

CAUSE NO. D-1-GV-10-000454

|                               |   |                                     |
|-------------------------------|---|-------------------------------------|
| STATE OF TEXAS,               | § | IN THE DISTRICT COURT OF            |
|                               | § |                                     |
| Plaintiff,                    | § |                                     |
| v.                            | § | TRAVIS COUNTY, TEXAS                |
|                               | § |                                     |
| RETIREMENT VALUE, LLC, et al, | § |                                     |
|                               | § |                                     |
| Defendants.                   | § | 126 <sup>th</sup> JUDICIAL DISTRICT |

**TWENTY-EIGHTH APPLICATION FOR FEES  
BY THE RECEIVER AND RECEIVER'S COUNSEL**

Eduardo S. Espinosa, court-appointed receiver for Retirement Value, LLC, files his Twenty-Seventh application for fees incurred by the Receiver and his counsel, Dykema Cox Smith (Dykema) for the months of October 2015 through March 2016.

**BACKGROUND**

To assist the Receiver in the performance of his duties, the Agreed TI<sup>1</sup> authorizes the Receiver to “to hire employees, contractors, consultants, accountants, attorneys, legal assistants, or other assistants under terms to be determined by the Receiver, whose services in the sole discretion of the Receiver, are necessary for an efficient and accurate administration of the receivership estate.” Agreed TI at 14, ¶8. To that end, the Receiver has retained Dykema to represent him in connection with this case, to assist him in the performance of his duties and to prosecute or defend litigation on behalf of Retirement Value.

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<sup>1</sup> The “Agreed TI” is the Agreed Temporary Injunction Order against Defendants Retirement Value, LLC and Richard H. “Dick” Gray and the Relief Defendant and Order Appointing Receiver, entered by the Court on May 28, 2010.

By its Order Regarding the First Application for Fees by the Receiver and Receiver's Counsel entered on October 26, 2010 (Fees Order), the Court modified the basis by which the Receiver and his counsel are paid. Pursuant to the Fees Order, the Receiver shall charge an hourly rate of \$320 per hour and the Receiver's counsel shall discount its rates by 9.5% from its then current hourly rates in effect as of the time services are rendered, beginning on August 1, 2010. Fees Order at 2. Moreover, the Receiver and his counsel are to submit to the Court and to the parties of record their request for payment of fees. If no party of record files an objection to the request for payment within ten days from the filing of the request for payment, then the Receiver shall pay the amount of the request from funds he holds in the receivership estate. Any objection must state with specificity the particular items of the Receiver's request to which the objection is made. If an objection is made, the Receiver shall not pay the contested portion of the invoice until a hearing has been held on the objection, but the Receiver may pay the portions of the request to which no objection is made. *Id.*

#### **APPLICATION FOR PROFESSIONAL FEES**

By this Application, the Receiver seeks approval from the Court to pay from the assets of the Receivership the fees incurred by the Receiver and his counsel, Dykema, for services rendered from October 2015 through March 2016.

The Receiver has incurred fees of \$36,800.00 during the period covered by this Application. He has retained the legal services of Dykema which incurred fees for the periods covered by this Application of \$ \$71,135.29. Affidavit of Eduardo S.

Espinosa (Espinosa Affid.) at ¶10 (attached as Exhibit 1). While substantial, these fees were both reasonable and necessary.

The fees charged by the Receiver and his counsel represent a 18.35% discount from the usual and customary fees charged by Dykema. As a general matter, the charge for the services provided by Dykema are determined by multiplying the total number of hours worked by each timekeeper by that timekeeper's billing rate. *Id.* at ¶6. In this case, the billing rate of each timekeeper was discounted from the usual and customary rates charged by Dykema. The Receiver is charging \$320/hour, which represents a 29% discount from his usual and customary rate of \$450/hour for 2015 and a 33% discount from his usual and customary rate of \$475/hour for 2016. In addition, Dykema has discounted its rates by 9.5%. In the aggregate the discounts and write-offs associated with this Application amount to \$24,254.74. *Id.* The chart below summarizes the fees charged and the discounts applied.

| <b>Invoice Summary</b>    |                      |
|---------------------------|----------------------|
| Services Rendered in:     | Total                |
| Fees Requested            |                      |
| DCS                       | \$106,907.17         |
| DCS- Schroeder Bankruptcy | \$537.07             |
| DCS- McDermott, et.al.    | \$491.05             |
| <b>Total</b>              | <b>\$107,935.29</b>  |
|                           |                      |
| Receiver Incurred         | \$53,587.50          |
| Receiver Billed           | \$36,800.00          |
| Receiver adj              | (\$16,787.50)        |
| All other Tkpr Incurred   | \$78,602.53          |
| All other Tkpr Billed     | \$71,135.29          |
| (9.5%) adj.               | (\$7,467.24)         |
| Write-offs                |                      |
| <b>Total Adj</b>          | <b>(\$24,254.74)</b> |

The Receiver certifies that the estate has sufficient cash reserves from which to pay this Application after taking into account the estate's receipts and expenditures since the last actuarial analysis of the portfolio in January 2016. *Id.* at ¶ 12.

**I. What have we accomplished during this period**

During the period covered by this Application, the Receiver and his counsel devoted substantial attention to collecting amounts due the estate pursuant to judgments and settlements; defending the estate against claims brought by Michael McDermott and Wendy Rogers; managing the portfolio and responding to investor comments and inquiries. The significant tasks during this time period include, without limitation:

- Responding to numerous inquiries and resolving various issues regarding the investors' claims, their IRA's and their distributions;
- Maintaining investor communications, including responding to inquiries from investors, defendants and their respective counsel regarding this matter, the Plan of Distribution, value of the claims and alternative recovery efforts;
- Maintaining and periodically updating the estate's website with new information and current events;
- Attending to the preservation of the estates' assets, including coordination of various accounting matters, funds management, fielding acquisition inquiries, payment of premiums, & collecting death benefits;
- Responding to appeals of judgments in favor of the Receiver;
- Enforcing the Estate's settlement agreements and judgments in order to maximize the Estate's recoveries;
- Preparing quarterly and annual reports;
- Analyzing the effect of recent increases in the cost of insurance on certain of the Estate's policies and determining the appropriate response; and
- Requesting permission from the Court to make a \$2.5 million distribution to the Investors raising the total amount distributed to \$11 million or 13.7%.

The Receiver initially undertook to investigate the business of Retirement Value, to collect the assets readily available to it and to put in place interim measures to protect the value of those assets. That work is complete. The Receiver is currently working to execute the court-approved plan for the portfolio of insurance policies in order to maximize the policies' value and return to investor victims. Except for one appeal, the Receiver has completed the litigation against the licensees and other defendants. He is now engaged in collecting on the judgments against the licensees, including asserting the estate's claims in their bankruptcy proceedings. He also continues to respond to inquiries and suggestions from investors.

The primary work in this period related to (i) preparing the quarterly and annual reports to the Court and the investors; (ii) evaluating the effect of and responding to increases in the cost of insurance of certain of the Estate's policies and (iii) determining and seeking permission to distribute an additional \$2.5 million to the investors. In addition, the Receiver and his counsel assisted in defending the appeals of the judgments against them by James Poe and Sal Magaraci. The court of appeals recently denied the appeals and Poe has entered into an agreement to pay \$660,000 to the Receiver to satisfy the judgment against him. The Receiver has also objected to the attempts by certain licensees to discharge the judgments against them in bankruptcy.

## **II. What Work Remains to Be Done**

While a substantial portion of the Receiver's work has been completed, work remains to be done. At this point, our work can be divided into three categories: (i)

collection of judgments; (ii) resolution of new claims and/or litigation against the estate; and (iii) fulfillment of the plan of distribution.

The litigation of claims by the estate has been largely completed by the estate's contingency fee counsel. Negotiated settlements entered into pursuant to the estate's collection efforts afforded the estate the opportunity to make an interim distribution. The first interim distribution was funded entirely from amounts collected. The remaining claims against licensees have been resolved by judgments in the Receiver's favor totaling \$6.1 million. Many of the judgment debtors have already entered into settlement agreements with the Receiver pursuant to which they have agreed to pay the estate over \$1.63 million. To the extent any of the licensees against whom a judgment has been secured file an appeal or otherwise seek to adversely affect the estate's judgments, the Receiver will seek to preserve and enforce the estate's legal rights.

The Receiver is currently engaged in two legal proceedings. One is the last remaining appeal of a judgment entered in his favor against licensees. This appeal is being handled by the Receiver's contingency fee counsel. The Receiver is also engaged in litigation in bankruptcy court in California with Eric Chick on the question of whether the Receiver's judgment against him may be discharged (i.e., eliminated) in his bankruptcy. Dykema is handling that matter.<sup>2</sup>

The Plan of Distribution largely resolved the claims against the estate. Receiver received 44 proofs of claim (38 from investors and 6 from other claimants)

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<sup>2</sup> The bankruptcy court in Ohio held that Scott Schroeder could not discharge his debt to the Receiver. That litigation has been concluded.

disputing scheduled claim amounts or characterization. All disputes pertaining to the Class 2 –Investor claims have been resolved. Disputes regarding Class 3 General Creditor claims have largely been resolved. The Tracy Moss litigation ended with an agreed judgment against Retirement Value for \$150,000 and Wells Fargo dropped its \$50,000 claim against the estate. As it is unlikely that there will be funds to pay the Class 3 claims, the Receiver does not contemplate further efforts to resolve the remaining disputes over Class 3 claims at this time.

The Court's adoption of the Initial Plan substantially reduces, if not eliminates, the need for further expense or delay associated with evaluating alternative asset management strategies. The proof of claim process has been concluded, each claimant's proportionate interests in the estate's assets have been established and the initial distribution remitted. The Receiver has since turned his attention to managing the liquid assets on hand without exposing them to undue risk, executing interim distributions, addressing investor inquiries and ministerial issues to ensure that the estate's records are updated and the estate is ready to execute the next distribution.

In March 2016, the Receiver filed his annual report for 2015. He had previously published a report for the third quarter of 2015. He anticipates preparing and publishing a report for the first quarter of 2016 shortly.

#### **ARGUMENT**

The Receiver's administrative costs, including his fee and that of his counsel, are to be paid out of the funds and other assets of the estate. These costs are considered costs of court and have priority over all other claims against the estate.

*Jordan v. Burbach*, 330 S.W.2d 249 (Tex. Civ. App. – El Paso 1959, writ ref'd n.r.e.); also TEX. CIV. PRAC. & REM. CODE §64.051. The Court should consider the reasonableness of the fees requested by both the Receiver and counsel.

In evaluating the reasonableness of the fees, the Court should consider the following factors: (1) the time and labor involved, the novelty and difficulty of the questions involved, and the skill required to perform the legal services properly; (2) the likelihood that the acceptance of the particular employment will preclude other employment by the lawyer; (3) the fee customarily charged in the locality for similar legal services; (4) the amount involved and the results obtained; (5) the time limitations imposed by the client or the circumstances; (6) the nature and length of the professional relationship with the client; (7) the experience, reputation, and ability of the lawyer or lawyers performing the services; and (8) whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered. *Arthur Andersen & Co. v. Perry Equip. Corp.*, 945 S.W.2d 812, 818 (Tex. 1997). These factors support the award of the requested fees.

**Time, labor, skill & complexity.** By its nature, a receivership proceeding is unique and complicated. As discussed above, this receivership is particularly complicated due to its size, the assets involved, the poor record keeping of Retirement Value and the sheer number of people involved (1,084 investors, 1,000 licensees, 18 insurance companies and several banks). To properly administer the estate requires a high degree of skill and diligence. Moreover, the Receiver and his counsel have had to devote significant time to this matter. The exact time expended



and work performed by the Receiver and his counsel are shown on the invoices attached to the Espinosa Affidavit. In addition, the Receiver's reports of July 28, 2010, April 30, 2011, December 31, 2011, May 31, 2013, May 31, 2014, May 31, 2015 and December 31, 2015; and the fee applications previously filed with the Court summarize the work of the Receiver and his counsel.

**Preclusion of other employment.** Dykema has not had to decline any representation solely because of its services in this case.

**Customary fees.** An attorney's usual and customary fees are presumed to be reasonable. TEX. CIV. PRAC. & REM. CODE § 38.003. The fees charged by Dykema in this case are the usual and customary fees that they charge to and collect from their clients for the services of the attorneys and other professionals working on this matter, except that: (i) the Receiver is charging 29% to 33% less than his usual and customary rate; and (ii) Dykema is charging 9.5% less than its usual and customary rates on all other timekeepers. Espinosa Affid. at ¶6. Further, the court may take judicial notice of customary fees and of the contents of the case file without further evidence. TEX. CIV. PRAC. & REM. CODE § 38.004.

Dykema undertakes annual analyses of the markets in which it operates in order to determine the appropriate fees to charge for their respective professionals based on the fees charged by their competitors and peer firms. The goal of this analysis is to set rates for each professional at the median rate for professionals at peer firms in similar practices areas and similar experience. Accordingly, the rates

charged by Dykema in this matter are well within the norm for firms of its type in Texas. Espinosa Affid. at ¶8.

**Amount involved and results obtained.** The amount involved in this matter, measured either by the \$77 million invested by the investors or the over \$35 million of estate assets administered by the Receiver, is very large. During the Receiver's 71 months on the job, the Receiver has actively managed the estate's affairs and discharged his court-imposed duties. All told, the Receiver has brought nearly \$29.9<sup>3</sup> million into the estate over the course of the Receivership Action. He has filed a plan of distribution and made distributions of approximately \$11.0 million.

**Time limitations.** Time is of the essence in a receivership. This is particularly true in the initial stages. The efforts undertaken in this case to recover assets, investigate the facts and preserve the portfolio of policies were conducted on an expedited basis.

**The nature and length of the professional relationship.** This factor cuts no particular way. However, neither the Receiver nor his counsel has any particular relationship with any of the parties involved in this matter. Nor is there any possibility of a future relationship with the estate. By their nature, receiverships

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<sup>3</sup> These recoveries include (i) \$1.25 million secreted by Retirement Value's principals into Special Acquisitions, Inc.; (ii) \$560,000 and 8 policies of insurance worth about \$1.1 million recovered from James Settlement Services; (iii) \$127,000 in cash and \$195,000 in debt-reduction from a settlement with Bruce Collins; (iv) \$710,000 in a settlement with Kiesling Porter; (v) \$623,000 in assets from a settlement with Dick and Catherine Gray; (vi) \$176,000 in assets and \$7,000 in debt reduction from a settlement with Wendy Rogers; (vii) \$10,117,534 collected from Pacific Life on the PLI140 policy, which was initially disputed by Pacific Life; (viii) \$34,564 in recovered state franchise taxes; (ix) \$2,183,000 in approved settlements with licensees; (x) \$6,086,240 in judgments against licensees; (xi) \$5.5 million in approved settlements with the James Defendants; and (xii) \$1,257,000 in setoffs.

are a one-time event. As a result, no discount would normally be appropriate. Nevertheless, this application reflects a discount of 18.35% off of the fees that Dykema would normally charge for the work performed during this time period.

**Experience, reputation, and ability of the professionals.** Dykema is one of Texas' premier law firms. Founded as Cox Smith Matthews Incorporated in San Antonio over 80 years ago and recently merged with Dykema Gossett, it employs over 400 attorneys with diverse experience, across 15 offices, in a myriad of practice areas. Dykema's experience spans all of the key Texas markets, with growing offices in Austin, Dallas, El Paso and McAllen, as well as offices across the nation in Michigan, Illinois, Minnesota, California and Washington, D.C. Dykema represents leading global corporations, growth and middle-market companies, capital markets participants and entrepreneurs in every major industry group as well as public sector entities, educational institutions, philanthropic organizations and individuals.

**Whether the fee is fixed or contingent.** The fees of the Receiver and his counsel are based on upon their hourly rates with a substantial discount. However, the payment of fees depends upon the approval of the court and the availability of assets in the estate – something which could not be known at the time the engagement was accepted and which remain uncertain.

Based on the size and complexity of the estate, the difficulties of administering it, the efforts expended and the results obtained, the fees requested by the Receiver and his counsel are reasonable and necessary.

ACCORDINGLY, the Receiver requests that this Application be granted in its entirety and that he be authorized to pay the fees requested by him and his counsel from the funds available to the estate.

Respectfully submitted,

By: /s/ Michael D. Napoli  
Michael D. Napoli  
State Bar No. 14803400

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(214) 698-7837  
(214) 462-6401 (fax)  
MNapoli@dykema.com

**Counsel for Eduardo S. Espinosa,  
Receiver**

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record listed below, through the electronic filing manager if that counsel's e-mail address is on file or via e-mail, if not, on this 19th day of April, 2016.

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(512) 682-2074 fax  
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**COUNSEL FOR THIRD PARTY DEFENDANTS RON  
JAMES, DON JAMES, AND JAMES SETTLEMENT  
SERVICES**

\_\_\_\_\_/s/ Michael D. Napoli  
Michael D. Napoli

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| STATE OF TEXAS,               | § | IN THE DISTRICT COURT OF            |
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| v.                            | § | TRAVIS COUNTY, TEXAS                |
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|                               | § |                                     |
| Defendants.                   | § | 126 <sup>th</sup> JUDICIAL DISTRICT |

**AFFIDAVIT OF EDUARDO S. ESPINOSA**

BEFORE ME, the undersigned authority, on this day personally appeared Eduardo S. Espinosa, who is personally known to me, and after being duly sworn according to law, upon his/her oath duly deposed and said:

1. My name is Eduardo S. Espinosa. I am over the age of twenty-one (21) years, of sound mind, and fully competent to testify in this cause. I have personal knowledge of the facts stated herein, all of which are true and correct.

2. I am a member of the law firm of Dykema Cox Smith (Dykema). I was admitted to practice law in the State of Louisiana in 1996 and in the State of Texas in 1999. Prior to entering private practice, I was an Enforcement Attorney with the United States Securities and Exchange Commission, where I investigated violations of and enforced the antifraud provisions of the federal securities laws. Since entering private practice in 1998, I have been counsel to multiple defendants in similar proceedings. I am familiar with the reasonable and customary fees charged by attorneys in this type of matter.

3. I am making this Affidavit in support of the Twenty-Eighth Application for Fees by the Receiver and Receiver's Counsel (the Application).

4. Pursuant to the Court's Order of May 5, 2010 and the Agreed Temporary Injunction Order of May 28, 2010 (the Agreed TI), I have employed professionals necessary "for an efficient and accurate administration of the receivership estate." To this goal, I have retained Dykema to represent me in connection with my duties and responsibilities as Receiver and have utilized a number of its respective lawyers and paralegals to assist me therewith. I have not acted as my own counsel.

5. Attached to this Affidavit (i) as Exhibits A through F are copies of Dykema's invoices for October 2015 through March 2016, respectively; (ii) as Exhibits G and H are copies of Dykema's invoices pertaining to the Scott Schroeder bankruptcy for October 2015 and February 2016, respectively; and (ii) as Exhibit I is a copy of Dykema's invoice pertaining to the McDermott litigation for October 2015 (collectively, the DCS Invoices). The DCS Invoices detail the services performed, during the corresponding months, by: (a) me, as Receiver; and (b) Dykema as Receiver's counsel. At the end of each Invoice is a Professional Summary that lists the professional staff that billed time to this matter during the relevant time period, the number of hours billed and their respective rates.

6. As a general matter, the charge for the services provided by Dykema are determined by multiplying the total number of hours worked by each timekeeper by that timekeeper's billing rate respective. The fees charged by the Receiver and his counsel represent a discount of approximately 18.35% from the usual and customary fees charged by Dykema. In this case, the billing rate of each



timekeeper was discounted from the usual and customary rates charged by the firm. The Receiver is charging \$320/hour, which represents a 29% discount from his usual and customary rate of \$450/hour for 2015 and a 33% discount from his usual and customary rate of \$475/hour for 2016. In addition, Dykema has discounted its rates for other timekeepers by 9.5%. In the aggregate the discounts and write-offs associated with this Application amount to \$10,426.79. The chart below summarizes the fees charged and the discounts applied.

| <b>Invoice Summary</b>    |                      |
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| Services Rendered in:     | Total                |
| Fees Requested            |                      |
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| (9.5%) adj.               | (\$7,467.24)         |
| Write-offs                |                      |
| <b>Total Adj</b>          | <b>(\$24,254.74)</b> |

7. I have personal experience working with every person billing time to this matter, they are each of high quality and they have skills and expertise that are invaluable to assist me in performing my duties and responsibilities in this matter.

8. The hourly rates set forth in the Invoices are set at a level designed to compensate the firm fairly for the work of its staff and to cover fixed and routine overhead expenses. Such rates are normal and customary in this market for legal professionals with the same level of experience and expertise at comparable legal

firms in Texas. Dykema undertakes annual analyses of the markets in which it operates in order to determine the appropriate fees to charge for its professionals based on the fees charged by their competitors and peer firms. The goal of these analyses is to set rates for each professional at the median rate for professionals at peer firms in similar practices areas and similar experience. Accordingly, the rates charged by Dykema in this matter are well within the norm for firms of their type in Texas.

9. The hourly rates charged are reasonable rates for this case, given: (1) the time and labor involved, the novelty and difficulty of the questions involved, and the skill required to perform the legal services properly; (2) the likelihood that the acceptance of the particular employment will preclude other employment by the respective professionals; (3) the fee customarily charged in the locality for similar services; (4) the amount involved and the results obtained; (5) the time limitations imposed by the client or the circumstances; (6) the nature and length of the professional relationship with the client; and (7) the experience, reputation, and ability of the professionals performing the services.

10. The amount billed for my services during the period covered by this application is \$36,800.00. The amount billed for my counsel's professional services during the period covered by this application is \$71,135.29. These amounts were calculated by taking the time billed for each task performed in connection with this case multiplied by the discounted hourly rate for the professional or staff member who performed the task. Based on my experience and knowledge of this matter, the

fees charged by myself and my team for work during the periods covered by this Fee Application are reasonable.

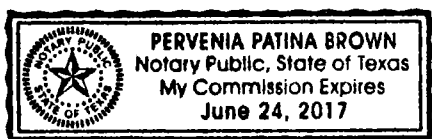
11. I have reviewed the DCS Invoices for services rendered during the periods covered by this Fee Application. Based on my experience and knowledge of this matter, the work performed by my staff during that period was reasonable and necessary to properly allow me to fulfill my duties and responsibilities in this case.

12. I engaged Lewis & Ellis to model the consolidated RV/HCF portfolio and advise the estate as to appropriate premium reserve levels and the portfolio's expected net cash at maturity. Their analysis was updated in connection with the most recent interim distributions. Lewis & Ellis determined that premium reserves of \$12,815,246 as of December 31, 2015 should suffice for 97.5% of the potential outcomes. After accounting for the interim distributions, the premiums paid since December 31, 2015, and the estate's collection of settlements and judgments; the estate maintains ample cash reserves from which to pay this Application.

**FURTHER AFFIANT SAYETH NOT.**

  
Eduardo S. Espinosa

SUBSCRIBED AND SWORN TO BEFORE ME this \_\_\_\_ day of April 2016.



  
Notary Public  
My Commission Expires:

# Exhibit A

RETIREMENT VALUE, LLC  
EDUARDO S. ESPINOSA, RECEIVER  
COX SMITH MATTHEWS INCORPORATED  
1201 ELM STREET, SUITE 3300  
DALLAS, TX 75270

November 16, 2015  
**Invoice No.3021811**

Legal Services Through 10/31/2015 in Connection With

**COUNSEL FOR RECEIVER OF RETIREMENT VALUE, LLC**

**Matter 734617-000001**

|          |               |      |        |                                                                                                                      |
|----------|---------------|------|--------|----------------------------------------------------------------------------------------------------------------------|
| 10/01/15 | E. ESPINOSA   | 0.20 | 64.00  | CORRESPOND WITH D. ANDREACCHI REGARDING UPDATE TO COMMUNICATIONS LOG (0.2).                                          |
| 10/02/15 | E. ESPINOSA   | 0.20 | 64.00  | ATTEND TO BOFI STATEMENT (0.2).                                                                                      |
| 10/05/15 | D. ANDREACCHI | 1.20 | 206.34 | RESPOND TO INVESTOR CALLS AND UPDATE COMMUNICATIONS LOG AND MAILING LIST RE SAME (1.2).                              |
| 10/06/15 | D. ANDREACCHI | 0.30 | 51.59  | RESPOND TO INVESTOR CALL AND EMAIL E. ESPINOSA RE DEATH OF E. RICHARDS                                               |
| 10/07/15 | E. ESPINOSA   | 0.80 | 256.00 | ATTEND TO ACCOUNTS PAYABLE (0.6); PROVIDE BKD WITH BOFI 2Q2015 STATEMENTS (0.2).                                     |
| 10/08/15 | E. ESPINOSA   | 1.50 | 480.00 | TELEPHONE CONFERENCE WITH TAVA SMITH (INVESTOR) (0.2); ATTEND TO ACCOUNTS PAYABLE AND ACCOUNT RECONCILIATIONS (1.3). |
| 10/09/15 | M. NAPOLI     | 0.70 | 313.60 | PREPARE 3Q REPORT (0.6); E-MAIL CORRESPONDENCE WITH K. HENDERSON REGARDING INSURANCE CHECK (0.1).                    |
| 10/14/15 | E. ESPINOSA   | 0.70 | 224.00 | CORRESPOND WITH A. WILLIAMS OF BKD REGARDING RV010 (0.3); DEPOSIT RV010 (0.4).                                       |

REMIT TO: DYKEMA COX SMITH  
112 East Pecan Street | Suite1800  
San Antonio, Tx 78205  
210.554.5500 tel | 210.226.8395 fax

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PAYMENT DUE UPON RECEIPT | FEDERAL TAX ID # 38-1446628

November 16, 2015  
 Invoice No. 3021811  
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|          |               |      |        |                                                                                                                                                                                                                                                                                                                              |
|----------|---------------|------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10/19/15 | E. ESPINOSA   | 1.80 | 576.00 | CONFER WITH A. WILLIAMS OF BKD REGARDING 3Q2015 CASH FLOWS (0.8); CORRESPOND WITH E. GARNETT REGARDING APPEAL FILINGS (0.1); ATTEND TO GRANADOS CHANGE OF ADDRESS (0.2); REVIEW CORRESPONDENCE FROM T. COSTA O/B/O B. NAKANA (0.5); TELEPHONE CONFERENCE WITH E. GARNETT REGARDING DOMESTICATION OF FOREIGN JUDGMENTS (0.5). |
| 10/20/15 | E. ESPINOSA   | 1.90 | 608.00 | CONFER WITH R. ARBUCKLE (EASTWEST BANK) (0.3); TELEPHONE CONFERENCE WITH D. BRADLEY AT BMS (0.3); CORRESPOND WITH A. ARNOLD (ASG) REGARDING POLICY CORRESPONDENCE (0.2); ATTEND TO POLICY PREMIUM ANALYSIS (0.4); REVIEW 3Q2015 ACCOUNTS PAYABLE (0.7).                                                                      |
| 10/22/15 | E. ESPINOSA   | 0.40 | 128.00 | CONFER WITH G. QUINONES REGARDING WEBSITE TRANSFER (0.2); REPLY TO J. GARDNER (INVESTOR) REGARDING INQUIRY (0.2).                                                                                                                                                                                                            |
| 10/22/15 | M. NAPOLI     | 0.10 | 44.80  | E-MAIL CORRESPONDENCE WITH D. ANDREACCHI REGARDING WEBSITE (0.1).                                                                                                                                                                                                                                                            |
| 10/22/15 | D. ANDREACCHI | 2.30 | 395.49 | CONTINUE WORK ON NEW WEBSITE (2.3)                                                                                                                                                                                                                                                                                           |
| 10/23/15 | M. NAPOLI     | 0.60 | 268.80 | WORK ON 3DQ REPORT (0.3); E-MAIL CORRESPONDENCE WITH D. BRADY (0.1); ATTENTION TO WEBSITE ISSUES (0.2).                                                                                                                                                                                                                      |
| 10/23/15 | D. ANDREACCHI | 1.20 | 206.34 | CONTINUE WORK ON WEBSITE DOCUMENT LINKS (1.0); EMAIL G. QUINONES RE ASSISTANCE WITH FILES (0.2).                                                                                                                                                                                                                             |

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|          |               |      |          |                                                                                                                                                                                                                                                                                               |
|----------|---------------|------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10/26/15 | E. ESPINOSA   | 1.30 | 416.00   | TELEPHONE CONFERENCE WITH T. COSTA (O/B/O B. NAKANO) (0.2); CORRESPOND WITH SAME CONFIRMING CORRECTION (0.7); CORRESPOND WITH I. ANTONGIORGI (0.2); CALL J. GARDNER (INVESTOR) REGARDING HER IRA (0.2).                                                                                       |
| 10/26/15 | M. NAPOLI     | 0.10 | 44.80    | E-MAIL CORRESPONDENCE REGARDING WEBSITE (0.1).                                                                                                                                                                                                                                                |
| 10/26/15 | D. ANDREACCHI | 1.50 | 257.93   | CONTINUE WORK ON WEBSITE DOCUMENTS (1.5).                                                                                                                                                                                                                                                     |
| 10/27/15 | D. ANDREACCHI | 6.60 | 1,134.87 | CONTINUE WORK ON WEBSITE DOCUMENTS AND LINKS (6.5); EMAIL G. QUINONES RE MISSING FILES (0.1).                                                                                                                                                                                                 |
| 10/28/15 | E. ESPINOSA   | 1.20 | 384.00   | CORRESPOND WITH J. MARINO (BOFI) (0.2); CONFER WITH D. ANDREACCHI REGARDING REVISED WEBSITE (0.3); CORRESPOND WITH R. ADAME (K&L) REGARDING OUTSTANDING ACCOUNTS RECEIVABLE (0.2); DRAFT 27TH FEE APPLICATION AND AFFIDAVIT (2.8 NO CHARGE).                                                  |
| 10/28/15 | M. NAPOLI     | 0.20 | 89.60    | E-MAIL CORRESPONDENCE WITH D. ANDREACCHI REGARDING WEBSITE (0.1); E-MAIL CORRESPONDENCE WITH E. ESPINOSA REGARDING 3DQ REPORT (0.1).                                                                                                                                                          |
| 10/28/15 | D. ANDREACCHI | 3.70 | 636.22   | FINALIZE WEBSITE (1.60); TELEPHONE CONFERENCE WITH GODADDY REGARDING SWITCHING DOMAIN TO NEW WEBSITE (1.50); TELEPHONE CONFERENCE WITH GODADDY RE ACTIVATING EMAIL AND HOW TO ACCESS SAME (.40); TELEPHONE CONFERENCE WITH G. QUINONES RE PST FILE AND TERMINATION OF ORIGINAL WEBSITE (.20). |
| 10/29/15 | E. ESPINOSA   | 0.80 | 256.00   | CONFER WITH M. NAPOLI AND D. ANDREACCHI REGARDING POSTING TO WEBSITE (0.3); TELEPHONE CONFERENCE WITH M. ESPARZA (0.5).                                                                                                                                                                       |

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|          |               |      |             |                                                                                           |
|----------|---------------|------|-------------|-------------------------------------------------------------------------------------------|
| 10/30/15 | M. NAPOLI     | 0.30 | 134.40      | REVISE FEE APPLICATION 27 AND AFFIDAVIT IN SUPPORT (0.5 NO CHARGE); REVISE WEBSITE (0.3). |
| 10/30/15 | D. ANDREACCHI | 0.60 | 103.17      | UPDATE WEBSITE PER EMAIL FROM M. NAPOLI (.40); RESPOND TO EMAIL FROM INVESTOR (.20).      |
|          |               |      | Total Hours | 30.20                                                                                     |
|          |               |      | Total Fees  | \$ 7,343.95                                                                               |

## Professional Summary

| Professional            | Title           | Hours Worked | Rate      | Total Fees  |
|-------------------------|-----------------|--------------|-----------|-------------|
| E. ESPINOSA             | Particip Member | 10.80        | 320.00    | 3,456.00    |
| M. NAPOLI               | Particip Member | 2.00         | 448.00    | 896.00      |
| D. ANDREACCHI           | Paralegal       | 17.40        | 171.95    | 2,991.95    |
| Total All Professionals |                 | 30.20        | \$ 243.18 | \$ 7,343.95 |

**Total This Invoice** **\$ 7,343.95**



# Exhibit B

# Dykema Cox Smith

RETIREMENT VALUE, LLC  
EDUARDO S. ESPINOSA, RECEIVER  
COX SMITH MATTHEWS INCORPORATED  
1201 ELM STREET, SUITE 3300  
DALLAS, TX 75270

December 15, 2015  
**Invoice No.3029277**

Legal Services Through 11/30/2015 in Connection With

## **COUNSEL FOR RECEIVER OF RETIREMENT VALUE, LLC**

### **Matter 734617-000001**

|          |               |      |          |                                                                                                                                                                                                                                                                                                           |
|----------|---------------|------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11/02/15 | E. ESPINOSA   | 0.00 | .00      | (NO CHARGE): FINALIZE FEE APPLICATION NO. 27 AND SUBMIT FOR FILING (0.5).                                                                                                                                                                                                                                 |
| 11/02/15 | E. ESPINOSA   | 3.70 | 1,184.00 | TELEPHONE CONFERENCE WITH T. DUNN AT FIRST FINANCIAL REGARDING BOFI (0.4); REVIEW ASG NOVEMBER PREMIUM AND WIRE SAME AND CORRESPOND WITH A. WILLIAMS AT BKD REGARDING SAME (0.8); CONFER WITH D. ANDREACCHI REGARDING DISTRIBUTION OF 3Q2015 REPORT (0.4); UPDATE DRAFT AND FINALIZE 3Q2015 REPORT (2.1). |
| 11/03/15 | E. ESPINOSA   | 1.00 | 320.00   | TELEPHONE CONFERENCE WITH R. CHODAN (INVESTOR) AND WELLS FARGO FINANCIAL ADVISORS (1.0).                                                                                                                                                                                                                  |
| 11/03/15 | D. ANDREACCHI | 1.60 | 275.12   | REVISE AND UPDATE WEBSITE WITH 3RD QUARTER REPORT, LETTER FROM THE COURT AND CHANGES REGARDING POLICY MATURITIES AND DELIVER COPIES OF QUARTERLY REPORT TO INVESTOR WHO HAVE OPTED OUT OF ELECTRONIC DELIVERY.                                                                                            |

REMIT TO: DYKEMA COX SMITH  
112 East Pecan Street | Suite1800  
San Antonio, Tx 78205  
210.554.5500 tel | 210.226.8395 fax  
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PAYMENT DUE UPON RECEIPT | FEDERAL TAX ID # 38-1446628

# Dykema Cox Smith

December 15, 2015  
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|          |               |      |        |                                                                                                                                                                                                                                                                                                                       |
|----------|---------------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11/04/15 | E. ESPINOSA   | 2.20 | 704.00 | TELEPHONE CONFERENCE WITH INVESTOR AND TODD HUDSON (FINANCIAL ADVISOR) (0.8); CORRESPOND WITH E. GARNETT REGARDING AUTHORITY TO ACCEPT SERVICE (0.4); REVIEW GLAZIER JUDGMENT (0.2); REVIEW COMPLAINT REGARDING GLAZIER PROPERTY IN S. CAROLINA (0.3); LEGAL RESEARCH REGARDING GLAZIER'S S. CAROLINA HOLDINGS (0.5). |
| 11/05/15 | E. ESPINOSA   | 0.80 | 256.00 | TELEPHONE CONFERENCE WITH M. KAYE REGARDING STATUS REPORT (0.5); CORRESPOND WITH J. THOMAS REGARDING GLAZIER (0.3).                                                                                                                                                                                                   |
| 11/06/15 | E. ESPINOSA   | 0.60 | 192.00 | TELEPHONE CONFERENCE WITH J. THOMAS REGARDING GLAZIER AND SCHROEDER (0.4); TELEPHONE CONFERENCE WITH T. DUNN AT FIRST FINANCIAL (0.2).                                                                                                                                                                                |
| 11/06/15 | D. ANDREACCHI | 0.10 | 17.20  | UPDATE CASE STATUS PAGE OF WEBSITE WITH 3RD QUARTER REPORT.                                                                                                                                                                                                                                                           |
| 11/09/15 | E. ESPINOSA   | 0.50 | 160.00 | CORRESPOND WITH D. BRADLEY BMS (0.2); CORRESPOND WITH J. THOMAS REGARDING PROPERTIES (0.3).                                                                                                                                                                                                                           |
| 11/09/15 | E. ESPINOSA   | 0.30 | 96.00  | TELEPHONE CONFERENCE WITH T. DUNN AT FIRST FINANCIAL REGARDING FUNDS MANAGEMENT (0.3).                                                                                                                                                                                                                                |
| 11/11/15 | E. ESPINOSA   | 0.70 | 224.00 | TELEPHONE CONFERENCE WITH R. CHODAN (INVESTOR) REGARDING HIS IRA (0.3); CORRESPOND WITH C. BUCHANAN (INVESTOR), D. ANDREACCHI AND A. WILLIAMS (BKD) (0.4).                                                                                                                                                            |
| 11/12/15 | E. ESPINOSA   | 0.80 | 256.00 | CONFERENCE WITH D. BRADLEY AND M. WISBEY (BMS) AND M. NAPOLI (0.5); REVIEW BMS AGREEMENT (0.3).                                                                                                                                                                                                                       |

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|          |               |      |        |                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------|---------------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11/12/15 | M. NAPOLI     | 0.50 | 224.00 | TELEPHONE CONFERENCE WITH D. BRADLEY REGARDING RABOBANK AND CLAIMS PAYMENT SOFTWARE (0.5).                                                                                                                                                                                                                                                                                                            |
| 11/13/15 | E. ESPINOSA   | 0.30 | 96.00  | TELEPHONE CONFERENCE WITH R. CHODAN (INVESTOR).                                                                                                                                                                                                                                                                                                                                                       |
| 11/16/15 | E. ESPINOSA   | 0.40 | 128.00 | CORRESPOND WITH J. THOMAS REGARDING K. PETTICOLAS (0.2); TELEPHONE CONFERENCE WITH R. CHODAN (0.2).                                                                                                                                                                                                                                                                                                   |
| 11/17/15 | M. NAPOLI     | 0.40 | 179.20 | E-MAIL CORRESPONDENCE TO. D. FRASER (SEC) REGARDING RECEIVER'S PLEADINGS.                                                                                                                                                                                                                                                                                                                             |
| 11/18/15 | E. ESPINOSA   | 0.50 | 160.00 | REVIEW CORRESPONDENCE BETWEEN M. NAPOLI AND D. FRASER AND CONFER WITH M. NAPOLI REGARDING SAME (0.3); REVIEW CORRESPONDENCE FROM D. ANDREACCHI REGARDING INVESTOR INQUIRIES (0.2).                                                                                                                                                                                                                    |
| 11/18/15 | M. NAPOLI     | 0.20 | 89.60  | E-MAIL CORRESPONDENCE WITH D. FRASER REGARDING SETTLEMENTS BY RECEIVER (0.2).                                                                                                                                                                                                                                                                                                                         |
| 11/19/15 | D. ANDREACCHI | 0.30 | 51.59  | RESPOND TO INVESTOR EMAILS AND INQUIRE RE CHECKS NOT CASHED.                                                                                                                                                                                                                                                                                                                                          |
| 11/20/15 | E. ESPINOSA   | 1.60 | 512.00 | TELEPHONE CONFERENCE WITH T. DUNN AT FIRST FINANCIAL REGARDING BOFI AND ALT RATES (0.3); RESEARCH V. EASTON'S CLAIM AND DISTRIBUTIONS, ISSUE STOP PAYMENT ON 2014 DISTRIBUTION AND INSTRUCT BKD TO REISSUE CHECK (0.5); RESEARCH G. BOMMARITO'S DISTRIBUTION (0.3); CORRESPOND WITH D. ANDREACCHI AND A. WILLIAMS REGARDING SAME (0.3); REVIEW CORRESPONDENCE WITH K. PETTICOLAS AND J. THOMAS (0.2). |

# Dykema Cox Smith

December 15, 2015  
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|          |             |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------|-------------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11/24/15 | E. ESPINOSA | 2.70 | 864.00 | REVIEW G. CHICK JUDGMENT AND BANKRUPTCY FILING AND CORRESPOND WITH D. ANDREACCHI AND A. KAUFMAN REGARDING SAME (0.7); TELEPHONE CONFERENCE WITH E. GRIMSLEY REGARDING GLAZIER AND TELEPHONE CONFERENCE WITH B. GRIMSLEY REGARDING SAME (0.6); CORRESPOND WITH T. DUNN REGARDING BOFI (0.2); WORK ON BOFI ACCOUNTS AND FUNDS MANAGEMENT (0.5); CONFER WITH E. GARNETT REGARDING NOTICE OF APPEARANCE IN SOUTH CAROLINA MATTER AND FILE SAME IN SOUTH CAROLINA (0.7). |
| 11/24/15 | M. NAPOLI   | 0.20 | 89.60  | CONFER WITH E. ESPINOSA REGARDING BANKING RELATIONSHIPS AND INVESTMENT OPTIONS (0.2).                                                                                                                                                                                                                                                                                                                                                                               |
| 11/30/15 | E. ESPINOSA | 1.20 | 384.00 | REVIEW COST POSITIONS, DECEMBER PREMIUM REQUIREMENTS TO TRANSFER FUNDS; LOG SAME AND CORRESPOND WITH A. WILLIAMS (BKD) REGARDING SAME (1.2).                                                                                                                                                                                                                                                                                                                        |

Total Hours 20.60

Total Fees \$ 6,462.31

# DyKEMA COX SMITH

December 15, 2015  
Invoice No. 3029277  
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## Professional Summary

| Professional            | Title              | Hours Worked | Rate      | Total Fees  |
|-------------------------|--------------------|--------------|-----------|-------------|
| E. ESPINOSA             | Particip<br>Member | 17.30        | 320.00    | 5,536.00    |
| M. NAPOLI               | Particip<br>Member | 1.30         | 448.00    | 582.40      |
| D. ANDREACCHI           | Paralegal          | 2.00         | 171.96    | 343.91      |
| Total All Professionals |                    | 20.60        | \$ 313.70 | \$ 6,462.31 |

**Total This Invoice** **\$ 6,462.31**

# Exhibit C

# DyKEMA COX SMITH

RETIREMENT VALUE, LLC  
EDUARDO S. ESPINOSA, RECEIVER  
COX SMITH MATTHEWS INCORPORATED  
1201 ELM STREET, SUITE 3300  
DALLAS, TX 75270

January 12, 2016  
**Invoice No.3032702**

Legal Services Through 12/31/2015 in Connection With

## COUNSEL FOR RECEIVER OF RETIREMENT VALUE, LLC

### Matter 734617-000001

|          |               |      |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------|---------------|------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12/01/15 | E. ESPINOSA   | 3.30 | 1,056.00 | WIRE FUNDS TO CHASE BANK FROM BOFI (0.4); TELEPHONE CONFERENCE WITH MAYLING OF BOFI CONFIRMING WIRE (0.1); ADVISE A. WILLIAMS (BKD) OF SAME (0.2); TELEPHONE CONFERENCE WITH L. GRIFFITH REGARDING DISTRIBUTION UPDATE (0.4); ATTEND TO ACCOUNTS PAYABLE, CORRESPOND WITH A. WILLIAMS AT BKD REGARDING FEE APPLICATION NO. 27, 3Q2015 EXPENSES, CHECK RE-ISSUE AND BKD INVOICES (1.7); DOWNLOAD 11/2015 BOFI STATEMENT (0.2); CONFER WITH E. GARNETT AND J. THOMAS REGARDING ACCOUNTS RECEIVABLE, ACCOUNTS PAYABLE AND GBKH TRUST ACCOUNT FUNDS (0.3). |
| 12/02/15 | E. ESPINOSA   | 0.40 | 128.00   | (NO CHARGE) DRAFT 20TH MOTION TO PAY PROFESSIONALS (1.3); CORRESPOND WITH D. ANDREACCHI REGARDING R. BLANCHARD'S CLAIM AND ASSIGNMENT BY EXECUTOR (0.4).                                                                                                                                                                                                                                                                                                                                                                                               |
| 12/02/15 | M. NAPOLI     | 0.00 | .00      | (NO CHARGE): REVISE MOTION TO PAY NON-LEGAL PROFESSIONALS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 12/02/15 | D. ANDREACCHI | 1.80 | 309.51   | RESPOND TO INVESTOR CALLS AND EMAILS; UPDATE COMMUNICATIONS LOG AND MAILING LIST.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 12/03/15 | E. ESPINOSA   | 0.30 | 96.00    | CORRESPOND WITH LEWIS & ELLIS REGARDING FORECAST ESTIMATE.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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# Dykema Cox Smith

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|          |               |      |        |                                                                                                                                                                                                                                                                                                                             |
|----------|---------------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12/04/15 | E. ESPINOSA   | 0.00 | .00    | (NO CHARGE) FINALIZE AND FILE THE 20TH APPLICATION FOR PROFESSIONAL FEES (0.2)                                                                                                                                                                                                                                              |
| 12/04/15 | D. ANDREACCHI | 0.50 | 85.98  | RESPOND TO PHONE CALLS FROM INVESTORS.                                                                                                                                                                                                                                                                                      |
| 12/10/15 | A. KAUFMAN    | 0.80 | 264.26 | CALL WITH THE CHAPTER 7 BANKRUPTCY TRUSTEE FOR ERIC CHICK AND DRAFT FOLLOW-UP E-MAIL REGARDING OBSERVATIONS.                                                                                                                                                                                                                |
| 12/10/15 | E. ESPINOSA   | 0.40 | 128.00 | CONFER W/ A. KAUFMAN RE CHICK BANKRUPTCY; REVIEW CORRESPONDENCE W/ US TRUSTEE.                                                                                                                                                                                                                                              |
| 12/11/15 | E. ESPINOSA   | 0.40 | 128.00 | CONFER W/ E. GARNET RE CHICK BANKRUPTCY AND JUDGMENT.                                                                                                                                                                                                                                                                       |
| 12/11/15 | E. ESPINOSA   | 0.50 | 160.00 | REVIEW CONTINGENCY COUNSEL COLLECTION SETTLEMENT STATEMENTS.                                                                                                                                                                                                                                                                |
| 12/11/15 | E. ESPINOSA   | 0.50 | 160.00 | REVIEW 4Q2015 EST TAX OBLIGATION AND CORRESP W/ BKD RE SAME.                                                                                                                                                                                                                                                                |
| 12/11/15 | E. ESPINOSA   | 0.40 | 128.00 | CORREPS W/ A. WILLIAMS (BKD) RE A/P MATTERS.                                                                                                                                                                                                                                                                                |
| 12/11/15 | E. ESPINOSA   | 0.20 | 64.00  | REVIEW CONTINGENCY COUNSEL EXPENSE A/R.                                                                                                                                                                                                                                                                                     |
| 12/14/15 | E. ESPINOSA   | 0.20 | 64.00  | ATTEND TO 4TH QUARTER EST TAX PAYMENT.                                                                                                                                                                                                                                                                                      |
| 12/14/15 | E. ESPINOSA   | 0.30 | 96.00  | REVIEW A/P RUN.                                                                                                                                                                                                                                                                                                             |
| 12/14/15 | E. ESPINOSA   | 0.20 | 64.00  | REVIEW BANK STATEMENT(OCT).                                                                                                                                                                                                                                                                                                 |
| 12/15/15 | E. ESPINOSA   | 2.60 | 832.00 | TELEPHONE CONFERENCE WITH M. KAYE (INVESTOR) (.2); MULTIPLE TELEPHONE CONFERENCE WITH A. WILLIAMS @ BKD RE ACCOUNTS PAYABLE, QB BACKUPS (.7); CORRESPOND WITH A. MCKEEL & E. GARNETT RE M. CAMPBELL'S ABSTRACT OF JUDGMENT (.7); REVIEW ACCOUNTS PAYABLE RUN, CONFER W/ A. WILLIAMS (.7); WIRE ACCOUNTS PAYABLE FUNDS (.3). |

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|          |               |      |        |                                                                                                                                                                                                             |
|----------|---------------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12/16/15 | E. ESPINOSA   | 0.80 | 256.00 | TELEPHONE CONFERENCE WITH VICKY CHESNA RE STATUS REPORT, VALUATION AND PLAN OF DISTRIBUTION AND RESTITUTION ORDER ; CONFER W/ D. ANDREACCHI RE SAME (.6); CORRESP WITH M. MARTIN RE HCF STATUS REPORT (.2). |
| 12/17/15 | E. ESPINOSA   | 1.30 | 416.00 | TELEPHONE CONFERENCE W/ A. WILLIAMS RE QUICKBOOKS BACKUP; RESTORE UPDATE (.7); TELEPHONE CONFERENCE WITH R. HARRISON (INVESTOR); CORRESP WITH D. ANDREACCHI RE SAME (.6).                                   |
| 12/17/15 | D. ANDREACCHI | 0.20 | 34.39  | UPDATE COMMUNICATIONS LOG.                                                                                                                                                                                  |
| 12/17/15 | D. ANDREACCHI | 0.30 | 51.59  | LOCATE AND EMAIL COPIES OF PLAN AND JUDGMENT AGAINST RV TO V. CHESNA.                                                                                                                                       |
| 12/21/15 | D. ANDREACCHI | 0.20 | 34.39  | UPDATE COMMUNICATIONS LOG.                                                                                                                                                                                  |
| 12/23/15 | E. ESPINOSA   | 0.30 | 96.00  | UPDATE D. BLANCHARD'S CLAIM AND CORRESPOND WITH A. WILLIAMS AND D. ANDREACCHI REGARDING SAME.                                                                                                               |
| 12/23/15 | D. ANDREACCHI | 0.30 | 51.59  | EMAIL WITH D. BLANCHARD RE DOCUMENTS REGARDING STATUS OF INVESTMENT AND CHANGE OF OWNERSHIP FORM; TELEPHONE CALL WITH D. BLANCHARD RE OWNERSHIP FORM.                                                       |
| 12/28/15 | E. ESPINOSA   | 0.20 | 64.00  | CORRESPOND WITH A. WILLIAMS OF BKD REGARDING DECEMBER BANK STATEMENT (0.2).                                                                                                                                 |
| 12/28/15 | D. ANDREACCHI | 0.20 | 34.39  | UPDATE RECORDS TO REFLECT NEW OWNER OF R. BLANCHARD CLAIM.                                                                                                                                                  |
| 12/29/15 | E. ESPINOSA   | 0.60 | 192.00 | REVIEW ASG REMITTANCE ADVICE FOR JANUARY 2016 PREMIUMS, TRANSMIT FUNDS, UPDATE PREMIUM LOG AND CORRESPOND WITH A. WILLIAMS OF BKD REGARDING SAME (0.6).                                                     |
| 12/29/15 | E. ESPINOSA   | 0.20 | 64.00  | CORRESPOND WITH M. FREITAS REGARDING AUTHORITY TO DISCUSS WITH RALPH FREITH.                                                                                                                                |

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|          |               |      |        |                                                                                                                                                                                  |
|----------|---------------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12/31/15 | D. ANDREACCHI | 1.80 | 309.51 | CONSULTATION WITH E. ESPINOSA<br>RE CASE STATUS AND<br>ORGANIZATION; WORK ON CREATING<br>NET DOCS FOLDERS AND<br>ORGANIZATION OF DOCUMENTS FOR<br>ATTORNEY USE IN MANAGING CASE. |
|----------|---------------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|             |       |
|-------------|-------|
| Total Hours | 19.20 |
|-------------|-------|

|            |             |
|------------|-------------|
| Total Fees | \$ 5,367.61 |
|------------|-------------|

## Professional Summary

| Professional            | Title              | Hours Worked | Rate      | Total Fees  |
|-------------------------|--------------------|--------------|-----------|-------------|
| A. KAUFMAN              | Particip<br>Member | .80          | 330.33    | 264.26      |
| E. ESPINOSA             | Particip<br>Member | 13.10        | 320.00    | 4,192.00    |
| D. ANDREACCHI           | Paralegal          | 5.30         | 171.95    | 911.35      |
| Total All Professionals |                    | 19.20        | \$ 279.56 | \$ 5,367.61 |

|                    |             |
|--------------------|-------------|
| Total This Invoice | \$ 5,367.61 |
|--------------------|-------------|

# Exhibit D

RETIREMENT VALUE, LLC  
EDUARDO S. ESPINOSA, RECEIVER  
COX SMITH MATTHEWS INCORPORATED  
1201 ELM STREET, SUITE 3300  
DALLAS, TX 75270

February 12, 2016  
**Invoice No.3039591**

Legal Services Through 01/31/2016 in Connection With

**COUNSEL FOR RECEIVER OF RETIREMENT VALUE, LLC**

**Matter 734617-000001**

|          |               |      |          |                                                                                                                                                                                                                                                                                            |
|----------|---------------|------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/04/16 | D. ANDREACCHI | 0.60 | 105.89   | RESPOND TO INVESTOR EMAILS (0.2);<br>TELEPHONE CALL WITH W. ZAWISLAK<br>RE DISTRIBUTION CHECKS (0.3);<br>EMAIL E. ESPINOSA AND A. WILLIAMS<br>RE CHECK CLEARANCE (0.1).                                                                                                                    |
| 01/05/16 | E. ESPINOSA   | 3.20 | 1,024.00 | TELEPHONE CONFERENCE WITH R.<br>O'HARA (0.6); TELEPHONE<br>CONFERENCE WITH E. EASON (.6);<br>TELEPHONE CONFERENCE WITH V.<br>LAMONICA O/B/O R. O'HARA (1.4);<br>CORRESPOND WITH S. GIBSON<br>(LEWIS & ELLIS) REGARDING<br>POLICIES (0.3); DEPOSIT 2015<br>SETTLEMENT FUNDS AT CHASE (0.3). |
| 01/05/16 | D. ANDREACCHI | 0.10 | 17.65    | EMAILS WITH A. WILLIAMS RE<br>ZAWISLAK CHECKS.                                                                                                                                                                                                                                             |
| 01/06/16 | E. ESPINOSA   | 4.30 | 1,376.00 | TELEPHONE CONFERENCE WITH R.<br>O'HARA (0.2); MEETING WITH J.<br>HUSEMAN, B. GUNN, D. FRAQID AND<br>M. NAPOLI (3.5); REVIEW<br>PRELIMINARY L&E ANALYSIS AND<br>CORRESPOND WITH S. GIBSON<br>REGARDING SAME (0.6).                                                                          |
| 01/06/16 | E. ESPINOSA   | 0.00 | .00      | (TRAVEL: NO CHARGE): ROUND TRIP<br>TRAVEL TO SEC IN FT. WORTH (2.0).                                                                                                                                                                                                                       |
| 01/06/16 | M. NAPOLI     | 4.50 | 2,097.36 | PREPARE FOR MEETING WITH SEC<br>REGARDING RV ISSUES (1.0); MEET<br>WITH SEC REPRESENTATIVES<br>REGARDING RV ISSUES (3.5).                                                                                                                                                                  |
| 01/06/16 | M. NAPOLI     | 0.00 | .00      | (TRAVEL: NO CHARGE): TRAVEL TO<br>AND FROM FT. WORTH TO MEET WITH<br>SEC (1.0).                                                                                                                                                                                                            |

REMIT TO: DYKEMA COX SMITH  
112 East Pecan Street | Suite1800  
San Antonio,Tx 78205  
210.554.5500 tel | 210.226.8395 fax

California | Illinois | Michigan | Minnesota | Texas | Washington, D.C.

dykema.com

PAYMENT DUE UPON RECEIPT | FEDERAL TAX ID # 38-1446628

# Dykema Cox Smith

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|          |               |      |          |                                                                                                                                                                                                                                                              |
|----------|---------------|------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/07/16 | E. ESPINOSA   | 1.90 | 608.00   | CONFER WITH D. ANDREACCHI REGARDING IRA VALUATIONS AND SUPPORTING DOCUMENTS AND RESEARCH REGARDING SAME (1.2); CORRESPOND WITH D. ANDREACCHI AND A. WILLIAMS REGARDING W. ZAWISLAK'S DISTRIBUTIONS (0.3); CORRESPOND WITH R. PARKER REGARDING INQUIRY (0.4). |
| 01/07/16 | M. NAPOLI     | 4.00 | 1,864.32 | RESEARCH IN REFERENCE TO SEC INQUIRIES (4.0).                                                                                                                                                                                                                |
| 01/07/16 | D. ANDREACCHI | 0.80 | 141.18   | UPDATE WEBSITE; RESEARCH INFORMATION AND EMAIL DOCUMENTS TO INVESTOR PER E. ESPINOSA REQUEST.                                                                                                                                                                |
| 01/08/16 | M. NAPOLI     | 5.00 | 2,330.40 | RESEARCH IN REFERENCE TO SEC INQUIRIES (5.0).                                                                                                                                                                                                                |
| 01/09/16 | E. ESPINOSA   | 0.80 | 256.00   | CORRESPOND WITH D. BRADLEY OF BMS (0.2); RECONCILE ESTATE RECOVERIES LOG TO TRANSMIT DEPOSIT DETAIL TO A. WILLIAMS OF BKD (0.6).                                                                                                                             |
| 01/11/16 | E. ESPINOSA   | 0.10 | 32.00    | CORRESPOND WITH D. BRADY AT BMS.                                                                                                                                                                                                                             |
| 01/11/16 | M. NAPOLI     | 3.60 | 1,677.89 | EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING RV DOCUMENTS (0.1); REVIEW RV DOCUMENTS IN RESPONSE TO SEC INQUIRIES (3.5).                                                                                                                                    |
| 01/12/16 | E. ESPINOSA   | 1.00 | 320.00   | CORRESPONDENCE WITH A. WILLIAMS (BKD) REGARDING B. CATANIA (.2); CORRESPONDENCE WITH A. WILLIAMS REGARDING CASH SOURCE AND USES REPORTING (.8).                                                                                                              |
| 01/12/16 | M. NAPOLI     | 5.10 | 2,377.01 | EMAIL CORRESPONDENCE WITH J. THOMAS (.1); REVIEW DOCUMENTS IN RESPONSE TO SEC INQUIRIES (4.5); EMAIL CORRESPONDENCE WITH E. KAIN AND E. GARNETT REGARDING SEC PRODUCTION (.5).                                                                               |

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|          |                  |      |          |                                                                                                                                                                                                                                                      |
|----------|------------------|------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/13/16 | E. ESPINOSA      | 1.50 | 480.00   | TELEPHONE CONFERENCE WITH P. CHIECHI (INVESTOR) (.8); TELEPHONE CONFERENCE WITH ED WHITE ON BEHALF OF WHITE FAMILY TRUST AND PETTICOLOR PAYMENT (.5); CONFER WITH D. HOROWITZ (.2).                                                                  |
| 01/13/16 | M. NAPOLI        | 4.80 | 2,237.18 | EMAIL CORRESPONDENCE WITH J. THOMAS AND E. GARNETT REGARDING DOCUMENTS (.1); PREPARE 2015 ANNUAL REPORT (4.0); EMAIL CORRESPONDENCE WITH D. HOROWITZ REGARDING STATUS OF CASE (.4); EMAIL CORRESPONDENCE WITH E. KAIN REGARDING SEC PROTECTION (.3). |
| 01/13/16 | D. ANDREACCHI    | 0.50 | 88.24    | TELEPHONE CALLS WITH INVESTORS RE STATUS AND OTHER QUESTIONS (0.4); EMAIL TO E. ESPINOSA RE E. WHITE QUESTIONS; UPDATE COMMUNICATIONS LOG (0.1).                                                                                                     |
| 01/14/16 | M. NAPOLI        | 0.10 | 46.61    | EMAIL CORRESPONDENCE WITH D. FRASER REGARDING SEC PRODUCTION.                                                                                                                                                                                        |
| 01/14/16 | D. ANDREACCHI    | 2.40 | 423.55   | TELEPHONE CALLS WITH INVESTORS; UPDATE COMMUNICATIONS LOG; WORK ON ORGANIZING EMAILS IN NETDOCS.                                                                                                                                                     |
| 01/14/16 | EDRICK A. HARRIS | 2.00 | 362.00   | LOAD DOCUMENTS INTO DOCUMENT REVIEW PLATFORM AND PERFORM QUALITY CHECK OF THE SAME.                                                                                                                                                                  |
| 01/15/16 | M. NAPOLI        | 0.20 | 93.22    | PREPARE CORRESPONDENCE TO J. HUSEMAN REGARDING RV DOCUMENTS.                                                                                                                                                                                         |
| 01/19/16 | E. ESPINOSA      | 1.00 | 320.00   | CONFER WITH M. NAPOLI REGARDING INITIAL STOCHAISTIC RESULTS (.4); TELEPHONE CONFERENCE WITH RV INVESTOR (.6).                                                                                                                                        |

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|          |               |      |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------|---------------|------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/19/16 | M. NAPOLI     | 4.60 | 2,143.97 | REVIEW FILES FOR PRODUCTION (.5); EMAIL CORRESPONDENCE WITH E. KAIN REGARDING PRODUCTION (0.1); ANALYZE LATEST ACTUARIAL ANALYSIS (.5); EMAIL CORRESPONDENCE WITH E. ESPINOSA REGARDING ACTUARIAL ANALYSIS (.1); WORK ON 2015 ANNUAL REPORT (3.0); CONFER WITH E. ESPINOSA REGARDING ACTUARIAL ANALYSIS (.1).                                                                                                                                                                                                                                                       |
| 01/19/16 | D. ANDREACCHI | 0.40 | 70.59    | FINALIZE FOLDERS OF INVESTOR EMAILS AND EMAIL E. ESPINOSA RE READY FOR USE.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 01/20/16 | E. ESPINOSA   | 3.10 | 992.00   | TELEPHONE CONFERENCE WITH TED MOORE REGARDING WEBSITE ACCESS AND STATUS REPORT (.4); TELEPHONE CONFERENCE WITH A. WILLIAMS (BKD) REGARDING SETTLEMENT/RECONCILIATION OF 2015 A/R FROM LICENSEES (.7); DOWNLOAD 12/15 BANK OF AMERICA STATEMENT, REVIEW BBVA CD AND CORRESPONDENCE WITH A. WILLIAMS (BKD) REGARDING SAME (.7); TELEPHONE CONFERENCE WITH A. LIEBALT REGARDING HIS CLAIMS AND HIS FATHER'S GENERAL STATUS REPORT (.4); TELEPHONE CONFERENCE AND CORRESPONDENCE WITH S. GIBSON REGARDING (AVS) STOCHASTIC ANALYSIS; REVIEW 2013 ANALYSIS RESULTS (.9). |



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|          |               |      |          |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------|---------------|------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/20/16 | M. NAPOLI     | 5.50 | 2,563.44 | EMAIL CORRESPONDENCE WITH D. HOROWITZ REGARDING LICENSEE RECOVERIES (.3); TELEPHONE CONFERENCE WITH S. GIBSON REGARDING ACTUARIAL REPORT (.3); EMAIL CORRESPONDENCE WITH S. GIBSON REGARDING ACTUARIAL ANALYSIS (.3); WORK ON 2015 ANNUAL REPORT (1.0); PREPARE MOTION TO AUTHORIZE SECOND SUPPLEMENT DISTRIBUTION (2.0); REVIEW SECOND ACTUARIAL ANALYSIS BY L&E (.3); REVIEW ADDITIONAL DOCUMENTS FOR PRODUCTION TO SEC (1.5). |
| 01/21/16 | E. ESPINOSA   | 1.60 | 512.00   | CORRESPONDENCE WITH T. LIEBALT REGARDING DESIGNATION OF BENEFICIARY (.2); REVIEW BBVA INTEREST ACCRUAL AND CORRESPONDENCE WITH A. WILLIAMS (BKD) REGARDING SAME (.4); REVIEW ISC STOCHAISTIC ANALYSIS, CONFER WITH M. NAPOLI AND CORRESPONDENCE WITH S. GIBSON REGARDING SAME (1.0).                                                                                                                                             |
| 01/21/16 | M. NAPOLI     | 6.50 | 3,029.52 | PREPARE MOTION TO DISTRIBUTE (2.5); CONFER WITH E. ESPINOSA REGARDING DISTRIBUTION (.2); EMAIL CORRESPONDENCE WITH S. GIBSON REGARDING ACTUARIAL ANALYSIS (.1); PREPARE 2015 ANNUAL REPORT (2.5); RESEARCH REGARDING COI INCREASES (1.0); PREPARE MEMO TO E. ESPINOSA REGARDING COI INCREASES (.2).                                                                                                                              |
| 01/21/16 | D. ANDREACCHI | 0.40 | 70.59    | REVIEW DOCUMENTS AND DISCS AND EMAIL E. ESPINOSA RE CONTENT; EMAILS RE RV LOCATION IN CASELOGISTIX OR RELATIVITY.                                                                                                                                                                                                                                                                                                                |

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|          |                 |      |          |                                                                                                                                                                                                                                                                                                                                                                    |
|----------|-----------------|------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/21/16 | D. ANDREACCHI   | 1.30 | 229.42   | RESPOND TO INVESTOR EMAILS AND PHONE CALLS, UPDATE COMMUNICATIONS AND ADDRESS LOG AND EMAIL A. WILLIAMS RE ADDRESS CHANGES FOR INVESTORS.                                                                                                                                                                                                                          |
| 01/22/16 | E. ESPINOSA     | 2.00 | 640.00   | CORRESPONDENCE WITH B. WARD REGARDING VALUATION (.6); CONFER WITH M. NAPOLI REGARDING AXA ESCALATION OF COI, AFFECT ON FORECASTS AND CONVERSATIONS WITH ASG (.5); CORRESPONDENCE WITH A. WILLIAMS & J. ZETINA REGARDING W9 (.2); CONFER WITH M. NAPOLI REGARDING 2015 SOURCES AND USES (.3); ATTEND TO CHANGE OF OWNERSHIP NOTICES (.4).                           |
| 01/22/16 | M. NAPOLI       | 3.50 | 1,631.28 | EMAIL CORRESPONDENCE WITH K. GARY AND A. ARNOLD REGARDING COI ISSUE (.2); REVIEW CORRESPONDENCE REGARDING COI INCREASE FROM AXA AND PREPARE MEMO REGARDING SAME (.5); CONFER WITH E. ESPINOSA REGARDING COI ISSUE (.1); EMAIL CORRESPONDENCE WITH S. TOWNSEND OF ASG (.2); REVIEW FINANCIAL REPORTS FROM BKD FOR ANNUAL REPORT (1.0); PREPARE ANNUAL REPORT (1.5). |
| 01/24/16 | MARYELLEN HAYES | 0.30 | 54.30    | PREPARATION AND IMPORT OF LATEST DOCUMENT PRODUCTION INTO DOCUMENT REVIEW PLATFORM AND EXAMINE SAME FOR ACCURACY.                                                                                                                                                                                                                                                  |
| 01/25/16 | E. ESPINOSA     | 1.60 | 512.00   | CONFER WITH M. NAPOLI REGARDING AXA NOTICES OF COI INCREASE (.4); CORRESPONDENCE AND TELEPHONE CONFERENCE WITH S. TOWNSEND REGARDING SAME (.5); REVIEW MULTIPLE NOTICES OF OWNERSHIP CHANGE (.5); CORRESPONDENCE WITH S. SZE (IDAHO AG'S OFFICE) (.2).                                                                                                             |

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|          |                  |      |          |                                                                                                                                                                                                                                                                                                           |
|----------|------------------|------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/25/16 | E. ESPINOSA      | 0.30 | 96.00    | TELEPHONE CONFERENCE WITH J. LONG REGARDING STATUS REPORT.                                                                                                                                                                                                                                                |
| 01/25/16 | M. NAPOLI        | 3.70 | 1,724.50 | REVIEW PRIVILEGE DOCS FOR PRODUCTION (.3); EMAIL CORRESPONDENCE WITH E. KAIN REGARDING PRODUCTION (.2); TELEPHONE CONFERENCE WITH S. TOWNSEND (.2); PREPARE ANNUAL REPORT (2.5); EMAIL CORRESPONDENCE WITH S. TOWNSEND REGARDING COI INCREASES (.1); CONFER WITH E. ESPINOSA REGARDING COI INCREASE (.4). |
| 01/25/16 | D. ANDREACCHI    | 0.30 | 52.94    | TELEPHONE CALL WITH K. ERICKSON RE STATUS OF PORTFOLIO (0.2); UPDATE COMMUNICATIONS LOG RE SAME (0.1).                                                                                                                                                                                                    |
| 01/26/16 | E. ESPINOSA      | 0.60 | 192.00   | CONFER WITH M. NAPOLI REGARDING BOFI (.2); CORRESPONDENCE WITH A. ARNOLD & M. NAPOLI REGARDING COI ISSUES (.3); REVIEW CHASE 1099 INT AND CORRESPONDENCE WITH A. WILLIAMS REGARDING SAME (.1).                                                                                                            |
| 01/26/16 | M. NAPOLI        | 3.60 | 1,677.89 | RESEARCH COI INCREASE (3.0); EMAIL CORRESPONDENCE WITH A. ARNOLD REGARDING VOYA, TRANSAM & WILLIAM PEU POLICIES (.1); PREPARE MEMO TO E. ESPINOSA REGARDING COI INCREASES AND INDUSTRY RESPONSE (.5).                                                                                                     |
| 01/26/16 | MARYELLEN HAYES  | 0.30 | 54.30    | PREPARATION AND IMPORT OF LATEST DOCUMENT PRODUCTION INTO DOCUMENT REVIEW PLATFORM AND EXAMINE SAME FOR ACCURACY.                                                                                                                                                                                         |
| 01/26/16 | EDRICK A. HARRIS | 7.00 | 1,267.00 | CREATE PRODUCTION VOLUME AND PERFORM QUALITY CHECK OF THE SAME.                                                                                                                                                                                                                                           |

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|          |               |      |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------|---------------|------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/27/16 | E. ESPINOSA   | 1.40 | 448.00   | TELEPHONE CONFERENCE WITH J. THOMAS AND M. NAPOLI REGARDING POE & MAGARICCI APPEALS; AND SCHROEDER COLLECTION EFFORTS (.5); CORRESPONDENCE WITH M. KAYE REGARDING 2016 DISTRIBUTION (.2); CONFER WITH D. ANDREACCHI & M. NAPOLI REGARDING STATUS OF SCHROEDER'S BANKRUPTCY (.3); CONFER WITH M. NAPOLI, S. GIBSON & A. ARNOLD REGARDING COI INCREASES, REVISED STOCHAISTIC ANALYSIS AND PREMIUM OPTIMIZATIONS (.4).                                                                                                                                                                                                   |
| 01/27/16 | M. NAPOLI     | 5.00 | 2,330.40 | EMAIL CORRESPONDENCE WITH A. ARNOLD REGARDING VOYA POLICIES (.1); PREPARE MEMO REGARDING VOYA COI INCREASE (.1); REVIEW DOCUMENTS FOR PRODUCTION TO SEC (.4); REVISE CORRESPONDENCE TO J. HUSEMAN (.2); EMAIL CORRESPONDENCE WITH J. HUSEMAN (.1); TELEPHONE CONFERENCE WITH J. THOMAS REGARDING POE APPEAL ARGUMENT AND COLLECTION STRATEGY (.3); RESEARCH SCHROEDER BANKRUPTCY (.2); EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING SCHROEDER BANKRUPTCY (.1); EMAIL CORRESPONDENCE WITH S. GIBSON REGARDING NEW ACTUARIAL ANALYSIS (.2); ANALYZE ILLUSTRATIONS FOR AXA POLICIES (1.3); PREPARE ANNUAL REPORT (2.0). |
| 01/27/16 | D. ANDREACCHI | 0.20 | 35.30    | TELEPHONE CALL WITH INVESTOR AND UPDATE COMMUNICATIONS AND MAIL LOGS RE SAME.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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|          |                  |      |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------|------------------|------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/28/16 | A. KAUFMAN       | 1.50 | 536.22   | REVISE COMPLAINT TO OBJECT TO ERIC CHICK'S BANKRUPTCY DISCHARGE AND CONTACT G. JONES IN CALIFORNIA TO COORDINATE FILING THROUGH THE LA OFFICE.                                                                                                                                                                                                                                                                                                                                  |
| 01/28/16 | E. ESPINOSA      | 2.00 | 640.00   | REVIEW ASG'S FEBRUARY 2016 REMITTANCE ADVICE (.2); TRANSFER FUNDS, LOG SAME & CORRESPOND WITH A. WILLIAMS (BKD) REGARDING SAME (.8); CONFER WITH A. KAUFMAN REGARDING G. CHICK'S BANKRUPTCY (.2); CONFER WITH M. NAPOLI REGARDING LISA'S EFFORTS AND DAN YOUNG'S REGARDING THE COI INCREASES (.4); REVIEW ASG'S POLICY UPLOADS (.4).                                                                                                                                            |
| 01/28/16 | M. NAPOLI        | 5.80 | 2,703.26 | REVIEW LATEST ILLUSTRATIONS (1.0); CONFER WITH E. ESPINOSA REGARDING COI INCREASES AND ADDITIONAL ANALYSIS (.3); EMAIL CORRESPONDENCE WITH S. GIBSON AND S. TOWNSEND REGARDING COI INCREASES AND PREMIUM OPTIMIZATION (.2); PREPARE ANNUAL REPORT (1.8); REVIEW NON-DISCHARGE COMPLAINT AGAINST E. CHICK (.3); TELEPHONE CONFERENCE WITH A. KAUFMAN REGARDING E. CHICK'S BANKRUPTCY (.1); CONTINUE COI RESEARCH (2.0); CONFER WITH E. ESPINOSA REGARDING D. YOUNG AND USA (.1). |
| 01/28/16 | GREGORY K. JONES | 0.20 | 87.79    | CONFER WITH A. KAUFMAN ON COMPLAINT TO BE FILED IN SAN DIEGO AND REVIEW EMAILS CONCERNING UNDERLYING DISPUTE.                                                                                                                                                                                                                                                                                                                                                                   |
| 01/29/16 | E. ESPINOSA      | 0.50 | 160.00   | TELEPHONE CONFERENCE WITH M. KAYE (.2); CONFER WITH M. NAPOLI REGARDING COI ADJUSTMENTS (.3).                                                                                                                                                                                                                                                                                                                                                                                   |

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|          |               |      |          |                                                                                                                                                                                                                                                 |
|----------|---------------|------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/29/16 | M. NAPOLI     | 6.30 | 2,936.30 | EMAIL CORRESPONDENCE WITH D. YOUNG REGARDING COI INCREASES (.3); LEGAL RESEARCH REGARDING LIMITS ON COI INCREASES (5.7); EMAIL CORRESPONDENCE WITH A. ARNOLD AND S. TOWNSEND REGARDING NEW ILLUSTRATIONS AND REVISED PREMIUM OPTIMIZATION (.3). |
| 01/29/16 | D. ANDREACCHI | 0.60 | 105.89   | REVISED LABELS FOR INVESTORS WITH NO INTERNET CONNECTION (0.6).                                                                                                                                                                                 |

Total Hours 117.60

Total Fees \$ 45,775.40

## Professional Summary

| Professional            | Title           | Hours Worked | Rate      | Total Fees   |
|-------------------------|-----------------|--------------|-----------|--------------|
| A. KAUFMAN              | Particip Member | 1.50         | 357.48    | 536.22       |
| E. ESPINOSA             | Particip Member | 26.90        | 320.00    | 8,608.00     |
| M. NAPOLI               | Particip Member | 71.80        | 466.08    | 33,464.55    |
| D. ANDREACCHI           | Paralegal       | 7.60         | 176.48    | 1,341.24     |
| GREGORY K. JONES        | Sr Counsel      | .20          | 438.95    | 87.79        |
| MARYELLEN HAYES         | Staff           | .60          | 181.00    | 108.60       |
| EDRICK A. HARRIS        | Staff           | 9.00         | 181.00    | 1,629.00     |
| Total All Professionals |                 | 117.60       | \$ 389.25 | \$ 45,775.40 |

**Total This Invoice \$ 45,775.40**

# **Exhibit E**

# DYKEMA COX SMITH

RETIREMENT VALUE, LLC  
EDUARDO S. ESPINOSA, RECEIVER  
COX SMITH MATTHEWS INCORPORATED  
1201 ELM STREET, SUITE 3300  
DALLAS, TX 75270

March 11, 2016  
Invoice No. 3045761

Legal Services Through 02/29/2016 in Connection With

**COUNSEL FOR RECEIVER OF RETIREMENT VALUE, LLC**

**Matter 734617-000001**

|          |                  |      |          |                                                                                                                                                                                                                                                                       |
|----------|------------------|------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 02/01/16 | A. KAUFMAN       | 0.20 | 71.50    | REVIEW AND REVISE BANKRUPTCY DISCHARGE COMPLAINT AGAINST ERIK CHICK AND CORRESPOND WITH G. JONES REGARDING FILING OF SAME.                                                                                                                                            |
| 02/01/16 | M. NAPOLI        | 4.40 | 2,050.75 | LEGAL RESEARCH REGARDING INSURER ABILITY TO INCREASE COI (4.0); PREPARE ANNUAL REPORT (.3); EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING COLLECTIONS (.1); EMAIL CORRESPONDENCE WITH D. YOUNG REGARDING COI INCREASE (.1).                                           |
| 02/01/16 | GREGORY K. JONES | 0.30 | 131.68   | REVIEW AND REVISE NONDISCHARGEABILITY COMPLAINT AND EMAILS WITH MR. KAUFMAN                                                                                                                                                                                           |
| 02/02/16 | E. ESPINOSA      | 2.00 | 640.00   | TELEPHONE CONFERENCE WITH A. ARNOLD REGARDING REVISED COI ILLUSTRATIONS AND PREMIUM OPTIMIZATION (.3); CONFER WITH M. NAPOLI AND S. TOWNSEND REGARDING COI INCREASES (.5); REVIEW RECORDS REGARDING M. FREITAS AND CORRESPONDENCE WITH R. FEITH REGARDING SAME (1.2). |

REMIT TO: DYKEMA COX SMITH  
112 East Pecan Street | Suite 1800  
San Antonio, Tx 78205  
210.554.5500 tel | 210.226.8395 fax

California | Illinois | Michigan | Minnesota | Texas | Washington, D.C.

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PAYMENT DUE UPON RECEIPT | FEDERAL TAX ID # 38-1446628



# Dykema Cox Smith

March 11, 2016  
 Invoice No. 3045761  
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|          |                  |      |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------|------------------|------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 02/02/16 | M. NAPOLI        | 3.00 | 1,398.24 | EMAIL CORRESPONDENCE WITH D. YOUNG REGARDING COI INCREASE (.1); REVIEW NEW VOYA ILLUSTRATIONS (.8); EMAIL CORRESPONDENCE WITH S. TOWNSEND (.2); REVIEW CLASS ACTION AGAINST AXA REGARDING COI INCREASE (.4); REVIEW NEW PREMIUM PROJECTIONS (.3); TELEPHONE CONFERENCE WITH A. ARNOLD AND E. ESPINOSA (.2); EMAIL CORRESPONDENCE WITH P. QUIGLEY REGARDING AXA (.2); CONFER WITH E. ESPINOSA REGARDING VOYA COI INCREASES (.3); REVIEW CLASS ACTION COMPLAINT AND CONSUMER FEDERATION LETTER REGARDING COI INCREASES (.5). |
| 02/02/16 | D. ANDREACCHI    | 0.80 | 141.18   | REVIEW INVESTOR EMAILS AND RESEARCH INFORMATION FOR R. FEITH REGARDING THE FREITAS' ACCOUNTS; EMAIL E. ESPINOSA RE SAME.                                                                                                                                                                                                                                                                                                                                                                                                   |
| 02/03/16 | E. ESPINOSA      | 1.40 | 448.00   | REVIEW INSTRUCTIONS FROM AND UPDATE CLAIM TITLE RECORDS FOR GILLESPIE, KATZ, O'HARA, CASIAS, STANLEY; CORRESPONDENCE WITH PROVIDENT REGARDING SAME.                                                                                                                                                                                                                                                                                                                                                                        |
| 02/03/16 | M. NAPOLI        | 6.10 | 2,843.09 | EMAIL CORRESPONDENCE WITH P. QUIGLEY (.1); REVIEW COI MATERIALS FROM S. TOWNSEND (.3); REVIEW NEW PREMIUM FLOWS FROM ASG (.2); PREPARE COMPLAINT TO TDI REGARDING AXA (5.0); REVIEW COI MATERIALS FROM ASG (.5).                                                                                                                                                                                                                                                                                                           |
| 02/03/16 | D. ANDREACCHI    | 0.40 | 70.59    | UPDATE WEBSITE WITH LATEST COURT FILINGS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 02/03/16 | GREGORY K. JONES | 0.40 | 175.57   | PREPARE ADVERSARY PROCEEDING COVER SHEET FOR THE SOUTHERN DISTRICT OF CALIFORNIA                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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|----------|------------------|------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 02/03/16 | GREGORY K. JONES | 0.30 | 131.68   | REVIEW AND REVISE NON-DISCHARGEABILITY COMPLAINT AND PREPARE FOR FILING                                                                                                                                                                                                                                                                                                    |
| 02/04/16 | E. ESPINOSA      | 0.70 | 224.00   | TELEPHONE CONFERENCE WITH D. YOUNG (VIDA/LISA) REGARDING AXA COI INCREASES (.5); TELEPHONE CONFERENCE FROM INVESTOR (.2).                                                                                                                                                                                                                                                  |
| 02/04/16 | M. NAPOLI        | 4.40 | 2,050.75 | TELEPHONE CONFERENCE WITH D. YOUNG REGARDING COI INCREASES (.4); PREPARE TDI COMPLAINT (4.0).                                                                                                                                                                                                                                                                              |
| 02/05/16 | E. ESPINOSA      | 2.10 | 672.00   | TELEPHONE CONFERENCE WITH S. GIBSON REGARDING RUNNING AN AVS STOCHAISTIC (.2); REVIEW 4Q2015 ANALYSIS AND DISCUSS SAME WITH M. NAPOLI (1.2); CORRESPONDENCE WITH D. YOUNG AT VIDA (.2); TELEPHONE CONFERENCE WITH K. SINGAL REGARDING RECEIVER'S PLATFORM (.5).                                                                                                            |
| 02/05/16 | M. NAPOLI        | 4.20 | 1,957.54 | ANALYZE REVIEW STOCHAISTIC ANALYSIS (.4); EMAIL CORRESPONDENCE WITH E. ESPINOSA REGARDING EFFECT OF COI INCREASE (.2); PREPARE ANNUAL REPORT (.7); EMAIL CORRESPONDENCE WITH P. QUIGLEY REGARDING COI INCREASE (.4); CONFER WITH E. ESPINOSA REGARDING DISTRIBUTION (.3); EMAIL CORRESPONDENCE WITH S. TOWNSEND REGARDING PREMIUM COSTS (.2); WORK ON TDI COMPLAINT (2.0). |
| 02/05/16 | GREGORY K. JONES | 0.20 | 87.79    | REVIEW FINAL VERSION OF DISCHARGEABILITY COMPLAINT AND PREPARE FOR FILING                                                                                                                                                                                                                                                                                                  |

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| 02/06/16 | E. ESPINOSA      | 1.00 | 320.00   | CORRESPONDENCE WITH A. WILLIAMS REGARDING CHANGES TO M. BAKER AND D. CHANDLER'S CLAIMS (.5); CORRESPONDENCE WITH M. NAPOLI TO K. SINGAL REGARDING RECEIVER'S PLATFORM (.3); PROVIDE SAMPLE DATA FOR PLATFORM (.2).               |
| 02/08/16 | M. NAPOLI        | 5.30 | 2,470.22 | PREPARE ANNUAL REPORT (3.0); REVIEW STOCHASTIC ANALYSES FROM L&E (.3); PREPARE MOTION TO AUTHORIZE DISTRIBUTION (1.0); REVIEW WEBSITE LANGUAGE (.8); EMAIL CORRESPONDENCE WITH A. ARNOLD REGARDING PROJECTED PREMIUM COSTS (.2). |
| 02/08/16 | D. ANDREACCHI    | 0.50 | 88.24    | TELEPHONE CALL WITH M. JONES RE STATUS OF CLAIM; REVIEW FAX FROM M. JONES RE FINANCIAL ADVISOR CONTACT.                                                                                                                          |
| 02/09/16 | E. ESPINOSA      | 0.40 | 128.00   | CORRESPONDENCE WITH K. SINGAL (TRUSTEESWORKS) REGARDING CURRENT SCHEDULE OF CLAIMS.                                                                                                                                              |
| 02/09/16 | D. ANDREACCHI    | 0.50 | 88.24    | ESPINOSA V CHICK - RECEIPT AND REVIEW OF COMPLAINT AND SUMMONS AND UPDATE CASE CALENDAR AND DOCKET RE SAME.                                                                                                                      |
| 02/09/16 | D. ANDREACCHI    | 0.10 | 17.65    | EMAIL A. WILLIAMS RE ADDRESSES FOR DISTRIBUTION.                                                                                                                                                                                 |
| 02/09/16 | GREGORY K. JONES | 0.10 | 43.89    | ANALYZE RETURN OF ADVERSARY SUMMONS BY BANKRUPTCY COURT                                                                                                                                                                          |
| 02/10/16 | E. ESPINOSA      | 1.10 | 352.00   | TELEPHONE CONFERENCE WITH K. SINGAL RE: CLAIMS PROCESSING.                                                                                                                                                                       |
| 02/10/16 | M. NAPOLI        | 1.20 | 559.30   | TELEPHONE CONFERENCE WITH K. SINGAL REGARDING CLAIMS PROCESSING (1.0); EMAIL CORRESPONDENCE WITH K. SINGAL (.2).                                                                                                                 |
| 02/10/16 | D. ANDREACCHI    | 0.30 | 52.94    | TELEPHONE CALL WITH H. DUNN RE IRA CUSTODIAN AND OPTIONS FOR CHANGE OF OWNERSHIP.                                                                                                                                                |

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| 02/11/16 | E. ESPINOSA      | 0.30 | 96.00  | TELEPHONE CALL FROM INVESTOR.                                                                                                                                                                                                                       |
| 02/11/16 | D. ANDREACCHI    | 0.40 | 70.59  | UPDATE COMMUNICATIONS LOG (.30);<br>EMAIL E. ESPINOSA RE QUESTION<br>FROM N. MALIA (.10).                                                                                                                                                           |
| 02/12/16 | D. ANDREACCHI    | 0.10 | 17.65  | EMAILS WITH A. WILLIAMS RE<br>ADDRESSES FOR DISTRIBUTION.                                                                                                                                                                                           |
| 02/15/16 | E. ESPINOSA      | 2.10 | 672.00 | TELEPHONE CONFERENCE WITH M.<br>KAYE (INVESTOR) REGARDING<br>PROSPECTIVE DISTRIBUTION (.2);<br>REVIEW, UPDATE AND FINALIZE THE<br>6TH A&R SCHEDULE OF CLAIMS FOR<br>PUBLICATION (1.7); CONFER WITH M.<br>NAPOLI REGARDING AXA COI<br>INCREASE (.2). |
| 02/15/16 | M. NAPOLI        | 0.40 | 186.43 | CONFER WITH E. ESPINOSA<br>REGARDING DISTRIBUTION REPORT<br>AND SCHEDULE OF CLAIMS (.3);<br>PREPARE NOTICE OF FILING 6TH<br>AMENDED SCHEDULE (.1).                                                                                                  |
| 02/16/16 | D. ANDREACCHI    | 0.50 | 88.24  | TELEPHONE CALL WITH P. STUCKEY<br>RE STATUS OF CASE AND<br>DISTRIBUTIONS (.20); PREPARE 6TH<br>AMENDED SCHEDULE OF CLAIMS<br>FOR ELECTRONIC FILING AND FILE<br>WITH THE COURT (.30).                                                                |
| 02/16/16 | GREGORY K. JONES | 0.20 | 87.79  | REVIEW ORDER OF DISCHARGE<br>ENTERED BY BANKRUPTCY COURT                                                                                                                                                                                            |
| 02/17/16 | M. NAPOLI        | 0.50 | 233.04 | TELEPHONE CONFERENCE WITH J.<br>THOMAS REGARDING COI INCREASE<br>ISSUE (.2); EMAIL CORRESPONDENCE<br>WITH J. THOMAS REGARDING COI<br>INCREASE (.2); EMAIL<br>CORRESPONDENCE WITH K. SINGAL<br>(.1).                                                 |
| 02/17/16 | D. ANDREACCHI    | 0.20 | 35.30  | UPDATE WEBPAGE RE 6TH AMENDED<br>SCHEDULE OF CLAIMS.                                                                                                                                                                                                |
| 02/18/16 | E. ESPINOSA      | 0.10 | 32.00  | TELEPHONE CONFERENCE WITH P.<br>MILLER (INVESTOR).                                                                                                                                                                                                  |

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| 02/18/16 | M. NAPOLI   | 0.40 | 186.43 | EMAIL CORRESPONDENCE WITH D. HOROWITZ (.1); EMAIL CORRESPONDENCE WITH K. SINGAL (.1); CONFER WITH E. ESPINOSA REGARDING REPORT (.1); EMAIL CORRESPONDENCE WITH E. ESPINOSA REGARDING WEBSITE UPDATES (.1). |
| 02/19/16 | E. ESPINOSA | 0.80 | 256.00 | MEETING WITH J. ORVELLO AT BBVA COMPASS REGARDING CD RENEWAL AND RATES.                                                                                                                                    |
| 02/22/16 | E. ESPINOSA | 2.50 | 800.00 | REVIEW AND REVISE PROPOSED DISTRIBUTION; UPDATE SCHEDULE; DRAFT EXHIBIT B-PROPOSED DISTRIBUTION AMOUNTS.                                                                                                   |
| 02/22/16 | E. ESPINOSA | 0.70 | 224.00 | TELEPHONE CONFERENCE WITH G. CRESPI (INVESTOR); CORRESPONDENCE WITH D. ANDREACCHI & A. WILLIAMS REGARDING SAME (.4); CORRESPONDENCE WITH J.A. ORELLANO AT BBVA (.3).                                       |
| 02/22/16 | M. NAPOLI   | 0.80 | 372.86 | REVISE ANNUAL REPORT (0.5); REVISE MOTION TO AUTHORIZE SECOND INTERIM DISTRIBUTION (0.2); PREPARE NOTICE OF CHANGE OF ADDRESS (0.1).                                                                       |
| 02/23/16 | A. KAUFMAN  | 0.20 | 71.50  | CALL FROM E. GARNETT REGARDING STATUS OF COLLECTIONS FROM E. CHICK AND EFFORTS TO COLLECT FROM NON-DEBTOR ENTITY.                                                                                          |
| 02/23/16 | E. ESPINOSA | 1.20 | 384.00 | CONFER WITH M. NAPOLI REGARDING DISTRIBUTION TIMING AND MOTION OBJECTIONS (.4); VARIOUS TELEPHONE CONFERENCES WITH J. JACKSON AT BBVA (.8).                                                                |

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| 02/23/16 | M. NAPOLI     | 1.30 | 605.90 | FINALIZE MOTION TO APPROVE DISTRIBUTION (0.3); EMAIL CORRESPONDENCE WITH J. PARSONS REGARDING NEED FOR HEARING (0.2); EMAIL CORRESPONDENCE WITH COUNSEL FOR VARIOUS PARTIES (0.3); E-MAIL CORRESPONDENCE WITH B. RENTEA (0.2); EMAIL CORRESPONDENCE WITH A. KAUFMAN REGARDING CHICK BANKRUPTCY (0.1); CONFER WITH E. ESPINOSA REGARDING DISTRIBUTION APPROVAL AND DELAY (0.2). |
| 02/23/16 | D. ANDREACCHI | 1.70 | 300.02 | UPDATE COMMUNICATIONS LOG (.20); REVIEW ADDRESS INFORMATION WITH LIST FROM A. WILLIAMS AND MAKE CORRECTIONS (1.40); REVIEW EMAILS RE M. FREITAS (.10).                                                                                                                                                                                                                         |
| 02/24/16 | E. ESPINOSA   | 0.50 | 160.00 | CONFER WITH D. ANDREACCHI REGARDING A. PETERSON.                                                                                                                                                                                                                                                                                                                               |
| 02/24/16 | M. NAPOLI     | 0.80 | 372.86 | TELECONFERENCE WITH J. THOMAS (0.2); TELECONFERENCE WITH J. HUSEMAN REGARDING DOCUMENT PRODUCTION ISSUES (0.2); E-MAIL CORRESPONDENCE WITH E. KAIN REGARDING PRODUCTION (0.1); REVISE MOTION TO AUTHORIZE DISTRIBUTION.                                                                                                                                                        |
| 02/24/16 | D. ANDREACCHI | 2.00 | 352.96 | REVIEW ADDRESS INFORMATION WITH LIST FROM A. WILLIAMS AND MAKE CORRECTIONS.                                                                                                                                                                                                                                                                                                    |
| 02/24/16 | D. ANDREACCHI | 0.10 | 17.65  | TELEPHONE CALL WITH M. JAMES RE DEATH OF A. PETERSON AND STATUS OF CASE (.40); EMAIL E. ESPINOSA RE SAME (.10).                                                                                                                                                                                                                                                                |
| 02/25/16 | E. ESPINOSA   | 1.30 | 416.00 | CORRESPONDENCE WITH M. JAMES REGARDING A. PETERSON (IRA) (0.4); ATTEND TO BBVA CD RENEWAL MATERIALS (0.5); CORRESPONDENCE WITH E. GARNETT REGARDING BURKE FOREIGN JUDGMENT MATERIALS (0.4).                                                                                                                                                                                    |

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| 02/25/16 | M. NAPOLI     | 1.10 | 512.69 | EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING TDI ISSUES (0.2); REVIEW ANNUAL REPORT (0.2); REVISE MOTION TO AUTHORIZE DISTRIBUTION (0.3); EMAIL CORRESPONDENCE WITH G. WEISBERT REGARDING DISTRIBUTION (0.1); CONFER WITH E. ESPINOSA REGARDING REPORT (0.1). |
| 02/25/16 | D. ANDREACCHI | 3.80 | 670.62 | REVIEW ADDRESS INFORMATION WITH LIST FROM A. WILLIAMS AND MAKE CORRECTIONS (1.0); COMPARE FINAL LIST TO SCHEDULE OF CLAIMS (2.80).                                                                                                                             |
| 02/26/16 | E. ESPINOSA   | 0.30 | 96.00  | CORRESPONDENCE WITH J. JAMES REGARDING A. PETERSON (IRA).                                                                                                                                                                                                      |
| 02/26/16 | M. NAPOLI     | 0.90 | 419.47 | REVISE ANNUAL REPORT (0.3); REVISE MOTION TO AUTHORIZE DISTRIBUTION (0.3); REVISE LANGUAGE FOR WEBSITE (0.3).                                                                                                                                                  |
| 02/27/16 | E. ESPINOSA   | 1.10 | 352.00 | REVIEW ASG REMITTANCE ADVICE, TRANSFER MAR PREMIUMS AND CORRESPONDENCE WITH BKD REGARDING SAME.                                                                                                                                                                |
| 02/29/16 | E. ESPINOSA   | 0.20 | 64.00  | VARIOUS EMAILS WITH W. GRIOVES AT BBVA.                                                                                                                                                                                                                        |
| 02/29/16 | E. ESPINOSA   | 0.20 | 64.00  | CORRESPOND WITH A. WILLIAMS REGARDING BBVA EXCESS INTEREST, DEPOSIT SAME.                                                                                                                                                                                      |
| 02/29/16 | E. ESPINOSA   | 0.50 | 160.00 | TELECONFERENCE WITH M. JAMES REGARDING A. PETERSON.                                                                                                                                                                                                            |
| 02/29/16 | E. ESPINOSA   | 0.40 | 128.00 | CONFER WITH D. ANDREACCHI REGARDING ADDRESS RECONCILIATIONS.                                                                                                                                                                                                   |
| 02/29/16 | D. ANDREACCHI | 1.00 | 176.48 | WORK ON SPREADSHEET FOR ANGIE RE ADDRESS CHANGES AND INACTIVE ACCOUNTS.                                                                                                                                                                                        |

Total Hours 70.00

Total Fees \$ 25,897.32

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## Professional Summary

| Professional            | Title           | Hours Worked | Rate      | Total Fees   |
|-------------------------|-----------------|--------------|-----------|--------------|
| A. KAUFMAN              | Particip Member | .40          | 357.50    | 143.00       |
| E. ESPINOSA             | Particip Member | 20.90        | 320.00    | 6,688.00     |
| M. NAPOLI               | Particip Member | 34.80        | 466.08    | 16,219.57    |
| D. ANDREACCHI           | Paralegal       | 12.40        | 176.48    | 2,188.35     |
| GREGORY K. JONES        | Sr Counsel      | 1.50         | 438.93    | 658.40       |
| Total All Professionals |                 | 70.00        | \$ 369.96 | \$ 25,897.32 |

**Total This Invoice**

**\$ 25,897.32**



# Exhibit F

RETIREMENT VALUE, LLC  
EDUARDO S. ESPINOSA, RECEIVER  
COX SMITH MATTHEWS INCORPORATED  
1201 ELM STREET, SUITE 3300  
DALLAS, TX 75270

April 05, 2016  
**Invoice No.3050898**

Legal Services Through 03/31/2016 in Connection With

**COUNSEL FOR RECEIVER OF RETIREMENT VALUE, LLC**

**Matter 734617-000001**

|          |               |      |        |                                                                                                                                                                                                                                                |
|----------|---------------|------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 03/01/16 | E. ESPINOSA   | 0.90 | 288.00 | TELECONFERENCE WITH A. O. WILLIAMS REGARDING CHECK STOCK, AND ANCILLARY ACCOUNTING ISSUES (0.3); ATTEND TO A/R MATTERS (0.4); CORRESPOND WITH E. GARNETT REGARDING GBKH EXPENSES (0.2).                                                        |
| 03/01/16 | M. NAPOLI     | 0.40 | 186.43 | EMAIL CORRESPONDENCE TO I. ANTOGIORGI (0.1); EMAIL CORRESPONDENCE WITH G. WEISBART (0.1) EMAIL CORRESPONDENCE WITH D. ANDREACCHI REGARDING DISTRIBUTION (0.1) REVISE MOTION TO AUTHORIZE DISTRIBUTION (0.3).                                   |
| 03/01/16 | D. ANDREACCHI | 2.60 | 458.85 | RESPOND TO INVESTOR CALLS AND UPDATE COMMUNICATIONS LOG (.50); REVIEW INVESTOR FILES AND PREPARE SPREADSHEET COMPARISON ON ADDRESS CHANGES (2.0); EMAIL TO A. WILLIAMS RE CHANGES (.10).                                                       |
| 03/02/16 | E. ESPINOSA   | 2.00 | 640.00 | MEETING WITH W. GROVES BBVA REGARDING MONEY MARKET RATES (1.1); ATTEND TO AUTHORIZATIONS FOR ASG (0.2); CORRESPOND WITH M. LAROSE, J. BELLO AND J. LASQUETTE (INVESTORS) (0.5); CORRESPOND WITH A. WILLIAMS (BKD) REGARDING CHECK STOCK (0.2). |

REMIT TO: DYKEMA COX SMITH  
112 East Pecan Street | Suite1800  
San Antonio, Tx 78205  
210.554.5500 tel | 210.226.8395 fax

California | Illinois | Michigan | Minnesota | Texas | Washington, D.C.

dykema.com

PAYMENT DUE UPON RECEIPT | FEDERAL TAX ID # 38-1446628

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| 03/02/16 | D. ANDREACCHI | 0.30 | 52.94    | UPDATE COMMUNICATIONS LOG (.10);<br>WORK WITH L. BOIU RE VOICEMAIL<br>FOR RV PHONE LINE (.20).                                                                                                                                                                                                                                                                   |
| 03/03/16 | E. ESPINOSA   | 0.80 | 256.00   | TELECONFERENCE WITH M. KAYE<br>(INVESTOR) (0.3); CORRESPOND WITH<br>K. BENNEGRAY AT ASG REGARDING<br>AUTHORIZATIONS (0.2);<br>CORRESPOND WITH J. JOHNSON AND<br>WILL GROVES (BBVA) REGARDING<br>MM FUNDS (0.3).                                                                                                                                                  |
| 03/03/16 | M. NAPOLI     | 0.30 | 139.82   | ATTENTION TO GROUP EMAIL AND<br>SERVICE LIST (0.3).                                                                                                                                                                                                                                                                                                              |
| 03/03/16 | D. ANDREACCHI | 0.30 | 52.94    | TELEPHONE CALL WITH W. WANDRY<br>RE ADDRESS CHANGE AND EMAIL A.<br>WILLIAMS RE SAME.                                                                                                                                                                                                                                                                             |
| 03/04/16 | E. ESPINOSA   | 2.00 | 640.00   | CORRESPOND WITH J. THOMAS<br>REGARDING POE APPEAL (0.3);<br>ATTEND TO AUTHORIZATION FOR<br>ASG (0.4); REVIEW ANNUAL REPORT<br>(1.3).                                                                                                                                                                                                                             |
| 03/04/16 | M. NAPOLI     | 0.20 | 93.22    | REVISE 2015 ANNUAL REPORT (0.2).                                                                                                                                                                                                                                                                                                                                 |
| 03/07/16 | E. ESPINOSA   | 3.20 | 1,024.00 | CORRESPOND WITH J. THOMAS<br>REGARDING JUDGMENT AMOUNTS<br>AND SETTLEMENT AUTHORITY (0.4);<br>ATTEND TO LIEBELT (INVESTOR)<br>UPDATES (0.3); ATTEND TO<br>TRANSFERRING PHONE LINES (0.3);<br>REVIEW/RELEASE WEBSITE UPDATES<br>(0.4); FINALIZE AND RELEASE<br>RECEIVER'S REPORT FOR FILING AND<br>PUBLICATIONS (1.6); CORRESPOND<br>WITH W. GROVES (BBVA) (0.2). |
| 03/07/16 | M. NAPOLI     | 1.50 | 699.12   | REVISE WEBSITE UPDATES (0.5);<br>REVISE 2015 ANNUAL REPORT AND<br>NOTICE OF FILING (0.5); REVIEW<br>OPINION AFFIRMING OF MAGARACI &<br>POE JUDGMENTS (0.5).                                                                                                                                                                                                      |
| 03/07/16 | D. ANDREACCHI | 0.60 | 105.89   | EMAILS AND TELEPHONE CALLS TO<br>WORK ON RESOLVING TELEPHONE<br>LINE AND VOICEMAIL PROBLEM.                                                                                                                                                                                                                                                                      |

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| 03/08/16 | E. ESPINOSA   | 1.60 | 512.00   | TELECONFERENCE WITH M. BAKER AT F. W. STAR TELEGRAM (0.8); UPDATE INVESTOR INFORMATION ON SCHEDULE OF CLAIMS (0.5); REVIEW CORRESPONDENCE BETWEEN J. THOMAS, M. NAPOLI AND M. BAKER (0.3).                   |
| 03/08/16 | M. NAPOLI     | 2.20 | 1,025.38 | TELECONFERENCE WITH J. THOMAS (0.4); REVISE WEBSITE (1.0); RESEARCH REGARDING J. POE AND S. MAGARACI ASSETS (0.5); CONFER WITH E. ESPINOSA REGARDING COLLECTION ISSUES (0.3).                                |
| 03/08/16 | D. ANDREACCHI | 3.00 | 529.44   | UPDATE COMMUNICATIONS LOG AND MAILING LIST (1.8); EMAILS WITH E. ESPINOSA AND A. WILLIAMS RE DISTRIBUTION LIST (0.2); UPDATE WEBSITE (1.0).                                                                  |
| 03/09/16 | E. ESPINOSA   | 0.80 | 256.00   | TELECONFERENCE WITH R. KESSLER (INVESTOR) REGARDING STATUS REPORT (0.4); REVIEW CHANGE OF ADDRESS FORM, REVISE AND RELEASE FOR PUBLICATION (0.4).                                                            |
| 03/09/16 | M. NAPOLI     | 1.70 | 792.34   | EMAIL CORRESPONDENCE WITH J. THOMAS (0.2); REVISE CHANGE OF ADDRESS FORM (0.1); REVIEW/REVISE COMPLAINT REGARDING INSURANCE (1.2); REVIEW J. THOMAS ENGAGEMENT LETTER (0.2).                                 |
| 03/09/16 | D. ANDREACCHI | 0.90 | 158.83   | PREPARE DRAFT NOTIFICATION OF CHANGE OF ADDRESS AND DELIVER TO E. ESPINOSA AND M. NAPOLI FOR REVIEW AND COMMENT (.50); PREPARE DRAFT INSTRUCTIONS REGARDING NEW PROCEDURES AND UPDATE WEBSITE RE SAME (.40). |

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| 03/10/16 | E. ESPINOSA   | 3.00 | 960.00 | MEETING WITH W. GROVES, BBVA (0.8); REVIEW TAX RETURNS AND CORRESPOND WITH A. WILLIAMS REGARDING SAME(1.4); CORRESPOND WITH K. BENNEGRAY REGARDING 1099S (0.4); CORRESPOND WITH M. BAKER (0.4).           |
| 03/10/16 | M. NAPOLI     | 0.80 | 372.86 | EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING MAGARACI (0.1); RESEARCH REGARDING POE ASSETS AND ONGOING BUSINESS (0.3); CONFER WITH E. ESPINOSA REGARDING COLLECTION OF (0.2); REVIEW CHICK ANSWER (0.2). |
| 03/11/16 | D. ANDREACCHI | 0.50 | 88.24  | TELEPHONE CALL WITH INVESTOR RE DEMISE OF NELL BIGHAM AND DOCUMENTS REQUIRED TO CHANGE OWNERSHIP OF CLAIM; EMAIL E. ESPINOSA RE SAME (.40); UPDATE COMMUNICATIONS LOG RE CALLS FROM INVESTORS (.10).      |
| 03/14/16 | M. NAPOLI     | 0.20 | 93.22  | EMAIL CORRESPONDENCE WITH J. PARSONS REGARDING MOTION TO AUTHORIZE SECOND INTERIM DISTRIBUTION.                                                                                                           |
| 03/15/16 | M. NAPOLI     | 0.60 | 279.65 | EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING POE (0.1); RESEARCH REGARDING POE CUSTOMERS (0.5).                                                                                                          |
| 03/15/16 | D. ANDREACCHI | 1.60 | 282.37 | UPDATE SPREADSHEET OF CONTACT INFORMATION FOR POE INVESTORS AND DELIVER TO M. NAPOLI.                                                                                                                     |
| 03/16/16 | M. NAPOLI     | 0.30 | 139.82 | REVIEW MAGARACI MATERIALS FROM J. THOMAS (0.2); EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING MAGARACI (0.1).                                                                                             |
| 03/17/16 | M. NAPOLI     | 0.70 | 326.26 | EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING BORUP (0.2); RESEARCH REGARDING PHIL BORUP (0.3); REVIEW BORUP TAX RETURN (0.2).                                                                            |

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|          |               |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------|---------------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 03/18/16 | M. NAPOLI     | 1.90 | 885.55 | EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING POE SETTLEMENT OFFER (0.3); RESEARCH POE ASSETS (1.0); REVIEW MATERIALS PROVIDED BY J. THOMAS REGARDING POE (0.2); EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING POE SETTLEMENT OFFER (0.2); TELECONFERENCE WITH M. KAYE (0.2).                                                                                                                                                                 |
| 03/21/16 | E. ESPINOSA   | 2.00 | 640.00 | REVIEW CORRESPONDENCE REGARDING POE'S SETTLEMENT OFFERS AND CONFER WITH M. NAPOLI AND J. THOMAS REGARDING SAME (0.5); RESEARCH REGARDING F. ACQUART'S DISTRIBUTIONS AND CORRESPOND WITH D. ANDREACCHI, A. WILLIAMS AND M. NAPOLI REGARDING SAME (0.8); CORRESPOND WITH J. THOMAS REGARDING P. BORUP (0.3); CORRESPOND WITH A. WILLIAMS REGARDING STATE FRANCHISE TAX (0.1); REVIEW ENTRY OF JUDGMENT AND AFFIDAVIT OF FOREIGN JUDGMENT (0.3). |
| 03/21/16 | M. NAPOLI     | 0.70 | 326.26 | CONFER WITH E. ESPINOSA REGARDING POE OFFER AND RESPONSE (0.2); EMAIL CORRESPONDENCE WITH G. CANTWELL REGARDING INVESTOR (0.2) EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING POE (0.1); TELECONFERENCE WITH J. THOMAS REGARDING POE (0.1); EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING POE (0.1).                                                                                                                                           |
| 03/21/16 | D. ANDREACCHI | 0.30 | 52.94  | RECEIPT AND REVIEW OF EMAIL FROM M. NAPOLI; EMAIL A. WILLIAMS WITH REQUEST FOR INFORMATION RE SAME (.10); TELEPHONE CALL WITH MUTUAL OF OMAHA RE TRANSFER OF CUSTODIAN FOR DORIS FRESCH (.20).                                                                                                                                                                                                                                                |

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|          |               |      |        |                                                                                                                                                                                                                                                                                                                             |
|----------|---------------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 03/22/16 | E. ESPINOSA   | 0.20 | 64.00  | CORRESPOND WITH D. ANDREACCHI REGARDING R. O'HARA.                                                                                                                                                                                                                                                                          |
| 03/22/16 | D. ANDREACCHI | 0.20 | 35.30  | REVIEW EMAIL FROM E. ESPINOSA RE R. O'HARA AND LEAVE VOICEMAIL WITH R. O'HARA RE SAME.                                                                                                                                                                                                                                      |
| 03/23/16 | D. ANDREACCHI | 0.50 | 88.24  | TELEPHONE CALL AND EMAIL WITH L. BLACK RE DOCUMENTATION FOR NELL BIGHAM (.20); TELEPHONE CALL WITH R. O'HARA RE DISTRIBUTIONS AND OPTIONS FOR IRA (.30).                                                                                                                                                                    |
| 03/24/16 | E. ESPINOSA   | 0.70 | 224.00 | TELECONFERENCE WITH M. KAYE (0.5); REVIEW NY RESPONSE REGARDING FOIA REQUEST (0.2).                                                                                                                                                                                                                                         |
| 03/24/16 | M. NAPOLI     | 0.30 | 139.82 | EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING POE SETTLEMENT AND DISCUSSIONS (0.1); EMAIL CORRESPONDENCE WITH J. THOMAS REGARDING MAGARACI ASSET SEARCH (0.1); REVIEW CONSECO RESPONSE REGARDING MAGARACI (0.1).                                                                                                            |
| 03/25/16 | E. ESPINOSA   | 2.60 | 832.00 | TELECONFERENCE WITH D. KING (INVESTOR), CORRESPOND WITH D. ANDREACCHI REGARDING SAME (0.2); REVIEW REVISED TAX RETURN AND CORRESPOND WITH A. WILLIAMS REGARDING SAME (0.8); REVIEW ASG'S REMITTANCE ADVICE, RECONCILE SAME AND SCHEDULE WIRE (0.7); REVIEW BBVA ACCOUNT DOCUMENTS, TRANSFER FUNDS FROM CHASE TO BBVA (0.9). |
| 03/28/16 | E. ESPINOSA   | 1.20 | 384.00 | TELECONFERENCE WITH S. BRADY (INVESTOR) REGARDING GENERAL STATUS REPORT; BENEFICIARY DESIGNATIONS; T. BRADY'S DEMISE (0.6); CORRESPOND WITH J. JOHNSON AND W. GROVES AT BBVA REGARDING FUNDING OF MONEY MARKET AND CHECKING ACCOUNT (0.3); CORRESPOND WITH D. KING REGARDING DESIGNATION OF BENEFICIARY (0.3).              |

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|          |                  |      |        |                                                                                                                                                                                                                                                                                                                                                                             |
|----------|------------------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 03/28/16 | D. ANDREACCHI    | 0.30 | 52.94  | REVIEW INVESTOR RECORDS FOR BENEFICIARY DESIGNATIONS BY DELAINE AND GARFIELD KING AND EMAIL MS. KING RE SAME.                                                                                                                                                                                                                                                               |
| 03/29/16 | E. ESPINOSA      | 1.20 | 384.00 | REVIEW REVISED 1099-INT AND TRANSMIT SAME TO A. WILLIAMS (BKD) (0.4); CORRESPOND WITH A. WILLIAMS (BKD) REGARDING NEW BBVA ACCOUNTS AND FUNDING TRANSFERS (0.4); CORRESPOND WITH D. KING AND D. ANDREACCHI REGARDING THE KING'S NEED TO DEAL WITH THEIR BENEFICIARIES WITHIN THE IRA (0.4).                                                                                 |
| 03/30/16 | E. ESPINOSA      | 2.20 | 704.00 | CORRESPOND WITH E. GARNER REGARDING GLAZIER CLAIM (0.3); TELECONFERENCE WITH AMY AT ASG REGARDING RV016 (0.4); TRANSFER FUNDS TO BBVA; CONFER WITH CHASE REGARDING SAME (0.6); REVIEW INFORMATION REGARDING J. POE (0.2); CORRESPOND WITH A. WILLIAMS REGARDING DISTRICUTIONS (0.3); CORRESPOND WITH J. PARSONS REGARDING ORDER AUTHORIZING 2ND INTERIM DISTRIBUTION (0.4). |
| 03/30/16 | M. NAPOLI        | 0.20 | 93.22  | EMAIL CORRESPONDENCE WITH B. REITEAN (0.1); RESEARCH REGARDING POE ASSETS (0.1).                                                                                                                                                                                                                                                                                            |
| 03/30/16 | GREGORY K. JONES | 0.70 | 307.25 | REVIEW LOCAL RULES AND PREPARE NOTICE REGARDING EARLY CONFERENCE OF COUNSEL                                                                                                                                                                                                                                                                                                 |
| 03/31/16 | E. ESPINOSA      | 0.90 | 288.00 | TELECONFERENCE WITH CHASE - FRAUD ALERT REGARDING WIRE ACTIVITY (0.3); DOWNLOAD 2016 CHASE STATEMENTS AND TRANSMIT SAME TO BKD (0.4); CORRESPOND WITH A. WILLIAMS (BKD) REGARDING DISTRIBUTIONS (0.2).                                                                                                                                                                      |
| 03/31/16 | D. ANDREACCHI    | 0.10 | 17.65  | EMAIL A. WILLIAMS ADDRESS FOR DARLA JO WEBSTER.                                                                                                                                                                                                                                                                                                                             |



# DyKEMA COX SMITH

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03/31/16      GREGORY K. JONES      0.20      87.79      CORRESPONDENCE TO AND FROM  
DEBTOR'S COUNSEL ON EARLY  
CONFERENCE OF COUNSEL

Total Hours      49.40

Total Fees      \$ 16,060.58

## Professional Summary

| Professional            | Title           | Hours Worked | Rate      | Total Fees   |
|-------------------------|-----------------|--------------|-----------|--------------|
| E. ESPINOSA             | Particip Member | 25.30        | 320.00    | 8,096.00     |
| M. NAPOLI               | Particip Member | 12.00        | 466.08    | 5,592.97     |
| D. ANDREACCHI           | Paralegal       | 11.20        | 176.48    | 1,976.57     |
| GREGORY K. JONES        | Sr Counsel      | .90          | 438.93    | 395.04       |
| Total All Professionals |                 | 49.40        | \$ 325.11 | \$ 16,060.58 |

**Total This Invoice      \$ 16,060.58**

# Exhibit G

RETIREMENT VALUE, LLC  
 EDUARDO S. ESPINOSA, RECEIVER  
 COX SMITH MATTHEWS INCORPORATED  
 1201 ELM STREET, SUITE 3300  
 DALLAS, TX 75270

November 16, 2015  
**Invoice No.3021812**

Legal Services Through 10/31/2015 in Connection With

**SCOTT D. SCHROEDER BANKRUPTCY**

**Matter 734617-000002**

|          |               |      |       |                                                                                  |
|----------|---------------|------|-------|----------------------------------------------------------------------------------|
| 10/26/15 | D. ANDREACCHI | 0.20 | 34.39 | REVIEW CASE DOCKET AND UPDATE CASE CALENDAR RE TRIAL OF U.S. TRUSTEE LITIGATION. |
| 10/29/15 | D. ANDREACCHI | 0.10 | 17.20 | UPDATE CASE CALENDAR RE TRIAL SETTING IN UST V. SCHROEDER CASE.                  |

Total Hours 0.30

Total Fees \$ 51.59

Professional Summary

| Professional            | Title     | Hours Worked | Rate      | Total Fees |
|-------------------------|-----------|--------------|-----------|------------|
| D. ANDREACCHI           | Paralegal | .30          | 171.97    | 51.59      |
| Total All Professionals |           | .30          | \$ 171.97 | \$ 51.59   |

**Total This Invoice \$ 51.59**

REMIT TO: DYKEMA COX SMITH  
 112 East Pecan Street | Suite1800  
 San Antonio,Tx 78205  
 210.554.5500 tel | 210.226.8395 fax

California | Illinois | Michigan | Minnesota | Texas | Washington, D.C.

dykema.com

PAYMENT DUE UPON RECEIPT | FEDERAL TAX ID # 38-1446628

# Exhibit H

# DYKEMA COX SMITH

RETIREMENT VALUE, LLC  
EDUARDO S. ESPINOSA, RECEIVER  
COX SMITH MATTHEWS INCORPORATED  
1201 ELM STREET, SUITE 3300  
DALLAS, TX 75270

March 11, 2016  
Invoice No. **3045762**

Legal Services Through 02/29/2016 in Connection With

## SCOTT D. SCHROEDER BANKRUPTCY

Matter 734617-000002

|          |             |      |        |                                                                                                                                                                           |
|----------|-------------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 02/01/16 | A. KAUFMAN  | 1.00 | 357.48 | REVIEW BANKRUPTCY COURT<br>DOCKET AND STATUS REPORT FILED,<br>AND DRAFT E-MAIL TO J. THOMAS<br>REGARDING STATUS OF CASE AND<br>ABILITY TO CONTINUE COLLECTION<br>EFFORTS. |
| 02/01/16 | E. ESPINOSA | 0.40 | 128.00 | CONFER WITH A. KAUFMAN<br>REGARDING SCHROEDER'S<br>AUTOMATIC STAY; REVIEW<br>CORRESPONDENCE REGARDING<br>SAME.                                                            |

Total Hours 1.40

Total Fees \$ 485.48

### Professional Summary

| Professional            | Title           | Hours Worked | Rate      | Total Fees |
|-------------------------|-----------------|--------------|-----------|------------|
| A. KAUFMAN              | Particip Member | 1.00         | 357.48    | 357.48     |
| E. ESPINOSA             | Particip Member | .40          | 320.00    | 128.00     |
| Total All Professionals |                 | 1.40         | \$ 346.77 | \$ 485.48  |

**Total This Invoice \$ 485.48**

REMIT TO: DYKEMA COX SMITH  
112 East Pecan Street | Suite 1800  
San Antonio, Tx 78205  
210.554.5500 tel | 210.226.8395 fax

California | Illinois | Michigan | Minnesota | Texas | Washington, D.C.

PAYMENT DUE UPON RECEIPT | FEDERAL TAX ID # 38-1446628

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# Dykema Cox Smith

RETIREMENT VALUE, LLC  
EDUARDO S. ESPINOSA, RECEIVER  
COX SMITH MATTHEWS INCORPORATED  
1201 ELM STREET, SUITE 3300  
DALLAS, TX 75270

March 11, 2016  
Invoice No.3045764

Legal Services Through 03/11/2016 in Connection With

## COUNSEL FOR RECEIVER OF RETIREMENT VALUE, LLC

**Matter 734617-000001**

### Disbursements

|                     |                                                                                                           |             |
|---------------------|-----------------------------------------------------------------------------------------------------------|-------------|
| 01/19/16            | E-DISCOVERY PROCESSING AND DATA REDUCTION - Level 1, 2 or 3 processing of electronic discovery for review | 1,400.83    |
| 02/02/16            | PHOTOCOPY                                                                                                 | .80         |
| 02/05/16            | PHOTOCOPY                                                                                                 | 14.80       |
| 02/05/16            | GREG JONES FILED ADVERSARY COMPLAIN IN BK CASE 15-07217-LA7 - AD KANOE WHEELER                            | 350.00      |
| 02/23/16            | FILING FEES & RELATED CHARGES - FILE & SERVEXPRESS LLC TRAVIS COUNTY DISTRICT CLERK SERVICE 3 OF 3        | 4.87        |
| 02/23/16            | FILING FEES & RELATED CHARGES - FILE & SERVEXPRESS LLC TRAVIS COUNTY DISTRICT CLERK SERVICE 1 OF 3        | 17.86       |
| 02/23/16            | FILING FEES & RELATED CHARGES - FILE & SERVEXPRESS LLC TRAVIS COUNTY DISTRICT CLERK SERVICE 2 OF 3        | 17.86       |
| Total Disbursements |                                                                                                           | \$ 1,807.02 |

**Total This Invoice \$ 1,807.02**

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PAYMENT DUE UPON RECEIPT | FEDERAL TAX ID # 38-1446628

REMIT TO: DYKEMA COX SMITH  
112 East Pecan Street | Suite 1800  
San Antonio, Tx 78205  
210.554.5500 tel | 210.226.8395 fax  
dykema.com

# Exhibit I

RETIREMENT VALUE, LLC  
EDUARDO S. ESPINOSA, RECEIVER  
COX SMITH MATTHEWS INCORPORATED  
1201 ELM STREET, SUITE 3300  
DALLAS, TX 75270

November 16, 2015  
**Invoice No.3021813**

Legal Services Through 10/31/2015 in Connection With

**MICHAEL MCDERMOTT LAWSUIT**

**Matter 734617-000003**

|          |              |      |        |                                                                                                                                                                                                       |
|----------|--------------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10/19/15 | E. ESPINOSA  | 0.10 | 32.00  | REVIEW CORRESPONDENCE FROM M. NAPOLI REGARDING MCDERMOTT (0.1).                                                                                                                                       |
| 10/19/15 | M. NAPOLI    | 0.20 | 89.60  | REVIEW COLLIN COUNTY DOCKET FOR MCDERMOTT ORDER (0.1); E-MAIL CORRESPONDENCE WITH J. HOHENGARTEN REGARDING SAME (0.1).                                                                                |
| 10/20/15 | E. ESPINOSA  | 0.20 | 64.00  | REVIEW CORRESPONDENCE FROM B. DELEON AND M. NAPOLI REGARDING MCDERMOTT (0.2).                                                                                                                         |
| 10/20/15 | M. NAPOLI    | 0.30 | 134.40 | E-MAIL CORRESPONDENCE WITH B. DELEON AND J. HOHENGARTEN (0.1); REVIEW NON-SUIT (0.1); E-MAIL E. ESPINOSA REGARDING NON-SUIT (0.1).                                                                    |
| 10/22/15 | M. NAPOLI    | 0.10 | 44.80  | E-MAIL CORRESPONDENCE WITH A. BOURESSA REGARDING MCDERMOTT (0.1).                                                                                                                                     |
| 10/26/15 | M. NAPOLI    | 0.10 | 44.80  | E-MAIL CORRESPONDENCE WITH C. BRENNEMAN REGARDING COLLIN COUNTY ORDER ON MCDERMOTT CASE (0.1).                                                                                                        |
| 10/26/15 | C. BRENNEMAN | 0.30 | 48.87  | REVIEW OF DOCKET ONLINE (.1); TELEPHONE CALL TO CRIMINAL COURT DISTRICT CLERK (.1); DRAFT AND SEND FAX TO COLLIN COUNTY DISTRICT CLERK'S OFFICE TO REQUEST COPY OF ORDER REQUESTED BY M. NAPOLI (.1). |

REMIT TO: DYKEMA COX SMITH  
112 East Pecan Street | Suite1800  
San Antonio, Tx 78205  
210.554.5500 tel | 210.226.8395 fax

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PAYMENT DUE UPON RECEIPT | FEDERAL TAX ID # 38-1446628



# DyKEMA COX SMITH

November 16, 2015  
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|          |              |      |       |                                                                                                                                                                                               |
|----------|--------------|------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10/29/15 | C. BRENNEMAN | 0.20 | 32.58 | REVIEW OF FAX RECEIVED FROM COLLIN COUNTY CRIMINAL COURT DIVISION OF ORDER REQUESTED BY M. NAPOLI (.1); DRAFT AND SEND EMAIL TO M. NAPOLI WITH COPY OF ORDER RECEIVED FROM COLLIN COUNTY (.1) |
|----------|--------------|------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Total Hours 1.50

Total Fees \$ 491.05

## Professional Summary

| Professional            | Title           | Hours Worked | Rate      | Total Fees |
|-------------------------|-----------------|--------------|-----------|------------|
| E. ESPINOSA             | Particip Member | .30          | 320.00    | 96.00      |
| M. NAPOLI               | Particip Member | .70          | 448.00    | 313.60     |
| C. BRENNEMAN            | Paralegal       | .50          | 162.90    | 81.45      |
| Total All Professionals |                 | 1.50         | \$ 327.37 | \$ 491.05  |

**Total This Invoice \$ 491.05**