WITH RECEIVER COUNSEL	0.50 600.00/hr	300.00
11/14/2013 ECS	A111 Other EMAILS WITH CO-COUNSEL	0.50 600.00/hr	300.00
11/15/2013 ECS	A111 Other TELECONFERENCE WITH OPPOSING COUNSEL REGARDING STATUS OF SETTLEMENT	0.75 600.00/hr	450.00
11/19/2013 ECS	A111 Other LONG TELECONFERENCE WITH COUNSEL FOR KROLL; EMAIL MEMO TO CLIENTS AND CO-COUNSEL	1.00 600.00/hr	600.00
11/20/2013 ECS	A111 Other LONG TELECONFERENCE WITH OPPOSING COUNSEL ; TELECONFERENCE WITH FELIPE TORRES REGARDING EFFECT OF BAR ORDER IN MEXICO	1.00 600.00/hr	600.00
11/21/2013 ECS	A111 Other TELECONFERENCE WITH OPPOSING COUNSEL ; EMAIL MEMO TO TEAM	0.50 600.00/hr	300.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
11/22/2013	ECS A111 Other ATTENDED RECEIVER AND COMMITTE MEETING	1.00 600.00/hr	600.00
12/5/2013	ECS A111 Other TELECONFERENCE WITH SADLER AND KROLL COUNSEL REGARDING SETTLEMENT	0.75 600.00/hr	450.00
1/8/2014	ECS A111 Other REVIEW AND RESPOND TO EMAILS FROM OPPOSING COUNSEL; TELECONFERENCE WITH MARK MURPHY	0.75 600.00/hr	450.00
1/9/2014	ECS A111 Other LONG TELECONFERENCE WITH OPPOSING COUNSEL REGARDING STATUS	1.00 600.00/hr	600.00
1/15/2014	ECS A111 Other VARIOUS EMAILS AND PROVIDE UPDATE TO CLIENTS	0.50 600.00/hr	300.00
1/16/2014	ECS A111 Other TRAVEL TO DALLAS; ATTEND STATUS CONFERENCE; ATTENDING MEEITNG WITH RECEIVER AND COMMITTEE	1.00 600.00/hr	600.00
1/29/2014	ECS A111 Other EMAILS WITH CO-COUNSEL	0.25 600.00/hr	150.00
2/21/2014	ECS A111 Other TELECONFERENCE WITH JASON DAVIS	0.25 600.00/hr	150.00
2/24/2014	ECS A111 Other TELECONFERENCE WITH KROLL COUNSEL REGARDING STATUS	0.25 600.00/hr	150.00
2/25/2014	ECS A111 Other REVIEW OF EMAIL FROM KROLL'S COUNSEL; DRAFT RESPONSES; EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00
2/27/2014	ECS A111 Other LONG TELECONFERENCES WITH KROLL; FOLLOW UP OFFICE CONFERENCE WITH JESSE R CASTILLO AND TELECONFERENCES	3.00 600.00/hr	1,800.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
	WITH JASON DAVIS; RESEARCH CLASS ACTIONS IN INTERNATIONAL CONTEXT		
2/28/2014 ECS	A111 Other TELECONFERENCE WITH JASON DAVIS AND RICHARD ROPER; VARIOUS EMAILS; RESEARCH CASE LAW ON GLOBAL SETTLEMENTS AND OPT-OUTS; TELECONFERENCE WITH KROLL COUNSEL; RESEARCH MEXICAN LAW; TELECONFERENCE WITH MEXICAN LAWYERS REGARDING EFFECT OF US COURT ORDER	6.00 600.00/hr	3,600.00
3/11/2014 ECS	A111 Other EMAILS WITH KROLL'S COUNSEL	0.25 600.00/hr	150.00
3/12/2014 ECS	A111 Other REVIEW OF SETTLEMENT AGREEMENT ANCILLARY DOCUMENTS; VARIOUS EMAILS	5.00 600.00/hr	3,000.00
3/17/2014 ECS	A111 Other EMAILS WITH CO-COUNSEL; CONTINUED REVIEW AND ANALYSIS OF SETTLEMENT DOCUMENTS	0.50 600.00/hr	300.00
3/19/2014 ECS	A111 Other PREPARED EXTENSIVE COMMENTS ON DRAFT SETTLEMENT AGREEMENT AND ANCILLARY DOCUMENTS	7.00 600.00/hr	4,200.00
3/21/2014 ECS	A111 Other TRAVEL TO DALLAS; ATTEND MEETING OF INVESTOR COMMITTEE AND RECEIVER	1.00 600.00/hr	600.00
3/24/2014 ECS	A111 Other PREPARED JOINT COMMENTS TO DRAFT SETTLEMENT AGREEMENT FROM RECEIVER, EXAMINER, AND CO-COUNSEL COMMENTS.	4.50 600.00/hr	2,700.00
3/25/2014 ECS	A111 Other REVIEW OF DOCS AND PREPARE FOR LENA STINSON INTERVIEW.	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
3/28/2014	ECS A111 Other LONG TELECONFERENCE WITH MICHAEL STANLEY (LAWYER FOR YOLANDA SUAREZ).	0.50 600.00/hr	300.00
3/31/2014	ECS A111 Other RESEARCH ON CLASS ACTION LAW REGARDING GLOBAL SETTLEMENTS	3.00 600.00/hr	1,800.00
4/1/2014	ECS A111 Other RESEARCH CLASS ACTION CERTIFICATION CASE LAW FOR CLASS SETTLEMENTS	5.00 600.00/hr	3,000.00
4/2/2014	ECS A111 Other RESEARCH CLASS CERTIFICATION CASE LAW FOR GLOBAL CLASS SETTLEMENTS	4.00 600.00/hr	2,400.00
4/3/2014	ECS A111 Other OFFICE CONFERENCE WITH JESSE R CASTILLO; RESEARCH ON CLASS CERTIFICATION ISSUES	2.00 600.00/hr	1,200.00
4/4/2014	ECS A111 Other WORKED ON CLASS ISSUES; TELECONFERENCE WITH EXPERT;	3.00 600.00/hr	1,800.00
4/8/2014	ECS A111 Other VARIOUS TELECONFERENCES, EMAILS, DISCUSSIONS AND RESEARCH REGARDING SETTLEMENT	3.00 600.00/hr	1,800.00
	ECS A111 Other CLASS CERTIFICATION RESEARCH FOR GLOBAL CLASS SETTLEMENTS	3.00 600.00/hr	1,800.00
4/9/2014	ECS A111 Other TELECONFERENCE WITH STEVE SPARLING; EMAILS	1.00 600.00/hr	600.00
4/10/2014	ECS A111 Other TELECONFERENCE WITH MARK MURPHY; EMAILS WITH KROLL COUNSEL	0.50 600.00/hr	300.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
4/14/2014	ECS A111 Other REVIEW EMAIL WITH ISSUES FROM KROLL	0.25 600.00/hr	150.00
4/15/2014	ECS A111 Other EMAIL KROLL COUNSEL; TELECONFERENCE WITH ANTIGUAN JL COUNSEL; EMAIL ANTIGUAN JL COUNSEL; TELECONFERENCE WITH MARK MURPHY	1.00 600.00/hr	600.00
4/17/2014	ECS A111 Other WORKED ON CLASS ACTION ISSUES	1.00 600.00/hr	600.00
4/18/2014	ECS A111 Other TELECONFERENCE WITH JIM SWANSON REGARDING HIS EXISTING CLAIMS VS. KROLL; EMAILS WTH KROLL	0.75 600.00/hr	450.00
4/23/2014	ECS A111 Other EMAILS WITH RECEIVER AND KROLL'S COUNSEL REGARDING LANGUAGE	0.50 600.00/hr	300.00
4/30/2014	ECS A111 Other TELECONFERENCE WITH KROLL'S COUNSEL REGARDING STATUS	0.25 600.00/hr	150.00
5/13/2014	ECS A111 Other TELECONFERENCE WITH MARK MURPHY REGARDING STATUS	0.50 600.00/hr	300.00
5/22/2014	ECS A111 Other PRELIMINARY REVIEW OF DRAFT; REVISED SETTLEMENT AGREEMENT	1.00 600.00/hr	600.00
5/23/2014	ECS A111 Other EMAIL TO CLIENTS AND CO-COUNSEL REGARDING SETTLEMENT; EMAIL TO MARK REGARDING COMMENTS	1.00 600.00/hr	600.00
5/30/2014	ECS A111 Other REVIEW OF COMMENTS FROM RECEIVER'S COUNSEL; TELECONFERENCE WITH MARK MURPHY REGARDING SETTLEMENT STATUS; EMAILS WITH KROLL	0.75 600.00/hr	450.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
6/3/2014	ECS A111 Other LONG TELECONFERENCE WITH KROLL AND MARK MURPHY; EMAIL TO RECEIVER	1.25 600.00/hr	750.00
	JRC A111 Other REVIEW SETTLEMENT DOCUMENTS, DISCUSSION AND EMAIL.	3.00 600.00/hr	1,800.00
6/6/2014	ECS A111 Other TELECONFERENCE WITH RECEIVER REGARDING RELEASE FORMS	0.50 600.00/hr	300.00
6/9/2014	ECS A111 Other PREPARE FOR AND TELECONFERENCE WITH KROLL COUNSEL REGARDING STATUS	0.50 600.00/hr	300.00
6/17/2014	ECS A111 Other REVIEW OF LATEST DRAFT OF SETTLEMENT AGREEMENT; EMAIL COMMENTS TO MURPHY; FOLLOW-UP EMAILS WITH MURPHY	1.75 600.00/hr	1,050.00
7/3/2014	JRC A111 Other REVIEW REVISED SETTLEMENT DOCUMENT LANGUAGE AND EMAIL REFERENCED CONTRIBUTION.	1.20 600.00/hr	720.00
	ECS A111 Other EMAILS REGARDING SETTLEMENT	0.50 600.00/hr	300.00
7/7/2014	ECS A111 Other TRAVEL TO DALLAS; MEETING WITH OSIC AND RECEIVER	1.50 600.00/hr	900.00
7/8/2014	ECS A111 Other REVIEW OF NEW VERSION OF SETTLEMENT AGREEMENT AND BAR ORDER; TELECONFERENCE WITH KROLL COUNSEL; TELECONFERENCE WITH MARK AND SCOTT POWERS	1.75 600.00/hr	1,050.00
7/9/2014	ECS A111 Other REVIEW OF RECEIVER'S COMMENTS TO SETTLEMENT; TELECONFERENCE WITH MARK MURPHY	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
7/10/2014	ECS A111 Other TELECONFERENCE WITH MARK MURPHY AND VARIOUS EMAILS REGARDING SETTLEMENT	1.00 600.00/hr	600.00
7/11/2014	ECS A111 Other EMAILS WITH KEVIN SADLER; TELECONFERENCE WITH MARK MURPHY	0.50 600.00/hr	300.00
7/12/2014	ECS A111 Other PREPARE STATUS MEMO TO CLIENTS	1.00 600.00/hr	600.00
7/20/2014	ECS A111 Other WORK ON KROLL SETTLEMENT DOCUMENTS	3.00 600.00/hr	1,800.00
7/22/2014	ECS A111 Other TELECONFERENCE WITH CO-COUNSEL REGARDING STATUS	0.50 600.00/hr	300.00
7/24/2014	ECS A111 Other EMAILS WITH CO-COUNSEL	0.50 600.00/hr	300.00
7/25/2014	ECS A111 Other TELECONFERENCE WITH KROLL'S COUNSEL REGARDING SETTLEMENT	0.50 600.00/hr	300.00
7/30/2014	ECS A111 Other EMAILS REGARDING SETTLEMENT	0.50 600.00/hr	300.00
8/4/2014	ECS A111 Other REVIEW OF SETTLEMENT AGREEMENT; LONG TELECONFERENCE WITH KROLL	2.00 600.00/hr	1,200.00
8/5/2014	ECS A111 Other WORKED ON REVISING MOTION TO APPROVE SETTLEMENT	3.00 600.00/hr	1,800.00
8/6/2014	ECS A111 Other WORKED ON MOTION FOR APPROVAL	0.50 600.00/hr	300.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
8/7/2014	ECS A111 Other WORKED ON MOTION FOR APPROVAL	1.00 600.00/hr	600.00
8/8/2014	ECS A111 Other REVIEW OF REVISED SETTLEMENT AGREEMENT; WORKED ON MOTION FOR APPROVAL; RESEARCH CASE LAW	1.00 600.00/hr	600.00
8/10/2014	ECS A111 Other WORKED ON MOTION FOR SETTLEMENT APPROVAL AND APPLICATION FOR FEES	5.00 600.00/hr	3,000.00
8/11/2014	ECS A111 Other REVISED AND PROVIDED COMMENTS ON MOTION FOR APPROVAL OF SETTLEMENT; WORKED ON FEE APPLICATIONS	6.00 600.00/hr	3,600.00
8/12/2014	ECS A111 Other REVIEW OF CURRENT SETTLEMENT DRAFT; LONG TELECONFERENCE WITH KROLL COUNSEL REGARDING STATUS OF SETTLEMENT; TELECONFERENCE WITH MARK MURPHY; EMAILS WITH ED DAVIS	1.50 600.00/hr	900.00
8/13/2014	JRC A111 Other REVIEW EMAIL REFERENCE ANTIGUAN RESOLUTION.	0.60 600.00/hr	360.00
8/15/2014	ECS A111 Other WORKED ON FEE APPLICATION; VARIOUS EMAILS	3.00 600.00/hr	1,800.00
8/19/2014	ECS A111 Other TELECONFERENCE WITH KROLL COUNSEL; TELECONFERENCE WITH SCOTT POWERS AND RICHARD ROPER; EMAILS WITH ED DAVIS	1.00 600.00/hr	600.00
8/20/2014	ECS A111 Other VARIOUS EMAILS WITH KEVIN SADLER AND CO-COUNSEL REGARDING KROLL	0.75 600.00/hr	450.00
8/21/2014	JRC A111 Other TRAVEL TO DALLAS (6:30 A.M.); OUT OF OFFICE CONFERENCE WITH MR. VALDESPINO AND MR. MILNER; ATTEND STATUS CONFERENCE;	2.00 600.00/hr	1,200.00



KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
	OUT OF OFFICE CONFERENCE WITH COMMITTEE; EXCHANGE EMAIL WITH MR. SNYDER; RETURN TRAVEL TO SAN ANTONIO (5:00 P.M.)		
8/22/2014 ECS	A111 Other LONG TELECONFERENCE WITH ED DAVIS; EMAIL CLIENTS AND CO-COUNSEL REGARDING SETTLEMENT; EMAIL TO KROLL'S COUNSEL	1.50 600.00/hr	900.00
8/26/2014 ECS	A111 Other TELECONFERENCE WITH ED DAVIS	0.25 600.00/hr	150.00
8/27/2014 ECS	A111 Other TELECONFERENCE WITH KROLL COUNSEL; REVISE BAR ORDER MEMO AND SEND TO KROLL'S COUNSEL	1.00 600.00/hr	600.00
9/2/2014 ECS	A111 Other OFFICE CONFERENCE WITH JASON DAVIS; OFFICE CONFERENCE WITH JESSE R CASTILLO; REVIEW OF STATUS	1.00 600.00/hr	600.00
9/3/2014 ECS	A111 Other MEETING WITH JOHN LITTLE REGARDING FEE APPLICATION	0.50 600.00/hr	300.00
9/4/2014 ECS	A111 Other PREPARED MEMO TO CO-COUNSEL; OFFICE CONFERENCE WITH JESSE R CASTILLO; FOLLOW-UP TELECONFERENCE WITH JASON DAVIS	1.50 600.00/hr	900.00
9/8/2014 ECS	A111 Other REVIEW OF REVISED SETTLEMENT AGREEMENT; REVIEW OF REVISED MOTION TO APPROVE; TELECONFERENCE WITH KROLL'S COUNSEL	1.50 600.00/hr	900.00
9/9/2014 ECS	A111 Other PROVIDE COMMENTS TO SETTLEMENT AGEEMENT AND MOTION TO APPROVE	1.00 600.00/hr	600.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
9/11/2014 ECS	A111 Other VARIOUS EMAILS	0.50 600.00/hr	300.00
9/16/2014 ECS	A111 Other EMAILS AND TELECONFERENCE WITH MARK MURPHY AND J. LITTLE	0.25 600.00/hr	150.00
9/17/2014 ECS	A111 Other EMAILS WITH MARK MURPHY REGARDING REMAINING ITEMS ON KROLL SETTLEMENT	0.25 600.00/hr	150.00
9/18/2014 ECS	A111 Other REVIEW LETTER FROM JANVEY; VARIOUS EMAILS	0.75 600.00/hr	450.00
9/22/2014 ECS	A111 Other TELECONFERENCE WITH RECEIVER AND COUNSEL REGARDING SETTLEMENT; REVIEW LETTER FROM RECEIVER; FOLLOW UP TELECONFERENCE WITH CO-COUNSEL	0.75 600.00/hr	450.00
9/25/2014 ECS	A111 Other REVIEW EMAILS	0.25 600.00/hr	150.00
10/28/2014 ECS	A111 Other TELECONFERENCE WITH CO-COUNSEL AND CLIENTS REGARDING SETTLEMENT STATUS	0.50 600.00/hr	300.00
10/30/2014 ECS	A111 Other TELECONFERENCE WITH KROLL COUNSEL REGARDING SETTLEMENT	0.50 600.00/hr	300.00
11/11/2014 ECS	A111 Other EMAILS WITH CO-COUNSEL	0.25 600.00/hr	150.00
11/12/2014 ECS	A111 Other EMAILS	0.25 600.00/hr	150.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
11/19/2014 ECS	A111 Other TELECONFERENCE WITH CO-COUNSEL AND RECEIVER REGARDING STATUS OF SETTLEMENT	0.75 600.00/hr	450.00
11/20/2014 ECS	A111 Other TELECONFERENCE WITH KROLL REGARDING STATUS OF SETTLEMENT	0.50 600.00/hr	300.00
11/25/2014 ECS	A111 Other TELECONFERENCE WITH KROLL COUNSEL REGARDING STATUS OF SETTLEMENT; WORKED ON REPORT TO CLIENTS	1.00 600.00/hr	600.00
12/8/2014 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY; EMAILS WITH ED VALDESPINO	0.25 600.00/hr	150.00
12/9/2014 ECS	A111 Other REVIEW OF SIDE LETTER; ATTEND OSIC MEETING WITH RECEIVER	1.00 600.00/hr	600.00
12/11/2014 ECS	A111 Other TELECONFERENCE WITH KROLL'S COUNSEL REGARDING SETTLEMENT; TELECONFERENCE WITH JASON DAVIS	0.75 600.00/hr	450.00
12/12/2014 ECS	A111 Other REVIEW AND REVISE LONG FORM SETTLEMENT NOTICE	1.00 600.00/hr	600.00
12/13/2014 ECS	A111 Other TELECONFERENCE WITH KROLL'S COUNSEL; TELECONFERENCE WITH MARK MURPHY; EMAILS	0.75 600.00/hr	450.00
12/29/2014 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY	0.25 600.00/hr	150.00
1/5/2015 ECS	A111 Other TELECONFERENCE WITH CO-COUNSEL AND CLIENT	0.50 600.00/hr	300.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
1/13/2015 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY REGARDING STATUS OF SETTLEMENT	0.25 600.00/hr	150.00
1/16/2015 ECS	A111 Other LONG TELECONFERENCE WITH KROLL'S COUNSEL REGARDING STATUS OF SETTLEMENT; VARIOUS FOLLOW UP EMAILS	2.00 600.00/hr	1,200.00
1/19/2015 ECS	A111 Other EMAILS REGARDING SETTLEMENT	0.25 600.00/hr	150.00
1/21/2015 ECS	A111 Other TELECONFERENCE WITH KROLL COUNSEL REGARDING 1-800 NUMBER	0.25 600.00/hr	150.00
2/9/2015 ECS	A111 Other REVIEW OF EMAIL REGARDING KROLL'S FILING FOR BANKRUPTCY; VARIOUS EMAILS WITH CO-COUNSEL	1.00 600.00/hr	600.00
2/11/2015 ECS	A111 Other TELECONFERENCE WITH BUNCHER AND LITTLE REGARDING KROLL; VARIOUS EMAILS	1.00 600.00/hr	600.00
2/16/2015 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY X2 REGARDING TOM CASH	0.25 600.00/hr	150.00
3/18/2015 ECS	A111 Other REVIEW REVISED SETTLEMENT DOCUMENTS; TELECONFERENCE WITH KROLL'S COUNSEL	1.00 600.00/hr	600.00
4/14/2015 ECS	A111 Other TELECONFERENCE WITH KROLL REGARDING SETTLEMENT AND BANKRUPTCY STATUS	0.25 600.00/hr	150.00
4/29/2015 ECS	A111 Other EMAILS REGARDING PROOF OF CLAIM IN KROLL BANKRUPTCY	0.25 600.00/hr	150.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
5/1/2015 ECS	A111 Other EMAILS REGARDING SETTLEMENT	0.25 600.00/hr	150.00
5/4/2015 ECS	A111 Other REVIEW OF BANKRUPTCY FILINGS	1.00 600.00/hr	600.00
5/5/2015 ECS	A111 Other REVIEW OF SETTLEMENT DOCUMENTS; EMAILS TO CO-COUNSEL	1.50 600.00/hr	900.00
5/6/2015 ECS	A111 Other EMAILS REGARDING CHANGES TO SETTLEMENT	0.50 600.00/hr	300.00
5/7/2015 ECS	A111 Other EMAILS REGARDING SETTLEMENT; TELECONFERENCE WITH MARK MURPHY	1.00 600.00/hr	600.00
5/11/2015 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY; REVIEW OF LATEST DRAFT OF KROLL SETTLEMENT AND SCOTT POWERS COMMENTS TO SAME; TELECONFERENCE WITH SCOTT POWERS AND MARK MURPHY	2.50 600.00/hr	1,500.00
5/29/2015 ECS	A111 Other EMAILS WITH CO-COUNSEL	0.25 600.00/hr	150.00
6/2/2015 ECS	A111 Other REVIEW OF CHANGES TO SETTLEMENT DOCUMENTS; ATTENDED TELECONFERENCE WITH KROLL; FOLLOW UP EMAILS	1.00 600.00/hr	600.00
6/3/2015 ECS	A111 Other REVIEW AND RESPOND TO MULTIPLE EMAILS REGARDING BANKRUPTCY AND SETTLEMENT	0.75 600.00/hr	450.00
6/10/2015 JRC	A111 Other REVIEW APPROVAL OF DISCLOSURE STATEMENT.	0.50 600.00/hr	300.00

## KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
6/12/2015 ECS	A111 Other REVIEW AND RESPOND TO VARIOUS EMAILS; REVIEW KROLL'S BANKRUPTCY NOTICE	0.50 600.00/hr	300.00
6/17/2015 ECS	A111 Other TELECONFERENCE WITH MARK MURPHY; REVIEW OF KROLL REVISIONS TO SETTLEMENT DOCS; EMAILS REGARDING: SETTLEMENT	1.50 600.00/hr	900.00
6/18/2015 ECS	A111 Other TELECONFERENCE WITH TEAM REGARDING KROLL SETTLEMENT	1.00 600.00/hr	600.00
6/23/2015 ECS	A111 Other STATUS AT TELECONFERENCE WITH KROLL AND TEAM	0.25 600.00/hr	150.00
6/24/2015 ECS	A111 Other TELECONFERENCE WITH KROLL AND ITS BANKRUPTCY COUNSEL; FOLLOW-UP CALLS WITH MARK MURPHY AND TEAM	1.25 600.00/hr	750.00
7/10/2015 ECS	A111 Other VARIOUS EMAILS REGARDING : BANKRUPTCY	0.50 600.00/hr	300.00
7/11/2015 ECS	A111 Other EMAILS REGARDING KROLL	0.25 600.00/hr	150.00
7/14/2015 ECS	A111 Other REVIEW OF REVISED SETTLEMENT DOCUMENTS; PARTICIPATED IN TELECONFERENCE WITH KROLL	1.50 600.00/hr	900.00
7/22/2015 ECS	A111 Other VARIOUS EMAILS REGARDING : SETTLEMENT	0.50 600.00/hr	300.00
8/4/2015 ECS	A111 Other TELECONFERENCE WITH TEAM REGARDING : SETTLEMENT STATUS	0.50 600.00/hr	300.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2015 ECS	A111 Other EMAILS REGARDING : BANKRUPTCY APPROVAL OF SETTLEMENT	0.25 600.00/hr	150.00
8/27/2015 ECS	A111 Other TELECONFERENCE WITH KROLL REGARDING : BANKRUPTCY STATUS	0.25 600.00/hr	150.00
8/28/2015 ECS	A111 Other TRAVEL TO DALLAS; ATTEND OSIC MEETING WITH RECEIVER; DISCUSS SETTLEMENT STATUS OF KROLL	2.50 600.00/hr	1,500.00
9/3/2015 ECS	A111 Other BEGAN WORK ON ATTORNEY DECLARATION	1.00 600.00/hr	600.00
9/23/2015 ECS	A111 Other EMAILS WITH CO-COUNSEL AND CLIENT REGARDING STATUS	0.25 600.00/hr	150.00
11/2/2015 ECS	A111 Other REVIEW OF SETTLEMENT DOCUMENTS AS REVISED BY KROLL; EMAIL TO KROLL COUNSEL; EMAILS TO TEAM	1.00 600.00/hr	600.00
11/11/2015 ECS	A111 Other REVIEW OF FINAL SETTLEMENT DOCUMENTS; EMAILS TO CO-COUNSEL; EMAIL TO JIM SWANSON; EMAIL TO PAM REED REGARDING DOCUMENTS FOR THEM TO SIGN; FOLLOW UP EMAILS WITH JIM SWANSON; TELECONFERENCE WITH PAM REED; EMAILS WITH JOHN LITTLE AND RECEIVER	2.50 600.00/hr	1,500.00
11/13/2015 ECS	A111 Other EMAILS WITH JOHN LITTLE; BAKER BOTTS AND JIM SWANSON; EMAILS IWTH ANTIGUAN JL COUNSEL	0.50 600.00/hr	300.00
11/16/2015 ECS	A111 Other VARIOUS EMAILS REGARDING EXECUTION OF SETTLEMENT	0.25 600.00/hr	150.00
11/18/2015 ECS	A111 Other VARIOUS EMAILS REGARDING EFFECTUATION OF SETTLEMENT; TELECONFERENCE WITH TEAM REGARDING ISSUES WITH	1.50 600.00/hr	900.00

KROLL

## SETTLEMENT AND JL'S

		<u>Hrs/Rate</u>	<u>Amount</u>
11/30/2015 ECS	A111 Other EMAILS REGARDING SETTLEMENT AGREEMENT SIGNATURES FROM ANTIGUA JLS AND JIM SWANSON	0.50 600.00/hr	300.00
12/2/2015 ECS	A111 Other TELECONFERENCE WITH JASON DAVIS; EMAILS WITH JOHN LITTLE AND SCOTT POWERS REGARDING SETTLEMENT	0.75 600.00/hr	450.00
12/7/2015 ECS	A111 Other TRAVEL TO DALLAS; MEETING WITH OSIC AND RECEIVER TO DISCUSS CASE STATUS; RETURN TRAVEL TO SAN ANTONIO	2.00 600.00/hr	1,200.00
12/8/2015 ECS	A111 Other EMAILS REGARDING SETTLEMENT	0.25 600.00/hr	150.00
12/14/2015 ECS	A111 Other WORKED ON MOTION TO APPROVE AND FEE APPLICATION	2.50 600.00/hr	1,500.00
1/5/2016 ECS	A111 Other EMAILS REGARDING STATUS OF SETTLEMENT	0.25 600.00/hr	150.00
1/8/2016 ECS	A111 Other WORKED ON ATTORNEY FEE DECLARATION	3.00 600.00/hr	1,800.00
1/11/2016 ECS	A111 Other WORKED ON ATTORNEY FEE DECLARATION; TELECONFERENCE WITH GROUP REGARDING SETTLEMENT; SENT EMAIL TO SPARLING	1.00 600.00/hr	600.00
1/12/2016 ECS	A111 Other WORKED ON MOTION TO APPROVE; REVIEW OF FINAL AND WORK DONE ON CASE; REVIEW COMPLAINT	2.50 600.00/hr	1,500.00



KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
1/13/2016 ECS	A111 Other TELECONFERENCE WITH KROLL'S COUNSEL REGARDING MOTION TO APPROVE; WORKED ON MOTION TO APPROVE	3.00 600.00/hr	1,800.00
1/14/2016 ECS	A111 Other REVIEW OF FILE; REVIEW OF COMPLAINT; REVIEW OF TIME RECORDS AND WORK ON MOTION TO APPROVE SETTLEMENT	6.00 600.00/hr	3,600.00
1/15/2016 ECS	A111 Other REVISED MOTION TO APPROVE SETTLEMENT AND REVISED AND FINALIZED DECLARATION IN SUPPORT; MEETING WITH JASON DAVIS	5.00 600.00/hr	3,000.00
1/18/2016 ECS	A111 Other REVIEW MOTION TO APPROVE FEE APP AND PROVIDE COMMENTS	1.00 600.00/hr	600.00
1/19/2016 ECS	A111 Other EMAILS WITH CO-COUNSEL REGARDING SETTLEMENT DOCUMENTS	0.50 600.00/hr	300.00
1/20/2016 ECS	A111 Other FINAL REVIEW AND REVISIONS AND FORWARD MOTION FOR APPROVAL TO KROLL; TELECONFERENCE WITH JOHN LITTLE	1.00 600.00/hr	600.00
2/1/2016 ECS	A111 Other REVIEW RECENT CASE ON SETTLEMENT APPROVALS; EMAIL CO-COUNSEL	0.50 600.00/hr	300.00
2/8/2016 ECS	A111 Other EMAIL TO KROLL COUNSEL REGARDING SETTLEMENT STATUS	0.25 600.00/hr	150.00
2/18/2016 ECS	A111 Other VARIOUS EMAILS REGARDING MOTION TO APPROVE	0.25 600.00/hr	150.00
2/22/2016 ECS	A111 Other REVIEW OF REVISED MOTION FOR APPROVAL; REVIEW AND REVISE MOTION TO APPROVE ATTORNEY'S FEES; EMAILS	2.50 600.00/hr	1,500.00

KROLL

		<u>Hrs/Rate</u>	<u>Amount</u>
2/26/2016	ECS A111 Other VARIOUS EMAILS REGARDING FINAL CHANGES TO MOTION TO APPROVE SETTLEMENT; TELECONFERENCE WITH JASON DAVIS	1.50 600.00/hr	900.00
<b>For professional services rendered</b>		<b>1055.45</b>	<b>\$626,020.00</b>
Additional Charges :			
		<u>Qty/Price</u>	
6/25/2012	BC E106 Online research PACER	1 23.40	23.40
6/26/2012	BC E108 Postage	1 5.30	5.30
	BC E101 Copying Texas Star Document Services (Inv. #49034); Med. Scanning; Master CD Export	1 379.26	379.26
10/1/2012	BC E108 Postage	1 4.90	4.90
5/28/2013	JRC E110 Out-of-town travel Airfare	1 784.78	784.78
	JRC E110 Out-of-town travel Hotel - New York	1 786.78	786.78
	JRC E110 Out-of-town travel Taxi to Hotel	1 49.63	49.63
	JRC E110 Out-of-town travel Meals	1 42.00	42.00

KROLL

		<u>Qty/Price</u>	<u>Amount</u>
5/30/2013 JRC	E110 Out-of-town travel Taxi to Airport	1 60.83	60.83
JRC	E110 Out-of-town travel Hotel St. Louis (flight cancelled)	1 104.33	104.33
JRC	E110 Out-of-town travel Tax - St. Louis	1 20.00	20.00
JRC	E110 Out-of-town travel Parking - S.A. Airport	1 30.00	30.00
	<b>Total additional charges</b>		<u>\$2,291.21</u>
	<b>Total amount of this bill</b>		<u>\$628,311.21</u>
	Balance due		<u><u>\$628,311.21</u></u>

## **EXHIBIT 3**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

STANFORD INTERNATIONAL BANK, LTD., *et al.*,

Defendants.

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§

Case No. 3:09-cv-0298-N

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**DECLARATION OF EDWARD F. VALDESPINO  
IN SUPPORT OF RECEIVER, OSIC AND INVESTOR PLAINTIFFS’ EXPEDITED  
REQUEST FOR ENTRY OF SCHEDULING ORDER AND MOTION TO APPROVE  
PROPOSED SETTLEMENT WITH KROLL, TO APPROVE THE PROPOSED NOTICE  
OF SETTLEMENT WITH KROLL, TO ENTER THE BAR ORDER, AND FOR  
PLAINTIFFS’ ATTORNEYS’ FEES**

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Pursuant to 28 U.S.C. § 1746, I, Edward F. Valdespino, hereby declare under penalty of perjury that I have personal knowledge of the following facts:

**BACKGROUND**

1. I submit this Declaration in support of the Receiver, Official Stanford Investors Committee (“OSIC”) and Investor Class Plaintiffs’ (the “Investor Plaintiffs”) (collectively, the “Plaintiffs”) Expedited Request for Entry of Scheduling Order and Motion to Approve Proposed Settlement with KROLL, to Approve the Proposed Notice of Settlement with KROLL, to Enter the Bar Order, and for Plaintiffs’ Attorneys’ Fees (the “Motion”).

2. The settlement for which approval is sought in the Motion settles all claims asserted against KROLL, LLC (f/k/a KROLL, INC.) and KROLL ASSOCIATES, INC. (collectively, “KROLL”), for \$24 million (the “KROLL Settlement”).

3. I am a former partner in the Commercial Litigation section of Strasburger & Price, LLP. I served and my former law firm continues to serve as Plaintiff's co-counsel in the pursuit of claims against KROLL for actions arising from KROLL's participation in the Stanford Ponzi Scheme. I actively participated in all material aspects of the claims from the investigative stage to the current status. The other firms that have been involved in the investigation and prosecution of the KROLL claims include Davis & Santos, P.C. ("Davis Santos"), which serves as lead counsel, Castillo Snyder P.C. ("Castillo Snyder"), Neligan Foley LP ("Neligan Foley"), and Butzel Long ("Butzel Long").

#### **CURRICULUM VITAE**

4. I was admitted to practice law in the State of Texas in 1987. I am also admitted to practice before the United States District Courts for the Northern, Southern and Western districts of Texas and the United States Court of Appeals for the Fifth Circuit. Throughout my career, I have handled complex commercial litigation for both corporate and individual clients, acting as both defendants' and plaintiffs' counsel

5. Strasburger & Price LLP ("Strasburger") was founded in 1939 and currently has approximately 220 attorneys with offices in Austin, Dallas, Frisco, Houston and San Antonio, Texas. Strasburger also maintains offices in New York, Washington, D.C. and Mexico City.

6. Strasburger is a full service firm with attorneys in multiple practice areas providing relevant and meaningful expertise to prosecute the KROLL claims. Strasburger has served as lead counsel in countless lawsuits concerning various areas of the law, including:

- a. securities litigation;
- b. fiduciary litigation;
- c. class action litigation;

- d. attorney malpractice; and
- e. accounting malpractice.

7. Strasburger attorneys also have handled numerous complex bankruptcy and receivership cases and litigation associated with those cases, representing creditors, receivers and trustees.

8. Strasburger also maintains a strong Appellate group that has been actively involved in the KROLL claims and all other Stanford lawsuits.

9. To date, the following current and former Strasburger attorneys have provided substantive assistance for the prosecution of these KROLL claims:

- a. Michael Jung;
- b. Judith Blakeway;
- c. Edward Valdespino (former Partner);
- d. David Cibrian (former Partner);
- e. Andy Kerr;
- f. Lee Polson;
- g. Margaret Hagelman; and
- h. Kelsey Sproull.

A detailed description of Strasburger, its areas of practice as well as the personal background and experience of the above referenced attorneys are set forth on Strasburger's website, [www.Strasburger.com](http://www.Strasburger.com).

### STRASBURGER'S WORK ON THE STANFORD CASES

10. In February of 2009, shortly after the collapse of Stanford, Strasburger was retained by approximately 2300 Stanford victims who lost approximately \$570,000,000. We then began investigating potential claims against third party defendants.

11. Together with Castillo Snyder, we approached the Receiver to offer assistance. Later, I filed putative class action lawsuits against the Willis and the Proskauer Defendants on behalf of Venezuelan investors that were ultimately combined into the current Troice Class Action Cases.<sup>1</sup> After the Official Stanford Investor's Committee ("OSIC") was formed, I was asked to become a member and have served on that committee, without compensation.

12. Through cooperation with other counsel and counsel for the Receiver, multiple class action lawsuits were filed on behalf of Stanford investors, as well as litigation filed on behalf of OSIC, including the following cases: *Janvey v. Willis of Colorado, Inc.*, Case No. 3:13-cv-03980; *Janvey v. Proskauer Rose, LLP*, Case No. 3:13-cv-477; *Janvey v. Greenberg Traurig, LLP*, Case No. 3:12-cv-04616; and *Turk v. Pershing, LLC*, Case No. 3:09-cv-02199. Strasburger is co-counsel in all of the aforementioned cases.

13. In addition, Strasburger has also been engaged as lead counsel to represent the OSIC in the following fraudulent transfer cases along with co-counsel:

- a. *The Official Stanford Investor's Committee v. American Lebanese Syrian Associated Charities, Inc., et al*; Civil Action No. 3:11-cv-00303-N-BG;
- b. *Janvey v. InsideOut Sports & Entertainment*, Civil Action No. 3:11-cv-00760-N-BG;

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<sup>1</sup> *Troice v. Willis of Colorado, et al*, Civil Action No. 3:09-CV-01274-N-BG and *Troice v. Proskauer Rose, LLP et al*, Civil Action No. 3:09-CV-01600-N-BG ("Troice Class Actions").



- c. *Janvey v. Interim Executive Management, Inc.*, Civil Action No. 3:10-cv-00829-N-BG;
- d. *Janvey v. Merge Healthcare, Inc.*; Civil Action No. 3:10-cv-01465-N-BG;
- e. *Janvey v. Tonarelli*; Civil Action No. 3:10-cv-01955-N-BG; and
- f. *Janvey v. Vingerhoedt, et al*; Civil Action No. 3:11-cv-00291-N-BG.

14. Since February of 2009, myself and Strasburger have spent thousands of hours investigating and prosecuting Stanford litigation on a contingent fee basis. This process began by meeting and interviewing clients and former employees of Stanford in both the United States and in Mexico. We also reviewed documents that we obtained from these individuals, from the internet and from other public sources. We also met with independent witnesses and gleaned information from the public filings of the SEC and Receiver. Through this process, we gained knowledge of the complex structure of Stanford entities, their operations, financial transactions and the relationships between them and the defendants that we have sued. Through this investigation we gained an understanding of how the Ponzi scheme was perpetrated and how Strasburger clients were victimized through the participation of the third party defendants. It was only through this extensive and comprehensive investigation that we could identify and develop the claims against the third party defendants.

15. Well in excess of 50% of my practice over the last 6 years has been dedicated to these Stanford cases. As a direct consequence, I was required to turn down billable work that I otherwise would have been able to accept.

16. Strasburger has participated as co-counsel in every facet of the prosecution of the KROLL claims, including the investigation of the facts and legal theories that form the bases for the claims and the preparation of a complaint. Strasburger also served as co-lead counsel in the

successful appeal of the dismissal of the Troice Class Action cases under SLUSA to the Fifth Circuit and the U.S. Supreme Court (“SLUSA Appeal”). The SLUSA Appeal directly impacted the KROLL claims because the claims against KROLL include allegations of violations of the Texas Securities Act that were the basis for the SLUSA appeals in the Troice Class Actions. Strasburger appellate partners, Michael Jung and Judith Blakeway, were heavily involved in preparing and presenting the briefs to the Fifth Circuit and to the Supreme Court of the United States. In addition, Mike Jung successfully argued the case before the Fifth Circuit.

17. Throughout this process, we have coordinated our activities with the Receiver and his counsel, the Examiner, other members of the OSIC, the SEC and the Department of Justice. On numerous occasions I have also traveled to Washington, D.C. to discuss and coordinate activities with the SEC and DOJ. I have also met with members of the U.S. Senate and US. Congress and their staff. I have interviewed numerous witnesses and reviewed thousands of documents, including spending weeks at the Receiver’s document warehouse in Houston. Strasburger partner, Margaret Hagelman and I traveled to Antigua to search for additional documents with counsel for the Receiver. I have also reviewed the databases maintained by the Receiver, and the trial transcripts of the Stanford criminal trial as well as the exhibits used at trial.

18. In my opinion, my involvement and the involvement of Strasburger in all of the related Stanford Cases has proven invaluable to the successful prosecution and resolution of the KROLL claims. In addition, it is also my opinion that the proposed KROLL settlement could not have been accomplished without the substantial amount of time and effort expended by all Plaintiffs’ Counsel and their tireless efforts in the Stanford Cases.

**STRASBURGER'S WORK ON THE KROLL  
CLAIMS AND SETTLEMENT**

19. We began our investigation of potential claims against Kroll in 2009. As a part of that investigation, we reviewed and analyzed thousands of documents, including emails of Stanford personnel and KROLL personnel. We also reviewed the investigative reports prepared by KROLL for various Stanford entities. Because of a cooperation agreement with the SEC we were also able to obtain additional investigative materials concerning key witnesses. To gain a clearer understanding of the work performed and the financial structure and condition of KROLL, Strasburger enlisted the assistance of a forensic accountant to evaluate various issues. We then researched relevant case law to develop viable claims against KROLL, based upon the facts uncovered during our investigation that substantiated those claims. We further investigated theories of causation and damage models for all classes of Plaintiffs.

20. Based upon our comprehensive investigation of the myriad Stanford entities, their relationship with KROLL and KROLL's role in the Ponzi scheme, we participated in formulating the causes of action and damage claims and prepared a comprehensive Complaint to use as a basis to make a demand. The KROLL claims were instituted on behalf of the Stanford Investor victims as a putative class and on behalf of the OSIC. Among other claims, the Plaintiffs asserted causes of action against KROLL for negligence, aiding and abetting violations of the TSA, aiding and abetting breaches of fiduciary duty, participation in a fraudulent scheme, and conspiracy.

21. Ultimately, the parties agreed to participate in a mediation that resulted in a settlement. That mediation was conducted with former Judge Milonas on May 29, 2013.

22. I prepared for and participated in the mediation. The mediation lasted two days, resulting in the \$24 million settlement that is the subject of this Motion. Even after the

agreement was reached, Plaintiffs' counsel, the Examiner and counsel for the Receiver, continued to work on the terms of the closing documents for approximately 2 years before the final documents were signed. During this time period, the parent company of KROLL filed for bankruptcy protection, which required additional attorney time and effort to conclude the settlement. Without the relentless efforts of the Receiver, Examiner, OSIC, Investor Plaintiffs and Plaintiffs' counsel investigating, developing and prosecuting these claims as a part of the overall effort to recover money from third parties for the benefit of all Stanford Investors, this settlement could not have been achieved and the KROLL claims would likely have continued for years with uncertain outcome and great expense to the parties.

#### **REQUEST FOR APPROVAL OF THE SETTLEMENT**

26. I respectfully submit that, based upon years of experience prosecuting and settling complex commercial litigation, the KROLL Settlement is fair and reasonable and in the best interests of the Stanford receivership estate and the Stanford investors and should be approved by the Court. I also believe that the KROLL Settlement represents the best result that could be achieved given the limits of KROLL's insurance and the bankruptcy of its parent company. The risks, uncertainty and the length of time it would take to get to trial further favors the settlement. In light of these practical considerations impacting the ability of KROLL to pay a judgment, the KROLL Settlement represents an extremely good result for the Stanford receivership estate and its investors. Therefore, I believe the KROLL Settlement is in the best interests of the Stanford receivership estate and its investors and should be approved.

#### **REQUEST FOR APPROVAL OF ATTORNEYS' FEES**

27. Plaintiffs' Counsel have been jointly handling all of the Stanford Cases referenced above, including the KROLL claims, pursuant to twenty-five percent (25%) contingency fee

agreements with OSIC (in cases in which OSIC is a named Plaintiff) and the Investor Plaintiffs (in investor class action lawsuits). The Movants seek Court approval to pay Plaintiffs' Counsel a fee equal to an aggregate of twenty-five percent (25%) of the Net Recovery in the KROLL claims.

28. I respectfully submit the fee requested in the Motion is reasonable in comparison to the total net amount to be recovered for the benefit of the Stanford investors. The twenty-five percent (25%) contingency fee was heavily negotiated between OSIC and Plaintiffs' Counsel, and is substantially below the typical market rate contingency fee percentage of 33% to 40% that most law firms would demand to handle cases of this complexity and magnitude. In certain instances, OSIC interviewed other potential counsel who refused to handle the lawsuits without a higher percentage fee. The KROLL claims and the other third-party lawsuits are extraordinarily large and complex, involving voluminous records and electronic data and requiring many years of investigation, discovery and dispositive motions to get to trial.

29. Moreover, the KROLL claims and the companion Stanford Cases, many of which were filed over 6 years ago, involve significant financial outlay and risk by Plaintiffs' Counsel. The investor class actions were dismissed following the Court's SLUSA ruling, and are only now proceeding toward class discovery and motions to certify. Plaintiffs' Counsel therefore has, for many years now, borne significant risk of loss through dispositive motions or at trial after years of work for no compensation, and an almost certain appeal following any victory at trial. A twenty-five percent (25%) contingency fee is reasonable given the time and effort required to litigate these cases, their complexity and the risks involved.

30. Since February 2009, myself and Strasburger have dedicated thousands of hours of time to the prosecution of Stanford litigation on a contingent fee basis. This includes time spent

investigating and understanding the background and history of the complex web of Stanford companies, the operations, financial transactions, interrelationship and dealings between and among the various Stanford entities and the defendants we have sued, the facts relating to the Ponzi scheme and how it was perpetrated through the various Stanford entities, and the involvement of the third-party defendants in the foregoing cases with Stanford. Without a comprehensive investigation and understanding of this background and the requisite legal skill, it would not have been possible to formulate viable claims against the third-party defendants and prosecute them successfully.

31. A review of the Court's docket in all of these cases reveals only a portion of the immense amount of work that Plaintiffs' Counsel have put into the prosecution of all of these lawsuits since 2009. The docket and pleadings reveal only the work that is filed with the Court. As discussed further herein, and as the Court is aware, the prosecution of lawsuits of this magnitude, complexity and novelty has required a tremendous amount of time and effort to investigate the facts, research the relevant legal issues, coordinate and strategize with counsel and clients regarding the handling of the cases, conduct discovery, prepare the briefs and motions, attempt to negotiate settlements, and prepare cases for summary judgment and/or trial. Plaintiffs' Counsel have collectively spent thousands of hours since 2009 in their investigation and prosecution of the lawsuits referenced above, including the KROLL claims. Because of the amount of time dedicated to those cases, Plaintiff's counsel was precluded from performing other legal work.

32. Over the last 6 years, myself and other attorneys and paralegals from Strasburger have spent thousands of hours in uncompensated time worth millions of dollars investigating and prosecuting the Stanford Cases, including the KROLL claims. Well in excess of 50% of my

practice over the last 6 years has been dedicated to these Stanford cases. I personally have worked many late nights and weekends for the last 6 years on Stanford cases or Stanford-related matters with virtually no compensation.

33. I have personally tracked the time spent by my firm working on Stanford litigation, which is recorded on a daily basis through detailed time records and identified the time attributable to the KROLL claims.<sup>2</sup> Based upon my professional judgment and experience with cases of similar novelty, complexity and importance, I believe that the hours and fees reflected in Exhibit A are reasonable and necessary for the effective resolution of this case.

34. The result of that attribution analysis is that Strasburger spent 332.1 hours of attorney and paralegal time worth \$181,085.00 at applicable hourly rates for complex cases of this nature that I feel is rightfully and equitably attributable to the KROLL claims. I am familiar with the legal practice in the Northern District of Texas and have knowledge of the usual and customary rates charged for legal services required in this and similar cases. I am also familiar with the type and amount of legal services reasonably necessary and the nature of the work required to prosecute this type of matter.

35. In addition to the efforts described herein specifically spent on the KROLL claims, Plaintiffs' Counsel were also involved in the briefing and argument of the SLUSA Appeal to the Fifth Circuit and the United States Supreme Court in the Troice Class Actions. But for Plaintiffs' Counsel's efforts over several years to win the SLUSA appeal, the KROLL claims could not have proceeded.

36. The proposed settlement is the direct result of many years of effort and thousands of hours of work by the Receiver, OSIC, Investor Plaintiffs and Plaintiffs' Counsel as described herein. But for the efforts of these parties, and the efforts of myself and Strasburger described

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<sup>2</sup> Attached and incorporated herein as Exhibit "A" is a true and correct copy of the billing statements.

herein, there would be no KROLL Settlement, which will net the Receivership estate and the Stanford investors approximately \$18 million they would not have otherwise received.

37. In light of the tremendous time and expense myself and my law firm and the other Plaintiffs' Counsel have put into the overall effort to recover monies for the Stanford Receivership Estate and the investors, all of which was necessary to the successful prosecution and resolution of the KROLL claims, I respectfully submit that the twenty-five percent (25%) fee to be paid to counsel for OSIC and the Investor Plaintiffs for the settlement of the KROLL claims is very reasonable. Myself, Strasburger and the other Plaintiffs' Counsel have worked tirelessly for six years to attempt to recover money for the benefit of Stanford's investors for virtually no compensation.

38. In addition, Strasburger requests reimbursement for the following expenses:

Edward Valdespino travel to warehouse and meetings in Houston – 03/02/11 - \$236.13;

Edward Valdespino travel to warehouse and meetings in Houston – 03/21/11 - \$205.85;

Edward Valdespino travel to warehouse and meetings in Houston (Meals) – 03/21/11 - \$193.21;

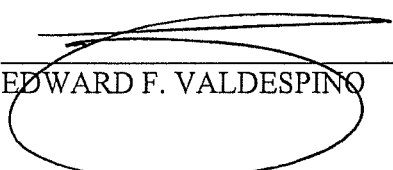
Accounting consulting expert BKD, LLP – 03/11/13 - \$4,362.54;

Accounting consulting expert BKD, LLP – 05/09/13 – 4,919.72;

Edward Valdespino out-of-town travel to attend mediation – 05/29/13 - \$1,503.46

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 3, 2016.

  
EDWARD F. VALDESPINO



## **EXHIBIT 3-A**

USER: pblancha

Strasbourg & Price L.L.P.  
PROFORMA NUMBER 766757  
CREATED 03/02/16

Page 1 (1)

RUN: 03/02/16  
TIME: 15:13:26

CLIENT: 40936 The Official Stanford Investors Committee  
MATTER: 40936.0101 OSIC/Kroll  
BILLING ATTORNEY: 1138 Judith R. Blakeway

FEES THRU: 03/02/16 INVOICE #: \*\*\*\*\*  
EXPENSES THRU: 03/02/16 INVOICE DATE: 03/02/16  
MATTER TYPE: OP

ADDRESS AND ARRANGEMENT INFORMATION

The Official Stanford Investors Committee  
c/o John J. Little, Examiner  
Little Pedersen Fankhauser LLP  
901 Main Street, Suite 4110  
Dallas, TX 75202

TEMPLATE: XS  
BILL FORMAT CODE: 153A  
RATE SET ID:  
MATTER RATE CODE: 1  
BILLING FREQUENCY: R

MATTER NARRATIVE:  
The Official Stanford Investors Committee v. ~ Kroll, Inc. et al ~  
MATTER BILLING INSTRUCTIONS:

- STMT REF LINE 1
- STMT REF LINE 2
- STMT REF LINE 3
- STMT REF LINE 4
- STMT REF LINE 5
- STMT REF LINE 6
- STMT REF LINE 7
- STMT REF LINE 8
- STMT REF LINE 9
- BANA Assigned Atty

BILLING INSTRUCTIONS

Inactive Matter Signature: \_\_\_\_\_  
 Bill All  
 Edits Included  
 Transfers  
 Include Transfers  
 Write-Off  
 A11 (\$ \_\_\_\_\_ )  
 Reduction of Fees (\$ \_\_\_\_\_ )  
 Reduction of Costs (\$ \_\_\_\_\_ )  
 Hold  
 Fees Costs A11  
 Create new proforma after edits  
 Include current time and costs

Approval

Comments:

\_\_\_\_\_

Strasburger & Price L.L.P.  
 FOR PROFORMA 766757 CREATED 03/02/16  
 CLIENT: 40936 The Official Stanford Investors Committee MATTER: 40936.0101 OSIC/Kroll

		CURRENT PROFORMA			
	WORKED VALUE	WRITE UP (DOWN)	BILLING VALUE	REVISED BILLING VALUE	
HOURS:	332.10		332.10		
FEES:	181085.00	.00	181085.00		
COSTS:	23.49	.00	23.49		
TOTAL:	181108.49	.00	181108.49		

MULTIPAYOR BILLING SUMMARY

Client #	Client Name	Percentage	Amount	Ledger Code
Total		.00%	.00	

TIMEKEEPER SUMMARY

TIMEKEEPER	WORKED				BILLING			
	HOURS	RATE	VALUE	STANDARD VALUE	HOURS	RATE	VALUE	
1138 JRB	Judith R. Blakeway	3.00	700.00	2100.00	3.00	700.00	2100.00	
1525 DNK	David N. Klener	.50	650.00	325.00	.50	650.00	325.00	
1926 EPV	Edward F. Valdespino	269.20	600.00	161520.00	269.20	600.00	161520.00	
1184 DD	Deborah DiFilippo	16.20	425.00	6885.00	16.20	425.00	6885.00	
1473 KSI	Kelsey Sproull	4.00	300.00	1200.00	4.00	300.00	1200.00	
5296 DC	Donna Chance	34.50	225.00	7762.50	34.50	225.00	7762.50	
5409 LS	Laura Sanders	4.70	275.00	1128.00	4.70	275.00	1292.50	
TOTAL:		332.10	181085.00	139429.50	332.10		181085.00	

UNBILLED FEE DETAILS THROUGH 03/02/16

DATE WORKED	TIME-KEEPER	INDEX	WORKED			BILLED			STAT	DESCRIPTION
			RATE	HOURS	VALUE	RATE	HOURS	VALUE		
03/02/11	EPV	4489180	600.00	9.40	5640.00	600.00	9.40	5640.00	B	Travel to Houston to review documents; review documents; return travel;
03/07/11	EPV	4489184	600.00	8.00	4800.00	600.00	8.00	4800.00	B	Continue review of floppy discs retrieved from warehouse;

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Date	Code	Amount 1	Rate 1	Amount 2	Rate 2	Amount 3	Rate 3	Amount 4	Rate 4	Code	Description
03/09/11	EFV	4489188	600.00	4.00	2400.00	600.00	4.00	2400.00	600.00	B	Review floppy discs; Task: Act:
03/10/11	EFV	4489190	600.00	4.00	2400.00	600.00	4.00	2400.00	600.00	B	Review Kroll emails; Task: Act:
06/23/11	EFV	4587267	600.00	6.00	3600.00	600.00	6.00	3600.00	600.00	B	Telephone conference with Mr. Arlington regarding tolling agreements; prepare email to Mr. Sadler regarding tolling agreements; receive and review conformed tolling agreement and forward to Ms. Ryan; receive and review subpoenas from Mr. Arlington; receive and review amended subpoena exhibits from Ms. Ryan and forward to Mr. Arlington; continue review of additional documents; legal research regarding breach of fiduciary duty issues; Task: Act:
09/07/11	DC	4665287	225.00	.30	67.50	225.00	.30	67.50	67.50	B	Review correspondence regarding latest Kroll indexing draft; review status on indexing DVDs of voluminous folders of documents. Task: Act:
09/26/11	DC	4684100	225.00	4.60	1035.00	225.00	4.60	1035.00	1035.00	B	Continue analysis and indexing of voluminous documents on Kroll DVD # 3 of receivership documents. Task: Act:
10/19/11	EFV	4726234	600.00	1.20	720.00	600.00	1.20	720.00	720.00	B	Review Kroll tolling agreement and engagement letter (1.2); Task: Act:
10/31/11	EFV	4726244	600.00	2.50	1500.00	600.00	2.50	1500.00	1500.00	B	Review and revise Kroll documents (1.9); review and revise Kroll tolling agreement (.6); Task: Act:
11/01/11	EFV	4771596	600.00	1.00	600.00	600.00	1.00	600.00	600.00	B	Attend conference call to discuss

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Date	Code	Amount 1	Amount 2	Amount 3	Amount 4	Amount 5	Amount 6	Amount 7	Amount 8	Code	Description
01/13/12	EFV	4847050	600.00	1.60	960.00	600.00	1.60	960.00	600.00	B	potential Kroll SIUSA issues; Task: Act:
04/05/12	EFV	4966385	600.00	3.10	1860.00	600.00	3.10	1860.00	600.00	B	Conference regarding Kroll claims; Task: Act:
04/16/12	LS	4947653	275.00	2.20	605.00	275.00	2.20	605.00	275.00	B	Meeting with Mr. Snyder and Mr. Morganstern to discuss potential Kroll case; Task: Act:
04/16/12	EFV	4966402	600.00	4.20	2520.00	600.00	4.20	2520.00	600.00	B	Research Kroll issues and prepare memorandum of findings; Task: Act:
04/18/12	LS	4947656	275.00	2.50	687.50	275.00	2.50	687.50	275.00	B	Receive and review Investigative Kroll memo; begin preparation of Kroll demand letter; Task: Act:
04/24/12	DC	4953922	225.00	5.70	1282.50	225.00	5.70	1282.50	225.00	B	Complete Kroll research; send memorandum, D&B report, and 2008-2010 income data to Ed Valdespino for his review; Task: Act:
04/24/12	EFV	4966416	600.00	1.80	1080.00	600.00	1.80	1080.00	600.00	B	Valdespino for his review; telephone call from Ed Valdespino and continue additional research updating memorandum with new findings; Task: Act:
07/05/12	EFV	5078340	600.00	4.80	2880.00	600.00	4.80	2880.00	600.00	B	Continue analysis of voluminous documents on DVD 3 of 6 of Kroll files and draft detailed index. Task: Act:
07/17/12	EFV	5078370	600.00	2.60	1560.00	600.00	2.60	1560.00	600.00	B	Conference call to discuss settlement demand; Task: Act:
											Review Kroll demand package; Task: Act:
											Receive and review draft Kroll Complaint; Task:

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Date	Code	Case No.	Amount	Rate	Hours	Rate	Hours	Code	Description
07/23/12	DD	5071795	425.00	3.50	1487.50	425.00	3.50	B	Act: Review Stanford pleadings in preparation of reply to response in opposition to motion to compel; confer with counsel Mark Murphy regarding issues for reply; Task: Act:
07/24/12	DD	5079359	425.00	3.00	1275.00	425.00	3.00	B	Telephone conference with counsel Mark Murphy regarding reply to Kroll's opposition to motion to compel; review motions and orders relating thereto; Task: Act:
07/25/12	DD	5079361	425.00	4.50	1912.50	425.00	4.50	B	Correspond with counsel regarding agreed extension of deadline to reply to Kroll's opposition and prepare stipulation; review cases cited in Kroll's response; Task: Act:
07/26/12	DD	5079364	425.00	4.50	1912.50	425.00	4.50	B	Review non-party Kroll's opposition to motion to compel; prepare reply to response; Task: Act:
07/26/12	EPV	5078397	600.00	1.90	1140.00	600.00	1.90	B	Address Kroll motion to compel; Task: Act:
07/27/12	DD	5079369	425.00	.50	212.50	425.00	.50	B	Revise reply to Kroll's opposition to motion to compel; Task: Act:
07/31/12	DD	5079381	425.00	.20	85.00	425.00	.20	B	Review correspondence from counsel regarding reply to Kroll subpoena; Task: Act:
07/31/12	EPV	5078414	600.00	2.50	1500.00	600.00	2.50	B	Review and revise Kroll motion to compel; Task: Act:
08/02/12	EPV	5131597	600.00	2.20	1320.00	600.00	2.20	B	Prepare report on Kroll; Task:

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Act:

08/03/12 EFV 5131600 600.00 1.60 960.00 600.00 1.60 960.00 B  
 Receive and review transcript for use in Kroll motion to compel;  
 Task:  
 Act:

08/06/12 DC 5098349 225.00 7.90 1777.50 225.00 7.90 1777.50 B  
 Analyze numerous Kroll financial statements documents and draft index.  
 Task:  
 Act:

08/06/12 EFV 5131605 600.00 2.20 1320.00 600.00 2.20 1320.00 B  
 Revise draft Kroll motion to compel;  
 Task:  
 Act:

08/07/12 KSI 5097232 300.00 3.10 930.00 300.00 3.10 930.00 B  
 Review and analyze citations in Receiver's Reply in Motion to Compel to ensure cases are cited properly; prepare memo to Edward Valdespino regarding same;  
 Task:  
 Act:

08/08/12 KSI 5097236 300.00 .90 270.00 300.00 .90 270.00 B  
 Finalize memo regarding the analysis of the citations in the Receiver's Reply for accuracy; send to Edward Valdespino for review; telephone conference with Mark Murphy regarding memo; research citation based on question from Mark Murphy; email correspondence to Murphy regarding same;  
 Task:  
 Act:

08/09/12 EFV 5131611 600.00 4.20 2520.00 600.00 4.20 2520.00 B  
 Revise draft motion to compel for Kroll;  
 Task:  
 Act:

08/13/12 EFV 5131616 600.00 3.40 2040.00 600.00 3.40 2040.00 B  
 Prepare comments to draft motion to compel Kroll;  
 Task:  
 Act:

08/14/12 DC 5102706 225.00 7.80 1755.00 225.00 7.80 1755.00 B  
 Analyze part of voluminous Kroll financial statements;  
 Task:  
 Act:

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08/16/12	EFV	5131626	600.00	1.40	840.00	600.00	1.40	840.00	B	Revise motion to compel Kroll; Task: Act:
08/21/12	EFV	5131633	600.00	3.50	2100.00	600.00	3.50	2100.00	B	Revise draft motion to compel; Task: Act:
09/04/12	EFV	5163682	600.00	3.90	2340.00	600.00	3.90	2340.00	B	Revise draft Kroll complaint; Task: Act:
09/18/12	EFV	5168645	600.00	4.80	2880.00	600.00	4.80	2880.00	B	Revise draft Kroll complaint and confer regarding Venezuelan class representatives; Task: Act:
09/19/12	EFV	5168650	600.00	3.60	2160.00	600.00	3.60	2160.00	B	Continue to revise Kroll complaint and conduct telephonic meetings with potential class plaintiffs. Task: Act:
10/30/12	DC	6847894	225.00	3.20	720.00	225.00	3.20	720.00	B	Analyze receivership documents and index and draft index documents. Task: Act:
11/07/12	EFV	5251648	600.00	3.80	2280.00	600.00	3.80	2280.00	B	Review draft complaint and analyze prospective class representatives from Venezuela; Task: Act:
11/27/12	EFV	5257836	600.00	3.20	1920.00	600.00	3.20	1920.00	B	Review revised revisions of Kroll complaint; address Kroll settlement issues; Task: Act:
01/25/13	EFV	5333509	600.00	1.30	780.00	600.00	1.30	780.00	B	Review Kroll financial issues; Task: Act:
01/30/13	EFV	5333520	600.00	1.40	840.00	600.00	1.40	840.00	B	Conference regarding Kroll financial evaluations; Task: Act:
02/11/13	DC	5350361	225.00	5.00	1125.00	225.00	5.00	1125.00	B	Analyze Kroll receivership documents and draft index.





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05/29/13	EFV	5503639	600.00	11.80	7080.00	600.00	11.80	7080.00	B	Attend Kroll mediation with retired Judge Malonis; dinner with co-counsel to discuss mediation strategy; Task: Act:
05/30/13	EFV	5503640	600.00	8.30	4980.00	600.00	8.30	4980.00	B	Prepare for and attend second day of mediation of Kroll case; strategy dinner with co-counsel; Task: Act:
05/31/13	EFV	5503641	600.00	4.60	2760.00	600.00	4.60	2760.00	B	Return travel from Kroll mediation; Task: Act:
06/19/13	EFV	5541896	600.00	2.60	1560.00	600.00	2.60	1560.00	B	Recap Kroll settlement issues with co-counsel; Task: Act:
08/05/13	EFV	5625325	600.00	3.60	2160.00	600.00	3.60	2160.00	B	Receive and review draft of Kroll letter; receive and review emails regarding Kroll; conference call with Venezuelan contacts to discuss Kroll case with class representatives; receive and review class representative files to confirm participation as potential settling class representatives; Task: Act:
08/06/13	EFV	5625331	600.00	3.60	2160.00	600.00	3.60	2160.00	B	Receive and review draft Kroll settlement terms; Task: Act:
08/08/13	EFV	5625336	600.00	6.60	3960.00	600.00	6.60	3960.00	B	Review revised Kroll settlement documents; conferences with prospective class settling plaintiffs; Task: Act:
05/19/14	EFV	6035050	600.00	1.90	1140.00	600.00	1.90	1140.00	B	Attend conference call regarding Kroll settlement; Task: Act:

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06/02/14	EFV	6052205	600.00	1.30	780.00	600.00	1.30	780.00	B	Review draft settlement documents for Kroll case; Task: Act:
06/12/14	EFV	6052238	600.00	.90	540.00	600.00	.90	540.00	B	Receive and review Kroll extension to Tolling Agreement; Task: Act:
06/18/14	EFV	6052258	600.00	1.70	1020.00	600.00	1.70	1020.00	B	Receive and review draft settlement documents in Kroll case; Task: Act:
06/18/14	EFV	6052259	600.00	.80	480.00	600.00	.80	480.00	B	Review revisions to Kroll documents; Task: Act:
07/02/14	EFV	6090747	600.00	1.30	780.00	600.00	1.30	780.00	B	Review contribution issues in Kroll settlement agreement; Task: Act:
09/01/14	EFV	6180332	600.00	3.60	2160.00	600.00	3.60	2160.00	B	Review Kroll documents and affidavits; Task: Act:
09/04/14	EFV	6180340	600.00	4.00	2400.00	600.00	4.00	2400.00	B	Review Kroll contribution settlement issues; Task: Act:
09/05/14	EFV	6180345	600.00	3.60	2160.00	600.00	3.60	2160.00	B	Analyze legal issues regarding Kroll settlement; Task: Act:
09/05/14	EFV	6180346	600.00	3.20	1920.00	600.00	3.20	1920.00	B	Review Kroll settlement issues; Task: Act:
09/09/14	EFV	6180354	600.00	1.80	1080.00	600.00	1.80	1080.00	B	Review draft of Kroll settlement; Task: Act:
09/09/14	EFV	6180355	600.00	3.20	1920.00	600.00	3.20	1920.00	B	Prepare legal memoranda regarding Kroll settlement; Task: Act:

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09/10/14	EFV	6180357	600.00	1.20	720.00	600.00	1.20	720.00	B	Receive and review amended Kroll Tolling Agreement; Task: Act:
09/10/14	EFV	6180358	600.00	2.90	1740.00	600.00	2.90	1740.00	B	Prepare comments to Kroll settlement documents; Task: Act:
09/12/14	EFV	6180367	600.00	1.60	960.00	600.00	1.60	960.00	B	Receive and review draft motion to approve Kroll settlement; Task: Act:
09/15/14	EFV	6180374	600.00	1.70	1020.00	600.00	1.70	1020.00	B	Receive and review draft motion to approve Kroll settlement; Task: Act:
09/18/14	EFV	6176672	600.00	1.80	1080.00	600.00	1.80	1080.00	B	Receive and review emails regarding Kroll settlement; Task: Act:
09/18/14	EFV	6176673	600.00	1.40	840.00	600.00	1.40	840.00	B	Receive and review revised Kroll settlement terms; Task: Act:
10/28/14	EFV	6220278	600.00	1.20	720.00	600.00	1.20	720.00	B	Receive and review draft Kroll documents and address class rep issues; Task: Act:
11/11/14	EFV	6262398	600.00	2.10	1260.00	600.00	2.10	1260.00	B	Receive and review amended tolling agreement for Kroll; Task: Act:
12/12/14	EFV	6307746	600.00	3.20	1920.00	600.00	3.20	1920.00	B	Analyze Kroll settlement issues; Task: Act:
12/22/14	EFV	6308489	600.00	4.40	2640.00	600.00	4.40	2640.00	B	Address Kroll settlement issues; Task: Act:
12/23/14	EFV	6308493	600.00	4.40	2640.00	600.00	4.40	2640.00	B	Continue to analyze Kroll settlement issues; Task: Act:

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12/24/14	EFV	6308495	600.00	3.40	2040.00	600.00	3.40	2040.00	B	Continue to research Kroll settlement issues; Task: Act:
12/27/14	EFV	6308498	600.00	4.10	2460.00	600.00	4.10	2460.00	B	Analyze Kroll settlement issues; Task: Act:
01/26/15	EFV	6344849	600.00	1.10	660.00	600.00	1.10	660.00	B	Analyze bankruptcy issues and Kroll release; Task: Act:
01/29/15	EFV	6341183	600.00	.50	300.00	600.00	.50	300.00	B	Receive and review bankruptcy aspects of release for Kroll settlement; Task: Act:
02/20/15	EFV	6375654	600.00	2.40	1440.00	600.00	2.40	1440.00	B	Receive and review emails regarding Kroll bankruptcy and settlement issues; Task: Act:
02/25/15	EFV	6380746	600.00	.40	240.00	600.00	.40	240.00	B	Receive and review new draft of Kroll settlement documents in light of bankruptcy; Task: Act:
05/04/15	EFV	6505826	600.00	3.60	2160.00	600.00	3.60	2160.00	B	Prepare documents in support of Kroll settlement; Task: Act:
05/05/15	EFV	6505827	600.00	1.40	840.00	600.00	1.40	840.00	B	Prepare documents in support of Kroll settlement; Task: Act:
05/05/15	EFV	6505828	600.00	6.60	3960.00	600.00	6.60	3960.00	B	Prepare documents in support of Kroll settlement; Task: Act:
05/08/15	EFV	6488563	600.00	4.30	2580.00	600.00	4.30	2580.00	B	Prepare exhibits to Kroll settlement documents and pleadings; Task: Act:
05/11/15	EFV	6488567	600.00	3.60	2160.00	600.00	3.60	2160.00	B	Analyze Kroll settlement issues;

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Date	EFV	6791407	600.00	2.70	1620.00	600.00	2.70	1620.00	B	Task:
05/12/15	EFV	6488569	600.00	4.70	2820.00	600.00	4.70	2820.00	B	Task: Act: Prepare motion to approve in Kroll case;
05/13/15	EFV	6488572	600.00	6.60	3960.00	600.00	6.60	3960.00	B	Task: Act: Work on motion to approve in Kroll case;
05/13/15	EFV	6488573	600.00	.20	120.00	600.00	.20	120.00	B	Task: Act: (Kroll) Telephone conference with Mr. Murphy regarding motion to approve;
05/28/15	EFV	6505840	600.00	1.10	660.00	600.00	1.10	660.00	B	Task: Act: Receive and review Kroll settlement document drafts;
06/09/15	EFV	6551317	600.00	1.20	720.00	600.00	1.20	720.00	B	Task: Act: Receive and review latest Kroll revisions and discuss lift stay motion;
08/07/15	EFV	6638054	600.00	2.30	1380.00	600.00	2.30	1380.00	B	Task: Act: Work on Kroll release;
11/06/15	EFV	6761649	600.00	3.30	1980.00	600.00	3.30	1980.00	B	Task: Act: Receive and review new versions of Kroll settlement documents;
11/10/15	EFV	6761663	600.00	1.60	960.00	600.00	1.60	960.00	B	Task: Act: Receive and review additional revisions to Kroll settlement documents;
12/01/15	EFV	6791406	600.00	.40	240.00	600.00	.40	240.00	B	Task: Act: Receive and review emails regarding settlement documents for Kroll;
12/01/15	EFV	6791407	600.00	2.70	1620.00	600.00	2.70	1620.00	B	Task: Act: Begin preparation of declaration and exhibits for Kroll settlement;

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Date	Attorney	Case No.	Hours	Rate	Amount	Task	Act			
12/28/15	EFV	6799042	600.00	1.30	780.00	600.00	1.30	780.00	B	Act: Task: Act:
01/12/16	JRB	6808770	700.00	.80	560.00	700.00	.80	560.00	B	Kroll - Review expedited request for scheduling order and motion for order approving settlement with Kroll; Task: Act:
01/28/16	JRB	6826012	700.00	.50	350.00	700.00	.50	350.00	B	(Kroll) Review and revise Valdespino declaration regarding attorneys' fees; review Receiver's application for payment of attorney's fees; Task: Act:
02/02/16	JRB	6836362	700.00	.40	280.00	700.00	.40	280.00	B	Review application for payment of attorneys' fees from Kroll settlement; Task: Act:
02/09/16	JRB	6844714	700.00	.30	210.00	700.00	.30	210.00	B	Telephone conference with Ed Snyder regarding timeframes and revised declaration concerning attorneys' fees; conference with Ed Valdespino regarding same; Task: Act:
02/15/16	JRB	6852206	700.00	.40	280.00	700.00	.40	280.00	B	Emails regarding revisions to Ed Valdespino's declaration; review revised declaration; Task: Act:
02/23/16	JRB	6863839	700.00	.50	350.00	700.00	.50	350.00	B	Review revisions to motion for approval of fees; Task: Act:
02/23/16	JRB	6863840	700.00	.10	70.00	700.00	.10	70.00	B	Send Jake Dickerson and Mark Arlington Ed Valdespino's declaration for attorneys' fees; Task: Act:
03/01/16	DNK	6875665	650.00	.50	325.00	650.00	.50	325.00	B	Interoffice conferences and emails regarding expenses to be

Strasburger & Price L.L.P.  
 FOR PROFORMA 766757 CREATED 03/02/16  
 CLIENT: 40936 The Official Stanford Investors Committee MATTER: 40936.0101 OSIC/Krc011

reimbursed;  
 Task:  
 Act:

TOTALS: 332.10 181085.00 332.10 181085.00  
 =====

VALUE OF UNBILLED TIME ENTRIES NOT ON THIS PROFORMA: .00

UNBILLED EXPENSE DETAILS THROUGH 03/02/16

DATE	TIMEKEEPER	INDEX	CODE	WORKED VALUE	BILLED VALUE	STAT	DESCRIPTION
02/09/16	9999	4413814	E108	.49	.49	B	POSTAGE USER DEFINED 1: 6034 DADISB
02/29/16	1138	4423222	E150	9.40	9.40	B	ONLINE RESEARCH - LEXIS 02/01/2016 - 02/29/2016
03/01/16	9999	4426196	E101	1.40	1.40	B	COPY CHARGES 14 Photocopies @ 10 Cents Type: Laser Print USER DEFINED 1: 6004 DAPRINT
03/01/16	9999	4426197	E101	2.50	2.50	B	COPY CHARGES 25 Photocopies @ 10 Cents Type: Laser Print USER DEFINED 1: 6004 DAPRINT
03/01/16	9999	4426198	E101	3.50	3.50	B	COPY CHARGES 35 Photocopies @ 10 Cents Type: Laser Print USER DEFINED 1: 6004 DAPRINT
03/01/16	9999	4426199	E101	6.20	6.20	B	COPY CHARGES 62 Photocopies @ 10 Cents Type: Laser Print USER DEFINED 1: 6004 DAPRINT
TOTAL SOFT COSTS:				23.49	23.49		
TOTAL HARD COSTS:				.00	.00		
TOTAL ALL COSTS:				23.49	23.49		
VALUE OF UNBILLED COST ENTRIES NOT ON THIS PROFORMA:				.00			

EXPENSE TYPE SUMMARY

TYPE	DESCRIPTION	RECORDED VALUE	BILLING VALUE
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Strasbourg & Price L.L.P.  
 FOR PROFORMA 766757 CREATED 03/02/16  
 CLIENT: 40936 The Official Stanford Investors Committee MATTER: 40936.0101 OSIC/Kroll

E101	COPY CHARGES	13.60	13.60
E108	POSTAGE	.49	.49
E150	ONLINE RESEARCH - LEXIS	9.40	9.40
TOTAL EXPENSES:		23.49	23.49

AGED ACCOUNTS RECEIVABLE

0 - 30	31 - 60	61 - 90	90 - 120	121+	Total
.00	.00	.00	.00	.00	.00

MATTER UNAPPLIED CASH: .00  
 TRUST BALANCE: .00  
 TRUST RETAINER: .00

BILLING SUMMARY

BILLING TO DATE	HOURS	FEES	EXPENSES
Relieved:	.00	0.00	0.00
Billed:	.00	0.00	0.00
Variance:		0.00	.00
%Realization		0.00	0.00
Receivable Write Off:		0.00	0.00
Total Outstanding:		0.00	0.00

TRUST BALANCE

INDEX #	DATE	TRANSACTION #	DESCRIPTION	RECEIPT	DISBURSEMENT	AMOUNT
TOTAL BALANCE ALL TRUST ACCOUNTS:						
						.00

BILL HISTORY

BILL NUMBER	DATE	FEES	COSTS	PAYMENTS	LAST PAYMENT DATE	WRITE-OFFS	OUTSTANDING BALANCE
TOTALS:							
						.00	.00

**EXHIBIT “4”**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

STANFORD INTERNATIONAL BANK, LTD., *et al.*,

Defendants.

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Case No. 3:09-cv-0298-N

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**DECLARATION OF PETER D. MORGENSTERN, ESQ.  
IN SUPPORT OF REQUEST FOR AWARD OF  
ATTORNEYS FEES AND COSTS**

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I, Peter D. Morgenstern, hereby declare under penalty of perjury the following:

**A. Curriculum Vitae**

1. My name is Peter D. Morgenstern. I am an attorney and have been duly admitted to practice law in the state of New York since 1983. I am also admitted to practice before the United States District Courts for the Southern and Eastern Districts of New York. By Order dated May 26, 2009, I was admitted pro hac vice to practice before this Court in connection with litigation related to the Stanford receivership cases. I am a partner in the law firm of Butzel Long, professional corporation (“BL”), a Michigan-based firm with branch offices in New York and Washington, D.C. I am a resident partner in BL’s New York office. BL has a broad nationwide legal practice, including groups of attorneys who practice in the areas of corporate law, litigation and like me, attorneys who practice in the areas of complex commercial litigation, bankruptcy and insolvency law. For over thirty years, I have concentrated my practice

exclusively in the areas of commercial litigation and insolvency-related matters. I was previously a partner at a large full-service international law firm, and headed the bankruptcy and insolvency practice at one of its regional offices. After relocating to New York several years ago, I became a name partner in a mid-size litigation boutique, and then joined BL in 2011 as a partner.

2. I have extensive experience representing creditors and other stakeholders in litigation relating to or arising from significant insolvencies (including bankruptcy cases, state court liquidation proceedings and out of court restructurings), major frauds, and Ponzi schemes, all on behalf of injured investors and creditors. I have participated as the lead attorney and as part of a team of attorneys who successfully prosecuted actions against third parties who were alleged to have been involved in, or profited from such frauds and Ponzi schemes. For instance, I was the lead attorney representing the court-appointed equity committee in the chapter 11 case of Adelpia Communications, Inc. (a massive Ponzi scheme); the class action plaintiffs in *In re Bennett Funding, Inc.* (a massive Ponzi scheme); a large investor group in the case of Tyco, Inc. (major fraud case); special counsel to the court-appointed equity committee of Calpine, Inc. (chapter 11 case); the Official Retiree Committee in connection with Outboard Marine, Inc. (chapter 11 case), and am currently representing major creditors in connection with the pending insolvency proceedings arising from the massive Madoff fraud, among many other notable representations during my career. A detailed description of BL's practice, and my biography, background and experience, are set forth on BL's website, at [www.butzel.com](http://www.butzel.com).

**B. The Kroll Claims**

3. I am submitting this Declaration in support of the Motion for Order Approving Proposed Settlement with Kroll, LLC and Kroll Associates, Inc. (collectively, "Kroll") and for

Entry of Bar Order, Approving Notice and Entry of Scheduling Order, and Approving Attorneys' Fees (the "Motion"). The settlement for which approval is sought in the Motion settles all claims asserted against Kroll for \$24,000,000.00.

4. The law firms Castillo Snyder, P.C. and Davis & Santos, Attorneys & Counselors, have acted as lead counsel for the plaintiffs in this litigation, and I respectfully refer the Court to their accompanying declarations for the detailed facts and circumstances relating to this litigation and the proposed settlement. BL has acted as co-counsel in this litigation.

5. In addition to representing a group of hundreds of individual clients in Stanford-related cases, whose claims aggregate in excess of \$400 million, I also serve as a member of The Official Stanford Investors Committee (the "OSIC") appointed by this Court by Order dated August 10, 2010 (the "Committee Order"). I was instrumental in the establishment of the OSIC, to represent the interests of Stanford victims in these cases, with the goal of empowering the real stakeholders in these cases with a meaningful voice and role in attempting to maximize their ultimate recoveries. The Order appointing the OSIC enabled victims, through the OSIC, to prosecute actions against third parties in cooperation with the Receiver and Examiner, or separately when appropriate, under the terms of the Committee Order. Other than fraudulent transfer actions brought by OSIC, OSIC has brought suits that are parallel to putative class action cases brought on behalf of individual creditors, through BL and various of our co-counsel.

6. Since the appointment of the OSIC, BL has worked closely with our co-counsel, including fellow OSIC members Edward Snyder (of Castillo Snyder) and Edward Valdespino (of Strasburger & Price) and with Neligan Foley and the Examiner, to share information, strategize and collaboratively take appropriate actions, including prosecuting lawsuits against third parties, all with the goal of maximizing recoveries to Stanford victims. In some of these litigations, BL

acts as lead counsel, and also acts as co-counsel in certain other cases, including the instant case. The coordination and collaboration of counsel is necessary and desirable to further the interests of Stanford victims, and has been the hallmark of the prosecution of this and other actions on behalf of investors and the Receivership estates. While various plaintiffs' counsel have assumed different levels of responsibility in each of the dozens of Stanford-related litigations, the sharing of information, and the overlap of facts and the law developed on joint litigation have been highly useful to the successful prosecution or settlement of this case and other pending litigations.

**C. Stanford-Related Litigation**

7. As noted above, since early 2009, BL was retained by hundreds of Stanford victims with claims exceeding four hundred million dollars, who sought assistance in asserting their interests in connection with the Receivership case, and to take appropriate legal steps to maximize their recoveries by prosecuting dozens of cases against various third parties, including banks, law firms and even foreign governments. I have personally devoted most of my professional efforts to representing Stanford victims during the course of the last six years, as has my colleague Joshua Abraham, of counsel to BL.

8. BL has actively participated in, or has monitored, all Stanford-related litigations. Through my membership on the OSIC, and as putative class counsel in various cases since 2009, I have devoted significant time to matters other than just litigation against third parties, including participating in the establishment of the claims protocol, litigation, and negotiations with the Antigua Joint Liquidators, meetings of the OSIC, monitoring related criminal proceedings and communications with various government representatives.

9. BL and my predecessor firms began their investigation of potential third-party claims which might be asserted on behalf of the Stanford victims immediately upon our retention in early 2009. Based on information discovered during this joint investigation with its various co-counsel, BL and my predecessor firms initiated several class action lawsuits on behalf of the investor plaintiffs.

10. BL is acting as lead counsel or co-counsel to the investor plaintiffs and the OSIC in Stanford-related litigation against third-party professionals and service providers, including banks, law firms, and other financial institutions. BL is also jointly handling many of the fraudulent transfer cases brought by the OSIC and the Receiver pursuant to an agreement approved by the Court by order dated February 25, 2011 [Docket No. 1267].

**D. Time and Effort of Plaintiffs' Counsel**

11. This Court is aware simply from legal filings alone of the extraordinary amount of time and effort that has been devoted to these incredibly complex cases by BL, its co-counsel and counsel to other parties seeking recoveries for Stanford creditors, including the Receiver and the Examiner. The Court's docket in the dozens of Stanford cases, however, provides just a snapshot of these efforts. These complex cases, involving billions of dollars in potential claims for defrauded Stanford investors, some of which are still in their early stages, have required a tremendous amount of attorney and other professional time and effort to investigate the facts, research the relevant legal issues, coordinate and strategize with counsel and clients regarding the handling of the cases, conducting discovery, prepare briefs and motions, attempt to negotiate settlements, and prepare cases for summary judgment and/or trial. Plaintiffs' counsel have jointly spent thousands of hours since 2009 in their investigation and prosecution of the lawsuits referenced above, including the BDO lawsuits. It is noteworthy that BL and the other plaintiff's

attorneys have to date received little compensation while these cases have been actively litigated before this Court, the Fifth Circuit Court of Appeals, and even to the Supreme Court of the United States. It is particularly relevant that plaintiffs' counsel, including BL, have prosecuted these cases on a contingency fee basis, without any regular hourly compensation.

### ATTORNEYS' FEES

#### A. The Contingency Fee Agreement

12. As noted in the other declarations submitted in support of the Kroll Settlement and the Proposed Fee Award, Plaintiffs' Counsel have been jointly handling the lawsuits referenced above, including the Kroll matter, pursuant to twenty-five percent (25%) contingency fee agreements with the OSIC (in cases in which the OSIC is a named-Plaintiff) and pursuant to retainer agreements with individual clients which provide for the payment of fees, **only from recoveries**, of 25% in investor class action lawsuits.

13. As stated in the Motion, the Movants seek Court approval to pay Plaintiffs' Counsel a fee equal to an aggregate of twenty-five percent (25%) of the Net Recovery (*i.e.*, the settlement amount less allowable disbursements).

14. As set forth in the other declarations submitted in support of the Kroll Settlement and the Proposed Fee Award, a twenty-five percent (25%) contingency fee for plaintiffs' counsel has previously been approved as reasonable by this Court in its order approving the Receiver's agreement with the OSIC regarding the joint prosecution of fraudulent transfer and other claims by the Receiver and the OSIC (the "OSIC-Receiver Agreement"). *See* Doc. 1267, p. 2 ("The Court finds that the fee arrangement set forth in the Agreement is reasonable."); *see also* Agreement [Doc. 1208] p. 3 (providing a "contingency fee" of twenty-five percent (25%) of any Net Recovery in actions prosecuted by OSIC's designated professionals).



15. It is my opinion that the fee requested in the Motion is reasonable in comparison to the total net amount to be recovered for the benefit of the Stanford investors from this settlement. The twenty-five percent (25%) contingency fee was negotiated at arm's length between the OSIC and Plaintiffs' Counsel, and is substantially below the typical market rate contingency fee percentage of 33% to 40% that most law firms require to handle cases of similar complexity and magnitude.

**B. Plaintiffs' Counsel's Efforts**

16. BL has devoted a tremendous amount of time and incurred significant expenses in preparing and prosecuting the Stanford-related lawsuits in which it serves as counsel or co-counsel. BL has devoted thousands of hours worth several million dollars to Stanford-related matters since 2009. Of this amount, BL attorneys spent approximately 117.50 hours on the Kroll matter (with a lodestar value of approximately \$81,150.00). In addition to being involved in the investigation of claims against Kroll, BL acted as bankruptcy counsel for the OSIC, investigating, drafting and filing a proof of claim, monitoring Kroll's chapter 11 proceeding, and participating in negotiations relating to the bankruptcy specific aspects of the Kroll Settlement. As stated above, I respectfully submit that the proposed settlement is not only the result of the specific efforts of counsel in the Kroll case, but is the result of many years of effort, and thousands of hours of work by the Receiver, the OSIC, Investor Plaintiffs and Plaintiffs' Counsel as described herein. But for the efforts of these parties, and the efforts of BL described herein, there would be no Kroll Settlement.

17. I respectfully submit that an award of attorneys' fees equal to twenty-five percent (25%) of the net recovery from the Kroll settlement, as requested, is reasonable and appropriate considering the significant time, effort, and resources which BL and the other firms retained by

the OSIC have invested in investigating the Stanford fraud, prosecuting and resolving this claim, and prosecuting the other Stanford-related litigation.

Dated: March 3, 2016

A handwritten signature in black ink, consisting of a large, stylized 'M' followed by a horizontal line that tapers to the right.

---

Peter D. Morgenstern

## **EXHIBIT 5**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

STANFORD INTERNATIONAL BANK, LTD., *et al.*,

Defendants.

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Case No. 3:09-cv-0298-N

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**DECLARATION OF DOUGLAS J. BUNCHE**

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Pursuant to 28 U.S.C. § 1746, I, Douglas J. Buncher, hereby declare under penalty of perjury that I have personal knowledge of the following facts:

**A. Curriculum Vitae**

1. My name is Douglas J. Buncher. I am an attorney admitted to practice law in the State of Texas since 1989. I am also admitted to practice before the United States District Courts for the Northern, Southern, Western and Eastern Districts of Texas, and am a member of the Bar Association of the United States Court of Appeals for the Fifth Circuit. I am a partner in Neligan Foley LLP ("Neligan Foley"), a Dallas law firm which concentrates its practice in complex bankruptcy, insolvency and receivership proceedings and related litigation. I have concentrated my practice in complex, commercial litigation since my career began in 1989, and since joining Neligan Foley in 2000 have concentrated my practice in handling complex receivership and bankruptcy litigation.

2. Neligan Foley has handled numerous complex bankruptcy and receivership cases, and litigation associated with those cases, since the firm was formed in 1995. Neligan Foley and I have handled many receivership and bankruptcy-related lawsuits seeking to recover hundreds of millions, and in some cases, billions of dollars in damages from third parties for the benefit of bankruptcy and receivership estates, as well as the investors and creditors of those estates. A detailed description of Neligan Foley, its areas of practice, case studies, and representative engagements, as well as my personal biography, background and experience, are set forth on Neligan Foley's website, [www.neliganfoley.com](http://www.neliganfoley.com).

3. As an example of Neligan Foley's prior experience in complex bankruptcy and receivership proceedings, in 1999 Neligan Foley was retained as counsel to the SEC receiver, joint official liquidators and Chapter 11 bankruptcy trustee in the InverWorld insolvency proceeding, a cross-border SEC receivership and bankruptcy case pending in United States Bankruptcy Judge Leif Clark's court in San Antonio, Texas, with a simultaneous Cayman liquidation proceeding in the Cayman Islands. InverWorld, Inc., one of the InverWorld companies, was a San Antonio-based SEC registered investment adviser and broker-dealer that took in over \$300 million of primarily Latin American investors' funds on the promise of liquid, low risk investments and above-market rate returns, much like Stanford on a smaller scale. Neligan Foley was the lead counsel for the SEC receiver in the InverWorld case, serving in essentially the same role as Baker Botts in the Stanford case. In the InverWorld case, Neligan Foley also coordinated and participated in the prosecution of several multi-hundred million dollar lawsuits brought by the receiver/trustee and investors, individually and as class representatives, against third parties who were alleged to have aided and abetted the InverWorld Ponzi scheme, including the auditor Deloitte & Touche, law firm Curtis Mallet, and French, Bahama and Swiss financial institutions affiliated with Credit Commercial de France. All of that litigation was successfully resolved, resulting in significant recoveries to the InverWorld estate and investors.

4. Neligan Foley also served as counsel to an ad hoc committee of bondholders, the litigation trustee, and a group of individual bondholders in litigation arising out of the Global Crossing bankruptcy in 2001 involving hundreds of millions of dollars in alleged damages. At the time, Global Crossing, a company that was laying fiber optic cable all over the world including on the ocean floors in anticipation of the expanding usage of the internet, was one of the largest bankruptcies in U.S. history.

**B. Neligan Foley Role in Stanford-Related Litigation**

5. Shortly after the Stanford receivership was commenced in early 2009, Neligan Foley was approached by Edward Snyder of Castillo Snyder P.C. (“Castillo Snyder”) and Edward Valdespino of Strasburger & Price, LLP (“Strasburger”) to serve as co-counsel to their clients who had invested hundreds of millions of dollars into Stanford International Bank, Ltd. CDs (“SIBL CDs”). Due to Neligan Foley’s prior experience in major bankruptcy and receivership proceedings and third-party litigation associated with those proceedings, Neligan Foley was hired to assist counsel at Castillo Snyder and Strasburger with the investigation and prosecution of litigation against third parties and to assist with the receivership and potential bankruptcy issues.

6. Neligan Foley has monitored and participated in the main Stanford receivership proceeding since that time. On July 29, 2009, the Stanford Multidistrict Litigation matter, MDL No. 2099, was initiated (the “Stanford MDL Proceeding”). Neligan Foley has also participated in and monitored the Stanford MDL Proceeding since its inception.

7. Neligan Foley began its investigation of potential third-party claims to be asserted on behalf of the Stanford investors immediately after joining as co-counsel with Castillo Snyder and Strasburger in 2009. Based on information discovered during this joint investigation, Castillo Snyder, Strasburger, and Neligan Foley jointly initiated class action lawsuits in this Court on behalf of certain named Stanford investors, individually and on behalf of a class of

similarly situated investors, styled *Troice v. Willis of Colorado, Inc.*, Case No. 3:09-cv-01274, and *Troice v. Proskauer Rose, LLP*, Case No. 3:09-cv-01600.

8. Since that time, in addition to the aforementioned *Proskauer* and *Willis* investor cases, attorneys from Neligan Foley have investigated, filed and prosecuted virtually all of the other major Stanford-related litigation against third-parties on behalf of the Committee and Stanford investor plaintiffs who have sued individually and on behalf of a putative class of Stanford investors, along with Castillo Snyder, Strasburger and Butzel Long, including the following lawsuits pending before the Court:

- (a) *Official Stanford Investors Committee, et al. v. Breazeale, Sachse, & Wilson, LLP, et al.*, Case No. 3:11-cv-00329;
- (b) *Janvey, et al. v. Adams & Reese, LLP, et al.*, Case No. 3:12-cv-00495;
- (c) *Janvey, et al. v. Greenberg Traurig, LLP, et al.*, Case No. 3:12-cv-04641;
- (d) *Janvey, et al. v. Proskauer Rose, LLP, et al.*, Case No. 3:13-cv-477; and
- (e) *Janvey, et al. v. Willis of Colorado, Inc., et al.*, Case No. 3:13-cv-03980.<sup>1</sup>

In addition to representing the Committee and Investor Plaintiffs in these cases, Neligan Foley has also been engaged to represent the Receiver in these cases where the Receiver is a named Plaintiff. Neligan Foley was also lead counsel for the Plaintiffs in the two BDO lawsuits, which were successfully resolved: *Philip Wilkinson, et al v. BDO USA, LLP, et al*, Case No. 3:11-cv-1115; *The Official Stanford Investors Committee v. BDO USA, LLP, et al*, Case No. 3:12-cv-01447. Thus, Neligan Foley has been actively involved in the major Stanford-related litigation against third parties since 2009.

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<sup>1</sup> Peter Morgenstern of Butzel Long is co-counsel for the Investor Plaintiffs and Committee in all of these cases except the cases against Willis of Colorado, Inc. and Proskauer Rose, LLP. Strasburger is not involved in the cases against Adams & Reese, LLP and Breazeale, Sachse & Wilson LLP.

9. Neligan Foley is also jointly handling many of the fraudulent transfer cases brought by the Committee and the Receiver pursuant to an agreement approved by the Court's order dated February 25, 2011 [Docket No. 1267]. Neligan Foley is lead counsel in the following cases:<sup>2</sup>

- (a) *Ralph S. Janvey and Official Stanford Investors Committee v. Yolanda Suarez*, Civil Action No. 10-cv-2581, now consolidated with the *Greenberg* lawsuit, Civil Action No. 3:12-cv-4641;
- (b) *Ralph S. Janvey and Official Stanford Investors Committee v. IMG Worldwide, Inc.*, Civil Action No. 11-0117; consolidated with *Ralph S. Janvey and Official Stanford Investors Committee v. International Players Championship, Inc.*, Civil Action No. 11-0293;
- (c) *Ralph S. Janvey and Official Stanford Investors Committee v. Miami Heat Limited Partnership and Basketball Properties, Ltd.*, Civil Action No. 11-0158;
- (d) *Ralph S. Janvey and Official Stanford Investors Committee v. PGA Tour, Inc.*, Civil Action No. 11-0226;
- (e) *Ralph S. Janvey and Official Stanford Investors Committee v. The Golf Channel, Inc.*, Civil Action No. 11-0294, currently on appeal at the Fifth Circuit;
- (f) *Ralph S. Janvey and Official Stanford Investors Committee v. ATP Tour, Inc.*, Civil Action No. 11-0295;and
- (g) *Ralph S. Janvey and Official Stanford Investors Committee v. Rocketball, Ltd. and Hoops, L.P.*, Civil Action No. 11-770.

### **C. Neligan Foley Role in Kroll Investigations and Settlement**

10. As discussed in Mr. Snyder's Declaration, Neligan Foley is one of the firms acting as Plaintiffs' Counsel with respect to the investigation, prosecution and settlement of claims against Kroll.

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<sup>2</sup> Castillo Snyder, Strasburger, and Butzel Long serve as co-counsel in these cases and lead counsel in other Stanford-related fraudulent transfer cases. In turn, Neligan Foley serves as co-counsel in the cases in which Castillo Snyder, Strasburger, or Butzel Long serve as lead counsel.



11. I am submitting this Declaration in support of the Receiver and Official Stanford Investors Committee's (the "Committee") (collectively, the "Plaintiffs") Expedited Request for Entry of Scheduling Order, and Motion for Order Approving Proposed Settlement with Kroll, LLC and Kroll Associates, Inc. (collectively "Kroll") and for Ancillary Orders (the "Motion"), and the Receiver and the Committee's Application for Payment of Attorneys' Fees and Reimbursement of Expenses from Kroll Settlement. to Approve the Proposed Notice of Settlement, to Enter the Final Judgment and Bar Order, and for Plaintiffs' Attorneys' Fees (the "Fee Application").<sup>3</sup>

12. The settlement for which approval is sought in the Motion settles all claims against Kroll in exchange for payment of \$24 million by Kroll to the Receiver for ultimate distribution to the Stanford investor victims. The Fee Application seeks approval and payment of the agreed upon twenty-five percent (25%) contingency fee to Plaintiffs' Counsel.

13. Since 2009, Neligan Foley has assisted Castillo Snyder with the investigation of potential claims against third parties, including Kroll. Neligan Foley's assistance in that investigation has included helping with document review at the warehouse in Houston, Texas, where the Stanford business records are maintained. As reflected in the time records attached hereto as Exhibit A, Neligan Foley has allocated a certain portion of its time investigating claims and reviewing documents to the Kroll matter.

14. Neligan Foley has also participated in the negotiation and drafting of the settlement documents. As described in the Snyder Declaration, the process of negotiating the structure of the settlement and the form of the settlement documents took several years after a settlement in principle was achieved in May 2013. Neligan Foley was an active participant in the effort to finalize the structure of the settlement and the form of the settlement documentation.

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<sup>3</sup> Capitalized Terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

Neligan Foley was also an active participant in the effort to protect the Receiver and the Committee's rights and preserve the settlement after Kroll and its parent company filed bankruptcy in January 2015.

**D. Reasonableness of Settlement**

15. It is my opinion based upon years of experience prosecuting, trying and settling complex receivership and bankruptcy litigation, and my assessment of the relative merits of the claims and defenses with respect to Kroll, the amount of Kroll's available insurance, and the fact Kroll filed for bankruptcy, that the settlement with Kroll is fair and reasonable and in the best interests of the Stanford receivership estate and the Stanford investors and should be approved by the Court.

**E. Time and Effort of Neligan Foley Related to Kroll and Other Stanford Litigation**

16. As reflected in Neligan Foley's time records for the Kroll matter, true and correct copies of which are attached hereto as Exhibit A, Neligan Foley has invested \$75,007.50 of professional time through February 29, 2016, the vast majority of which is attorney time, related to or allocable to the claims against and settlement with Kroll. Neligan Foley will continue to incur additional time in connection with obtaining court approval of the Kroll settlement. While Neligan Foley's role and investment of time in connection with the prosecution and settlement of the claims against Kroll has been limited consistent with the agreement among Plaintiffs' counsel (Castillo Snyder and later the Davis law firm acted as lead counsel with respect to the Kroll claims), a cursory review of the Court's docket in all of the Stanford lawsuits in which Neligan Foley has been involved reveals the immense amount of work that Neligan Foley and the other Plaintiffs' Counsel have put into the prosecution of all of the Stanford lawsuits since 2009. However, the docket and pleadings only reveal the work that is filed with the Court. As

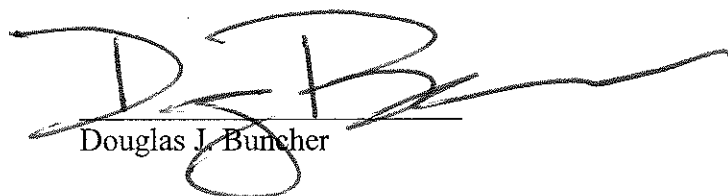
the Court is aware, the prosecution of lawsuits of this magnitude and complexity has required a tremendous amount of time and effort to investigate the facts, research the relevant legal issues, coordinate and strategize with counsel and clients regarding the handling of the cases, conduct discovery, prepare the briefs and motions, attempt to negotiate settlements, and prepare cases for summary judgment and/or trial. Plaintiffs' counsel have spent thousands of hours since 2009 in their investigation and prosecution of the Stanford lawsuits referenced above, including the potential lawsuit against Kroll. Neligan Foley has devoted thousands of hours and millions of dollars of time investigating and prosecuting the Stanford litigation referenced above. Neligan Foley and the other Plaintiffs' Counsel have done an immense amount of work investigating and analyzing the Stanford Ponzi scheme and the potential claims that could be brought against third party aiders and abettors of Stanford since the commencement of this receivership case, all of which allowed Plaintiffs' Counsel to formulate, prosecute and successfully settle the claims against Kroll. But for the diligent efforts of Plaintiffs' Counsel since the commencement of this receivership proceeding, the settlement with Kroll would never have been achieved.

**F. Reasonableness of Attorneys' Fees**

17. In light of the tremendous time and effort Neligan Foley and the other Plaintiffs' Counsel have put into the effort to recover monies for the Stanford Receivership Estate and the investors, including but not limited to the time related to the claims against Kroll, the Court's prior approval of the 25% contingency fee arrangement between the Committee and the Receiver related to the prosecution of the fraudulent transfer claims, the Court's approval of the 25% contingency fees in connection with the BDO Settlement and the settlement with certain Defendants in the Stanford Trust Company litigation, as well as applicable case law in the Fifth Circuit concerning the range of reasonable contingency fees for litigation of this nature, it is my

opinion that the twenty-five percent (25%) fee to be paid to Plaintiffs' Counsel for the settlement with Kroll is reasonable and should be approved. Although no lawsuit was filed, a tremendous amount of attorney work by Plaintiffs' counsel has been put into the investigation and settlement of the Kroll claims over a period of many years in order to achieve the result obtained.

Dated: March 1, 2016.



Douglas J. Buncher

# NELIGAN FOLEY LLP

325 N. St. Paul  
Suite 3600  
Dallas, TX 75201

Telephone: 214.840.5300  
Facsimile: 214.840.5301

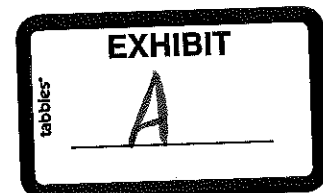
March 01, 2016

Mr. Ralph S. Janvey  
Krage & Janvey, LLP  
2100 Ross Avenue, Suite 2600  
Dallas, TX 75201

In Reference To: Stanford/Kroll  
CM# 10676-014  
Invoice Number: 24078

## Legal Services

		<u>Hrs/Rate</u>	<u>Amount</u>
2/26/2009	DJB Review receivership docket and SEC complaint; telephone conferences with Mr. Snyder regarding joint handling of matter.	0.20 625.00/hr	125.00
3/3/2009	JDG Reviewed and researched Stanford investigation and litigation materials.	2.00 300.00/hr	600.00
7/31/2009	DJB Telephone conference with Mr. Snyder regarding motion with multi-district litigation panel (.2).	0.20 625.00/hr	125.00
8/3/2009	DJB Telephone conference with Mr. Snyder and Mr. Foley regarding motion for multi-district litigation (.2).	0.20 625.00/hr	125.00
8/20/2009	DJB Review and reply to correspondence from Mr. Snyder (.1).	0.10 625.00/hr	62.50
9/18/2009	RKB Draft research/investigation memorandum on the facts surrounding the history of the financial empire of Robert Allen Stanford, the Stanford Financial Group, Stanford Capital Management and the Stanford International Bank, Inc. regarding their "Ponzi" scheme to defraud creditors out of billions of dollars and the ultimate control of those	1.00 275.00/hr	275.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	companies by and through criminal litigation and the estate receivership in multi-district litigation.		
9/23/2009	RKB Legal research and draft position memorandum of Receiver's standing to bring third party lawsuits (2.0).	2.00 275.00/hr	550.00
9/24/2009	RKB Draft memorandum regarding potential third party claims (0.5).	0.50 275.00/hr	137.50
	DJB Review research memo from Mr. Berger regarding potential third party claims (.2); confer with Mr. Berger regarding additional research needed (.2).	0.40 625.00/hr	250.00
9/25/2009	DJB Confer with Mr. Berger regarding research regarding receiver standing (.2).	0.20 625.00/hr	125.00
10/2/2009	RKB Read and evaluate Report of the 2009 Special Review Committee on FINRA's Examination Program in Light of the Stanford and Madoff Schemes, September 2009.	0.50 275.00/hr	137.50
10/12/2009	RKB Investigation of Kroll, Inc. and Marsh & McLennan Companies (5.0); draft correspondence to Ed Snyder (.3).	5.30 275.00/hr	1,457.50
10/13/2009	RKB Analysis of publications related to Allen Stanford (.5).	0.50 275.00/hr	137.50
11/10/2009	DJB Print and review numerous pleadings regarding Chapter 15 and bankruptcy issues for background and status of Stanford case (2.0).	2.00 625.00/hr	1,250.00
11/12/2009	DJB Telephone conference with Mr. Snyder and Mr. Morgenstern regarding status of cases and potential strategy going forward (0.2).	0.20 625.00/hr	125.00
12/7/2009	DJB Review FINRA report regarding Stanford (0.4).	0.40 625.00/hr	250.00
12/15/2009	JDG Review pleadings and research SLUSA issue.	0.60 300.00/hr	180.00
12/17/2009	RKB Legal research of the Securities Litigation Uniform Standards Act of 1998 (5.0).	5.00 275.00/hr	1,375.00
12/28/2009	RKB Legal research of SLUSA issue (1.1).	1.10 275.00/hr	302.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/30/2009	RKB Legal research of SLUSA case law (0.2).	0.20 275.00/hr	55.00
1/4/2010	RKB Investigation of principals involved in Stanford (1.0); legal research (1.0).	2.00 275.00/hr	550.00
1/6/2010	RKB Analysis and outline the deposition of Laura Pendergest - Holt in SEC investigation of Stanford Financial Group (1.2); review Davis plea (0.2).	1.40 275.00/hr	385.00
1/7/2010	RKB Analysis and outline of SEC deposition of Laura Pendergest - Holt Chief Investment Office of Stanford Financial Group (.8).	0.80 275.00/hr	220.00
1/11/2010	RKB Investigation of the backgrounds of executives of Stanford Financial Group (1.2).	1.20 275.00/hr	330.00
1/14/2010	RKB Investigation of Stanford officers (1.4).	1.40 275.00/hr	385.00
2/11/2010	DJB Attend hearing on motion to lift bankruptcy injunction (0.5).	0.50 625.00/hr	312.50
2/24/2010	KLG Research and review case dockets for evidentiary pleadings.	1.10 115.00/hr	126.50
2/25/2010	KLG Continue to research and review case dockets for evidentiary pleadings.	0.90 115.00/hr	103.50
3/23/2010	DJB Review and reply to correspondence from Mr. Snyder regarding access to SEC and receiver records (0.3).	0.30 625.00/hr	187.50
3/24/2010	DJB Review correspondence from Mr. Foly regarding effort to access records (0.1).	0.10 625.00/hr	62.50
	NAF Draft correspondence to Mr. Snyder (0.2).	0.20 650.00/hr	130.00
3/25/2010	DJB Review and reply to correspondence from Mr. Snyder regarding document review at warehouse (0.2).	0.20 625.00/hr	125.00
3/26/2010	DJB Document review at warehouse (1.3).	1.30 625.00/hr	812.50
3/30/2010	DJB Review warehouse documents in Houston (1.6).	1.60 625.00/hr	1,000.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/31/2010	DJB Continue review of warehouse files (1.1).	7.90 625.00/hr	4,937.50
4/22/2010	RKB Review OIG report regarding Stanford (1.3).	1.30 275.00/hr	357.50
5/26/2010	DJB Telephone conference with Mr. Snyder and Mr. Valdespino regarding to do list and strategy (.2).	0.20 625.00/hr	125.00
8/10/2010	DJB Attend status conference (0.5).	0.50 625.00/hr	312.50
9/23/2010	DJB Attend status conference in MDL proceeding (0.5).	0.50 625.00/hr	312.50
10/6/2010	DJB Confer with Mr. Gaither regarding update of research regarding memo (.2).	0.20 625.00/hr	125.00
10/20/2010	JDG Researched and drafted memo regarding potential liability issue.	1.80 300.00/hr	540.00
10/26/2010	JDG Continue researching, drafting, and revising memo regarding liability issue.	0.70 300.00/hr	210.00
	DJB Review research memo prepared by Mr. Gaither (.5).	0.50 625.00/hr	312.50
11/15/2010	DJB Correspondence and telephone conference with Mr. Snyder regarding review of legal files (.2).	0.20 625.00/hr	125.00
11/18/2010	DJB Confer with Mr. Snyder, Mr. Morgenstern, Mr. Little and Mr. Reid regarding potential causes of action (0.2).	0.20 625.00/hr	125.00
11/30/2010	JDG Research regarding liability issues.	0.70 300.00/hr	210.00
12/27/2010	DJB Document review in Houston.	2.00 625.00/hr	1,250.00
12/28/2010	DJB Document review in Houston.	2.00 625.00/hr	1,250.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
12/29/2010	DJB Telephone conference with Mr. Snyder, Mr. Morgenstern and Mr. Valdespino regarding additional claims to be pursued on behalf of investors and estates and procedural issues related to same (0.5); follow up correspondence with Mr. Foley and Mr. Snyder related to same (0.2).	0.70 625.00/hr	437.50
12/30/2010	DJB Correspondence with Mr. Valdespino and Mr. Snyder regarding document review (0.2).	0.20 625.00/hr	125.00
1/10/2011	DJB Review and reply to correspondence from Mr. Snyder regarding tolling agreement (.1).	0.10 625.00/hr	62.50
3/22/2011	DJB Travel to Miami and begin review of Greenberg Traurig document production.	1.00 625.00/hr	625.00
3/23/2011	DJB Continued review of documents produced by Greenberg Traurig (1.0).	1.00 625.00/hr	625.00
3/24/2011	DJB Finish document review at Greenberg Traurig (0.5).	0.50 625.00/hr	312.50
3/28/2011	DJB Attend status conference (0.5).	0.50 625.00/hr	312.50
4/20/2011	DJB Review and reply to correspondence from Mr. Snyder and Mr. Morgenstern regarding various issues (.2).	0.20 625.00/hr	125.00
7/13/2011	DJB Attend all day investor counsel meeting in Austin (1.0).	1.00 625.00/hr	625.00
7/21/2011	DJB Conference call with co-counsel to discuss overall status and fee arrangements (0.2).	1.70 625.00/hr	1,062.50
9/1/2011	DJB Review Judge Godbey's opinion regarding applicability of SLUSA to Stanford investor claims (0.3).	0.30 625.00/hr	187.50
9/26/2011	DJB Telephone conference with Mr. Snyder regarding potential estate claims (.3).	0.30 625.00/hr	187.50
10/13/2011	DJB Attend status conference (0.3).	0.30 625.00/hr	187.50
10/20/2011	DJB Review and reply to correspondence from Mr. Snyder (0.2).	0.20 625.00/hr	125.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/21/2011	DJB Review and reply to correspondence related to dismissal of various cases on SLUSA grounds and appeal of same (.2).	0.20 625.00/hr	125.00
10/24/2011	DJB Review and reply to correspondence from Mr. Snyder (0.2).	0.20 625.00/hr	125.00
12/7/2011	DJB Review SLUSA brief filed in Fifth Circuit (0.3).	0.30 625.00/hr	187.50
12/12/2011	JDG Research and revise memo regarding possible defenses.	0.20 300.00/hr	60.00
12/13/2011	DJB Review research memo and law regarding possible defenses (0.6).	0.60 625.00/hr	375.00
12/14/2011	DJB Review case law and revise memo regarding possible defense (0.7).	0.70 625.00/hr	437.50
12/15/2011	DJB Review case law and revise memo prepared by Mr. Gaither (0.5).	0.50 625.00/hr	312.50
12/22/2011	DJB Correspondence with Mr. Snyder regarding Kroll claims (.2); review preliminary report regarding Kroll's involvement with Stanford (1.1).	1.30 625.00/hr	812.50
1/12/2012	DJB Review and provide comments on letter and memo to receiver regarding potential receiver claims against third parties (0.2).	0.20 625.00/hr	125.00
1/24/2012	JDG Research regarding potential claims against third parties.	0.40 300.00/hr	120.00
2/29/2012	DJB Telephone conference regarding Stanford litigation issues (.2).	0.20 625.00/hr	125.00
3/19/2012	DJB Review Fifth Circuit SLUSA decision (0.2).	0.20 625.00/hr	125.00
4/10/2012	DJB Work on issues related to receiver claims (0.5).	0.50 625.00/hr	312.50
4/18/2012	DJB Review and reply to correspondence from Mr. Snyder regarding joint venture agreement (.1).	0.10 625.00/hr	62.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/18/2012	DJB Review correspondence from Mr. Murphy and Mr. Snyder regarding Kroll claims (0.2); review demand letter and report previously delivered to Kroll which forms the basis for the settlement demand (1.4).	1.60 625.00/hr	1,000.00
7/19/2012	DJB Review draft of class complaint prepared by Mr. Murphy and Mr. Snyder (3.2).	3.20 625.00/hr	2,000.00
7/25/2012	DJB Telephone conference with Mr. Little, Mr. Hohman and others to prepare for status conference (0.2).	0.20 625.00/hr	125.00
7/26/2012	DJB Attend status conference with Court (0.5).	0.50 625.00/hr	312.50
7/31/2012	DJB Review court's decision in Chapter 15 proceeding (0.5).	0.50 625.00/hr	312.50
9/11/2012	DJB Review correspondence related to Kroll document production (0.3).	0.30 625.00/hr	187.50
9/12/2012	DJB Review correspondence regarding proposed changes to Protective Order (0.4).	0.40 625.00/hr	250.00
9/28/2012	DJB Further correspondence regarding revisions to Protective Order (0.5).	0.50 625.00/hr	312.50
10/2/2012	DJB Review proposed protective order form Kroll and confer with Mr. Murphy regarding same (.5); correspondence with Mr. Day regarding access to database (.2).	0.70 625.00/hr	437.50
10/8/2012	DJB Further correspondence related to Kroll protective order (0.3).	0.30 625.00/hr	187.50
1/8/2013	DD Reviewed documents in the case on the Ringtail system.	1.20 350.00/hr	420.00
1/9/2013	DD Reviewed documents in the case on the Ringtail system.	1.80 350.00/hr	630.00
1/10/2013	DD Reviewed documents in the case on the Ringtail system.	1.40 350.00/hr	490.00
1/11/2013	DD Review documents in the case on the Ringtail system.	1.60 350.00/hr	560.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/14/2013	DD Review documents in the case on the Ringtail system.	1.10 350.00/hr	385.00
1/15/2013	DD Review documents in the case on the Ringtail system.	1.90 350.00/hr	665.00
1/22/2013	DD Search of Ringtail database for documents relevant to potential claims.	0.90 350.00/hr	315.00
1/23/2013	DD Search of Ringtail database for documents relating to potential claims (1.1).	1.10 350.00/hr	385.00
1/24/2013	DD Search of Ringtail database for documents relating to potential claims.	0.80 350.00/hr	280.00
1/25/2013	DD Search of Ringtail database for documents relating to potential claims.	1.20 350.00/hr	420.00
2/4/2013	DJB Meet with potential Supreme Court lawyer Goldstein (0.5).	0.50 625.00/hr	312.50
2/28/2013	JDG Attended OSIC meeting (0.5).	0.50 300.00/hr	150.00
	DJB Attend meeting with Stanford Investors Committee and Receiver (0.5).	7.30 625.00/hr	4,562.50
3/27/2013	KLG Continue to organize all Stanford pleadings and update dockets for all cases NF working on.	0.40 115.00/hr	46.00
3/28/2013	KLG Continue to organize all Stanford pleadings and update dockets for all cases NF working on (0.6).	0.60 115.00/hr	69.00
4/1/2013	KLG Continue to organize all Stanford pleadings and update dockets for all cases NF working on (0.5).	0.50 115.00/hr	57.50
5/31/2013	DJB Correspondence with Mr. Snyder regarding potential settlement of Kroll matter (.3).	0.30 625.00/hr	187.50
6/11/2013	DJB Research law regarding standing and damages issues (.2).	0.20 625.00/hr	125.00
6/14/2013	DJB Organization and review of litigation files (0.5).	0.50 625.00/hr	312.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/7/2013	DJB Review draft of class action complaint against Kroll (3.1).	3.10 625.00/hr	1,937.50
8/16/2013	DJB Review correspondence related to Kroll settlement terms sheet (.3).	0.30 625.00/hr	187.50
9/9/2013	DJB Attend Investors Committee meeting (0.5).	0.50 625.00/hr	312.50
9/13/2013	DJB Review and reply to correspondence (.1).	0.10 625.00/hr	62.50
9/19/2013	DJB Confer with Ms. Clark regarding status of all Stanford cases (0.2).	0.20 625.00/hr	125.00
11/22/2013	DJB Attend Stanford Investors Committee Meeting (0.2).	0.20 625.00/hr	125.00
12/23/2013	DD Review of documents from Ed Snyder (0.8).	0.80 350.00/hr	280.00
12/24/2013	DD Review of documents from Ed Snyder.	0.50 350.00/hr	175.00
12/27/2013	DD Review second set of documents from Ed Snyder.	1.00 350.00/hr	350.00
12/30/2013	DD Continue review of second set of documents from Ed Snyder.	0.70 350.00/hr	245.00
12/31/2013	DD Continue review of documents from Ed Snyder (0.5).	0.50 350.00/hr	175.00
1/2/2014	DD Continue review of documents from Ed Snyder.	1.00 350.00/hr	350.00
1/16/2014	DJB Attend status conference with Court (0.5); attend OSIC meeting (0.5).	1.00 625.00/hr	625.00
3/21/2014	DJB Attend OSIC meeting (0.5).	0.50 625.00/hr	312.50
5/23/2014	DJB Review and reply to correspondence related to Kroll settlement (.3).	0.30 625.00/hr	187.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/12/2014	DJB Review Kroll settlement agreement and correspondence related to same (1.1).	1.10 625.00/hr	687.50
6/30/2014	DJB Review settlement agreement and correspondence from Mr. Murphy regarding contribution and settlement credit provisions (1.2); research Texas Civil Practice and Remedies Code provisions (.5); draft correspondence to Mr. Murphy suggesting language to address contribution and settlement credit issues (.5); confer with Mr. Snyder and Mr. Little regarding same (.5).	2.70 625.00/hr	1,687.50
7/3/2014	DJB Review revised settlement agreement (1.5); provide comments to Mr. Murphy regarding settlement credit language (.1); review correspondence from Mr. Little regarding same (.1).	1.70 625.00/hr	1,062.50
7/8/2014	DJB Correspondence with Mr. Snyder (.2).	0.20 625.00/hr	125.00
7/23/2014	DJB Correspondence with Mr. Snyder regarding status of remaining issues in Kroll settlement documents (.5).	0.50 625.00/hr	312.50
8/6/2014	DJB Review correspondence from Mr. Murphy regarding status of Kroll settlement and remaining issues (.2).	0.20 625.00/hr	125.00
8/7/2014	DJB Review correspondence from Mr. Snyder and Mr. Murphy regarding remaining issues with respect to settlement documents (.2); telephone conference with Mr. Snyder regarding settlement and motion for approval (.3); telephone conference with Mr. Murphy regarding same (.2).	0.70 625.00/hr	437.50
8/26/2014	DJB Review Kroll settlement agreement and redline (2.2); draft correspondence to Mr. Murphy regarding comments to draft terms of settlement (.4); telephone conference with Mr. Murphy regarding same (.3).	2.90 625.00/hr	1,812.50
8/27/2014	DJB Review and reply to correspondence from Mr. Murphy regarding settlement (.2).	0.20 625.00/hr	125.00
8/29/2014	DJB Draft correspondence to Mr. Murphy regarding settlement approval process (.3).	0.30 625.00/hr	187.50
9/2/2014	DJB Correspondence related to Kroll settlement terms and motion for approval (.2).	0.20 625.00/hr	125.00
9/3/2014	DJB Review and reply to correspondence related to settlement issues (.2).	0.20 625.00/hr	125.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/5/2014	DJB Telephone conference with Mr. Murphy, Mr. Snyder, Mr. Little, Mr. Morgenstern, Mr. Neligan, Mr. Foley and Mr. Valdespino regarding status of settlement and motion for approval of fees and structure of settlement (1.1); review draft motion for approval of attorneys' fees (.5).	1.60 625.00/hr	1,000.00
9/9/2014	DJB Review and provide comments on motion for approval of attorneys' fees (.6); review and reply to correspondence related to case related expenses (.1); review and comment upon additional revisions to settlement agreement proposed by Kroll counsel (.5).	1.20 625.00/hr	750.00
9/10/2014	DJB Review correspondence from Mr. Murphy with latest edits to settlement agreement requested by counsel for Kroll (.4); review correspondence related to amended tolling agreement (.1).	0.50 625.00/hr	312.50
9/18/2014	DJB Review and reply to correspondence from Mr. Janvey, Mr. Little and Mr. Snyder regarding settlement terms (.6); correspondence with Mr. Neligan regarding same (.2).	0.80 625.00/hr	500.00
9/19/2014	DJB Review and reply to correspondence from Mr. Morgenstern regarding receiver's issues with Kroll settlement (.3).	0.30 625.00/hr	187.50
9/22/2014	DJB Telephone conference with Mr. Sadler and Mr. Janvey to discuss terms of settlement (.7); confer with Mr. Neligan regarding same (.2).	0.90 625.00/hr	562.50
12/12/2014	DJB Review correspondence from Mr. Snyder regarding status of settlement discussions and long form notice proposed by Kroll (.2).	0.20 625.00/hr	125.00
2/11/2015	DJB Review and reply to correspondence related to Kroll Chapter 11 filing (.6).	0.60 625.00/hr	375.00
2/12/2015	DJB Telephone conference with Mr. Morgenstern regarding effect of Kroll filing on settlement (.5); draft correspondence with Mr. Murphy related to Kroll (.2); further correspondence related to status of settlement in light of bankruptcy filing (.3).	1.00 625.00/hr	625.00
2/27/2015	DJB Review and reply to correspondence with Mr. Murphy regarding status of Kroll settlement (.2).	0.10 625.00/hr	62.50
3/6/2015	DJB Review and reply to correspondence from Mr. Murphy regarding status of settlement (.4).	0.40 625.00/hr	250.00
3/26/2015	DJB Review and reply to correspondence from Mr. Murphy regarding status of Kroll settlement (.1).	0.10 625.00/hr	62.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/13/2015	DJB Review correspondence related to status of settlement (.1).	0.10 625.00/hr	62.50
4/29/2015	DJB Review and reply to correspondence related to filing of proof of claim (.3).	0.30 625.00/hr	187.50
5/1/2015	DJB Review correspondence from Mr. Murphy with latest draft of settlement documents and status report (.5).	0.50 625.00/hr	312.50
5/5/2015	DJB Review correspondence related to latest draft of settlement documents (.2).	0.20 625.00/hr	125.00
5/8/2015	DJB Review and reply to correspondence from Mr. Murphy regarding Kroll settlement documents (.4).	0.40 625.00/hr	250.00
5/29/2015	DJB Review correspondence from Mr. Murphy regarding revised settlement documents (.2).	0.20 625.00/hr	125.00
6/3/2015	DJB Review and reply to correspondence related to filing a claim in the Kroll bankruptcy case (.2).	0.20 625.00/hr	125.00
6/8/2015	DJB Review and reply to correspondence related to status of settlement and need to take action in bankruptcy case (.4).	0.40 625.00/hr	250.00
6/15/2015	DJB Review and reply to correspondence related to status of settlement and bankruptcy case, need to file motion to lift stay and local counsel requirement (.5).	0.50 625.00/hr	312.50
6/16/2015	DJB Review and reply to correspondence related to Altegrity bankruptcy, status of settlement, motion to lift stay and need for local counsel (.8); telephone conference related to same (.2).	1.00 625.00/hr	625.00
6/17/2015	DJB Review and reply to correspondence from Mr. Morgenstern regarding status of settlement and Debtor's plan confirmation (.3); correspondence with potential local Delaware counsel to assist with Altegrity bankruptcy proceeding (.2); draft correspondence to Mr. Morgenstern regarding same (.1); review and reply to correspondence related to revised settlement documents (.8).	1.40 625.00/hr	875.00
6/18/2015	DJB Telephone conference with Mr. Driscoll regarding Altegrity bankruptcy and need for local counsel (.5); telephone conference with Mr. Morgenstern regarding same (.1); review correspondence related to revised settlement agreement and open issues (.5).	1.10 625.00/hr	687.50



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		<u>Hrs/Rate</u>	<u>Amount</u>
6/19/2015	DJB Review and reply to correspondence related to revisions to settlement agreement (.5).	0.50 625.00/hr	312.50
6/25/2015	DJB Review and reply to correspondence related to status of settlement and Alltegrity bankruptcy and need to engage local counsel (.4).	0.40 625.00/hr	250.00
6/26/2015	DJB Draft correspondence to Delaware counsel regarding engagement letter (.3).	0.30 625.00/hr	187.50
6/29/2015	DJB Review and reply to correspondence related to filing of motion to lift stay (.2).	0.20 625.00/hr	125.00
6/30/2015	DJB Review correspondence regarding status of settlement discussion with Mr. Sparling and correspond with Mr. Driscoll regarding bankruptcy issues (.2).	0.20 625.00/hr	125.00
7/7/2015	DJB Correspondence related to settlement and bankruptcy case (.1); draft correspondence to Mr. Driscoll regarding motion to lift stay (.1)	0.20 625.00/hr	125.00
7/8/2015	DJB Review and reply to correspondence from Mr. Morgenstern regarding bankruptcy issues (.3); telephone conference with Mr. Driscoll regarding Motion to Lift Stay and bankruptcy plan issues (.5); follow up correspondence related to same (.1).	0.90 625.00/hr	562.50
7/9/2015	DJB Review and reply to correspondence regarding bankruptcy and motion to lift stay (.1).	0.10 625.00/hr	62.50
7/10/2015	DJB Review and reply to correspondence related to bankruptcy and settlement (.1); review and reply to correspondence from Mr. Sparling (.1).	0.20 625.00/hr	125.00
7/13/2015	DJB Review revised settlement documents from Mr. Sparling and correspondence related to same (.5).	0.50 625.00/hr	312.50
7/14/2015	DJB Telephone conference with Mr. Sparling and others to discuss latest revisions to settlement documents and timing of finalizing (.8); draft correspondence to Mr. Sparling regarding language requested by other defendants in bar order (.2).	1.00 625.00/hr	625.00
7/17/2015	DJB Review correspondence and revised settlement documents (.5).	0.50 625.00/hr	312.50
7/21/2015	DJB Draft correspondence to Mr. Little, et al. regarding bankruptcy court approval of settlement (.1).	0.10 625.00/hr	62.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2015	DJB Review correspondence from Mr. Murphy regarding status of Kroll settlement (.1).	0.10 625.00/hr	62.50
10/9/2015	DJB Review and reply to correspondence regarding settlement status (.1).	0.10 625.00/hr	62.50
11/10/2015	DJB Review and reply to correspondence related to settlement with Kroll (.2).	0.20 625.00/hr	125.00
11/17/2015	DJB Review correspondence related to signature and bankruptcy court approval of settlement (.3).	0.30 625.00/hr	187.50
12/29/2015	DJB Review and reply to correspondence from Mr. Murphy regarding motion for approval and attorney declarations (.1).	0.10 625.00/hr	62.50
1/11/2016	DJB Telephone conference to discuss motion to approve settlement (.7); correspondence related to bankruptcy court approval of settlement (.1).	0.80 625.00/hr	500.00
1/18/2016	DJB Review and revise draft of Motion to Approve Settlement (2.1).	2.10 625.00/hr	1,312.50
1/19/2016	DJB Review and revise motion for approval of attorneys' fees (1.6); draft correspondence to Mr. Murphy regarding same (.1).	1.70 625.00/hr	1,062.50
2/23/2016	DJB Correspondence related to settlement motion and fee application (.2).	0.20 625.00/hr	125.00
2/25/2016	DJB Review and provide comments on Mr. Snyder's declaration in support of Kroll settlement (.8); begin drafting declaration to support settlement and approval of fees (.7).	1.50 625.00/hr	937.50
	For Legal Services Rendered	<u>147.70</u>	<u>\$75,007.50</u>
	Balance Due		<u><u>\$75,007.50</u></u>

## Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Douglas J. Buncher	95.40	625.00	\$59,625.00
Nicholas A. Foley	0.20	650.00	\$130.00
Doug Dunn	17.50	350.00	\$6,125.00
John D. Gaither	6.90	300.00	\$2,070.00
Richard K. Berger	24.20	275.00	\$6,655.00
Kathy L. Gradick	3.50	115.00	\$402.50

# **EXHIBIT 6**

**DECLARATION OF EXAMINER JOHN J. LITTLE**

Pursuant to 28 U.S.C. § 1746, I, John J. Little, hereby declare under penalty of perjury that I have personal knowledge of the following facts:

1. My name is John J. Little. I am over the age of eighteen (18) and am competent to make this Declaration.

2. I am admitted to practice law in the State of Texas, and am admitted to practice before various federal courts, including the United States Supreme Court, the U.S. Courts of Appeal for the Fifth and Eleventh Circuits, the United States Tax Court and the U.S. District Courts for the Northern, Eastern and Southern Districts of Texas. I have been practicing law in Dallas, Texas since 1983, and have been a partner in the Dallas law firm Little Pedersen Fankhauser, LLP, since 1994.

3. By Order dated April 20, 2009, I was appointed by Judge David C. Godbey (the “Court”) to serve as the Examiner in the Stanford Financial Group receivership proceedings. *SEC v. Stanford International Bank, Ltd., et al.*, Civil Action No. 3:09-CV-0298-N, Doc. No. 322 (the “Examiner Order”). Pursuant to the Examiner Order, I was directed to “convey to the Court such information as the Examiner, in his sole discretion, shall determine would be useful to the Court in considering the interests of the investors in any financial products, accounts, vehicles or ventures sponsored, promoted or sold by any Defendants<sup>1</sup> in this action (the “Investors”).” I have served as Examiner in the Stanford Financial Receivership proceedings continuously since my appointment.

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<sup>1</sup> The Defendants include Stanford International Bank, Ltd., Stanford Group Company, Stanford Capital Management, LLC, Robert Allen Stanford, James M. Davis, Laura Pendergest-Holt, Stanford

4. By Order dated August 10, 2010, the Court created the Official Stanford Investors Committee (“OSIC”) to represent Stanford Investors in the Stanford Financial Receivership proceedings and all related matters. *SEC v. Stanford International Bank, Ltd., et al.*, Civil Action No. 3:09-CV-0298-N, Doc. No. 1149 (the “OSIC Order”). The OSIC Order defined “Stanford Investors” as “the customers of SIBL who, as of February 16, 2009, had funds on deposit at SIBL and/or were holding certificates of deposit issued by SIBL.” OSIC Order at 2. The OSIC Order conferred upon the OSIC “rights and responsibilities similar to those of a committee appointed to serve in a bankruptcy case.” The OSIC Order appointed me, as Examiner, to serve as a member of the OSIC and as its initial Chair. I have served as the Chair of the OSIC since its formation and continue to so serve.

5. The OSIC Order specifically authorized the OSIC to pursue claims on a contingency fee basis against (a) Stanford’s pre-receivership professionals, and (b) the officers, directors and employees of any Stanford entity.<sup>2</sup> OSIC Order at 8.

6. Following its formation, the OSIC and its counsel began working with the Receiver and his counsel to investigate potential claims against Kroll, Inc. (now known as Kroll, LLC) and Kroll Associates, Inc. (Kroll, Inc., Kroll, LLC and Kroll Associates, Inc. are referred to collectively herein as “Kroll”). OSIC’s ongoing investigation led to

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Financial Group, The Stanford Financial Group Bldg. Inc. The Receivership encompasses Defendants and all entities they own or control.

<sup>2</sup> This authority was limited in that the OSIC could not pursue claims that were duplicative of claims already being prosecuted by the Receiver. OSIC Order at 8.

the Receiver serving a subpoena on Kroll on November 30, 2011 for documents relating to its dealings with the Stanford entities.

7. The Receiver and Kroll engaged in motion practice relating to the subpoena, but the end result was that Kroll began to produce documents to the Receiver and OSIC, in response to the subpoena, in October 2012. Kroll eventually produced over 20,000 pages of material. That material supplemented information already in the Receiver's possession.

8. In my capacity as Chair of the OSIC, I negotiated and executed an engagement agreement dated October 24, 2011, pursuant to which the OSIC retained four law firms (The Davis Group, Attorneys & Counselors, P.C., Castillo Snyder, P.C. ("CS"), Strasburger Price, L.L.P. ("SP") and Morgenstern & Blue, LLC)<sup>3</sup> to represent the OSIC in connection with the prosecution of potential claims against Kroll (the "Kroll Claims"). The October 24, 2011 engagement agreement contemplated that the four law firms would be compensated for their services through a contingent fee of twenty-five percent (25%) of the Net Recovery realized in respect of the Kroll Claims. The engagement agreement defined Net Recovery as the "anything of value directly or indirectly received by the Client as a result of the Kroll Claims," after "deducting allowable expenses." In connection with the execution of the October 24, 2011 engagement agreement, the four law firms entered into an agreement that addressed how those firms would divide the

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<sup>3</sup> The Davis Group, Attorneys & Counselors, P.C., is now known as Davis & Santos ("DS"). The interest of Morgenstern & Blue, LLC in the engagement has been transferred to Butzel Long, PC ("BL").

work to be done in prosecuting the Kroll Claims and any fees paid with respect to the Kroll Claims.

9. The OSIC and the Receiver began discussions with Kroll in December 2011. Those discussions continued throughout 2012 while counsel for the OSIC and the Receiver were continuing to review and analyze materials being produced by Kroll. Counsel for the OSIC and the Receiver also began work to draft a complaint for filing against Kroll.

10. The parties' negotiations led to a mediation conducted in New York City, with the Hon. E. Leo Milonas serving as mediator. That mediation took place over two days in late May, 2013, and was attended by OSIC's counsel, members of OSIC, and representatives from Kroll. I did not attend the mediation but monitored its progress via email and telephone calls.

11. The result of the mediation was a tentative agreement, reached at the end of the second day, to settle all of the Kroll Claims for a payment of \$24 million. That agreement was conditioned upon Kroll being able to secure funding for payment of the settlement amount and upon the parties' ability to negotiate and agree upon a settlement structure and final settlement documentation.

12. The tentative settlement with Kroll was the first significant Stanford-related settlement achieved with a third party. Because Kroll wanted the settlement to include a global release from all Stanford-related liability, the parties engaged in extensive and time-consuming negotiations concerning the structure of the Settlement Agreement and Bar Order, the type of notice that would be given to interested parties, and related

matters. The settlement structure initially created for the Kroll settlement eventually became the structure used for settlements already approved by this Court in the Adams & Reece and BDO litigation.

13. The settlement with Kroll was further complicated by the filing of bankruptcy petitions under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1532 by Kroll and its parent company, Altegrity, Inc. (now known as Corporate Risk Holdings, LLC) in February 2015. Because of those bankruptcy filings, counsel for the OSIC and the Receiver devoted extensive attention to further negotiations with Kroll and the effort to obtain bankruptcy court approval of the Kroll settlement.

14. In my capacity as the OSIC Chair, I have worked closely with the Receiver, his counsel, and OSIC's counsel to coordinate the prosecution of claims against third parties for the benefit of the Receivership Estate and Stanford Investors, including the claims against Kroll.

15. In that regard, I have been involved, as Chair of OSIC, in the OSIC's investigation and prosecution of the Kroll Claims.

16. OSIC's counsel at DS, CS, BL and SP have spent several years and thousands of hours investigating and pursuing the Kroll Claims. As a part of their investigation of those Kroll Claims, OSIC's counsel have reviewed voluminous documents and emails, including those obtained through the Receiver's subpoena to Kroll.

17. Following the May 2013 mediation, the OSIC's counsel and the Receiver's counsel have engaged in extensive negotiations with counsel for Kroll to draft and



finalize a settlement agreement and the various documents necessary to obtain Court approval of the settlement reached with Kroll. As OSIC's Chair, I participated in numerous conference calls and negotiating sessions that have occurred in connection with those negotiations, and I have worked closely with OSIC's counsel and with the Receiver's counsel throughout those subsequent negotiations, and throughout the process of documenting the agreement in principle that was reached with Kroll.

18. Ultimately, a Settlement Agreement was entered into in December 2015, by the Receiver, the OSIC, the Antiguan Joint Liquidators, and Kroll.

19. It is my opinion that the settlement OSIC and the Receiver reached with Kroll is fair and reasonable, in the best interests of the Stanford Receivership estate and the Stanford Investors, and should be approved by the Court. My opinion is based upon my involvement in the investigation and prosecution of the Kroll Claims, the risks, uncertainty and the length of time it would take to get to trial on those Claims, and the collectability problems presented by the bankruptcy filings of Kroll and its parent company.

20. The Receiver and the OSIC have agreed in principal that any proceeds recovered in respect of the Kroll Claims will be distributed through the Receiver's existing (and already approved and operating) mechanism for identifying and approving claims and making distributions. Using the Receiver's existing process will be far more efficient, and likely result in larger distributions to Stanford Investors, than the alternative of creating one or more parallel claim and distribution process(es) for third party liability actions.

21. As noted above, the OSIC entered into a fee agreement with DS, CS, BL and SP that provided for the payment of a contingent fee of twenty-five percent (25%) of the Net Recovery realized in respect of the Kroll Claims.

22. The Court has previously approved a contingent fee arrangement between OSIC and its counsel that provides for the payment of a 25% contingent fee on net recoveries from certain lawsuits prosecuted by OSIC.<sup>4</sup> Civil Action No. 3:09-CV-0298-N, Doc. No. 1267. The Court has similarly approved a 25% contingent fee on the net recoveries in the BDO litigation and the Adams & Reece litigation. Civil Action No. 3:12-CV-01447-N, Doc. No. 80 (BDO Litigation); Civil Action No. 3:09-CV-0298-N, Doc. No. 2231 (Adams & Reece)

23. The fee agreement entered between OSIC and its counsel here (DS, CS, BL and SP) was modeled after the contingency fee agreement already approved by the Court in the primary receivership proceeding. Civil Action No. 3:09-CV-0298-N, Doc. No. 1267.

24. For the same reasons the Court previously found the twenty-five percent (25%) contingency fee agreement between the OSIC and its counsel to be reasonable, *see id.*, p. 2, the Court should find the twenty-five percent (25%) contingency fee applicable to the settlement with Kroll to be reasonable and approve it for payment.

25. It is my opinion that the attorneys' fees requested are reasonable in comparison to the total net amount to be recovered for the benefit of the Stanford

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<sup>4</sup> The referenced Order addressed the OSIC's prosecution of certain fraudulent transfer and unjust enrichment actions.

Investors. The twenty-five percent (25%) contingency fee was heavily negotiated between OSIC and its Counsel, and is substantially below the typical market rate contingency fee percentage of 33% to 40% that most law firms would demand to handle cases of this complexity and magnitude.

26. I respectfully submit that an award of attorneys' fees equal to twenty-five percent (25%) of the Net Recovery from the settlement with Kroll is reasonable and appropriate considering the significant time, effort, and resources which OSIC's counsel have invested in investigating the Stanford fraud, prosecuting and resolving the Kroll Claims, and prosecuting the other Stanford-related litigation.

Executed on March 1, 2016.

  
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John J. Little

