

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 16-CV-21301-DPG

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ARIEL QUIROS,
WILLIAM STENGER,
JAY PEAK, INC.,
Q RESORTS, INC.,
JAY PEAK HOTEL SUITES L.P.,
JAY PEAK HOTEL SUITES PHASE II L.P.,
JAY PEAK MANAGEMENT, INC.,
JAY PEAK PENTHOUSE SUITES L.P.,
JAY PEAK GP SERVICES, INC.,
JAY PEAK GOLF AND MOUNTAIN SUITES L.P.,
JAY PEAK GP SERVICES GOLF, INC.,
JAY PEAK LODGE AND TOWNHOUSES L.P.,
JAY PEAK GP SERVICES LODGE, INC.,
JAY PEAK HOTEL SUITES STATESIDE L.P.,
JAY PEAK GP SERVICES STATESIDE, INC.,
JAY PEAK BIOMEDICAL RESEARCH PARK L.P.,
AnC BIO VERMONT GP SERVICES, LLC,

Defendants, and

JAY CONSTRUCTION MANAGEMENT, INC.,
GSI OF DADE COUNTY, INC.,
NORTH EAST CONTRACT SERVICES, INC.,
Q BURKE MOUNTAIN RESORT, LLC,

Relief Defendants.

**DEFENDANT ARIEL QUIROS'S THIRD MOTION FOR AN ORDER PERMITTING
PAYMENT OF ATTORNEYS' FEES AND COSTS AND SUPPORTING
MEMORANDUM OF LAW**

{00108829.1 }

Defendant Ariel Quiros, by and through undersigned counsel, hereby moves this Court for an order permitting him to pay his fees and costs incurred in the months of July and August, 2016, in connection with this action (the “SEC Action”) and the following five related actions:

- (1) *State of Vermont v. Quiros*, Docket no. 217-4-16Wncv (Vt. Superior Court);
- (2) *Alexandre Daccache v. Raymond James Financial, Inc. et al.*, Case No. 1:16-cv-21575-FAM (S.D. Fla.);
- (3) *Michael I. Goldberg, as Receiver v. Raymond James Financial, Inc. et al.*, Case No. 1:16-cv-21831-JAL (S.D. Fla.);
- (4) *Caterina Gonzalez Calero v. Raymond James & Associates, Inc. et al.*, Case No. 2016-017840- CA-01 (Miami-Dade County Circuit Court, Complex Business Litigation Division); and
- (5) *Minggan Wei And Zhao Wei v. Ariel Quiros et al.*, Case No. 602-7-16 (Vt. Superior Court).

The reasons for this Motion are set forth in the following Memorandum of Law and accompanying Declaration of David B. Gordon, attached hereto as **Exhibit A**. In sum, these fees and costs represent the necessary and reasonable costs of Mr. Quiros’s defense in the SEC Action and the five above-listed actions.

I. INTRODUCTION AND BACKGROUND

By this Motion, Defendant Ariel Quiros seeks fees to defend himself against escalating litigation: During the months of July and August, 2016, Mr. Quiros’s counsel worked on three motions to dismiss, faced a consolidated class action lawsuit, and responded to two new state court actions. Mr. Quiros now seeks leave of Court for attorneys’ fees to be paid from the mortgage of his Setai Condominium, an asset already approved by the Court, and which is not part of the Receivership estate. This is Mr. Quiros’s third motion for payment of attorneys’ fees.

On May 27, 2016, this Court granted Defendant Ariel Quiros's first motion for attorneys' fees. (DE 148.) After considering Mr. Quiros's motion, which sought fees beyond the instant SEC action, the Court unequivocally ordered that Mr. Quiros could sell or mortgage his Setai Condominium and use the proceeds to "pay Quiros's reasonable attorney's fees in amounts approved by the Court[.]" (DE 148, pg. 4.) The Court placed no other limit on these fees.

On July 25, 2016, Mr. Quiros filed his second motion for attorneys' fees. (DE 192.) On August 11, 2016, the SEC and the Receiver each filed an Opposition to Mr. Quiros's second fees motion (DE 199, 200), and on August 22, 2016, Mr. Quiros filed a Reply. (DE 204.) Mr. Quiros's second fees motion is set for hearing on October 7, 2016. (DE 211.) Mr. Quiros's attorneys have not yet been paid for any of the work they performed in April, May, June, July, or August 2016.

In opposition to Mr. Quiros's second motion for attorneys' fees, counsel for the SEC and the Receiver argued: (1) Mr. Quiros should not be allowed to use the proceeds from his Setai condominium to pay his attorneys' fees; (2) Mr. Quiros should not be given fees for cases other than the instant SEC Action; and (3) Mr. Quiros's attorneys' rates are unreasonably high. (DE 199, 200.) The first and second arguments are directly contradicted by the Court's May 27 order, and the SEC and Receiver must not be permitted to re-litigate these issues. The third argument is defeated by the fact that the Receiver himself has been recently awarded attorneys' fees at the rate of \$638.25 an hour, which is only slightly lower than the rate charged by Mr. Quiros's lead attorney, David B. Gordon. (*See* DE 204-2; Supplemental Declaration of Douglas Gold.)

Mr. Quiros expects that the SEC and the Receiver may try to raise the same arguments in response to his third motion for attorneys' fees. Re-litigating these overarching issues on each

fees motion is not productive, nor efficient. Mr. Quiros thus welcomes the October 7 hearing as an opportunity for the Court to establish a procedure for Mr. Quiros to submit for approval his invoices (and, if desired, a description of the work performed), consistent with the May 27 order. In the meantime, Mr. Quiros submits the instant third motion for attorneys' fees to give the Court a more complete record of the work performed by his attorneys before the October 7 hearing.

II. QUIROS'S ATTORNEYS' FEES ARE OBJECTIVELY REASONABLE

A. MSK fees are objectively reasonable given the scope of work performed.

Mr. Quiros has retained the law firm of Mitchell Silberberg & Knupp LLP ("MSK") to serve as his lead counsel. Gordon Decl. ¶ 2. MSK's fees incurred in connection with its representation of Mr. Quiros for the months of July and August, 2016 are reflected in Exhibit 1 to the Gordon Declaration, which consists of the firm's invoices, redacted for attorney-client privilege and work product. *Id.* ¶ 3 & Ex. 1. A review of the invoices demonstrates that the \$497,242.72 in fees and costs incurred were necessary and reasonable in light of the complex and multi-jurisdictional nature of the lawsuits against Mr. Quiros. MSK's fees and costs for July and August fell into nine primary categories:

1. Motion to Dismiss Receiver's Action

On August 10, 2016, Mr. Quiros filed a Motion to Dismiss in *Michael I. Goldberg, as Receiver v. Raymond James Financial, Inc. et al.* Mr. Quiros moved to dismiss the Receiver's complaint on the grounds that the Receiver failed to plead his fraud, breach of fiduciary duty, or RICO claims with particularity; the Receiver failed to establish standing for each of the limited partnerships on behalf of which he filed suit because he failed to plausibly allege loss on their behalf; the Receiver's RICO claims are barred by the PSLRA; most of the Receiver's claims are time-barred; and the Receiver's breach of fiduciary duty claims are barred by the independent tort doctrine. Because the posture of the Receiver's case against Mr. Quiros is different than that

of the SEC Action or the *Daccache* class action case, preparing the motion required substantial legal research. As reflected in Exhibit 1 to the Gordon Declaration, MSK's fees and costs included:

- Legal research
- Drafting and revisions
- Preparing request for judicial notice and voluminous supporting exhibits

2. Reply in Support of Motion to Dismiss SEC Action

On September 2, 2016, Mr. Quiros filed a Reply in Support of his Motion to Dismiss the SEC's Amended Complaint. (DE 208.) On August 2, 2016, the SEC submitted an incredibly dense, 30-page Opposition,¹ replete with lengthy summaries of its allegations and straw-man arguments that failed to address the more difficult, carefully reasoned questions raised by Mr. Quiros's Motion. (*See* DE 196.) The SEC offered a misleading characterization of the facts, and made a number of arguments that were not supported by the cases cited. By way of just one example, the SEC argued that because it was seeking the remedy of disgorgement, its claims were not barred by the applicable five-year federal statute of limitations. However, the SEC cited no cases saying that the federal statute considers when a *remedy* (as opposed to a *claim*) first accrues. Mr. Quiros's counsel was thus required to analyze the cases cited by the SEC and conduct its own research in order to disprove this entirely novel and unsupported theory. For this point, as well as several others, analyzing and unpacking the SEC's arguments and performing legal research required significant work. It was likewise time-consuming to draft a tight Reply brief that addressed all the points raised by the Opposition. As reflected in Exhibit 1 to the Gordon Declaration, MSK's fees and costs included:

¹ Pursuant to the parties' stipulation, the SEC filed a 30-page Opposition, and Mr. Quiros filed a 15-page Reply.

- Factual and legal analysis of the SEC’s Opposition
- Legal research
- Drafting and revisions

3. Reply in Support of Motion to Dismiss Vermont Action

On September 6, 2016, Mr. Quiros filed a Reply in Support of his Motion to Dismiss the Vermont Action. (MSK did significant work on the Motion in August.) On August 3, 2016, the State of Vermont filed an extensive, 43-page Opposition to Mr. Quiros’s Motion to Dismiss the State’s complaint. The State’s Opposition raised new legal theories and arguments that substantially diverged from the theory pursued in the initial complaint. Working with local Vermont counsel, MSK assisted in the preparation of the Reply. As reflected in Exhibit 1 to the Gordon Declaration, MSK’s fees and costs included:

- Factual and legal analysis of the SEC’s Opposition
- Legal research
- Drafting and revisions
- Coordination with local counsel

4. Daccache – Class Action Consolidation and Early Proceedings

The *Daccache* case was originally one of four class action lawsuits filed against Mr. Quiros and other defendants. As discussed in greater detail in the second motion for attorneys’ fees, on June 13, 2016, the plaintiffs in the Vermont class action, *James B. Shaw, et al. v. Raymond James Financial, Inc. et al.*, Case No. 5:16-cv-00129-GWC (D. Vt.), filed a motion before the Judicial Panel on Multidistrict Litigation (“MDL” panel) for the class actions to be consolidated and transferred to Vermont, pursuant to 28 U.S.C. § 1407, on the grounds that the class actions shared common questions of fact, and thus it would thus promote efficiency and serve the interests of justice for them to be consolidated or coordinated. The hearing in the MDL

proceeding was scheduled for July 28, 2016. However, before the MDL hearing could take place, the plaintiffs in *Shaw*, as well as those in the other class actions – *Jose R. Casseres-Pinto v. Ariel Quiros et al.*, Case No. 1:16-cv-22209-DPG (S.D. Fla.) and *Carlos Enrique Hiller Sanchez v. Raymond James & Associates, Inc.*, Case No. 1:16-cv-21643-KMW (S.D. Fla.) – dismissed their cases and joined the *Daccache* class action, which is pending in the Southern District of Florida. The result is a single consolidated class action case.

On August 9, 2016, the plaintiffs in *Daccache* filed an amended complaint. On August 31, 2016, counsel for the parties held a supplemental Rule 26(f) early meeting of counsel. Also during August, the parties agreed to extend the deadline for responses to pending discovery requests, and counsel for Mr. Quiros began working on his responses. The parties additionally met and conferred and agreed on a Protective Order and an electronic discovery protocol governing documents to be produced by Raymond James. As reflected in Exhibit 1 to the Gordon Declaration, MSK's fees and costs included:

- Reviewing and analyzing the amended complaint
- Preparing for and attending supplemental Rule 26(f) conference
- Reviewing and revising Protective Order
- Reviewing and revising electronic discovery protocol for Raymond James
- Working on RFP responses
- Correspondence with plaintiffs' counsel and co-defendants' counsel

5. Gonzalez Calero Florida State Court Case

On July 13, 2016, lead Plaintiff Caterina Gonzales Calero filed a complaint against Mr. Quiros and other defendants in the Complex Business Litigation Division of Miami-Dade County. On August 15, 2016, co-defendant Raymond James moved to stay the complaint pending a determination of previously filed federal class actions involving substantially the same

parties and same issues. On August 18, 2016, Mr. Quiros joined in Raymond James's motion to stay and moved for an enlargement of time to respond to the complaint. As reflected in Exhibit 1 to the Gordon Declaration, MSK's fees and costs included:

- Reviewing and analyzing the complaint
- Discussions with local counsel regarding strategy
- Reviewing joinder in motion to stay and motion for enlargement of time

6. Wei Vermont State Court Case

On July 20, 2016, Minggan and Zhao Wei filed a 45-page, 313-paragraph complaint against Mr. Quiros and other defendants in Vermont state court. Co-defendant Raymond James moved to stay the complaint and sought an enlargement of time to respond, pending a decision on the motion to stay. Mr. Quiros joined in Raymond James's motion to stay and filed his own motion for enlargement of time. As reflected in Exhibit 1 to the Gordon Declaration, MSK's fees and costs included:

- Reviewing and analyzing the complaint
- Discussions with local counsel regarding strategy
- Reviewing joinder in motion to stay and motion for enlargement of time

7. Motion for May/June Attorneys' Fees

As noted above, on July 25, 2016, Mr. Quiros filed his second motion for attorneys' fees. (DE 192.) On August 11, the SEC and the Receiver filed Oppositions (DE 199, 200), and on August 22, 2016, Mr. Quiros filed a Reply (DE 204). The motion for attorneys' fees required substantial work, including reviewing and redacting MSK's 53-page bill (DE 192-11), summarizing the work performed in the multiple cases, and researching comparable attorneys' rates. Additionally, counsel for Mr. Quiros was required to draft a Reply in response to the two

Opposition briefs. As reflected in Exhibit 1 to the Gordon Declaration, MSK's fees and costs included:

- Reviewing and redacting MSK's bill for May/June
- Coordinating and reviewing the submissions of four local counsel firms
- Legal research
- Drafting and revisions of the fees motion
- Researching comparable attorneys' rates and drafting two declarations on behalf of Douglas Gold (*see* DE 192-22; DE 204-2)
- Reviewing and analyzing the Oppositions submitted by the Receiver and SEC
- Drafting the Reply

8. Mortgage of Setai Condominium

In August 2016, Mr. Quiros completed the mortgage of his Setai Condominium, the proceeds of which the Court authorized to be used to pay his attorneys' fees. (*See* DE 148.) During July and August, MSK attorneys Paul Montclare and Anthony Adler negotiated the mortgage, prepared the documentation, and closed the deal. On August 11, 2016, the Receiver received a wire transfer of over \$1 million from the transaction. (*See* DE 200.) As reflected in Exhibit 1 to the Gordon Declaration, MSK's fees and costs included:

- Negotiating the mortgage deal
- Preparing the mortgage documents
- Coordinating with the lender and his counsel
- Attending the closing

9. Case Coordination

Mr. Quiros's counsel also spent time during July and August managing and coordinating the multiple lawsuits against him. MSK attorneys and staff tracked, reviewed, and analyzed the

myriad pleadings filed across the cases. MSK also coordinated with local counsel in both Vermont and Florida, and communicated with the Receiver. As reflected in Exhibit 1 to the Gordon Declaration, MSK's fees and costs included:

- Almost daily communications with the client
- Communications with the Receiver, SEC, and other opposing counsel
- Reviewing, analyzing and organizing pleadings
- Correspondence and coordination with local counsel

B. MSK's rates are objectively reasonable

Additionally, for the reasons discussed in Mr. Quiros's first and second fees motions, MSK is entitled to recover its attorneys' fees and costs because its billing rates are objectively reasonable. As set forth in the Declarations of Douglas Gold submitted in support of the May/June fees motion, MSK's rates are comparable to those of law firms providing competitive legal services, both nationally and in the Miami area. (*See* DE 192-22; DE 204-2.) Perhaps most tellingly, Receiver Michael Goldberg was recently awarded attorneys' fees of \$638.25 an hour, which is comparable to MSK lead partner David B. Gordon's rate of \$695 an hour. (*Compare* DE 192 *with* DE 204-2), and whose rate is the same as that of Charles Lichtman of Berger Singerman. (*See* DE 118, pg. 4.)

During the months of July and August, the MSK partners performing the majority of the work on the litigation were lead partner David B. Gordon, who managed strategy across all six cases; John Durrant, who drafted the Motion to Dismiss the Receiver's action and the Reply in Support of Motion to Dismiss the SEC Action; and Robert Rotstein, who oversaw the State of Vermont, Wei, and Gonzales Calero cases. (*See* DE 192-12, 192-13, 192-15; Gordon Decl. Ex. 1.) Additionally, two associates joined the core team of MSK attorneys working on the cases.

Senior associate Emily Evitt assumed greater responsibility for case coordination and discovery, and mid-level associate Melinda Carrido handled significant research (as did mid-level associate Travis Meserve, who had previously been working on the cases). (*See* Gordon Decl., Ex. 1.) By thus shifting more work to associates, MSK endeavored to keep costs down.

C. MSK's local counsel's rates are objectively reasonable

As alluded to above, and as discussed in the May/June fees motion, Mr. Quiros is assisted by local counsel in Vermont and in Florida. Local counsel's fees and costs are also reasonable.

1. Dinse, Knapp & McAndrew, P.C.

Dinse, Knapp & McAndrew, P.C. is Mr. Quiros's Vermont local counsel for civil matters. As noted above, the State of Vermont filed an extensive Opposition to Mr. Quiros's motion to dismiss that raised new legal theories and arguments that substantially diverged from the theory pursued in the initial complaint. To respond, Dinse, Knapp & McAndrew was required to research a wide range of issues related to state and federal securities law. Counsel also conducted in-depth research on consumer protection law in Vermont, as well as the consumer protection laws of a number of jurisdictions relied upon in the State's Opposition. Relying on this research, counsel drafted a 30-page Reply in support of Mr. Quiros's Motion to Dismiss. (Gordon Decl., Ex. 2.)

Dinse, Knapp & McAndrew also took preliminary steps to respond to the complaint filed in a new state court action in Vermont, *Wei v. Quiros et al.* Counsel reviewed and evaluated the complaint and reviewed the underlying facts. Counsel analyzed potential avenues for responding to the complaint, and coordinated with counsel for the other named defendants in moving for a stay of the lawsuit pending resolution of the previously filed class actions and action by the Receiver. (*Id.*)

Finally, Dinse, Knapp & McAndrew seeks fees for a small amount of work that counsel performed in June on the Vermont federal class action, *James B. Shaw, et al. v. Raymond James Financial, Inc. et al.*, Case No. 5:16-cv-00129-GWC (D. Vt.), before that case was dismissed and consolidated with the *Daccache* class action. For its work on the three cases, Dinse, Knapp & McAndrew seeks a total of \$24,935.48, which is reasonable given the scope of work performed. (*Id.*)

2. León Cosgrove, LLC

León Cosgrove, LLC is Mr. Quiros's Florida local counsel. During the months of July and August, attorneys Scott Cosgrove and James Bryan worked on the cases pending in the Southern District of Florida as well as the *Gonzalez Calero* case pending in the Complex Business Litigation Division of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida. For the month of July, León Cosgrove, LLC incurred a total of \$12,024.50 in fees and costs, and for the month of August, León Cosgrove, LLC incurred a total of \$25,051.00 in fees and costs, which was reasonable given the scope of the work performed. (Gordon Decl., Ex. 3.)

During the months of July and August, León Cosgrove, LLC performed the following services: reviewed and analyzed filings and dockets for all actions pending in the Southern District of Florida and the Complex Business Litigation Division of Miami-Dade County; reviewed MDL Proceeding filings and strategized with co-counsel regarding consolidation matters; strategized with co-counsel regarding stay issues and local practice for same; assisted co-counsel in court-ordered scheduling conference and with joint proposed scheduling report; strategized with co-counsel regarding motions to dismiss; strategized with co-counsel regarding case management issues; and prepared various filings and documents to be served in the Southern District of Florida and the Complex Business Litigation Division of Miami-Dade County. (*Id.*)

3. Gray Robinson

By this Motion, Mr. Quiros also seeks \$15,358 in attorneys' fees and costs that former Florida local counsel Gray Robinson incurred during June 2016. These fees were included in the invoice attached to the second fees motion (DE 192-18), however, counsel inadvertently did not include them in the Proposed Order for the second fees motion. (Gordon Decl., Ex. 4.)

III. CONCLUSION

For the foregoing reasons, Defendant Quiros requests that this Motion be granted and that the Court order that funds be released as follows:

- A. \$497,242.72 to pay MSK's legal fees and costs for July 1, 2016 through August 31, 2016.
- B. \$24,935.48 to pay Dinse, Knapp & McAndrew's legal fees and costs for July 1, 2016 through August 31, 2016.
- C. \$37,075.50 to pay León Cosgrove's legal fees and costs for July 1, 2016 through August 31, 2016.
- D. \$15,358 to pay Gray Robinson's remaining legal fees and costs through June 30, 2016.

WHEREFORE, Mr. Quiros respectfully requests that this Honorable Court enter an Order awarding his counsel the requested fees and costs. A proposed order is attached hereto as **Exhibit B** and will also be submitted via e-mail to the Court as prescribed by Section 3I(6) of the CM/ECF Administrative Procedures.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(3)

Counsel for Mr. Quiros contacted counsel for the SEC and the Receiver to determine whether there was any objection to the relief sought herein. After conferring, undersigned counsel can report that both the SEC and the Receiver oppose the Motion.

s/ Scott B. Cosgrove _____
Scott B. Cosgrove

Dated: September 27, 2016

Respectfully submitted,

By: s/ Scott B. Cosgrove

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Counsel for Defendant Ariel Quiros

CERTIFICATE OF SERVICE

I hereby certify that on this on September 27, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing documents are being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in the manner stated in the service list attached.

s/ Scott B. Cosgrove
Scott B. Cosgrove

SERVICE LIST
US District Court, Southern District of Florida
Case No.: 16-cv-21301-DPG

Securities and Exchange Commission v. Ariel Quiros, et al.

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EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:16-cv-21301-DPG

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ARIEL QUIROS,
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Q RESORTS, INC.,
JAY PEAK HOTEL SUITES L.P.,
JAY PEAK HOTEL SUITES PHASE II L.P.,
JAY PEAK MANAGEMENT, INC.,
JAY PEAK PENTHOUSE SUITES L.P.,
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JAY PEAK BIOMEDICAL RESEARCH PARK L.P.,
AnC BIO VERMONT GP SERVICES, LLC,

Defendants, and

JAY CONSTRUCTION MANAGEMENT, INC.,
GSI OF DADE COUNTY, INC.,
NORTH EAST CONTRACT SERVICES, INC.,
Q BURKE MOUNTAIN RESORT, LLC,

Relief Defendants.

_____/

**DECLARATION OF DAVID B. GORDON IN SUPPORT OF ARIEL QUIROS'S THIRD
MOTION FOR ORDER PERMITTING PAYMENT OF
ATTORNEYS' FEES AND COSTS**

I, DAVID B. GORDON, hereby declare as follows:

1. I am an attorney at law and a member, through my professional corporation, of the firm of Mitchell Silberberg & Knupp LLP (“MSK”), attorneys for Defendant Ariel Quiros. I am lead counsel on this matter. I make this Declaration in support of Defendant Ariel Quiros’s Third Motion For An Order Permitting Payment Of Attorneys’ Fees And Costs in this matter.

2. Mr. Quiros retained my law firm, MSK, to serve as his lead counsel for this action and, *inter alia*, five related lawsuits against him: (i) *State of Vermont v. Quiros*, Docket no. 217-4-16Wncv (Vt. Superior Court); (ii) *Alexandre Daccache v. Raymond James Financial, Inc. et al.*, Case No. 1:16-cv-21575-FAM (S.D. Fla.); (iii) *Michael I. Goldberg, as Receiver v. Raymond James Financial, Inc. et al.*, Case No. 1:16-cv-21831-JAL (S.D. Fla.); (iv) *Caterina Gonzalez Calero v. Raymond James & Associates, Inc. et al.*, Case No. 2016-017840- CA-01 (Miami-Dade County Circuit Court, Complex Business Litigation Division); (v) *Minggan Wei And Zhao Wei v. Ariel Quiros et al.*, Case No. 602-7-16 (Vt. Superior Court).

3. During the months of July and August, 2016, MSK incurred a total of \$497,242.72 in fees and costs across the six cases. A true and correct copy of MSK’s July and August invoice, redacted for attorney-client privilege and work product, is attached hereto as **Exhibit 1** and incorporated herein by reference.

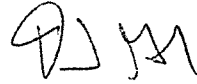
4. Dinse, Knapp & McAndrew, P.C. is Mr. Quiros’s Vermont local counsel for civil matters. True and correct copies of Dinse, Knapp & McAndrew, P.C.’s invoices, redacted for attorney-client privilege and work-product, are attached hereto as **Exhibit 2** and incorporated by reference herein.

5. León Cosgrove, LLC is Mr. Quiros’s local counsel in Florida. True and correct copies of León Cosgrove’s invoices, redacted for attorney-client privilege and work-product, are attached hereto as **Exhibit 3** and incorporated by reference herein.

6. Gray Robinson is Mr. Quiros's former local counsel in Florida. A true and correct copy of Gray Robinson's June 2016 invoice, redacted for attorney-client privilege and work-product, is attached hereto as **Exhibit 4** and incorporated by reference herein. Counsel inadvertently failed to seek Gray Robinson's June attorneys' fees and costs of \$15,358 in the Second Motion for Attorneys' Fees.

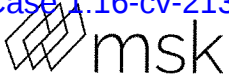
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 26th day of September, 2016, at New York, NY.



David B. Gordon

Exhibit 1



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

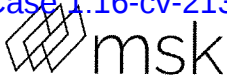
Ariel Quiros
19 Grand Bay Estates Circle
Key Biscayne, FL 33149

00626 47553
Invoice: 349055

September 16, 2016

LEGAL SERVICES RENDERED through August 31, 2016

Re: Quiros Securities Litigation	494,539.50	
Disbursements and charges per attached	2,703.22	
		497,242.72
TOTAL DUE:		<u>497,242.72</u>



Ariel Quiros
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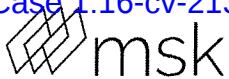
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Quiros Securities Litigation

Fees through August 31, 2016:

07/01/16	Emails with SEC; review court filings and motions; work on motion for extension in Receiver case; review multiple MDL filings; emails with C. Murray re: research issues; emails with M. Goldberg re: buyer; finalize discovery report to Judge Gayles; emails with T. Adler re: [REDACTED]; emails with VT counsel re: motion to dismiss Attorney General case; review T. Coffin email re: Stenger	D. GORDON	1.60	1,112.00
07/01/16	E-mail and telephone conferences with J. Durrant re response re MDL motion to transfer.	E. EVITT	0.60	360.00
07/01/16	E-mail with J. Durrant re procedure re response re MDL motion to transfer; telephone conference with clerk re same.	E. EVITT	0.50	300.00
07/01/16	Draft and finalized MDL papers and supervise filing; conference with E. Evitt re MDL issues and other research issues; review MDL briefs filed by other parties; conference with D. Gordon regarding [REDACTED] for SEC case [REDACTED] and MDL.	J. DURRANT	5.00	3,375.00
07/01/16	Read, strategize regarding Raymond James response in connection with MDL.	R. ROTSTEIN	0.50	402.50

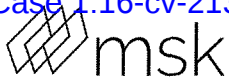


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07/02/16	Research	C. MURRAY	1.50	600.00
07/02/16	Review and comment on potential loan agreement	D. GORDON	0.30	208.50
07/05/16	Review, manage, and organize pleadings.	N. TRAN	2.00	340.00
07/05/16	Emails with G. Sazer and A. Quiros re: [REDACTED]; review MDL filings; review email from RJ's counsel re: same	D. GORDON	0.40	278.00
07/05/16	Review of MDL filings and correspondence to team regarding Raymond James' correction; legal analysis regarding [REDACTED].	J. DURRANT	1.40	945.00
07/05/16	Review, read cases on Vermont motion to dismiss	R. ROTSTEIN	2.20	1,771.00
07/06/16	Review court order In Receiver action; review court notice in SEC action; review SEC letter to court; emails with M. Goldberg; review MDL notice; work on fee motion; emails with client re [REDACTED]; work on potential MDL arguments	D. GORDON	0.90	625.50
07/06/16	Draft motion for May and June attorneys' fees, including e-mail with D. Gordon, R. Rotstein, and J. Durrant.	E. EVITT	3.00	1,800.00
07/06/16	Work on motion for May/June attorneys' fees.	E. EVITT	1.30	780.00

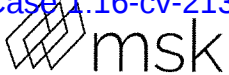


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07/06/16	Review of submitted 26(f) report in SEC action and correspondence to D. Gordon regarding [REDACTED]; correspondence to D. Gordon regarding [REDACTED]; legal analysis regarding [REDACTED] and correspondence to C. Murray regarding same; correspondence with D. Gordon regarding [REDACTED] MDL issues and review MDL filings regarding same.	J. DURRANT	3.00	2,025.00
07/06/16	Further research, checking, Vermont law	R. ROTSTEIN	1.40	1,127.00
07/07/16	Confer with J. Durrant regarding [REDACTED]	C. MURRAY	0.20	80.00
07/07/16	Call with client re: [REDACTED]; work on motion for fees; review court notices; emails with VT counsel re: motion to dismiss	D. GORDON	1.60	1,112.00
07/07/16	Telephone conference with D. Gordon re fees motion and plan for case organization and management going forward; telephone conference with J. Durrant re same; work on fees motion.	E. EVITT	1.50	900.00
07/07/16	Conference with C. Murray regarding [REDACTED] issues and related legal analysis; conferences with E. Evitt re issues related to fees motion, [REDACTED], and staffing; review appearances for argument in MDL proceeding and correspondence to D. Gordon regarding approach to same	J. DURRANT	2.20	1,485.00

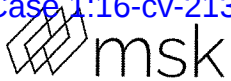


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07/08/16	Prepare notice of appearance	C. MURRAY	0.60	240.00
07/08/16	Work on motion for fees; emails with R. Berger re: VT law re: [REDACTED] [REDACTED]	D. GORDON	0.40	278.00
07/08/16	Correspondence regarding appearance at MDL hearing	J. DURRANT	0.20	135.00
07/08/16	Communicate (email) with Vermont counsel regarding [REDACTED] [REDACTED], and review file re same.	R. ROTSTEIN	0.80	644.00
07/10/16	Further draft motion for May/June attorneys' fees.	E. EVITT	1.80	1,080.00
07/10/16	Correspondence to E. Evitt regarding [REDACTED] [REDACTED]	J. DURRANT	0.20	135.00
07/11/16	Call with E. Evitt re case management and organization; read motion for fees	N. TRAN	0.30	51.00
07/11/16	Prepare and serve notice of appearance; research	C. MURRAY	2.30	920.00
07/11/16	Emails with C. Murray re research re: [REDACTED]; review multiple court notices and filings in MDL and SEC action.	D. GORDON	0.40	278.00
07/11/16	Work on May/June motion for attorneys' fees.	E. EVITT	1.20	720.00
07/11/16	Plan for case management and organization; telephone conference with J. Durrant re MDL filing, fees motion, and case status.	E. EVITT	1.10	660.00

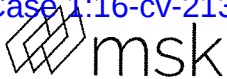


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07/11/16	Address MDL filing regarding appearance and review of those filed by other parties; analyze ██████████ ██████████ SEC matter.	J. DURRANT	1.30	877.50
07/11/16	Read Stenger, Quiros transcript, close analysis of same.	R. ROTSTEIN	1.00	805.00
07/12/16	Review, manage, and organize pleadings	N. TRAN	0.50	85.00
07/12/16	Research background materials on ██████████ for E. Evitt.	A. KELLY	0.40	106.00
07/12/16	Call with client re: ██████████; emails with M. Goldberg and call with Midra re: sale of JPI; assignment to E. Evitt re: ██████████ ██████████; emails with counsel in the Golberg v. Quiros matter re: 26f conference; emails with J. Durrant re: same.	D. GORDON	1.40	973.00
07/12/16	Work on May/June fees motion; telephone conferences with D. Gordon and J. Durrant re legal research re: ██████████; legal research re: same; e-mail with D. Gordon and J. Durrant re same; e-mail with team re case management.	E. EVITT	2.00	1,200.00

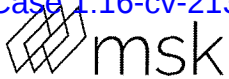


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07/12/16	Review of motion to dismiss in Vermont AG and related correspondence with R. Rotstein regarding same; multiple correspondence and conferences with E. Evitt regarding legal analysis [REDACTED], related legal analysis, and correspondence to D. Gordon regarding same; review 26(f) proposal in Receivership matter and correspondence to S. Cosgrove regarding same; correspondence with D. Gordon regarding [REDACTED].	J. DURRANT	5.30	3,577.50
07/12/16	Further read Stenger SEC transcript, analysis of case in light of recent allegations	R. ROTSTEIN	0.80	644.00
07/13/16	Research motions [REDACTED] for E. Evitt.	A. KELLY	1.00	265.00
07/13/16	Research	C. MURRAY	3.50	1,400.00
07/13/16	Calls with A. Quiros re: [REDACTED]; research re: [REDACTED]; emails with M. Goldberg and Midra re: sale of JPI; emails with G. Sazer re: mortgage; provide notice insurance carrier re: various claims; work on issues re: [REDACTED]; work on potential claim for insurance coverage.	D. GORDON	2.50	1,737.50



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07/13/16	Legal research re: [REDACTED]; telephone conference with J. Durrant re same; e-mail with J. Durrant re same.	E. EVITT	2.70	1,620.00
07/13/16	E-mail with D. Gordon and J. Durrant re: legal research re: [REDACTED]; e-mail team re case organization.	E. EVITT	0.40	240.00
07/13/16	Review of background materials for mortgage loan documents and correspondence re: same.	G. NAPOLITANO	1.20	600.00
07/13/16	Review legal analysis and case law concerning [REDACTED] and oversight and multiple conferences with E. Evitt regarding same; correspondence and conference with E. Evitt re case management; perform legal analysis and correspondence with J. Noguez regarding [REDACTED]; conference with D. Gordon regarding strategy issues regarding receivership action; prepare for Rule 26(f) conference in the Receivership case, review pleadings and prior agreements, and conference with S. Cosgrove regarding strategy; analyze [REDACTED] issues in Receiver case.	J. DURRANT	6.60	4,455.00
07/13/16	Further read, analyze Stenger transcript from SEC investigation	R. ROTSTEIN	0.50	402.50

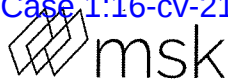


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07/14/16	Work on analysis of [REDACTED]; emails with J. Durrant re: 26f conference in Receiver v. Quiros; review Daccache filing in MDL	D. GORDON	1.30	903.50
07/14/16	E-mail with local counsel re fees motion; further analyze [REDACTED]; telephone conference with J. Durrant re [REDACTED] and strategy re same.	E. EVITT	0.80	480.00
07/14/16	Discussion with P. Montclare re: loan documentation and correspondence re: same.	G. NAPOLITANO	0.90	450.00
07/14/16	Prepare for and attend Rule 26(f) conference in Receiver case; follow up with S. Cosgrove regarding Rule 26(f) conference; legal analysis regarding [REDACTED] and multiple conferences with E. Evitt regarding same; correspondence (emails) to D. Gordon regarding scheduling issues in Receivership action.	J. DURRANT	5.80	3,915.00
07/14/16	Work on loan documents in connection with proposed mortgage.	P. MONTCLARE	0.80	556.00
07/14/16	Read Stenger transcript.	R. ROTSTEIN	0.90	724.50
07/15/16	Call with client re: [REDACTED]; work on fee application; work on strategy re: [REDACTED]; review MDL notices	D. GORDON	1.30	903.50

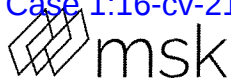


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 Key Biscayne, FL 33149

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07/15/16	Address scheduling issues in class action and receiver cases and review proposal from counsel from Raymond James; review of proposed protective order; review of [REDACTED] and correspondence and conference with E. Evitt regarding same and [REDACTED]; review comments from Raymond James to search terms in class actions for ESI; review [REDACTED].	J. DURRANT	3.70	2,497.50
07/15/16	Analyze SEC testimony, article regarding Governor Shumlin.	R. ROTSTEIN	0.40	322.00
07/16/16	Initial review of preliminary title report; commence preparation of Mortgage and Note	A. ADLER	1.70	1,275.00
07/16/16	E-mail with D. Gordon and J. Durrant re: [REDACTED]; further draft, revise motion for May/June fees.	E. EVITT	3.40	2,040.00
07/17/16	Continue drafting of the Mortgage and Note, commence drafting of the Loan and Security Agreement	A. ADLER	3.00	2,250.00
07/17/16	Work on loan documents	D. GORDON	0.10	69.50
07/17/16	E-mail with D. Gordon, R. Rotstein, J. Noguez, and J. Durrant re motion for May/June fees.	E. EVITT	0.20	120.00
07/18/16	Review, manage, and organize pleadings.	N. TRAN	2.00	340.00
07/18/16	Work on Mortgage, including necessary documentation for same.	N. TRAN	1.50	255.00



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07/18/16	Review and prepare emails; finalize initial draft of Mortgage, Note and Loan and Security Agreement	A. ADLER	1.30	975.00
07/18/16	Call and emails with client re: [REDACTED]; emails with D. Kirby re: [REDACTED]; email with M. Goldberg re: call	D. GORDON	0.70	486.50
07/18/16	Revise May/June fees motion based on comments from D. Gordon, R. Rotstein, and J. Durrant; telephone conference with R. Rotstein re Vermont action and its relation to other lawsuits; telephone conference with J. Durrant re fees motion, [REDACTED], and case organization and strategy; e-mail with N. Tran re case organization and management.	E. EVITT	2.50	1,500.00
07/18/16	Address planning issues for MDL and review procedures; review of factual background information and press, [REDACTED], regarding all cases	J. DURRANT	3.80	2,565.00
07/18/16	Further read, analyze SEC testimony of Quiros [REDACTED]	R. ROTSTEIN	0.70	563.50
07/19/16	Obtain financial documents for mortgage/lender	N. TRAN	0.30	51.00
07/19/16	Review, manage, and organize pleadings.	N. TRAN	0.50	85.00



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07/19/16	Call with M. Goldberg re: potential sale of JPI; call with client re: [REDACTED]; emails with potential lender re: the Setai; work on fee application; emails with SEC re: extension	D. GORDON	2.20	1,529.00
07/19/16	E-mail and telephone conference with D. Gordon re May/June fees motion; e-mail J. Noguez re same; telephone conference and conference with J. Durrant re same and re motion to dismiss Receiver's action and case strategy; work on May/June fees motion; attend to case management and organization.	E. EVITT	3.00	1,800.00
07/19/16	Legal analysis regarding receiver's complaint and motion to dismiss, [REDACTED]; correspondence with D. Gordon regarding briefing scheduling in SEC matter.	J. DURRANT	4.70	3,172.50
07/19/16	Continue to work on deal documents and communications regarding same in connection with mortgage for 5th Avenue Condominium	P. MONTCLARE	0.40	278.00
07/19/16	Further close review of Quiros SEC transcript	R. ROTSTEIN	0.90	724.50
07/20/16	Work on obtaining necessary documentation for Mortgage	N. TRAN	0.30	51.00



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07/20/16	Emails with Midra Management and M. Goldberg re: JPI; work on fee application; review SEC motion and proposed order	D. GORDON	0.40	278.00
07/20/16	Telephone conferences with D. Gordon and D. Gold re May/June fees motion; telephone conference and conference with J. Durrant re same; e-mail with D. Gordon, J. Durrant, and D. Gold re same; draft D. Gold declaration in support of fees motion; work on exhibits for May/June fees motion.	E. EVITT	3.80	2,280.00
07/20/16	Revise May/June fees motion to incorporate J. Durrant comments and additional data; begin drafting D. Gordon declaration in support of fees motion; e-mail with D. Gold re information and attachments for fees motion	E. EVITT	1.30	780.00
07/20/16	Address various issues regarding fees motion and conference and correspondence with team regarding same, [REDACTED]; analysis of receiver complaint and legal issues regarding same	J. DURRANT	5.50	3,712.50
07/20/16	Read recent articles about case, analyze same and further analysis of transcripts	R. ROTSTEIN	0.40	322.00
07/21/16	Review emails re: Receiver's motion to extend deadline in SEC case; emails with potential lender re: mortgage	D. GORDON	1.20	834.00



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07/21/16	Revise May/June fees motion and supporting Gordon and Gold declarations; coordinate exhibits for Gordon declaration; telephone conference and e-mail with S. Cosgrove re [REDACTED].	E. EVITT	4.10	2,460.00
07/21/16	Revise May/June fees motion and supporting declarations; e-mail with S. Cosgrove re exhibits for fees motion; e-mail with D. Gordon re final steps for fees motion.	E. EVITT	1.80	1,080.00
07/21/16	Prepare and plan for MDL hearing	J. DURRANT	1.20	810.00
07/21/16	Research as requested by A. Adler	S. XING	1.00	265.00
07/22/16	Call with client re: [REDACTED]; work on fee application; email to other counsel in SEC action re: same; review court notices and orders; review letter from Ironshore re: insurance coverage; review multiple emails re: [REDACTED].	D. GORDON	1.80	1,251.00
07/22/16	Review, revise, and finalize May/June fees motion, supporting declarations, and exhibits including telephone conferences and e-mail with D. Gordon and N. Tran re same; e-mail with local counsel J. Bryan re filing requirements and proposed order; conference with J. Durrant re case strategy [REDACTED]; draft proposed order re fees motion and e-mail D. Gordon re same	E. EVITT	2.70	1,620.00

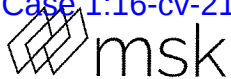


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07/22/16	Address issues regarding filing of fees motion and correspondence with team regarding same; correspondence with team regarding [REDACTED] and related conferences with E. Evitt; legal analysis regarding research issues in Receiver and class action matters.	J. DURRANT	3.70	2,497.50
07/22/16	Read Shaw plaintiffs' notice regarding mootness, [REDACTED] email regarding same	R. ROTSTEIN	0.20	161.00
07/23/16	Emails with J. Durrant and analysis re: [REDACTED]	D. GORDON	0.10	69.50
07/23/16	Correspondence with team regarding strategy emails regarding [REDACTED]	J. DURRANT	0.40	270.00
07/24/16	Review emails and prepare response; prepare standalone Continuing Guaranty	A. ADLER	1.50	1,125.00
07/24/16	Emails with J. Durrant re: MDL ruling and motion to dismiss in Receiver case	D. GORDON	0.20	139.00
07/24/16	Correspondence with team regarding [REDACTED]	J. DURRANT	0.20	135.00
07/25/16	Voice mail conferences with G. Abrahams; commence revisions to Loan and Security Agreement; review and prepare emails	A. ADLER	0.60	450.00
07/25/16	Research discovery issues	C. MURRAY	1.50	600.00



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07/25/16	Call with client re: [REDACTED] [REDACTED] [REDACTED]; emails and call with J. Nogues re: [REDACTED] [REDACTED]; email to SEC re: Motion; work on issues re: potential mortgage; work on fee application; email to Stenger's lawyers re: Stenger communications; review multiple emails from Receiver, Stenger and potential JPI buyer re: sale of JPI ; review MDL order; review email from T. Lifshitz re: lifting stay	D. GORDON	2.30	1,598.50
07/25/16	Revise, finalize, and oversee filing of May/June fees motion and supporting declarations, including telephone conferences with D. Gordon, J. Durrant, local counsel J. Bryan, and N. Tran re same; review correspondence among Daccache counsel re 26(f) report and ESI protocol.	E. EVITT	2.50	1,500.00



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07/25/16	Circulate ruling dismissing MDL; strategy regarding [REDACTED]; review and revise proposed protective order in class actions; review and outline response to joint scheduling report in class actions; correspondence with E. Evitt regarding fees motion and review revisions to same; conference and correspondence with E. Evitt re proposals regarding [REDACTED]; review correspondence and attachments in Hiller Sanchez; review and consider proposal from counsel to re-activate Daccache case.	J. DURRANT	5.30	3,577.50
07/25/16	Numerous emails regarding closing details; review loan agreement language	P. MONTCLARE	0.30	208.50
07/26/16	Research discovery issues; confer with J. Durant regarding discovery research; email with team regarding Daccache stay; email with team regarding [REDACTED]	C. MURRAY	3.30	1,320.00

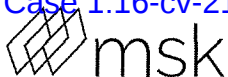


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07/26/16	<p>Communications with K. Strauss, G. Sazer and P. Montclare re: opinion letter for loan; emails with G. Abrahams re: mortgage; review email from JPI re: list of assets and email to client re: [REDACTED]; review multiple emails from M. Goldberg, Midra and B. Stenger re: sale of JPI; call with A. Quiros re: [REDACTED]; work on edits to mortgage documents; review emails from T. Lifshitz and others re: terminating stay in Daccache case; emails with J. Durrant re: [REDACTED]; review case law re: [REDACTED] and multiple emails with E. Evitt, C. Murray and J. Durrant re: same and discovery responses in Daccache; review Lifshitz email re: order in Daccache and proposed order sent to court; emails with J. Durrant re: [REDACTED]; review emails from RJ's and Stenger's counsel re: discovery in Daccache</p>	D. GORDON	3.00	2,085.00
07/26/16	<p>Telephone conference with J. Durrant re strategy [REDACTED]; e-mail correspondence with team re same; read recent article on Vermont case.</p>	E. EVITT	0.60	360.00

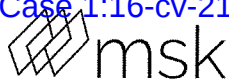


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07/26/16	Address discovery and scheduling issues in class actions, review served discovery and correspondence with counsel for class regarding discovery requests; analysis and correspondence internally and externally about transfer of Receiver action and related strategy; legal analysis regarding [REDACTED]; correspondence (email) to D. Gordon regarding [REDACTED]; legal analysis regarding [REDACTED] and correspondence with D. Gordon regarding same and related correspondence with team	J. DURRANT	7.90	5,332.50
07/26/16	Multiple emails regarding deal documents and comments	P. MONTCLARE	0.80	556.00
07/26/16	Read article sent by Ritchie Berger regarding State's early purported knowledge	R. ROTSTEIN	0.20	161.00
07/27/16	Review, manage and organize pleadings	N. TRAN	1.00	170.00
07/27/16	Multiple emails with client, G. Sazer, G. Abrahams, T. Adler and P. Montclare re: mortgage; multiple emails with counsel in Daccache re: discovery issues; call with J. Durrant re: arguments to make re: [REDACTED]; call with client re: [REDACTED]; review court notices	D. GORDON	1.30	903.50
07/27/16	Telephone conferences with J. Durrant re initial disclosures; begin outlining same.	E. EVITT	0.70	420.00
07/27/16	Read and analyze Receiver's complaint	E. EVITT	0.80	480.00



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07/27/16	Multiple correspondence with counsel regarding scheduling issues in Receiver cases and class actions); draft and revise inserts for Scheduling Reports and review and consider proposals regarding scheduling in Receiver case; review and analyze proposed factual stipulations, internal correspondence and correspondence to opposing counsel regarding same; internal conference with D. Gordon regarding strategy and initial disclosures; correspondence to Receiver's counsel regarding initial disclosures; conference and correspondence with E. Evitt regarding discovery issues; correspondence with counsel regarding [REDACTED]; analyze Raymond James schedule and correspondence to counsel for Raymond James regarding [REDACTED]	J. DURRANT	7.20	4,860.00
07/27/16	Further analysis of article regarding state's knowledge	R. ROTSTEIN	0.30	241.50
07/28/16	Review and prepare e mails; telephone conference with G. Sazer; prepare revised drafts of the Loan Documents	A. ADLER	1.00	750.00
07/28/16	Research [REDACTED]	C. MURRAY	2.50	1,000.00



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07/28/16	Numerous calls and emails with lender re: terms of mortgage, mortgage documents, declaration of J. Sazer, and communications with SEC and Receiver; call and emails with Receiver re: agreement to unfreeze cash to pay for certain fixed costs; calls and with client re: [REDACTED]; email to SEC and Receiver re: mortgage; call and emails with Midra re: JPI; work on Joint Report to court in Receiver lawsuit and multiple emails with other counsel re: same; review analysis of cases re: [REDACTED] and email to D. Kirby re: [REDACTED]	D. GORDON	4.50	3,127.50
07/28/16	Review drafts of joint scheduling report; telephone conferences and e-mail with J. Durrant re same; conference with J. Durrant re scheduling report and case strategy; e-mail with D. Gordon re initial disclosures.	E. EVITT	1.30	780.00
07/28/16	Revise extensively Joint Scheduling Report in Receiver case, including schedule; negotiations and discussions with counsel regarding schedule in Receiver case and related internal emails and conferences; legal analysis regarding [REDACTED]; correspondence with local counsel regarding [REDACTED].	J. DURRANT	8.70	5,872.50



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07/28/16	Review title report; checklist of [REDACTED]; analyze legal aspects of [REDACTED]; offices conferences regarding same; emails regarding same; estimate [REDACTED]; telecom with managing agent regarding any further outstanding requirements necessary for closing	P. MONTCLARE	1.20	834.00
07/29/16	Confer with team regarding [REDACTED]	C. MURRAY	0.30	120.00
07/29/16	Call and emails with S. Cosgrove and J. Durrant re: [REDACTED]; emails with SEC re: page limit; review SEC motion and proposed order re: same; emails re: [REDACTED] Daccache; work on issues re: loan and guarantees of same; review numerous emails from counsel in Receiver v. Quiros re: joint report to court; review court notices and orders in SEC case; meeting with potential JPI buyers; call with client re: [REDACTED]	D. GORDON	3.30	2,293.50
07/29/16	Conferences with J. Durrant re discovery status, case management, and next steps; e-mail with D. Gordon and J. Durrant re same.	E. EVITT	0.50	300.00



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07/29/16	Finalize and coordinate joint scheduling statement in Receiver case; conference and correspondence with team regarding [REDACTED]; legal analysis of several issue [REDACTED].	J. DURRANT	7.50	5,062.50
07/29/16	Telecon with title clearer re closing issues; emails regarding same; discuss closing logistics with various parties to the deal; outline ACRIS and correction; email with vendor re closing requirements	P. MONTCLARE	1.50	1,042.50
07/30/16	Call with client re: [REDACTED]; emails with M. Goldberg re: communications with potential buyers and potential motion	D. GORDON	0.60	417.00
07/30/16	Analyze deadlines and action items; e-mail with J. Durrant re same.	E. EVITT	0.50	300.00
07/31/16	Emails with G. Sazer re: loan	D. GORDON	0.10	69.50
07/31/16	Legal analysis of further research issues for associates to perform and review of relevant pleadings.	J. DURRANT	2.00	1,350.00
08/01/16	Review, manage, and organize pleadings.	N. TRAN	0.30	51.00
08/01/16	Review and prepare emails; initial research on [REDACTED]	A. ADLER	0.50	375.00
08/01/16	Confer with team regarding strategy; research [REDACTED]	C. MURRAY	1.20	480.00

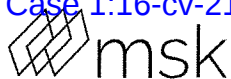


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08/01/16	Call with client re: [REDACTED]; work on issues re: mortgage, including re: insurance, title, opinion letter and closing; emails with SEC re: loan; draft declarations of Gary Sazer and Jon Sazer; review new state court complaint and emails with S. Cosgrove re: same; provide notice to new insurance carrier re: state case; emails with Stenger's counsel re: insurance coverage; call with client re: [REDACTED]	D. GORDON	3.70	2,571.50
08/01/16	Telephone conference with D. Gordon, J. Durrant, and C. Murray re action items and case strategy; conferences and telephone conference with J. Durrant same; conference with J. Nogues re initial disclosures; outline initial disclosures.	E. EVITT	1.60	960.00
08/01/16	Further outline initial disclosures and e-mail with D. Gordon re same; read and analyze SEC motion to dismiss.	E. EVITT	1.20	720.00
08/01/16	Prepare for and conference with team regarding coordination; review rejection of schedule in Receiver case and correspondence with team regarding [REDACTED]; review civil theft complaint and conference and correspondence with team regarding [REDACTED]; draft and revise motion to dismiss receiver case; outline research issues for team regarding Receiver motion to dismiss	J. DURRANT	10.70	7,222.50

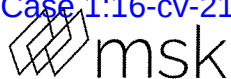


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08/01/16	Prepare drafts of Florida and New York UCC1 Financing Statements.	L. LANCHESTER	0.60	153.00
08/01/16	Analyze title report exceptions re: [REDACTED]; review ACRIS re: [REDACTED]; draft corrected deed; review title aff & make comments thereon, review multiple emails re deal terms	P. MONTCLARE	2.20	1,529.00
08/01/16	Read, closely analyze Florida state complaint.	R. ROTSTEIN	1.80	1,449.00
08/02/16	Confer with J. Durant regarding motion to dismiss; review research issues for motion to dismiss	C. MURRAY	0.80	320.00
08/02/16	Email declarations to SEC; work on initial disclosures for Receiver case; numerous emails with lender, lender's counsel, K. Strauss, P. Montclare and T. Adler re: loan; emails with Stenger's lawyer re: insurance issues; emails with VT counsel re: new VT lawsuit; work on response to complaint in Gonzalez; review court notice in SEC case	D. GORDON	2.80	1,946.00
08/02/16	Draft and revise initial disclosures for Receiver case; e-mail with D. Gordon re same.	E. EVITT	1.30	780.00



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08/02/16	Telephone conference with J. Durrant re action items and plan for research; conference with M. Carrido re case background; telephone conference and e-mail with D. Gordon re initial disclosures; oversee research re SEC opposition to motion to dismiss.	E. EVITT	1.40	840.00
08/02/16	Attention to initial disclosures and conference and correspondence with E. Evitt regarding same; conference with S. Wakshlag regarding [REDACTED]; multiple correspondence to team regarding strategy issues [REDACTED]; review of new Vermont complaint and related correspondence and conference; review and revise joinder in Receiver case and related email; draft and revise motion to dismiss Receiver complaint; conference with C. Murray regarding research issues.	J. DURRANT	8.20	5,535.00
08/02/16	Read, begin analysis of Vermont state Wei complaint; further analysis of law governing Florida complaint;	R. ROTSTEIN	2.80	2,254.00
08/03/16	Review and prepare emails; prepare revised drafts of the Loan Documents	A. ADLER	0.70	525.00
08/03/16	Research for motion to dismiss	C. MURRAY	1.40	560.00



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08/03/16	<p>Work on initial disclosures in Receiver case; call with K. Strauss re: [REDACTED] and [REDACTED] and emails with M. Goldberg re: same; review notice from FAA and emails with M. Goldberg re: same; emails with Stenger's counsel re: insurance; brief review of arguments to opposition for dismissal in SEC lawsuit and confer with J. Durrant and T. Meserve re: [REDACTED] [REDACTED] research issues; work on motion to dismiss Receiver action; emails with lender re: mortgage; coordinate responses to new VT and FL lawsuits; call with client re: [REDACTED] [REDACTED]</p>	D. GORDON	3.70	2,571.50
08/03/16	<p>Review and finalize initial disclosures for receiver's action; e-mail with S. Cosgrove and J. Bryan re same; e-mail with J. Durrant re research strategy; review e-mail from D. Gordon and J. Durrant re [REDACTED] [REDACTED]</p>	E. EVITT	0.60	360.00



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08/03/16	Legal analysis of multiple research issues related to Receiver's complaint and correspondence (emails) to team and conference with M. Carrido regarding same; address issues regarding [REDACTED] and multiple correspondence (emails) to team and conference with M. Carrido regarding same; conference with D. Gordon regarding SEC action and issues to raise in Reply; draft and revise motion to dismiss Receiver's complaint	J. DURRANT	13.40	9,045.00
08/03/16	Prepare electronic submission of Florida UCC1 Financing Statement.	L. LANCHESTER	0.70	178.50
08/03/16	Conduct research regarding [REDACTED] regarding Motion to Dismiss receiver's motion, and [REDACTED]; conducted research regarding [REDACTED].	M. CARRIDO	3.70	1,776.00
08/03/16	Further analysis [REDACTED] and read research regarding legal theories in companion cases; review [REDACTED] documents	R. ROTSTEIN	2.10	1,690.50
08/03/16	Prepare authorities at request of E. Evitt	S. XING	1.00	265.00
08/03/16	Legal research regarding motion to dismiss [REDACTED].	T. MESERVE	0.40	192.00
08/04/16	Organize pleadings	N. TRAN	0.30	51.00



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08/04/16	Work on documents for mortgage of 400 Fifth Avenue unit	N. TRAN	0.70	119.00
08/04/16	Manage and organize pleadings	N. TRAN	0.70	119.00
08/04/16	Review and prepare emails; prepare initial drafts of Funds Flow Statement and Notice Letter to Condo Board; prepare updated drafts of Loan Documents; conference with P. Montclare; telephone conference with G. Abrahams; telephone conference with G. Sazer	A. ADLER	2.70	2,025.00
08/04/16	Research for motion to dismiss	C. MURRAY	4.00	1,600.00
08/04/16	Review Wei complaint and emails with local counsel re: [REDACTED]; review emails and motion of Receiver re: special immigration counsel; provide notice to insurance carrier re: Wei case; work on argument for [REDACTED] Receiver lawsuit; obtain various information requested by lender relating to mortgage in preparation for closing; emails with J. Schneider re: potential borrowing of funds from RJ settlement fund	D. GORDON	2.40	1,668.00
08/04/16	E-mail with D. Gordon, R. Rotstein, J. Durrant and N. Tran re case management and deadlines and summarize same; e-mail with J. Bryan re initial disclosures; e-mail with local counsel July fees motion.	E. EVITT	1.10	660.00



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08/04/16	Legal analysis and multiple correspondence with team regarding research issues for motion to dismiss Receiver case, [REDACTED]; draft and revise Receiver motion to dismiss; correspondence with team regarding project management, scheduling and staffing issues; review correspondence regarding management of funds from Raymond James settlement; correspondence with R. Rotstein regarding reply to motion to dismiss	J. DURRANT	11.20	7,560.00
08/04/16	Conduct research regarding [REDACTED]	M. CARRIDO	4.20	2,016.00
08/04/16	Coordinate closing documents; review title documents; review final draft loan documents and calculate title charges and taxes for cash flow statement; emails re: same	P. MONTCLARE	2.70	1,876.50
08/04/16	Read, research opposition to Motion to Dismiss State of Vermont case; further analysis of Vermont complaint [REDACTED]; strategize regarding [REDACTED] and communicate with Ritchie Berger regarding same	R. ROTSTEIN	3.20	2,576.00



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08/04/16	Legal research regarding motion to dismiss [REDACTED].	T. MESERVE	4.20	2,016.00
08/05/16	Speak with managing company for 400 Fifth Avenue; make arrangements for notary in VT and FL for upcoming mortgage closing; edit and send affidavits to P. Montclare for review and to send to client re: [REDACTED]	N. TRAN	2.00	340.00
08/05/16	Research for motion to dismiss	C. MURRAY	5.40	2,160.00
08/05/16	Work on motion to dismiss Receiver's case, including review of case law potentially to be cited in same; multiple emails re: loan closing with P. Montclare, T. Adler and lender's counsel; calls with A. Quiros and M. Figueroa re: [REDACTED]; call and emails with A. Quiros re: [REDACTED]; emails with J. Schneider re: Receiver's proposed motion; multiple emails with R. Rotstein and J. Durrant re: [REDACTED]	D. GORDON	3.10	2,154.50
08/05/16	E-mail with N. Tran re case management; update summary of cases and action items; review e-mail correspondence from team re research re motion to dismiss Receiver's Action [REDACTED]; review, analyze and revise motion to dismiss Receiver's Action; e-mail with J. Durrant re same.	E. EVITT	2.00	1,200.00



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08/05/16	Draft, revise, and finalize initial draft of motion to dismiss receiver case; review research regarding [REDACTED] and related correspondence; multiple correspondence with team regarding [REDACTED] Receiver case; multiple correspondence with M. Carrido regarding [REDACTED]; correspondence with C. Murray regarding [REDACTED].	J. DURRANT	5.80	3,915.00
08/05/16	Conduct research regarding [REDACTED] for purposes of drafting Motion to Dismiss.	M. CARRIDO	3.30	1,584.00
08/05/16	Re-read Vermont complaint and analyze claims [REDACTED], research legal issues [REDACTED].	R. ROTSTEIN	5.30	4,266.50
08/05/16	Legal research regarding [REDACTED].	T. MESERVE	4.70	2,256.00
08/06/16	Email to Stenger's counsel re: insurance	D. GORDON	0.10	69.50
08/06/16	Review comments from D. Gordon and E. Evitt to motion to dismiss draft in Receiver case.	J. DURRANT	0.30	202.50
08/06/16	Further analysis, [REDACTED] research regarding Wei Vermont complaint	R. ROTSTEIN	2.10	1,690.50

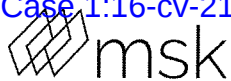


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08/07/16	Review and prepare emails; review final version of Loan Documents; finalize Authorization to file UCC Financing Statement	A. ADLER	1.30	975.00
08/07/16	Finalize deal documents for closing	P. MONTCLARE	3.50	2,432.50
08/07/16	Further research regarding Vermont Wei complaint [REDACTED]	R. ROTSTEIN	1.90	1,529.50
08/08/16	Assist in preparing mortgage documents for 44 Fifth Avenue	N. TRAN	4.00	680.00
08/08/16	Review and prepare emails; prepare revised drafts of Loan and Security Agreement	A. ADLER	1.00	750.00
08/08/16	Emails with J. Schneider and review proposed order re: Receiver's motion; Call with G. Sazer re: loan and provide suggested revision re: potential second loan; emails with VT counsel re: [REDACTED]; review court notice in SEC case; review L. Vargas email to Judge Gayles; review court order in Daccache case	D. GORDON	1.20	834.00
08/08/16	Work on July fees motion.	E. EVITT	0.70	420.00
08/08/16	Read and analyze SEC opposition to motion to dismiss; conference with R. Rotstein and telephone conference with J. Durrant re case strategy and management; strategize re case management.	E. EVITT	1.70	1,020.00

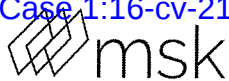


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08/08/16	Review various correspondence regarding Vermont matters; review correspondence and emails regarding Receiver's application to use funds; correspond with M. Carrido [REDACTED]; correspond with D. Gordon and conference with E. Evitt regarding motion to dismiss Receiver's complaint and strategy and coordination; review and substantially revise motion to dismiss, integrating comments of D. Gordon and E. Evitt and research by T. Meserve, and make numerous other revisions	J. DURRANT	10.40	7,020.00
08/08/16	Conduct research regarding [REDACTED]	M. CARRIDO	1.90	912.00
08/08/16	Review and finalize deal documents; multiple emails re same.	P. MONTCLARE	3.00	2,085.00
08/08/16	Further review of [REDACTED] documents [REDACTED]; strategize [REDACTED], email Vermont local counsel regarding same	R. ROTSTEIN	2.20	1,771.00
08/09/16	Prepare and coordinate additional mortgage documents for 400 Fifth Avenue; contact insurance company; assist P. Montclare in having evidence of mortgage insurance prepared	N. TRAN	3.00	510.00

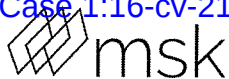


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08/09/16	Review and prepare emails; review proposed Certificate of Insurance; prepare revised checklist; review final draft of Loan Documents	A. ADLER	1.80	1,350.00
08/09/16	Revise motion to dismiss; confer with team regarding filing motion to dismiss; prepare request for judicial notice	C. MURRAY	2.10	840.00
08/09/16	Call with client re: [REDACTED]; review S. Cosgrove email re: [REDACTED]; review M. Goldberg and Midra emails re: LOI; review numerous emails of attorneys handling mortgage re: same and closing; work on fee application; review email from T. Lishitz re: case management protocol in Daccache; emails with J. Durrant and RJ's counsel re: same; review court notices in Daccache; review Lifshitz email to Judge Moreno in Daccache	D. GORDON	1.60	1,112.00
08/09/16	Review and revise reply in support of motion to dismiss Receiver's Action; e-mail with J. Durrant re same; telephone conference with D. Gordon re July fees motion; e-mail with local counsel re same; analyze case management and calendaring.	E. EVITT	2.10	1,260.00



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08/09/16	Analyze research issues for reply in support of motion to dismiss SEC complaint; e-mail with M. Carrido re same; e-mail with J. Durrant re [REDACTED] Receiver motion to dismiss.	E. EVITT	0.80	480.00
08/09/16	Initial review of amended complaint in Daccache; review of case management materials and correspond with team and S. Wakshlag regarding same; revise motion to dismiss Receiver's complaint, including tightening of arguments, revisions to [REDACTED] and other arguments, incorporation of further changes from team and local counsel; correspondence with team members and local counsel regarding motion to dismiss Receiver's complaint, including multiple research issues	J. DURRANT	8.80	5,940.00
08/09/16	Analyze Wei, Florida state complaints [REDACTED] and read [REDACTED] documents [REDACTED]	R. ROTSTEIN	3.00	2,415.00
08/09/16	Review motion to dismiss reply brief section re [REDACTED] arguments and provide comments on same in Receiver Action.	T. MESERVE	0.40	192.00
08/10/16	Assist in mortgage closing, attend closing meeting	N. TRAN	7.00	1,190.00
08/10/16	Prepare request for judicial notice and exhibits	C. MURRAY	3.80	1,520.00



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08/10/16	Email with RJ's counsel and T. Lifshitz re: timing of motions in Daccache; work on motion to dismiss Receiver's lawsuit; work on [REDACTED] Miami state court lawsuit; work on [REDACTED] Wei lawsuit; emails with M. Goldberg re: asset freeze and AQ's allowance; review multiple court notices in Daccache; review court notices in Receiver's action; work on reply to opposition brief in SEC case	D. GORDON	2.70	1,876.50
08/10/16	Read Wei Vermont complaint and e-mail with R. Rotstein re same; review e-mail correspondence re Florida state court action.	E. EVITT	0.90	540.00
08/10/16	Analyze and outline research issues for reply in support of SEC motion to dismiss; conference with M. Carrido re same; telephone conferences with J. Durrant re same; proof, revise, and finalize motion to dismiss Receiver's Action and supporting papers, including e-mails and telephone conferences with team and with local counsel J. Bryan re same.	E. EVITT	5.60	3,360.00
08/10/16	Draft, revise and finalize motion to dismiss Receiver's complaint and supervise filing and address related issues; review SEC opposition to motion to dismiss complaint and outline reply to same	J. DURRANT	9.50	6,412.50

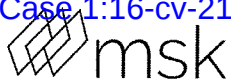


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08/10/16	Prepare electronic submission of Florida UCC3 Financing Statement Amendment.	L. LANCHESTER	0.30	76.50
08/10/16	Review and revise Motion to Dismiss Receiver's Complaint; conduct ██████████ ██████████ research regarding Reply in support of Motion to Dismiss SEC's Complaint	M. CARRIDO	3.40	1,632.00
08/10/16	Prepare and format exhibits to Motion to Dismiss for transfer.	M. JACKSON	1.00	265.00
08/10/16	Revise and prepare FINAL closing documents	P. MONTCLARE	1.00	695.00
08/10/16	Analysis of ██████████ complaints	R. ROTSTEIN	2.80	2,254.00
08/11/16	Review all documents from closing with P. Montclare	N. TRAN	1.50	255.00
08/11/16	Work on strategy for Wei case, ██████████ ██████████; review and analyze SEC and Receiver opposition briefs in SEC action; work on reply; review T. Lifshitz email re: discovery in Daccache; review court notice and order in SEC case	D. GORDON	1.80	1,251.00

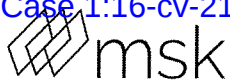


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08/11/16	Telephone conference with R. Berger, J. Barnard, and R. Rotstein re strategy for [REDACTED] Wei case; e-mail team re same and re areas for additional follow up; telephone conferences with R. Rotstein and J. Durrant re Wei case; conference and telephone conference with J. Durrant re case management, organization and staffing; attend to case management and organization; read SEC's and Receiver's oppositions to May/June fees motion; telephone conferences with D. Gordon re same	E. EVITT	4.90	2,940.00
08/11/16	Confer with D. Gordon re case strategy.	J. ALBERTSON	0.20	108.00
08/11/16	Review SEC opposition to motion to dismiss and outline response and related research issues, including [REDACTED]; correspondence with D. Gordon regarding handling research issues; conferences with E. Evitt regarding case management	J. DURRANT	7.60	5,130.00
08/11/16	Prepare e-mail to A. Adler regarding Florida UCC3 Financing Statement Amendment.	L. LANCHESTER	0.10	25.50
08/11/16	Telephone conference with Vermont counsel and E. Evitt regarding [REDACTED] Wei matter; analyze Wei complaint, read [REDACTED] documents; further analyze Florida state complaint	R. ROTSTEIN	4.70	3,783.50



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08/12/16	Organize executed mortgage closing documents	N. TRAN	2.00	340.00
08/12/16	Emails and calls with Goldberg re: fee motion and insurance; email to client re: [REDACTED]; call with client re: [REDACTED]; emails and calls with E. Evitt and J. Durrant re: [REDACTED] Daccache; work on reply in SEC case re: motion to dismiss; emails with Goldberg re: check for client; work on analysis as to [REDACTED]; review emails from plaintiff's counsel in Daccache; review court notice in Receiver's lawsuit	D. GORDON	2.90	2,015.50
08/12/16	Review and analyze SEC's and Receiver's oppositions to May/June fees motion; telephone conference with D. Gordon re same; work on next fees motion; telephone conferences re case management; telephone conferences, conferences, and e-mail with D. Gordon, J. Durrant, R. Rotstein and team re deadlines, strategy and case management.	E. EVITT	2.30	1,380.00
08/12/16	Review and analyze [REDACTED]; confer with D. Gordon re [REDACTED].	J. ALBERTSON	1.20	648.00

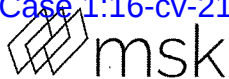


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08/12/16	Conference with S. Wakshlag regarding [REDACTED]; correspondence (emails) to team regarding strategy issues in Receiver case, state court cases, scheduling, and coordination of matters; conferences with E. Evitt and D. Gordon regarding case management and coordination; assessment of issues in Daccache matter, [REDACTED], and coordinate discovery; emails assessing [REDACTED] and legal analysis	J. DURRANT	7.10	4,792.50
08/12/16	Legal research regarding [REDACTED] for purposes of drafting Reply in Support of Motion to Dismiss.	M. CARRIDO	4.20	2,016.00
08/13/16	Draft Reply in support of motion for attorneys' fees.	E. EVITT	3.50	2,100.00
08/13/16	Legal analysis of [REDACTED] and correspondence to T. Meserve regarding same	J. DURRANT	0.70	472.50
08/14/16	Further draft and revise reply in support of May/June fees motion; review M. Carrido research for Motion to Dismiss reply.	E. EVITT	2.60	1,560.00

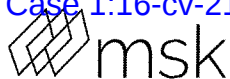


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08/14/16	Further legal research regarding ██████████ for purposes of drafting Reply in support of Motion of Dismiss SEC's Complaint, and responding to SEC's ██████████ arguments.	M. CARRIDO	3.00	1,440.00
08/15/16	Organize mortgage documents	N. TRAN	0.30	51.00
08/15/16	Review motion to stay in FL state case and multiple emails with local counsel and R. Rotstein re: ██████████; work on reply brief in SEC case; call with D. Cleary re: insurance issues; review multiple court notices in Daccache	D. GORDON	1.60	1,112.00
08/15/16	Revise Reply in support of May/June fees motion and e-mail D. Gordon and D. Gold re same; telephone conferences with T. Lifshitz re extensions for response to amended complaint and RFPs in Daccache; e-mail with counsel for Raymond James and team re ██████████; e-mail with J. Durrant re joint scheduling report for Daccache.	E. EVITT	3.80	2,280.00



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08/15/16	Review and analyze of research regarding SEC opposition to motion to dismiss and correspondence to team regarding same; correspondence with team and counsel for Raymond James regarding [REDACTED]; draft introductory email to defense team for E. Evitt and related emails to E. Evitt; review of amended complaint in Daccache; correspondence (emails) with team regarding [REDACTED]; correspondence with team regarding motion to join stay in Florida state court cases; address scheduling conference issues in Daccache.	J. DURRANT	5.80	3,915.00
08/15/16	Legal research regarding [REDACTED] for purposes of drafting Reply in support of Motion to Dismiss.	M. CARRIDO	2.90	1,392.00
08/15/16	Strategize regarding [REDACTED] Florida state court matter	R. ROTSTEIN	0.40	322.00
08/15/16	Legal research regarding [REDACTED] for Motion to Dismiss Reply in SEC Lawsuit.	T. MESERVE	5.60	2,688.00
08/15/16	Legal research regarding [REDACTED] for Motion to Dismiss Reply in SEC Lawsuit.	T. MESERVE	3.20	1,536.00

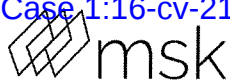


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08/16/16	Manage documents for 400 Fifth Avenue mortgage closing	N. TRAN	0.50	85.00
08/16/16	Emails and call with D. Cleary re: coverage issues; meeting with client re: [REDACTED]; work on reply brief in SEC case; work on response re: motion to transfer Goldberg's case to Judge Moreno; work on analysis of [REDACTED]; review court notices in Daccache; review court notice in Receiver case	D. GORDON	5.20	3,614.00
08/16/16	Revise reply in support of May/June fees motion; telephone conference and e-mail with D. Gordon re same; e-mail with D. Gordon and J. Durrant re [REDACTED] and review research re same.	E. EVITT	2.70	1,620.00
08/16/16	Correspondence with team, counsel, and opposing counsel regarding scheduling issues and review of related documents; review of motion to transfer and correspondence with team and Raymond James's counsel regarding [REDACTED]; conference with counsel for People's Bank; review of research issues and substantive comments to same.	J. DURRANT	6.30	4,252.50
08/16/16	Review emails from D. Gordon re insurance coverage and [REDACTED]	J. NOGUES	0.20	155.00

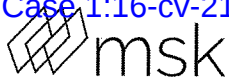


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08/16/16	Further legal research regarding SEC's arguments [REDACTED] for purposes of drafting Reply in Support of Motion to Dismiss.	M. CARRIDO	3.40	1,632.00
08/16/16	Read emails from Vermont lawyers regarding stay; read joinder in stay; further preparation [REDACTED] in connection with Florida and Vermont state cases	R. ROTSTEIN	2.10	1,690.50
08/16/16	Legal research regarding [REDACTED] for use in MTD reply brief in SEC action.	T. MESERVE	4.60	2,208.00
08/16/16	Legal research regarding [REDACTED] for SEC Lawsuit.	T. MESERVE	0.50	240.00
08/17/16	Work on reply brief in SEC case; meeting with client re: [REDACTED]; call with Stenger's lawyer re: insurance issues; review notice of joinder in Miami state case and email to local counsel re: same; review court notices in Daccache; review Order in Receiver case; review order in Daccache; emails with E. Evitt re: [REDACTED]	D. GORDON	2.80	1,946.00
08/17/16	Further revise May/June fees motion and e-mail D. Gordon re same.	E. EVITT	1.60	960.00

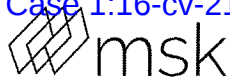


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08/17/16	Revise reply in support of May/June fees motion; telephone conferences with D. Gordon re same and re [REDACTED]; telephone conference with J. Durrant re case status and strategy; telephone conference with R. Rotstein re strategy and deadlines for Wei and Gonzales cases; e-mail with R. Berger re [REDACTED]; e-mail with defense counsel in Daccache re extension of time to respond to complaint; manage deadlines and case organization.	E. EVITT	2.90	1,740.00
08/17/16	Correspondence with team regarding [REDACTED]; review and analysis of research by T. Meserve and outline follow up points regarding [REDACTED]; legal analysis and draft reply in support of motion to dismiss SEC complaint; address [REDACTED] issues.	J. DURRANT	7.30	4,927.50
08/17/16	For purposes of drafting Reply in support of Motion to Dismiss SEC Complaint, further legal research regarding [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	M. CARRIDO	3.40	1,632.00
08/17/16	Read emails with co-counsel regarding [REDACTED] Florida and Vermont actions; further analysis of state private complaints	R. ROTSTEIN	1.70	1,368.50



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08/18/16	Meet with Nicole Quiros	N. TRAN	1.00	170.00
08/18/16	Cite check references in SEC v. Quiros Reply Brief ISO fees motion	N. TRAN	1.00	170.00
08/18/16	Emails with local counsel and R. Rotstein re: [REDACTED] [REDACTED]; email to client re: [REDACTED]; instructions to J. Albertson and N. Tran re: [REDACTED] [REDACTED]; review Schneider email re: Daccache; review court notice in same; emails with E. Evitt re: Receiver's report in SEC case; work on reply brief and proposed order in SEC case	D. GORDON	1.60	1,112.00
08/18/16	Oversee case management and deadlines; e-mail with D. Gordon re reply in support of second fees motion; e-mail with S. Cosgrove and J. Bryan re same; draft supplemental Gold declaration in support of second fees motion and e-mail with D. Gold re same; draft proposed order re fees motion and e-mail D. Gordon re same.	E. EVITT	1.80	1,080.00
08/18/16	Attend meeting with Nicole Quiros; confer with D. Gordon re [REDACTED] [REDACTED]; confer with N. Tran re [REDACTED] [REDACTED]; review documents.	J. ALBERTSON	1.50	810.00
08/18/16	Attention to scheduling issues in various cases; legal analysis regarding SEC motion to dismiss reply, [REDACTED] [REDACTED] and scheduling issues.	J. DURRANT	7.10	4,792.50



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08/18/16	Further legal research regarding [REDACTED] [REDACTED] [REDACTED] for purposes of drafting Reply in Support of Motion to Dismiss SEC's Complaint.	M. CARRIDO	5.40	2,592.00
08/18/16	Further emails with Vermont local counsel [REDACTED]; further analyze Florida, Vermont complaints.	R. ROTSTEIN	1.10	885.50
08/18/16	Legal research regarding [REDACTED] [REDACTED] [REDACTED] for SEC Lawsuit.	T. MESERVE	0.60	288.00
08/18/16	Legal research regarding [REDACTED] [REDACTED] [REDACTED] for SEC Lawsuit.	T. MESERVE	1.00	480.00
08/18/16	Legal research regarding [REDACTED] [REDACTED] [REDACTED] for SEC Lawsuit.	T. MESERVE	0.50	240.00
08/19/16	Work on list of expenses and backup for Receiver	N. TRAN	2.00	340.00
08/19/16	Work on reply papers in SEC case; work on analysis of [REDACTED] [REDACTED]; work on list of expenses and backup for Receiver; multiple emails with counsel in Daccache case; review multiple court notices in same	D. GORDON	2.40	1,668.00

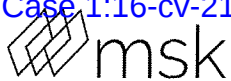


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08/19/16	Revise and fix citations in reply in support of second fees motion; telephone conference with D. Gordon re reply; revise and finalize D. Gold declaration in support of fees motion and e-mail with D. Gordon and D. Gold re same; read cases on [REDACTED]; e-mail correspondence with S. Cosgrove, J. Bryan, and D. Gordon re proposed order re fees motion; manage case deadlines and organization.	E. EVITT	3.50	2,100.00
08/19/16	Confer with N. Tran re accounting; review and organize documents re asset maintenance.	J. ALBERTSON	1.10	594.00
08/19/16	Legal analysis issues regarding SEC reply brief and related emails; correspondence with team regarding [REDACTED]; correspondence with team regarding [REDACTED]; correspondence with co-defense and local counsel regarding [REDACTED].	J. DURRANT	3.80	2,565.00
08/19/16	Conduct further research regarding [REDACTED] for purposes of drafting Reply in support of Motion to Dismiss.	M. CARRIDO	5.80	2,784.00

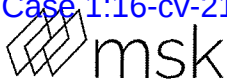


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08/19/16	Emails regarding [REDACTED]; further preparation of reply memorandum in support of motion to dismiss State of Vermont case; read emails from Vermont local counsel regarding motion to stay	R. ROTSTEIN	1.00	805.00
08/19/16	Legal research regarding [REDACTED] for SEC Lawsuit.	T. MESERVE	1.80	864.00
08/19/16	Legal research regarding [REDACTED] for SEC Lawsuit.	T. MESERVE	4.20	2,016.00
08/19/16	SEC Lawsuit: Legal research regarding whether or not disgorgement may be pled as a claim for use in reply brief.	T. MESERVE	1.20	576.00
08/20/16	Work on Declaration re: [REDACTED]; work on arguments [REDACTED]	D. GORDON	0.60	417.00
08/20/16	Research and analyze [REDACTED] and e-mail with D. Gordon, J. Durrant and R. Rotstein re same; review previous week's filings in Daccache and SEC cases; revise proposed order for second fees reply and e-mail with D. Gordon re same.	E. EVITT	4.30	2,580.00
08/20/16	Correspondence (emails) with team regarding [REDACTED]	J. DURRANT	0.30	202.50



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08/20/16	Read emails regarding [REDACTED]; read, begin revisions of [REDACTED]	R. ROTSTEIN	1.40	1,127.00
08/21/16	E-mail with S. Cosgrove and J. Bryan re revised proposed order for fees reply; e-mail with D. Gordon [REDACTED]	E. EVITT	0.20	120.00
08/21/16	Draft emails to D. Gordon re asset maintenance.	J. ALBERTSON	0.20	108.00
08/21/16	Legal research regarding [REDACTED] for use in reply brief for SEC Lawsuit.	T. MESERVE	3.50	1,680.00
08/22/16	Research [REDACTED] for E. Evitt.	A. KELLY	0.50	132.50
08/22/16	Emails with client re: [REDACTED]; emails with [REDACTED]; emails with J. Albertson re: same; call with K. Strauss re: [REDACTED]; emails with D. Cleary and M. Goldberg re: claim against the partnership in Wei; emails with VT counsel re: Wei; review court notices in SEC case; work on reply brief in SEC case	D. GORDON	1.40	973.00

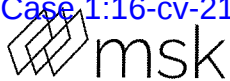


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08/22/16	Revise, finalize, and oversee filing of reply in support of second fees motion, including telephone conferences and e-mail with D. Gordon and J. Bryan re same; conference with R. Rotstein re [REDACTED]; [REDACTED]; telephone conference with head librarian A. Kelly re researching [REDACTED].	E. EVITT	3.30	1,980.00
08/22/16	Review accounting re commercial properties; draft emails to D. Gordon re asset maintenance.	J. ALBERTSON	1.80	972.00
08/22/16	Legal analysis regarding SEC and Vermont actions	J. DURRANT	2.30	1,552.50
08/22/16	Emails with D. Gordon re insurance issues; Review [REDACTED] re same	J. NOGUES	0.40	310.00
08/22/16	Edit reply memo in Vermont State case (motion to dismiss), read cases and distinguish them regarding same	R. ROTSTEIN	3.30	2,656.50
08/22/16	Legal research regarding [REDACTED]; [REDACTED]; [REDACTED] for use in reply brief for SEC Lawsuit.	T. MESERVE	4.50	2,160.00
08/23/16	Research [REDACTED]; [REDACTED] for E. Evitt.	A. KELLY	0.80	212.00



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08/23/16	Call with client re: [REDACTED]; email to Goldberg re: nonpayment of monthly allowance to Quiros; emails with RJ re: ESI protocol in Daccache; emails with J. Durrant and E. Evitt re: [REDACTED]; emails with client re: [REDACTED]; email to D. Cleary re: insurance; review court notices in Daccache	D. GORDON	1.40	973.00
08/23/16	Review and analyze Raymond James ESI protocol for Daccache case and e-mail correspondence with D. Gordon, J. Durrant and MSK litigation support re same; e-mail correspondence with D. Corbishley re same; telephone conference with J. Durrant re same and re discovery strategy; telephone conference with D. Gordon re same; e-mail with D. Gordon re next fees motion.	E. EVITT	2.00	1,200.00
08/23/16	Address ESI issues with E. Evitt; review correspondence between and among counsel in Daccache regarding discovery issues; correspondence and conference with team regarding discovery strategy; correspondence with E. Evitt regarding Vermont case; draft reply in support of motion to dismiss SEC case	J. DURRANT	4.50	3,037.50
08/23/16	Further read cases in opposition and draft reply, MTD Vermont State complaint, revise same	R. ROTSTEIN	4.60	3,703.00



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08/24/16	Emails and calls with Plaintiffs' counsel in Daccache re: case deadlines; emails with Receiver's counsel re: case deadlines; work on strategy re: [REDACTED]; review court notices in Daccache; review court notice in Receiver's case	D. GORDON	0.90	625.50
08/24/16	Review [REDACTED] and e-mail with D. Gordon and R. Rotstein re same; begin drafting RFP responses in Daccache.	E. EVITT	0.80	480.00
08/24/16	Review [REDACTED] and e-mail with R. Rotstein and D. Gordon re strategy [REDACTED]; telephone conference with J. Durrant and e-mail with J. Bryan re deadline and extension to respond to Daccache complaint; review e-mails from D. Corbishley re ESI protocol in Daccache; e-mail with D. Gordon and J. Durrant re plan for Daccache RFP responses; begin preparing Daccache RFP responses.	E. EVITT	1.20	720.00



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08/24/16	Review and comment on Vermont AG Reply brief, including suggesting additional arguments, points, and research; attention to scheduling issues and conference with D. Gordon and E. Evitt regarding same; review press regarding [REDACTED]; draft motion to dismiss reply in SEC case; conference with team regarding [REDACTED]; review filing by receiver to modify preliminary injunction	J. DURRANT	6.00	4,050.00
08/24/16	Background on [REDACTED], read article regarding [REDACTED] same	R. ROTSTEIN	2.10	1,690.50
08/25/16	Research [REDACTED] for E. Evitt.	A. KELLY	0.30	79.50
08/25/16	Work on reply brief in SEC case; review court notice in Daccache; review court notice in Receiver case; emails re: discovery in Daccache; call with client re: [REDACTED]	D. GORDON	1.10	764.50
08/25/16	Review motion to extend time to respond to complaint in Daccache and e-mail with J. Durrant and J. Bryan re same.	E. EVITT	0.20	120.00
08/25/16	Draft and revise reply in support of motion to dismiss SEC complaint; correspondence with team and co-defense counsel regarding protective order issues; review stipulation to extend time and related correspondence; correspondence to plaintiff counsel regarding Receiver documents	J. DURRANT	8.30	5,602.50



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08/25/16	Read John Durrant comments to motion to dismiss State of Vermont complaint and incorporate same, review various cases in connection therewith	R. ROTSTEIN	3.90	3,139.50
08/26/16	Emails with J. Durrant and S. Cosgrove re: ██████████; emails with plaintiffs' counsel re: same; assignment to T. Meserve re: same; work on reply brief in SEC case; work on Strauss affidavit; emails with J. Schneider re: potential settlement with Citi in SEC case; review multiple court notices and orders	D. GORDON	1.40	973.00
08/26/16	Review and analyze protective order for Daccache; telephone conferences with J. Durrant re same; e-mail with D. Gordon re same; e-mail with all counsel re same; review proposed schedule for Daccache and create alternative schedule; e-mail with counsel for Raymond James re ██████████; telephone conferences and e-mail with J. Durrant re same; read and analyze SEC's proposed findings of fact and conclusions of law; telephone conference with J. Durrant re same; e-mail with R. Rotstein re ██████████ ██████████	E. EVITT	5.90	3,540.00



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08/26/16	Address various scheduling issues and conference with E. Evitt regarding scheduling proposal for Daccache and review same; conference with E. Evitt regarding protective order and review same; conference with D. Gordon regarding Citibank settlement with Receiver; conferences with D. Gordon and related correspondence regarding strategy issues regarding [REDACTED] and motion to dismiss in SEC case; correspondence with co-defense counsel and local counsel regarding [REDACTED]; draft and revise reply in support of motion to dismiss	J. DURRANT	7.80	5,265.00
08/26/16	Read various emails, documents regarding [REDACTED]	R. ROTSTEIN	1.30	1,046.50
08/26/16	Research re [REDACTED] for Receiver lawsuit.	T. MESERVE	0.30	144.00
08/26/16	Legal research re [REDACTED] for Dacacche.	T. MESERVE	0.20	96.00
08/27/16	Work on potential responses [REDACTED], and calls and emails with E. Evitt, J. Durrant and R. Rotstein re: same.	D. GORDON	0.80	556.00



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08/27/16	Read and analyze SEC's proposed findings of fact and conclusions of law; e-mail with D. Gordon, R. Rotstein, and J. Durrant re [REDACTED] [REDACTED] [REDACTED].	E. EVITT	2.30	1,380.00
08/27/16	Draft and revise reply in support of motion to dismiss SEC complaint and related legal analysis; correspondence with team regarding strategy issues [REDACTED]	J. DURRANT	9.10	6,142.50
08/27/16	Telephone conference with David Gordon regarding [REDACTED]; analyze [REDACTED]; read emails, background material on [REDACTED]	R. ROTSTEIN	2.50	2,012.50
08/28/16	Emails with E. Evitt re: [REDACTED] [REDACTED].	D. GORDON	.030	208.50
08/28/16	E-mail with D. Gordon re [REDACTED] [REDACTED]; outline and begin drafting [REDACTED] [REDACTED].	E. EVITT	1.50	900.00
08/29/16	Emails with plaintiffs' counsel in Daccache re: subpoenas and confidentiality order; call with client re: [REDACTED] [REDACTED]; emails with E. Evitt re: [REDACTED] [REDACTED].	D. GORDON	0.80	556.00

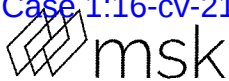


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08/29/16	Draft RFP responses for Daccache; conference and telephone conference with R. Rotstein re [REDACTED]; telephone conference with J. Durrant re [REDACTED]; e-mail with J. Durrant re SEC's proposed findings of fact; legal research re: [REDACTED], and e-mail with R. Rotstein re same.	E. EVITT	6.00	3,600.00
08/29/16	Conferences with R. Rotstein and E. Evitt regarding [REDACTED]; draft and revise reply in support of motion to dismiss SEC complaint and extensive legal analysis regarding same	J. DURRANT	8.00	5,400.00
08/29/16	Research and analysis of [REDACTED] and conference with Emily Evitt regarding same	R. ROTSTEIN	5.10	4,105.50
08/29/16	Legal research regarding [REDACTED] for Receiver lawsuit.	T. MESERVE	2.30	1,104.00
08/30/16	Review court notice and begin work on response to Receiver's motion in SEC case; emails with E. Evitt re: proposed order in Daccache; emails with Stenger's counsel re: insurance; review court notices in Daccache	D. GORDON	0.90	625.50



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08/30/16	Research and analyze Receiver's motion for approval of Citibank settlement, [REDACTED], and related issues and e-mail with team re same; telephone conferences with R. Rotstein re same; telephone conference with T. Meserve re same; review amended complaint in Daccache, motion to dismiss in Daccache and draft Quiros's statement of case for joint scheduling report for Daccache; telephone conference with J. Durrant re same; e-mail with defense counsel re same; e-mail with team re scheduling and case management.	E. EVITT	5.10	3,060.00
08/30/16	Draft and revise motion to dismiss; correspondence (email) with team and conference with E. Evitt regarding preparations for scheduling conference and review and revise scheduling order; correspondence with team regarding [REDACTED]; review correspondence with team regarding [REDACTED].	J. DURRANT	8.70	5,872.50
08/30/16	Read cases, research regarding [REDACTED]; read, analyze findings of fact (proposed) by SEC; various telephone conferences with Emily Evitt regarding same; read opposition to motion to stay in Gonzales (Raymond James motion)	R. ROTSTEIN	3.10	2,495.50
08/30/16	Work re [REDACTED] for Receiver lawsuit.	T. MESERVE	1.00	480.00



Ariel Quiros
19 Grand Bay Estates Circle
Key Biscayne, FL 33149

00626 47553
Invoice: 349055

September 16, 2016
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08/30/16	Review [REDACTED] [REDACTED] [REDACTED] in connection with research assignment re [REDACTED] [REDACTED].	T. NGUYEN	1.10	495.00
08/31/16	Emails with SEC re: reply brief in SEC case; emails with counsel in Daccache re: proposed order; emails with J. Schneider re: privilege issue; review multiple court notices in Daccache; work on [REDACTED] [REDACTED] issues re: Daccache; call with client re: [REDACTED].	D. GORDON	1.40	973.00
08/31/16	Attend telephonic joint scheduling conference; telephone conference with J. Durrant re same and conference with J. Durrant following same; e-mail with D. Gordon re joint scheduling conference; telephone conference with T. Nguyen re [REDACTED] research; telephone conference with R. Rotstein re same; e-mail with T. Meserve re [REDACTED] research; e-mail correspondence with team re research and case management.	E. EVITT	4.30	2,580.00
08/31/16	Review and revise reply in support of motion to dismiss SEC action.	E. EVITT	2.70	1,620.00

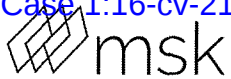


Ariel Quiros
19 Grand Bay Estates Circle
Key Biscayne, FL 33149

00626 47553
Invoice: 349055

September 16, 2016
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08/31/16	Prepare for scheduling conference in Daccache; conferences with S. Cosgrove regarding 26(f) preparations; conference with E. Evitt regarding 26(f) preparations; attend Rule 26(f) conference and related follow up emails to team; draft and extensively revise reply in support of motion to dismiss SEC complaint and related correspondence (emails) to team; correspondence with D. Gordon and S. Cosgrove regarding [REDACTED] [REDACTED] [REDACTED]	J. DURRANT	9.40	6,345.00
08/31/16	Further review of documents, research, strategizing regarding [REDACTED]; telephone conference with Emily Evitt re same	R. ROTSTEIN	3.20	2,576.00
08/31/16	Legal research regarding [REDACTED] [REDACTED] [REDACTED] for Receiver lawsuit.	T. MESERVE	4.60	2,208.00
08/31/16	Review motion filed by receiver to set procedure for settlement with Citi and provide comments thereto.	T. MESERVE	0.80	384.00



Ariel Quiros
19 Grand Bay Estates Circle
Key Biscayne, FL 33149

00626 47553
Invoice: 349055

September 16, 2016
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08/31/16	Review [REDACTED] [REDACTED] [REDACTED] in connection with research assignment re [REDACTED] [REDACTED]; telephone conference with Emily Evitt re research assignment re [REDACTED]; conduct legal research re [REDACTED] [REDACTED].	T. NGUYEN	3.60	1,620.00
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Total Fees:	\$521,909.50
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Ariel Quiros
 19 Grand Bay Estates Circle
 Key Biscayne, FL 33149

00626 47553
 Invoice: 349055

September 16, 2016
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Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
R. ROTSTEIN	79.90 hours at	\$805.00 =	64,319.50
J. NOGUES	0.60 hours at	\$775.00 =	465.00
A. ADLER	17.10 hours at	\$750.00 =	12,825.00
D. GORDON	84.50 hours at	\$695.00 =	58,727.50
P. MONTCLARE	17.40 hours at	\$695.00 =	12,093.00
J. DURRANT	281.20 hours at	\$675.00 =	189,810.00
E. EVITT	137.00 hours at	\$600.00 =	82,200.00
J. ALBERTSON	6.00 hours at	\$540.00 =	3,240.00
G. NAPOLITANO	2.10 hours at	\$500.00 =	1,050.00
T. MESERVE	50.10 hours at	\$480.00 =	24,048.00
M. CARRIDO	44.60 hours at	\$480.00 =	21,408.00
T. NGUYEN	4.70 hours at	\$450.00 =	2,115.00
C. MURRAY	34.40 hours at	\$400.00 =	13,760.00
A. KELLY	3.00 hours at	\$265.00 =	795.00
M. JACKSON	1.00 hours at	\$265.00 =	265.00
S. XING	2.00 hours at	\$265.00 =	530.00
L. LANCHESTER	1.70 hours at	\$255.00 =	433.50
N. TRAN	34.70 hours at	\$170.00 =	5,899.00
SUMMARY TOTALS	802.8		494,539.50

Costs Advanced and In-House Services:

07/27/16	Misc - Pacer Service Center - For services provided during the period of 4/1 - 6/30/16	771.20
08/12/16	Misc - Halstead Management - Fee for the last 2 years of financials for mortgage of 400 Fifth Avenue, Unites 39F, G and H, 7/18/16	150.00

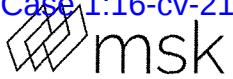


Ariel Quiros
 19 Grand Bay Estates Circle
 Key Biscayne, FL 33149

00626 47553
 Invoice: 349055

September 16, 2016
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08/23/16	Misc - FL UCC Filing fee, 8/3/16	41.00	
06/20/16	Delivery Services - Martinez Robert Colson Hicks Edison MIAMI FL US 06/20/16	21.47	
08/08/16	Delivery Services - Ariel Quiros KEY BISCA YNE FL US 08/08/16	72.70	
08/09/16	Delivery Services - N TRAN Mitchell Silberberg & Knupp LL NEW YORK NY US 08/09/16	19.05	
08/10/16	Delivery Services - Ariel Quiros KEY BISCA YNE FL US 08/10/16	30.78	
08/15/16	Delivery Services - N TRAN Mitchell Silberberg & Knupp LL NEW YORK NY US 08/15/16	27.54	
08/26/16	Messenger Service - NY Minute Messenger - Holstead Mgmt, NY, 7/18/16	9.75	
07/22/16	Airfare - D. Gordon - From Miami to South Carolina, 4/25/16	239.10	
08/23/16	Airfare - J. Durrant - Seattle, 7/27/16	397.02	
07/22/16	Ground Transportation - D. Gordon - Cab fare to airport, 4/25/16	40.00	
07/22/16	Ground Transportation - D. Gordon - Car service to airport, 5/8/16	76.00	
07/22/16	Ground Transportation - D. Gordon - Car service from airport, 5/10/16	80.50	
07/22/16	Ground Transportation - D. Gordon - Airport to hotel, 5/8/16	31.57	
07/22/16	Ground Transportation - D. Gordon - Miami, 4/25/16	30.55	
07/22/16	Ground Transportation - D. Gordon - Cab fare for appearance, 4/25/16	36.34	
07/22/16	Meal Expenses - D. Gordon - Lunch, 5/8/16	29.38	
07/22/16	Lodging - D. Gordon - Miami, 4/25/16	326.02	
07/22/16	Lodging - D. Gordon - Miami, 5/10/16	273.25	
	Total Costs:		\$2,703.22
	Total Fees & Costs:		\$497,242.72



Ariel Quiros
19 Grand Bay Estates Circle
Key Biscayne, FL 33149

00626 47553
Invoice: 349055

September 16, 2016
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MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Ariel Quiros
19 Grand Bay Estates Circle
Key Biscayne, FL 33149

00626 47553
Invoice: 349055

September 16, 2016

REMITTANCE
(please include with payment)

Current Fees:	494,539.50
Current Disbursements:	2,703.22
Total Current Charges - This Invoice:	\$497,242.72

Please remit to:
Mitchell Silberberg & Knupp LLP
11377 West Olympic Blvd.
Los Angeles, CA 90064

Wire/ACH Transfer Instructions:
Routing Number or ABA: 121000248
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
Beneficiary Account No.: 4159349430
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP
For International Transfers: Swift BIC WFBIUS6WFFX
For ACH inquiries only, please contact Elizabeth Carrera at exc@msk.com

I am able to receive future statements via email. Please send them to:

Contact name: _____

Email address: _____

Exhibit 2

REMIT TO:

Dinse, Knapp & McAndrew, P.C.
209 Battery Street
P.O. Box 988
Burlington, VT 05402
(802) 864-5751

Ariel Quiros
19 Grand Bay
Estates Circle
Key Biscayne, FL 33149

September 14, 2016
Invoice No.: 177387
File No.: 015469-0001

Re: State of Vermont v. Ariel Quiros, et al.
Docket No.: 217-4-16 Wncv
Client Reference No.:

INVOICE SUMMARY

PLEASE REMIT WITH PAYMENT

Total Fees	\$19,220.00
Total Disbursements	\$2.72
TOTAL THIS INVOICE	<u>\$19,222.72</u>
Plus net balance forward	\$16,670.00
Plus interest charge on past	\$166.70
TOTAL BALANCE DUE	<u><u>\$36,059.42</u></u>

A Late Payment applied for unpaid balances
after 30 days at a charge of 1% per month

WE ACCEPT DISCOVER, VISA AND MASTERCARD

Visa _____ MasterCard _____ Discover _____ (check one)

Payment amount: \$ _____ Expiration Date: _____

Account Number: _____ V-Code (required): _____

Signature: _____

015469 0001

Invoice No.: 177387

Dinse, Knapp & McAndrew, P.C.

Attorneys at Law
 209 Battery Street
 P.O. Box 988
 Burlington, VT 05402
 (802) 864-5751
 Firm Tax Id: 03-0349804

September 14, 2016
 Invoice No.: 177387
 File No.: 015469-0001

Ariel Quiros
 19 Grand Bay
 Estates Circle
 Key Biscayne, FL 33149

Regarding: State of Vermont v. Ariel Quiros, et al.
Docket No.: 217-4-16 Wncv

SERVICES RENDERED

Date	Staff	Description	Hours	Charges
06/01/2016	REB	Review and revise 12(b)(6) memo; develop strategy; prepare document to and review document from co-counsel regarding same	1.80	\$900.00
08/04/2016	JBB	Reviewed and analyzed State's opposition to motion to dismiss. Began researching cases cited by State in opposition. Researched [REDACTED]	6.50	\$1,950.00
08/05/2016	JBB	[REDACTED] Began drafting reply. Continued drafting reply. Researched [REDACTED] Researched [REDACTED]	4.70	\$1,410.00
08/08/2016	JBB	Continued researching and drafting reply in support of motion to dismiss. Researched [REDACTED] Researched [REDACTED]	4.10	\$1,230.00
08/09/2016	REB	Begin review of SEC material	2.50	\$1,250.00
08/11/2016	JBB	Continued drafting reply in support of motion to dismiss. Drafted stipulated motion to extend time for reply. Researched [REDACTED]	1.50	\$450.00
08/12/2016	JBB	Continued drafting reply brief in support of motion to dismiss. Researched [REDACTED] Researched [REDACTED] Researched [REDACTED] Researched [REDACTED]	4.10	\$1,230.00
08/15/2016	JBB	Continued drafting reply in support of motion to dismiss. Researched [REDACTED] Researched [REDACTED] Researched [REDACTED]	3.50	\$1,050.00

REMIT TO:

Dinse, Knapp & McAndrew, P.C.
209 Battery Street
P.O. Box 988
Burlington, VT 05402
(802) 864-5751

Ariel Quiros
19 Grand Bay
Estates Circle
Key Biscayne, FL 33149

September 14, 2016
Invoice No.: 177388
File No.: 015469-0002

Re: James B. Shaw, et al. v. Raymond James Financial, Inc., et al.
U.S. District Court Civil Action No.: 5:16-CV-129
Client Reference No.:

INVOICE SUMMARY
PLEASE REMIT WITH PAYMENT

Total Fees	\$1,680.00
TOTAL THIS INVOICE	<u>\$1,680.00</u>
Plus net balance forward	\$2,610.00
Plus interest charge on past	\$26.10
TOTAL BALANCE DUE	<u><u>\$4,316.10</u></u>

A Late Payment applied for unpaid balances
after 30 days at a charge of 1% per month

WE ACCEPT DISCOVER, VISA AND MASTERCARD

Visa _____ MasterCard _____ Discover _____ (check one)
Payment amount: \$ _____ Expiration Date: _____
Account Number: _____ V-Code (required): _____
Signature: _____

015469 0002

Invoice No.: 177388

Dinse, Knapp & McAndrew, P.C.

Attorneys at Law
 209 Battery Street
 P.O. Box 988
 Burlington, VT 05402
 (802) 864-5751
 Firm Tax Id: 03-0349804

September 14, 2016
 Invoice No.: 177388
 File No.: 015469-0002

Ariel Quiros
 19 Grand Bay
 Estates Circle
 Key Biscayne, FL 33149

Regarding: James B. Shaw, et al. v. Raymond James Financial, Inc., et al.
U.S. District Court Civil Action No.: 5:16-CV-129

SERVICES RENDERED

Date	Staff	Description	Hours	Charges
06/01/2016	JBB	Completed researching and drafting memorandum [REDACTED] [REDACTED] Conducted further research [REDACTED] [REDACTED] Revised and finalized memorandum in light of comments from Ritchie Berger. Researched [REDACTED] [REDACTED] Researched [REDACTED] [REDACTED] Researched [REDACTED] [REDACTED] Researched [REDACTED] [REDACTED] Email to Ritchie Berger summarizing research.	5.60	\$1,680.00

TOTAL SERVICES \$1,680.00

Lawyer Summary

Barnard, Justin B	5.60 hrs	\$300.00 hr	\$1,680.00
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TOTAL BILLED THIS INVOICE \$1,680.00

Plus interest charge on past due balance \$26.10

Prior balance \$2,610.00

TOTAL BALANCE DUE \$4,316.10

*** Trust account balance \$0.00

REMIT TO:

Dinse, Knapp & McAndrew, P.C.
209 Battery Street
P.O. Box 988
Burlington, VT 05402
(802) 864-5751

Ariel Quiros
19 Grand Bay
Estates Circle
Key Biscayne, FL 33149

September 14, 2016
Invoice No.: 177389
File No.: 015469-0003

Re: Minggan Wei and Zhao Wei v. Ariel Quiros, et al.
Client Reference No.:

INVOICE SUMMARY
PLEASE REMIT WITH PAYMENT

Total Fees	\$4,025.00
Total Disbursements	\$7.76
TOTAL THIS INVOICE	<u>\$4,032.76</u>
TOTAL BALANCE DUE	<u><u>\$4,032.76</u></u>

A Late Payment applied for unpaid balances
after 30 days at a charge of 1% per month

WE ACCEPT DISCOVER, VISA AND MASTERCARD

Payment amount: \$ _____ Expiration Date: _____
Account Number: _____ V-Code (required): _____
Signature: _____

015469 0003

Invoice No.: 177389

Dinse, Knapp & McAndrew, P.C.

Attorneys at Law
 209 Battery Street
 P.O. Box 988
 Burlington, VT 05402
 (802) 864-5751

Firm Tax Id: 03-0349804

September 14, 2016

Invoice No.: 177389

File No.: 015469-0003

Ariel Quiros
 19 Grand Bay
 Estates Circle
 Key Biscayne, FL 33149

Regarding: Minggan Wei and Zhao Wei v. Ariel Quiros, et al.

SERVICES RENDERED

Date	Staff	Description	Hours	Charges
08/02/2016	REB	Review Complaint; prepare document to and review document from co-counsel	0.60	\$300.00
08/08/2016	REB	Review document from and prepare document to Attorneys Rothstein and Gordon; review document from and prepare document to Attorney Kaiser	0.30	\$150.00
08/10/2016	JBB	Emails with Mitchell Silberberg & Knapp attorneys regarding planning for response to complaint.	0.10	\$30.00
08/10/2016	LCR	Management [REDACTED] review and analysis	0.30	\$45.00
08/10/2016	REB	Prepare document to and review document from Attorney Rothstein	0.30	\$150.00
08/11/2016	JBB	Reviewed and analyzed complaint, [REDACTED] to evaluate possible responses to complaint. Conferred with Ritchie Berger regarding strategy for responding to complaint. Telephone conference with Ritchie Berger, Robert Rotstein, and Emily Evitt regarding same.	3.00	\$900.00
08/11/2016	REB	Review [REDACTED] documents; conference with Attorney Rotstein regarding strategy	2.80	\$1,400.00
08/12/2016	JBB	Reviewed and responded to email from Emily Evitt regarding [REDACTED]	0.10	\$30.00
08/18/2016	JBB	Reviewed and responded to emails from MSK and Ritchie Berger regarding [REDACTED]. Researched [REDACTED]. Conferred with Ritchie Berger regarding same. Began researching [REDACTED]. Researched [REDACTED].	2.20	\$660.00
08/19/2016	JBB	Reviewed [REDACTED]. Drafted motions to stay and for enlargement of time. Emails with team regarding same.	0.50	\$150.00
08/22/2016	JBB	Reviewed and analyzed Raymond James Motion for Stay. Revised motion joining RJA motion for stay. Letter to Court regarding same. Finalized filings.	0.70	\$210.00
TOTAL SERVICES				\$4,025.00

Lawyer Summary

File No.: 015469 0003
 Date: September 14,
 2016

Invoice No.: 177389
 Page: 2

Barnard, Justin B	6.60 hrs	\$300.00 hr	\$1,980.00
Reese, Louise C	0.30 hrs	\$150.00 hr	\$45.00
Berger, Ritchie E	4.00 hrs	\$500.00 hr	\$2,000.00

DISBURSEMENTS

		<u>Units</u>	<u>Rate</u>	<u>Amount</u>
08/22/2016	POSTAGE		1.00	\$4.76
08/22/2016	DKM HAND DELIVERY		1.00	\$3.00

TOTAL DISBURSEMENTS \$7.76

TOTAL BILLED THIS INVOICE \$4,032.76

TOTAL BALANCE DUE \$4,032.76

*** Trust account balance \$0.00

Exhibit 3

LEÓN  COSGROVE255 Alhambra Circle
Suite 800
Coral Gables, FL 33134

305.740.1975

Ariel Quiros
19 Grand Bay Estates Circle
Key Biscayne, FL 33149

Attached is our Statement for Services for the period ending 07/31/2016. For your convenience, we have included a Summary description of the charges below. As always, if you have questions concerning this bill, please do not hesitate to contact us.

	Previous Balance	Fees	Expenses	Payments	Balance
198-001 Michael I. Goldberg v. Ariel Quiros	2,083.00	5,674.00	75.00	0.00	\$7,832.00
198-002 Alexandre Daccache v. Ariel Quiros (Class Action)	4,653.50	1,534.00	0.00	0.00	\$6,187.50
198-003 Caterina Gonzalez Calero v. Ariel Quiros	242.50	0.00	0.00	0.00	\$242.50
198-004 Casseres-Pinto v. Ariel Quiros	234.00	0.00	0.00	0.00	\$234.00
198-005 SEC v. Quiros	486.50	4,741.50	0.00	0.00	\$5,228.00
	<u>7,699.50</u>	<u>11,949.50</u>	<u>75.00</u>	<u>0.00</u>	<u>\$19,724.00</u>

255 Alhambra Circle
Suite 800
Coral Gables, FL 33134

305.740.1975

Ariel Quiros
19 Grand Bay Estates Circle
Key Biscayne, FL 33149

Statement Date: August 10, 2016
Statement No. 10567
Account No. 198.001
Page: 1

Attn: David B. Gordon

RE: Michael I. Goldberg v. Ariel Quiros

Fees

			Hours	
07/01/2016	SC	Correspond with D. Gordon re [REDACTED]; teleconference with J. Schneider re [REDACTED]; further teleconference with D. Gordon re [REDACTED].	0.40	234.00
	JB	Review and revise motion for extension of time to respond to the Complaint re proceedings before the MDL.	0.70	339.50
07/05/2016	JB	Review, edit and file motion for extension of time to respond to the Complaint and proposed order granting same.	0.60	291.00
07/06/2016	SC	Review order on motion for enlargement of time in receivership action and correspond with D. Gordon and J. Durrant re [REDACTED].	0.20	117.00
07/13/2016	SC	Teleconference with J. Durrant re [REDACTED]; [REDACTED]; prepare communication to J. Kellogg re discovery conference.	0.60	351.00
07/14/2016	SC	Attend Rule 26 scheduling conference; teleconference with J. Durrant re [REDACTED].	1.50	877.50
07/18/2016	JB	Review and edit motions for pro hac vice admission for D. Gordon and J. Durrant; draft proposed orders on motions for pro hac vice admission for D. Gordon and J. Durrant; research re certification requirements for pro hac vice admission.	1.30	630.50
07/19/2016	JB	Review and edit motions for pro hac vice and proposed orders for D. Gordon and J. Durrant.	0.40	194.00
07/20/2016	SC	Review order on extension of time re Raymond James.	0.10	58.50
07/24/2016	SC	Correspond with D. Gordon and J. Durrant re [REDACTED]; [REDACTED]; review dismissal for Vermont action and correspond with J. Durrant re [REDACTED].	0.40	234.00
07/27/2016	JB	Review, edit and finalize motion for pro hac vice admission of J. Durrant; review, edit and finalize proposed order on pro hac vice admission for J. Durrant.	0.40	194.00

Ariel Quiros
Account No. 198

Statement Date: 08/10/2016
Page No. 2

		Hours		
	SC	Correspond with J. Durrant re [REDACTED]; review correspondence from M. Diaz-Cortes re joint proposed scheduling order and joint proposed scheduling report; review further correspondence from J. Durrant re [REDACTED].	1.20	702.00
07/28/2016	SC	Review e-mails from S. Wakshalg re [REDACTED]; review revised joint scheduling report; correspond with co-counsel re [REDACTED]; review materials on [REDACTED] case and prepare correspondence to co-counsel re [REDACTED]; review Burstein comments to [REDACTED]; numerous e-mails re joint scheduling issues.	1.90	1,111.50
07/29/2016	JB	Review initial disclosures for the Receiver; review initial disclosures for Raymond James; review initial disclosures for J. Burstein.	0.70	339.50
Total Professional Services			10.40	5,674.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Scott Cosgrove	6.30	\$585.00	\$3,685.50
James R. Bryan	4.10	485.00	1,988.50

Expenses

07/27/2016	Court filing fee.	75.00
	Total Expenses	75.00
	Total This Invoice	5,749.00
	Previous Balance	\$2,083.00
	Balance Due Matter: 198.001	<u>\$7,832.00</u>

Ariel Quiros
Account No. 198

Statement Date: 08/10/2016
Page No. 3

Account No: 198-002M
Statement No: 10567

Alexandre Daccache v. Ariel Quiros (Class Action)

Fees

			Hours	
07/01/2016	JB	Review all briefing on motion to transfer before the MDL Panel re responses due in the Southern District of Florida.	0.90	373.50
07/25/2016	SC	Review correspondence from plaintiffs' counsel re meet and confer on motion to lift stay.	0.10	58.50
07/26/2016	JB	Review requests for production sent to defendants.	0.40	166.00
	SC	Review correspondence from S. Wakshalg re [REDACTED]; correspond with J. Durrant re [REDACTED]; review correspondence on discovery issues and related deadlines; review motion to lift stay; review proposed order and S. Wakshlag e-mails re [REDACTED].	1.60	936.00
Total Professional Services			3.00	1,534.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Scott Cosgrove	1.70	\$585.00	\$994.50
James R. Bryan	1.30	415.00	539.50

Total This Invoice	1,534.00
Previous Balance	\$4,653.50
Balance Due Matter: 198.002	<u>\$6,187.50</u>

Ariel Quiros
Account No. 198

Statement Date: 08/10/2016
Page No. 4

Account No: 198-003M
Statement No: 10567

Caterina Gonzalez Calero v. Ariel Quiros

Previous Balance	\$242.50
Balance Due Matter: 198.003	<u>\$242.50</u>

Ariel Quiros
Account No. 198

Statement Date: 08/10/2016
Page No. 5

Account No: 198-004M
Statement No: 10567

Casseres-Pinto v. Ariel Quiros

Previous Balance	\$234.00
Balance Due Matter: 198.004	<u>\$234.00</u>

Ariel Quiros
Account No. 198

Statement Date: 08/10/2016
Page No. 6

Account No: 198-005M
Statement No: 10567

SEC v. Quiros

			<u>Fees</u>	
			Hours	
07/01/2016	SC	Review receiver's response in JPML requesting transfer to S.D. of FL.; correspond with D. Gordon re [REDACTED]; review SEC's agreed motion to enlarge time to respond to motion to dismiss and time to prepare a reply memo.	0.40	234.00
07/07/2016	SC	Work on requested write-up for fee application.	0.20	117.00
07/08/2016	SC	Prepare memo re work performed by firm for inclusion in application for attorneys' fees.	0.40	234.00
07/12/2016	SC	Communicate with D. Gordon re [REDACTED].	0.20	117.00
07/13/2016	JB	Draft substitution of counsel; review case dockets re substitution of counsel; confer with D. Gordon re [REDACTED].	0.80	332.00
07/14/2016	JB	Review, edit and file notice of withdrawal of counsel; check all dockets re the appearance of J. Grodin.	0.50	207.50
07/21/2016	SC	Confer with E. Evitt re [REDACTED]; review fee motion draft; call to SEC's counsel and Receiver's counsel re same; prepare correspondence to B. Levenson re meet and confer; prepare correspondence to J. Kellogg re meet and confer; review receiver's motion to file application for professional compensation; further communications with J. Kellogg re receiver's position on fees; further correspondence with J. Durrant and E. Evitt.	1.10	643.50
07/22/2016	SC	Review motion for reimbursement of attorneys' fees and costs and correspond with E. Evitt re [REDACTED]; further communications with J. Kellogg.	0.80	468.00
	JB	Confer with counsel for the Receiver re motion for order permitting payment of fees and costs; review and analysis of administrative consent order; confer with team re [REDACTED]; confer with E. Evitt re [REDACTED]; review Receiver's motion for miscellaneous relief.	0.90	373.50

Ariel Quiros
Account No. 198

Statement Date: 08/10/2016
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			Hours	
07/25/2016	JB	Review, edit and finalize motion for an order permitting payment of attorneys' fees and costs; review all exhibits to be attached to motion for an order permitting payment of attorneys' fees and costs; review and edit proposed order on motion for an order permitting payment of attorneys' fees and costs; confer with E. Evitt re [REDACTED]; review declaration of J. Gordon and D. Gold re motion for an order permitting payment of attorneys' fees and costs; review order from the MDL re status of MDL proceedings.	2.60	1,079.00
	SC	Review dismissal of MDL; review e-mail from J. Durrant re [REDACTED]; review questions from E. Evitt re [REDACTED] and confer with J. Bryan [REDACTED].	0.50	292.50
07/29/2016	SC	Correspond and strategize with co-counsel regarding [REDACTED]; review order granting motion to exceed page limit and correspond with co-counsel re [REDACTED]; review Raymond James initial disclosures.	1.10	643.50
			<u>9.50</u>	<u>4,741.50</u>
Total Professional Services				

Recapitulation

Timekeeper	Hours	Rate	Total
Scott Cosgrove	4.70	\$585.00	\$2,749.50
James R. Bryan	4.80	415.00	1,992.00

Total This Invoice	4,741.50
Previous Balance	\$486.50
Balance Due Matter: 198.005	<u>\$5,228.00</u>
Total Balance Due	<u>\$19,724.00</u>

255 Alhambra Circle
Suite 800
Coral Gables, FL 33134

305.740.1975

Ariel Quiros
19 Grand Bay Estates Circle
Key Biscayne, FL 33149

Attached is our Statement for Services for the period ending 08/31/2016. For your convenience, we have included a Summary description of the charges below. As always, if you have questions concerning this bill, please do not hesitate to contact us.

	Previous Balance	Fees	Expenses	Payments	Balance
198-001 Michael I. Goldberg v. Ariel Quiros	7,832.00	8,960.50	75.00	0.00	\$16,867.50
198-002 Alexandre Daccache v. Ariel Quiros (Class Action)	6,187.50	4,391.00	0.00	0.00	\$10,578.50
198-003 Caterina Gonzalez Calero v. Ariel Quiros	242.50	4,158.50	0.00	0.00	\$4,401.00
198-004 Casseres-Pinto v. Ariel Quiros	234.00	0.00	0.00	0.00	\$234.00
198-005 SEC v. Quiros	5,228.00	7,466.00	0.00	0.00	\$12,694.00
	<u>19,724.00</u>	<u>24,976.00</u>	<u>75.00</u>	<u>0.00</u>	<u>\$44,775.00</u>

255 Alhambra Circle
Suite 800
Coral Gables, FL 33134

305.740.1975

Ariel Quiros
19 Grand Bay Estates Circle
Key Biscayne, FL 33149

Statement Date: September 14, 2016
Statement No. 10652
Account No. 198.001
Page: 1

Attn: David B. Gordon

RE: Michael I. Goldberg v. Ariel Quiros

Draft

Fees

			Hours	
08/01/2016	SC	Review order on joint scheduling report; review correspondence from J. Durrant on [REDACTED].	0.50	292.50
	JB	Review joint scheduling report and order striking joint scheduling report.	0.50	242.50
08/02/2016	SC	Review notice of joinder; review correspondence from J. Kellogg re joint scheduling report; review several communications re [REDACTED].	0.40	234.00
	JB	Review Raymond James' motion to transfer; review status of all matters re motion to transfer; draft joinder in Raymond James' motion to transfer.	1.40	679.00
08/03/2016	SC	Review motion to appoint special immigration counsel; review correspondence re [REDACTED].	0.50	292.50
	JB	Review dockets of cases in the Southern District of Florida; review, edit and file notice of joinder in Raymond James' motion to stay.	0.80	388.00
08/04/2016	SC	Review correspondence from J. Schneider re motion to use settlement proceeds to fund estate; review initial disclosures.	0.30	175.50
	JB	Review, edit and serve initial disclosures; review and analysis of other parties' initial disclosures; review, edit and file motion for pro hac vice for D. Gordon.	1.90	921.50
08/05/2016	SC	Review motion regarding request to use settlement funds.	0.20	117.00
08/09/2016	JB	Review and analysis of complaint re motion to dismiss; review and edit draft motion to dismiss; confer with J. Durrant re [REDACTED].	1.80	873.00
08/10/2016	JB	Review, edit and file motion to dismiss; review, edit and file request for judicial notice; review and analysis of all exhibits attached to request for judicial notice; confer with team re [REDACTED].	4.60	2,231.00
	SC	Review motion to dismiss; edit and revise document re services provided by Leon Cosgrove.	1.30	760.50
08/11/2016	SC	Review draft amended motion to transfer; prepare correspondence to J. Durrant re [REDACTED].	0.50	292.50

Ariel Quiros
Account No. 198

Statement Date: 09/14/2016
Page No. 2

			Hours	
08/12/2016	JB	Review and analysis of motion to dismiss by J. Burstein.	0.30	145.50
	SC	Review notice of voluntary dismissal; correspond with J. Durrant re [REDACTED]; further correspondence with J. Durrant and D. Gordon re [REDACTED]; analyze potential stay issues and draft correspondence on [REDACTED].	0.90	526.50
08/16/2016	JB	Review and analysis of motion to reassign case to Judge Moreno.	0.30	145.50
08/17/2016	SC	Review order denying motion to transfer and correspond with co-counsel [REDACTED]; correspond with J. Durrant re [REDACTED].	0.40	234.00
08/31/2016	SC	Review Raymond James' motion to dismiss.	0.70	409.50
		Total Professional Services	17.30	8,960.50

Recapitulation

Timekeeper	Hours	Rate	Total
Scott Cosgrove	5.70	\$585.00	\$3,334.50
James R. Bryan	11.60	485.00	5,626.00

Expenses

08/04/2016	Filing Fee for Pro Hac Vice of D. B. Gordon.	75.00
	Total Expenses	75.00
	Total This Invoice	9,035.50
	Previous Balance	\$7,832.00
	Balance Due Matter: 198.001	<u>\$16,867.50</u>

Ariel Quiros
Account No. 198

Statement Date: 09/14/2016
Page No. 3

Account No: 198-002M
Statement No: 10652

Alexandre Daccache v. Ariel Quiros (Class Action)

Fees

			Hours	
08/08/2016	SC	Review order lifting stay.	0.10	58.50
08/09/2016	SC	Review correspondence from T. Lifshitz, and plaintiffs proposed motion for appointment of interim lead class counsel and case management order.	0.40	234.00
	JB	Review correspondence re adoption of case management protocols; review and analysis of motion for adoption of case management protocols.	0.50	207.50
08/17/2016	SC	Review correspondence from co-counsel [REDACTED]; review proposed scheduling order.	0.50	292.50
08/18/2016	JB	Review and analysis of case management order.	0.30	124.50
	SC	Review order from J. O'Sullivan setting interim procedures.	0.30	175.50
08/19/2016	SC	Review issues related to enlargement and coordination; strategize with co-counsel re [REDACTED]; review confidentiality agreement.	0.90	526.50
08/24/2016	JB	Draft motion for extension of time to respond to Amended Complaint.	0.50	207.50
08/25/2016	JB	Draft proposed order for extension of time; revise motion for extension of time and confer with team re [REDACTED].	0.40	166.00
	SC	Review motion on extension of time; e-mails with D. Gordon.	0.30	175.50
08/26/2016	SC	Review proposed joint scheduling report and strategies w/ co-counsel re [REDACTED]; review motion for protective order.	1.60	936.00
08/29/2016	SC	Teleconference with J. Stricker re [REDACTED]; prepare correspondence to co-counsel re [REDACTED]; review revised motion to stay; review correspondence from plaintiffs' lawyers.	0.80	468.00
08/31/2016	SC	Attend joint scheduling conference telephonically.	1.40	819.00
		Total Professional Services	8.00	4,391.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Scott Cosgrove	6.30	\$585.00	\$3,685.50
James R. Bryan	1.70	415.00	705.50

Total This Invoice 4,391.00

Ariel Quiros
Account No. 198

Statement Date: 09/14/2016
Page No. 4

Previous Balance	\$6,187.50
Balance Due Matter: 198.002	<u>\$10,578.50</u>

Ariel Quiros
Account No. 198

Statement Date: 09/14/2016
Page No. 5

Account No: 198-003M
Statement No: 10652

Caterina Gonzalez Calero v. Ariel Quiros

Fees

			Hours	
08/01/2016	SC	Review complaint; review e-mail correspondence from D. Gordon re [REDACTED]; prepare correspondence to D. Gordon re [REDACTED].	0.90	526.50
08/04/2016	SC	Review correspondence from R. Rotstein re [REDACTED]; prepare correspondence to R. Rotstein re [REDACTED].	0.30	175.50
	JB	Review and analysis of complaint filed in the Complex Business Litigation Section.	0.50	207.50
08/08/2016	SC	Review correspondence from R. Rotstein re [REDACTED]; review file and prepare responsive correspondence re [REDACTED].	0.30	175.50
08/09/2016	JB	Prepare and file notice of appearance for S. Cosgrove and J. Bryan; review case docket re all new filings.	0.50	207.50
08/15/2016	SC	Review motion to stay; prepare correspondence to co-counsel re [REDACTED].	1.00	585.00
	JB	Review and analysis of all filings on case docket; review complex rules for Judge Thornton; draft motion for extension of time to respond to complaint; draft proposed order; review and analysis of motion to stay filed by Raymond James; correspond with team re [REDACTED].	1.60	664.00
08/16/2016	JB	Draft notice of joinder in Raymond James' motion to stay and draft motion for extension of time to respond to the complaint; confer with team re [REDACTED].	0.90	373.50
	SC	Review motion for joinder in stay and enlargement of time and comment on same; review motion to stay and receiver's joinder in same.	0.80	468.00
08/18/2016	JB	Review, edit, and file joinder in Raymond James' motion to stay and request for an extension of time.	0.60	249.00
08/26/2016	SC	Review motion to stay filed by Burstein and request for enlargement of time to respond.	0.30	175.50
08/30/2016	SC	Review response to motion to stay and correspond with co-counsel [REDACTED].	0.60	351.00
		Total Professional Services	8.30	4,158.50

Ariel Quiros
Account No. 198

Statement Date: 09/14/2016
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	Recapitulation			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>	
Scott Cosgrove	4.20	\$585.00	\$2,457.00	
James R. Bryan	4.10	415.00	1,701.50	
Total This Invoice				4,158.50
Previous Balance				\$242.50
Balance Due Matter: 198.003				<u>\$4,401.00</u>

Ariel Quiros
Account No. 198

Statement Date: 09/14/2016
Page No. 7

Account No: 198-004M
Statement No: 10652

Casseres-Pinto v. Ariel Quiros

Previous Balance	\$234.00
Balance Due Matter: 198.004	<u>\$234.00</u>

Ariel Quiros
Account No. 198

Statement Date: 09/14/2016
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Account No: 198-005M
Statement No: 10652

SEC v. Quiros

Fees

			Hours	
08/02/2016	SC	Review correspondence from J. Durrant re [REDACTED]; prepare response re [REDACTED]; further communications with J. Durrant and D. Gordon re [REDACTED].	0.70	409.50
08/08/2016	JB	Prepare summary of July time for all matters; redact invoices for July time; review and analysis of receiver's motion to approve partial use of funds.	1.30	539.50
08/11/2016	SC	Review court order granting receiver's motion to use Raymond James settlement funds to operate business; review oppositions to fee requests.	0.80	468.00
	JB	Review and edit summary of work for July; review and edit redactions to July time entries; review and analysis of order approving partial use of funds.	0.90	373.50
08/12/2016	JB	Review receiver's 1st interim report; review and analysis of receiver's opposition to Mr. Quiros' fee request; review and analysis of the SEC's opposition to Mr. Quiros' fee request.	1.30	539.50
08/16/2016	SC	Review communication from G. Melville litigation and correspond with co-counsel re [REDACTED]; review draft of motion to transfer and comments re [REDACTED].	0.40	234.00
08/18/2016	SC	Review opinion from Ohio federal court dismissing Eb-5 case; communicate w/ co-counsel re [REDACTED]; review correspondence re [REDACTED]; review prior order from J. Gayles re right to attorneys' fees and provide comments re [REDACTED]; review reply memo re right to attorneys' fees and expense.	1.70	994.50
08/19/2016	JB	Legal research and analysis re the [REDACTED]; review and analysis of reply in support of second motion for fees and costs; review and analysis of proposed order re second motion for fees and costs.	1.40	581.00
	SC	Review proposed order on fees and provide comments re [REDACTED]; review research on fee issue and provide communications re [REDACTED].	1.80	1,053.00
08/21/2016	JB	Review and analysis of reply in support of second motion for fees and costs; review and analysis of proposed order re second motion for fees and costs; review correspondence re [REDACTED].	0.60	249.00

Ariel Quiros
Account No. 198

Statement Date: 09/14/2016
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			Hours	
08/22/2016	JB	Review, edit and file reply in support of second motion for fees and costs; review all exhibits to reply in support of second motion for fees and costs; review, edit and file proposed order in support of second motion for fees and costs; review and analysis of the receiver and the SEC's response in opposition to second motion for fees and costs; confer with E. Evitt re [REDACTED].	2.20	913.00
	SC	Review reply to request for fees and attached documents and provide comments re [REDACTED].	0.50	292.50
08/24/2016	SC	Review correspondence on date for responding to complaint; review correspondence from D. Corbishly; review correspondence re [REDACTED].	0.80	468.00
08/26/2016	SC	Review settlement with Citibank.	0.20	117.00
08/31/2016	SC	Teleconference with J. Durrant re [REDACTED]; numerous e-mails re [REDACTED].	0.40	234.00
		Total Professional Services	15.00	7,466.00

Recapitulation

Timekeeper	Hours	Rate	Total
Scott Cosgrove	7.30	\$585.00	\$4,270.50
James R. Bryan	7.70	415.00	3,195.50

Total This Invoice	7,466.00
Previous Balance	\$5,228.00
Balance Due Matter: 198.005	<u>\$12,694.00</u>
Total Balance Due	<u>\$44,775.00</u>

Exhibit 4

GRAY ROBINSON

Attorneys At Law
Suite 1400
301 E. Pine Street
Post Office Box 3068
Orlando, Florida 32802

Telephone (407) 843-8880
Federal ID # 59-1300132

Ariel Quiros
c/o Mitchell Silberberg & Knupp LLP
12 East 49th Street, 30th Floor
New York, NY 10017

July 5, 2016
FILE # 301809 - 1

Invoice # 10636894
Re: SEC v. QUIROS
DACCACHE v. QUIROS

This summary includes all transactions on the above matter processed up to and including the date of the last transaction shown on this invoice. Any transactions, including credits or receipts processed after that date will be reflected on a future statement.

PRIOR BALANCE:	\$ 19,952.99
CURRENT FEES:	\$ 14,983.00
CURRENT DISBURSEMENTS:	\$ 375.00
CURRENT BALANCE DUE:	\$ 15,358.00
TOTAL BALANCE DUE: (Prior balance included)	\$ 35,310.99

0619

REMITTANCE COPY

**Please return this remittance copy with your payment for proper allocation.
PAYMENT IS DUE UPON RECEIPT**

GRAY ROBINSON

Attorneys At Law
Suite 1400
301 E. Pine Street
Post Office Box 3068
Orlando, Florida 32802

Telephone (407) 843-8880
Federal ID # 59-1300132

Ariel Quiros
c/o Mitchell Silberberg & Knupp LLP
12 East 49th Street, 30th Floor
New York, NY 10017

July 5, 2016
FILE # 301809 - 1

Invoice # 10636894
Re: SEC v. QUIROS
DACCACHE v. QUIROS

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CURRENT BALANCE DUE:	\$ 15,358.00
TOTAL BALANCE DUE: (Prior balance included)	\$ 35,310.99

0619

CLIENT COPY
PAYMENT IS DUE UPON RECEIPT

10636894
SEC v. QUIROS

Professional Services:

06/01/16	KLS	Review Receiver's Motion for Authorization to Enter and for Approval of Passenger Tramway Modification Agreement	0.20	\$ 93.00
06/01/16	KLS	Daccache - Review Corporate Disclosure Statement of Defendants Raymond James Financial, Inc. and Raymond James Associates, Inc.	0.10	\$ 46.50
06/01/16	KLS	Daccache - review e-mail exchange between T. Ronzetti and J. Durrant re attendance at Rule 26(f) Conference; exchange numerous e-mails with J. Durrant, J. Nogues and D. Gordon re same; review draft e-mail from J. Durrant to T. Ronzetti re same; review numerous e-mail exchange with all counsel re same	0.70	\$ 325.50
06/01/16	KLS	Daccache - review Endorsed Order Granting Joint Motion to Set Schedule for Rule 26(f) Conference and Rule 26(a)(1) Initial Disclosures; exchange e-mails with D. Gordon and J. Durrant re same; exchange e-mails with J. Durrant and D. Gordon re Initial Disclosures per Order; exchange e-mails with J. Durrant and D. Gordon re Motion for Clarification of Order; prepare same	1.20	\$ 558.00
06/01/16	KLS	Daccache - exchange e-mails with opposing counsel re filing pro hac vice motions	0.30	\$ 139.50
06/01/16	KLS	Daccache - review Certifications of Travis Meserve and John Durrant for Pro Hac Vice Motions	0.20	\$ 93.00
06/01/16	KLS	Daccache - exchange e-mails with J. Durrant motion to dismiss	0.40	\$ 186.00
06/01/16	KLS	Review Complaint filed by Receiver; exchange e-mails with D. Gordon and J. Durrant re transferring cases to Judge Gayles; review e-mail exchange with all counsel re same; telephone conference with J. Durrant re same	0.70	\$ 325.50
06/01/16	JLG	Daccache - review Joint Motion re Rule 26 Conference; review Court Order; review related e-mails; prepare Motion for Clarification of Order	1.60	\$ 560.00
06/02/16	KLS	Daccache - review and revise redlined draft of Defendant Quiros' Motion for Clarification of Order of June 1, 2016; exchange numerous e-mails with J. Durrant re same; exchange e-mails with J. Durrant re attaching declaration to Motion	0.80	\$ 372.00
06/02/16	KLS	Review e-mail from J. Schneider to Court attaching proposed Order on Receiver's Unopposed Motion to Release and Disburse Funds from Citibank Pledged	0.20	\$ 93.00

10636894
SEC v. QUIROS

		Account without Prejudice; review proposed Order		
06/02/16	KLS	Review e-mail exchange with J. Levit re proposed Receiver's Motion to Modify the Preliminary Injunction and/or Receivership Order to Authorize a Stipulated Writ of Attachment for the Burke Contractors and Subcontractors to Preserve their Lien Rights; review same	0.20	\$ 93.00
06/02/16	KLS	Daccache - exchange e-mails with opposing counsel re Motions to Appear Pro Hac Vice	0.20	\$ 93.00
06/02/16	KLS	Daccache - exchange e-mails with J. Durrant re 12(b)(6) motion	0.40	\$ 186.00
06/03/16	KLS	Daccache - review Endorsed Order granting Quiros' request for extension of time with regard to Rule 26(f) Scheduling Conference; exchange e-mails with D. Gordon and J. Durrant re same	0.30	\$ 139.50
06/03/16	KLS	Review Order Authorizing Release and Disbursement of Funds in Citibank Pledged Account to Receiver, Without Prejudice	0.10	\$ 46.50
06/03/16	KLS	Review Plaintiff's Motion to Amend Court Order re Asset Freeze; review e-mail to Court enclosing proposed Order on same; review same; review Endorsed Order denying Motion to Amend; exchange e-mails with D. Gordon re same	0.40	\$ 186.00
06/03/16	KLS	Review Endorsed Order granting Receiver's Motion for Authorization to Enter and for Approval of Passenger Tramway Modification Agreement	0.10	\$ 46.50
06/03/16	KLS	Review Receiver's Motion to Modify the Preliminary Injunction and/or Receivership Order to Authorize a Stipulated Writ of Attachment for the Burke Contractors and Subcontractors to Preserve Their Lien Rights and Memorandum of Law	0.10	\$ 46.50
06/03/16	KLS	Exchange e-mails with J. Durrant re motion to dismiss	0.20	\$ 93.00
06/03/16	KLS	Daccache - review numerous e-mail exchange with all counsel re rescheduling Rule 26(f) Conference; exchange e-mails with J. Durrant and C. Murray re same	1.00	\$ 465.00
06/03/16	KLS	Daccache - exchange e-mails with J. Durrant re transferring case to Judge Gayles	0.30	\$ 139.50
06/05/16	KLS	Daccache - review e-mail exchange between S. Wakshlag and J. Durrant re Rule 26(f) Conference; exchange e-mails with J. Durrant re same; prepare unopposed motion to extend June 20 deadline	1.00	\$ 465.00
06/05/16	JLG	Daccache - prepare Unopposed Joint Motion to Extend Scheduling Conference	0.40	\$ 140.00

10636894
SEC v. QUIROS

06/06/16	KLS	Daccache - exchange e-mails with J. Durrant re unopposed joint motion to extend scheduling conference	0.20	\$ 93.00
06/06/16	KLS	Daccache - review Initial Disclosures of Defendant Joel Burstein; review Initial Disclosures of Defendants Raymond James Financial, Inc. and Raymond James & Associates, Inc.; review Plaintiff's Initial Disclosures	0.50	\$ 232.50
06/06/16	JLG	Daccache - review Order on Motion for Clarification and revise Motion for Enlargement	0.20	\$ 70.00
06/07/16	KLS	Daccache - exchange e-mails with J. Durrant re Unopposed Joint Motion for One-Day Enlargement of Time to Conduct Rule 26(f) Scheduling Conference	0.20	\$ 93.00
06/07/16	KLS	Review e-mail from J. Levit to Court enclosing proposed Order on Receiver's Motion to Modify the Preliminary Injunction and/or Receivership Order to Authorize a Stipulated Writ of Attachment for the Burke Contractors and Subcontractors to Preserve Their Lien Rights; review same	0.20	\$ 93.00
06/07/16	KLS	Daccache - review draft motion to dismiss; exchange e-mails with J. Durrant re same	1.20	\$ 558.00
06/08/16	KLS	Daccache - review Order Granting Motions to Appear Pro Hac Vice for T. Meserve and J. Durrant	0.10	\$ 46.50
06/08/16	JLG	Daccache - analysis of issues re [REDACTED]; related e-mails	1.40	\$ 490.00
06/08/16	KLS	Daccache - exchange e-mails with J. Durrant and C. Murray re Motion to Dismiss and Request to Take Judicial Notice	0.30	\$ 139.50
06/08/16	KLS	Daccache - review e-mail from S. Wakshlag re motions to transfer; exchange e-mails with J. Durrant re same	0.20	\$ 93.00
06/08/16	KLS	Daccache - exchange e-mails with J. Durrant re [REDACTED]; review same	0.80	\$ 372.00
06/08/16	KLS	Review e-mail from J. Levit to Court enclosing proposed Orders on Receiver's Motions to Modify Preliminary Injunction; review same	0.10	\$ 46.50
06/08/16	JLG	Daccache - analysis re request for judicial notice	0.40	\$ 140.00
06/09/16	KLS	Daccache - review Endorsed Order Granting Defendants' Unopposed Motion for Extension of Time to Conduct Rule 26(f) Scheduling Conference; review e-mail exchange with all counsel re rescheduling Rule 26(f) Scheduling Conference	0.50	\$ 232.50
06/09/16	KLS	Daccache - review Raymond James Defendants'	0.20	\$ 93.00

10636894
SEC v. QUIROS

Date	Attorney	Description	Hours	Amount
		Motion to Transfer		
06/09/16	KLS	Daccache - review Quiros' Motion to Dismiss Complaint, Request for Judicial Notice and exhibits thereto; exchange numerous e-mails with J. Durrant and C. Murray re same	1.80	\$ 837.00
06/09/16	KLS	Daccache - review Quiros' Notice of Filing Request for Judicial Notice of Documents Incorporated in the Plaintiff's Complaint	0.10	\$ 46.50
06/09/16	JLG	Daccache - analysis re Judicial Notice Request	0.30	\$ 105.00
06/09/16	JLG	Daccache - review and prepare documents for filing; prepare Notice of Filing Request for Judicial Notice	0.40	\$ 140.00
06/10/16	KLS	Review Order Granting Motion to Modify the Preliminary Injunction and/or Receivership Order to Authorize a Stipulated Writ of Attachment for the Stateside Contractor and Subcontractors to Preserve Their Lien Rights	0.10	\$ 46.50
06/10/16	KLS	Review Order Granting Motion to Modify the Preliminary Injunction and/or Receivership Order to Authorize a Stipulated Writ of Attachment for the Burke Contractors and Subcontractors to Preserve Their Lien Rights	0.10	\$ 46.50
06/10/16	KLS	Review Stipulated Writ of Attachment re Stateside Contractor and Subcontractors	0.10	\$ 46.50
06/10/16	KLS	Review Stipulated Writ of Attachment re Burke Contractors and Subcontractors	0.10	\$ 46.50
06/10/16	KLS	Review Motion to Transfer filed with the Judicial Panel on Multi District Litigation; review e-mail from N. Orenstein re clarification of same; review Notice of Clarification	0.20	\$ 93.00
06/10/16	KLS	Review letter to Haas Hetic forwarding corrected Subpoenas to William Kelly and Inner Circle Professional Services, LLC; exchange e-mails with D. Gordon re same; review numerous e-mail exchange between D. Gordon and M. Goldberg re same	0.50	\$ 232.50
06/10/16	JLG	Analysis re Third Party Subpoenas and related enforcement issues	0.40	\$ 140.00
06/13/16	KLS	Daccache - review Order Denying Motion to Transfer	0.10	\$ 46.50
06/13/16	KLS	Review e-mail exchange with D. Gordon re Rule 26(f) Scheduling Conference	0.20	\$ 93.00
06/13/16	KLS	Exchange e-mails with D. Gordon re [REDACTED]; prepare draft [REDACTED]; e-mail to D. Gordon re same	1.00	\$ 465.00
06/13/16	KLS	Review e-mail exchange with M. Goldberg re Quiros	0.30	\$ 139.50

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		response date for subpoena; exchange e-mails with D. Gordon re same		
06/13/16	KLS	Review various pleadings filed with the Judicial Panel on Multidistrict Litigation; review e-mail from S. Buttacavoli re same	0.20	\$ 93.00
06/13/16	JLG	Review filings re sale of condominium and related Order; review hearing transcript and prepare [REDACTED]	1.00	\$ 350.00
06/14/16	KLS	Review courtesy copies of Plaintiffs James B. Shaw, Johannes Eijmberts, and Lorne Morris' Motion for Transfer of Actions to the District of Vermont Pursuant to 28 U.S.C. Sec. 1407 for Coordinated or Consolidated Pretrial Proceedings re SEC and Daccache cases; review courtesy copies of Motions to Withdraw Plaintiffs' Motion for Transfer re SEC and Daccache cases	0.20	\$ 93.00
06/14/16	KLS	Telephone conference with D. Gordon re status of mortgage	0.40	\$ 186.00
06/14/16	KLS	Daccache - exchange e-mails with D. Gordon re pro hac vice application	0.10	\$ 46.50
06/14/16	KLS	Exchange e-mails with D. Gordon re [REDACTED]	0.30	\$ 139.50
06/14/16	JLG	Review Notice re Multidistrict Litigation; conference with Clerk of Multidistrict Court re hearing	0.30	\$ 105.00
06/15/16	KLS	Daccache - review courtesy copy of Plaintiffs James B. Shaw, Johannes Eijmberts, and Lorne Morris' Motion for Transfer of Actions to the District of Vermont Pursuant to 28 U.S.C. Sec. 1407 for Coordinated or Consolidated Pretrial Proceedings re Daccachè case	0.10	\$ 46.50
06/16/16	KLS	Telephone conference with J. Durrant re status	0.30	\$ 139.50
06/16/16	KLS	Review Ex Parte Motion for Entry of an Amended Stipulated Writ with Stateside Contractors; review e-mail exchange with J. Levit re same	0.10	\$ 46.50
06/17/16	KLS	Daccache - review Order Granting Motion to Appear Pro Hac Vice for David Gordon	0.10	\$ 46.50
06/17/16	KLS	Review Receiver's Ex Parte Motion for Entry of Amended Stipulated Writ of Attachment for the Stateside Contractor and Subcontractors; review e-mail from J. Levit to Court attaching proposed Order and Amended Stipulated Writ re same; review proposed Order and Amended Stipulated Writ	0.10	\$ 46.50
06/17/16	KLS	Daccache - review proposals for Rule 26(f) Scheduling Conference; review e-mail exchange with all counsel re same	0.30	\$ 139.50

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06/18/16	KLS	Exchange e-mails with J. Durrant re page limits for Motion to Dismiss	0.20	\$ 93.00
06/20/16	KLS	Daccache - review Raymond James Defendants' Motions to Dismiss Counts III, I V, V & VI; review Joel Burstein's Motion to Dismiss and Incorporated Memorandum of Law	1.00	\$ 465.00
06/20/16	KLS	Review e-mail exchange with all counsel re Rule 26(f) Scheduling Conference	0.20	\$ 93.00
06/22/16	KLS	Daccache - review Motion for Clerk's Entry of Default as to Defendant William Stenger	0.10	\$ 46.50
06/22/16	KLS	Daccache - review Interim Class Counsel's Unopposed Motion for Adoption of Case Management Protocols; review e-mail from T. Lifshitz to Court attaching proposed Order on Unopposed Motion for Adoption of Case Management Protocols	0.20	\$ 93.00
06/22/16	KLS	Exchange e-mails with J. Durrant, C. Murray and E. Evitt re Request for Judicial Notice and Motion to Dismiss	0.20	\$ 93.00
06/22/16	KLS	Daccache - review Plaintiff's Discovery Demands to Plaintiffs and Notices of Intent to Service Subpoena Duces Tecum to Non-Parties; review e-mail from D. Corbishley re same	0.10	\$ 46.50
06/23/16	KLS	Daccache - review Clerk's Default as to Defendant William Stenger	0.10	\$ 46.50
06/23/16	KLS	Prepare Motion to Appear Pro Hac Vice for John Durrant	0.10	\$ 46.50
06/23/16	KLS	Review Agreed Motion for Entry of Order Approving the Confidentiality, Non-Disclosure and Non-Waiver Stipulation Between the Receiver and CitiBank, N.A.; review e-mail from M. Brew to Court attaching proposed Order on same; review proposed Order	0.10	\$ 46.50
06/23/16	KLS	Review and revise draft Motion to Dismiss Amended Complaint; exchange e-mails with J. Durrant re same	1.00	\$ 465.00
06/23/16	KLS	Review e-mail exchange with H. Hatic re extension of time to respond to subpoena	0.10	\$ 46.50
06/23/16	KLS	Review Notice of Substitution of Counsel; exchange e-mails with J. Bryan re same	0.10	\$ 46.50
06/24/16	KLS	Exchange e-mails with opposing counsel re J. Durrant motion to appear pro hac vice	0.20	\$ 93.00
06/24/16	KLS	Review and revise Defendant Quiros' Motion to Dismiss Amended Complaint and Supporting Memorandum of Law and exhibits thereto; exchange numerous e-mails with J. Durrant and C. Murray re	1.20	\$ 558.00

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		same		
06/24/16	KLS	Revise Motion to Appear Pro Hac Vice for J. Durrant	0.10	\$ 46.50
06/24/16	KLS	Review Defendant Quiros' Notice of Filing Request for Judicial Notice, Request for Judicial Notice and exhibits thereto; exchange e-mails with J. Durrant and C. Murray re same	0.30	\$ 139.50
06/24/16	JLG	Review and prepare documents for filing re Motion to Dismiss and Request for Judicial Notice	1.60	\$ 560.00
06/27/16	KLS	Exchange e-mails with D. Gordon re [REDACTED] Motion Authorizing Receiver to Enter Into and Execute Management Agreement	0.10	\$ 46.50
06/28/16	KLS	Review e-mail exchange with D. Gordon re Receiver's Motion for Authorization to Enter and for Approval of Management Agreement Nunc Pro Tunc to Date of Appointment of Receiver; review same	0.20	\$ 93.00
06/28/16	KLS	Review Amended Stipulated Writ of Attachment	0.10	\$ 46.50
06/29/16	KLS	Review Notice of Substitution of Counsel; exchange e-mails with J. Bryan re same	0.10	\$ 46.50

Current Fees: \$ 14,983.00

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Stetson, Karen L	26.20	\$ 465.00	\$ 12,183.00
Gaines, Jonathan L	8.00	\$ 350.00	\$ 2,800.00
	34.20		\$ 14,983.00

Disbursements:

06/03/16	PAYEE: USDC FLSD; REQUEST#: 833948; DATE: 6/6/2016. - SEC v Quiros	\$ 150.00
06/03/16	PAYEE: USDC FLSD; REQUEST#: 833949; DATE: 6/6/2016. - SEC v Quiros	\$ 75.00
06/14/16	PAYEE: USDC FLSD; REQUEST#: 835154; DATE: 6/15/2016. - SEC v. Ariel Quiros	\$ 75.00
06/24/16	PAYEE: USDC FLSD; REQUEST#: 836720; DATE: 6/27/2016. - SEC v Ariel Quiros	\$ 75.00

Current Disbursements: \$ 375.00

<u>DESCRIPTION</u>	<u>AMOUNT</u>
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Filing Fee

\$ 375.00

\$ 375.00

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 16-CV-21301-DPG

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ARIEL QUIROS,
WILLIAM STENGER,
JAY PEAK, INC.,
Q RESORTS, INC.,
JAY PEAK HOTEL SUITES L.P.,
JAY PEAK HOTEL SUITES PHASE II L.P.,
JAY PEAK MANAGEMENT, INC.,
JAY PEAK PENTHOUSE SUITES L.P.,
JAY PEAK GP SERVICES, INC.,
JAY PEAK GOLF AND MOUNTAIN SUITES L.P.,
JAY PEAK GP SERVICES GOLF, INC.,
JAY PEAK LODGE AND TOWNHOUSES L.P.,
JAY PEAK GP SERVICES LODGE, INC.,
JAY PEAK HOTEL SUITES STATESIDE L.P.,
JAY PEAK GP SERVICES STATESIDE, INC.,
JAY PEAK BIOMEDICAL RESEARCH PARK L.P.,
AnC BIO VERMONT GP SERVICES, LLC,

Defendants, and

JAY CONSTRUCTION MANAGEMENT, INC.,
GSI OF DADE COUNTY, INC.,
NORTH EAST CONTRACT SERVICES, INC.,
Q BURKE MOUNTAIN RESORT, LLC,

Relief Defendants.

_____ /

**[PROPOSED] ORDER GRANTING DEFENDANT ARIEL QUIROS'S
THIRD MOTION FOR AN ORDER
PERMITTING PAYMENT OF ATTORNEYS' FEES AND COSTS**

THIS CAUSE came before the Court on Defendant Ariel Quiros's Third Motion for an Order Permitting Payment of Attorneys' Fees and Costs. The Court has carefully considered the Motion, and good cause existing therefor, it is **ORDERED AND ADJUDGED** as follows:

1. Defendant Ariel Quiros's Third Motion for an Order Permitting Payment of Attorneys' Fees and Costs is hereby **GRANTED**.
2. The Court finds that Mr. Quiros's attorneys billed their services at a reasonable hourly rate. The Court further holds that Mr. Quiros's attorneys expended a reasonable number of hours on his defense.
3. The Court orders that funds be released by the Receiver as follows:
 - a. \$497,242.72 to pay Mitchell Silberberg & Knapp LLP's legal fees and costs for July 1, 2016 through August 31, 2016.
 - b. \$24,935.48 to pay Dinse, Knapp & McAndrew's legal fees and costs for July 1, 2016 through August 31, 2016.
 - c. \$37,075.50 to pay León Cosgrove's legal fees and costs for July 1, 2016 through August 31, 2016.
 - d. \$15,358 to pay Gray Robinson's remaining legal fees and costs through June 30, 2016.

DONE AND ORDERED in Chambers at Miami-Dade County, Florida, this ____ day of _____, 2016.

Darrin P. Gayles
United States District Judge

cc: All Counsel of Record