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4 COURT APPOINTED RECEIVER  
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ELECTRONICALLY  
**FILED**  
SUPERIOR COURT OF CALIFORNIA

1/13/2025 1:29 PM  
County of Tehama  
Kevin Harrigan, Clerk of the Court  
Brittany Richards  
By \_\_\_\_\_, Deputy  
EFILED

8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF TEHAMA**

10 GOLDEN STATE FARM CREDIT, ACA, a  
federal Farm Credit System institution;  
11 GOLDEN STATE FARM CREDIT, PCA, a  
federal Farm Credit System institution; and  
12 GOLDEN STATE FARM CREDIT, FLCA, a  
federal Farm Credit System institution,

13 Plaintiffs,

14 v.

15 ANDERSEN & SONS SHELLING, INC., a  
16 California corporation, et al.,

17 Defendants.  
18

CASE NO. 24-CI-000197

**RECEIVER'S REPORT NO. 2**

19 David P. Stapleton, the court-appointed receiver (“Receiver”) for the above-entitled action,  
20 respectfully submits the following Report No. 2.

21 **I. Background**

22 On August 8, 2024, the Order Appointing Receiver and Issuing Preliminary Injunction (the  
23 “Order”) was entered with this Court.

24 The Defendants (aka “Obligors”) stipulated with Golden State Farm Credit (“GSFC”) and  
25 Bank of America (“BoFA”) to appoint a receiver. The Plaintiffs are secured lenders with respect to  
26 multiple loans made to the Obligors. The Obligors did not have the financial stability, or the  
27 working capital required to continue operations and to maintain the collateral (“Collateral”) in good  
28 condition. They also did not have the ability to readily liquidate the Collateral in an orderly fashion.

1 The Collateral includes agricultural real estate with orchards and, during October 2024, involved  
2 harvesting millions of pounds of walnuts. Upon his appointment, the Receiver immediately  
3 implemented the necessary agricultural management and operational and financial oversight to  
4 carry out critical operations to maximize the value and preserve the condition of the Collateral.

5 Andersen Shelling, Andersen Ranch, A&M Farming, J.B. Cusick, Farmers Hill and A  
6 Butter World are hereinafter collectively referred to as the “Receivership Entities” or the  
7 “Companies.” The Collateral of the Receivership Entities constitutes the “Receivership Estate.”

8 At the time of the Receiver’s appointment, the Receivership Estate consisted of four primary  
9 categories of assets: (1) real property, including approximately 42 ranch properties (with trees and  
10 crop included), and the real property where the Vina HQ is situated with its approximately 900,000  
11 square feet of processing and production lines such as a walnut huller, a walnut shelling line, a  
12 pasteurization line, oil roasting line and retail packaging lines, among others; (2) walnut, almond,  
13 cashew and other nut inventory in various forms including in-shell, work-in-progress (“WIP”) and  
14 finished goods inventory (“FGI”); (3) various fixed assets including the equipment related to the  
15 above-mentioned processing lines, forklifts, farm equipment, rolling stock and various other items  
16 used in the ranch and shelling operations, bins, farm products, supplies, and miscellaneous furniture  
17 and fixtures; and (4) accounts receivable (“A/R”) and cash (collectively, the “Receivership Estate”).  
18 As previously reported, various components of the Receivership Estate are subject to liens by  
19 different lenders, the priority of liens is disputed for certain components of the Collateral.

## 20 **II. Operations Overview**

21 The Receiver continues to maintain an on-site presence each week at the Vina HQ to  
22 manage staff, to execute sales of inventory and bins, to direct administrative functions, and to  
23 support the turnkey facility sale process. The Receiver’s team also directly oversaw the harvest and  
24 huller operations for the 2024 harvest throughout the course of the fall. The Receiver organized  
25 winddown operations into five key phases. The first two phases are complete. The three remaining  
26 phases are: (Phase 3) liquidating remaining inventory and bins; (Phase 4) selling the Ranch real  
27 estate and any unused farm equipment; and (Phase 5) preserving the facilities and equipment for a  
28 turnkey sale to a prospective new operator. The Receiver is actively managing the completion of

1 Phase 3 and Phase 4 and is working with an investment banker to complete Phase 5.

2 ***Budget, Funding and Cash Reporting***

3 The Receiver continues to issue funding requests weekly to the Plaintiffs based on the  
4 immediate cash needs to continue operations. The Receiver also continues to assess funding needs  
5 and update the lenders accordingly.

6 The Receiver updated the 13-week cash flow plan for the Ranch entity based on updated  
7 information provided by the third-party manager, Crain Orchards, Inc. (“Crain”). To facilitate the  
8 liquidation of inventory, the Receiver developed a capacity model and shipment schedule related  
9 to the Pearl Crop and other sales transactions. The model takes into consideration the number of  
10 employees, man hours and trucks to complete the load out.

11 The Receiver developed a wind down budget for Sheller operations to facilitate the final  
12 disposition of inventory, fumigation, cleaning, and staffing costs. The Receiver is actively  
13 negotiating with multiple vendors to achieve the best pricing for fumigation at all necessary  
14 warehouses and work sites. Additionally, the Receiver drafted a post-harvest budget for the Ranch  
15 entity related to costs required to preserve the orchards.

16 ***Staffing & RIFs***

17 Upon the Receiver’s appointment, there were 136 employees. The Receiver has diligently  
18 worked to reduce the payroll expense as job duties were completed in an effort to manage the cash  
19 flow of the Receivership Estate. Since the date of his appointment, the Receiver has periodically  
20 made reductions in the workforce. To date, the Receiver has terminated 100+ employees. The  
21 current employee headcount is 25 (15 at Andersen Ranch and 10 at Andersen Shelling).  
22 Additionally, the Receiver transitioned certain individuals to independent contractors who are  
23 expected to have more limited hours and are paid on an hourly basis. The conversion from full-  
24 time employees to independent contractors has helped to reduce the costs of the Receivership Estate  
25 while retaining historical knowledge of the company and its operations to assist with wind-down  
26 matters. The Receiver will continue to assess which employees need to be retained to fulfill the  
27 Receiver’s objectives.

28

1 III. Collateral

2 **2023 Inventory**

3 The 2023 inventory was comprised of products in various forms, including raw in-shell  
4 walnuts, WIP in a multitude of states, and finished retail packaged product. As previously reported,  
5 sales of the retail packaged product have been completed to major customers who placed purchase  
6 orders prior to the Receiver’s appointment. To liquidate the remaining raw, WIP, and finished retail  
7 product, the Receiver is working with Hilco Wholesale Solutions (“Hilco”), its sales agent. The  
8 Receiver’s staff and Hilco compiled a report on the saleable inventory and established a process for  
9 accepting and approving sales.

10 Some of the 2023 crop were stored at multiple off-site warehouses outlined in the initial  
11 receivership report. The Receiver has resolved these demands on behalf of Andersen Shelling and  
12 exited the warehouses.

13 The table below represents the Andersen Shelling inventory on hand as of November 30,  
14 2024:

15 <b>Inventory Type</b>	16 <b>On Hand Quantity <sup>1</sup></b>
17 Raw	-
18 Rework	-
19 Packaging	21,948,545
20 WIP	382,649
21 Retail	265,718
22 Finished Bulk	199,629
23 Ingredient	75,246
24 Birdfeed / Oil stock	-
25 <b>Grand Total</b>	<b>22,871,788</b>

26 Since November 30<sup>th</sup> and as of the date of this report, the Receiver has now finalized the sale of  
27 nut product inventory and packaging materials.

28 **2024 Inventory**

The Receiver estimates that the 2024 harvest of walnuts produced by Andersen Ranch  
totaled 5.8 million pounds of walnuts. The harvest yields have been significantly down this year as

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<sup>1</sup>On Hand Quantity listed in pounds, except for Retail, which is listed in cases or eches.

1 predicted by USDA’s National Agricultural Statistics Service. The Receiver executed an agreement  
2 with Crain to purchase all of the 2024 raw in-shell walnut inventory.

3 **IV. Sheller Operations**

4 ***WIP and Finished Goods***

5 The WIP and Finished Goods conversion process was completed in September and generated  
6 \$8.7 million in sales to Costco, Trader Joe’s and Sam’s Club. All proceeds were collected by the  
7 Receiver.

8 ***Inventory Liquidation***

9 The Receiver continues to work closely with Hilco, Bank of America’s financial advisors,  
10 and the Andersen staff to coordinate the outgoing shipments of the approved sales. Significant  
11 progress was made during the month of November to ship out the remaining inventory. As of the  
12 date of this report, all of the goods inventory has been shipped from the facility and only the  
13 packaging materials remain. A few buyers have committed to acquiring a portion of the packaging  
14 and the remaining will be discarded in order to timely exit the offsite leased storage centers.

15 ***Winddown Plan***

16 The Receiver is working with lenders to determine final costs of winding down Sheller  
17 operations including staffing, waste removal, fumigation, etc. The Receiver is currently in  
18 negotiations for large-scale fumigations in anticipation of the turnkey sale of the Vina HQ.  
19 Concurrently, the Receiver is evaluating options for a more cost effective and efficient waste  
20 disposal at the Vina HQ, which will also benefit turning the facility over in a turnkey sale.

21 **V. Ranch Operations**

22 ***Walnut Harvest***

23 After developing budgets and discussions with GSFC and key employees, the Receiver  
24 decided to engage a third-party farmer to harvest and manage day-to-day operations of the huller  
25 for the 2024 walnut crop, with the Receiver’s oversight. The Receiver solicited multiple bids to  
26 contract out the harvest and huller operations from separate local farming operations. With GSFC’s  
27 approval, the Receiver determined the best contract farming operator for Andersen Ranch and  
28 executed a management agreement with Crain Orchards, Inc. This enabled the Receiver to complete

1 the 2024 harvest and operate the huller, a critical operation for the North Valley agriculture  
2 community.

3 The following table reflects the harvested acres by variety for 2024 harvest season:

4 **Harvested Acres by Variety**

5

6 <b>Variety</b>	7 <b>Total Acres</b>	8 <b>Net Weight in Pounds</b>
9 Chandler	862	3,797,935
10 Howard	402	1,479,345
11 Tulare	145	433,270
12 Solano	17	66,270
13 Hartley	14	41,940
14 Ivanhoe	10	24,940
15 Mix	3	41,780
16 <b>Total</b>	<b>1,452</b>	<b>5,885,480</b>

17 ***Almond & Prune Harvest***

18 The Receiver finalized the purchase contracts for the almond and prune crop to processors  
19 shortly after his appointment. The Receiver engaged a third party to harvest and hull Andersen  
20 Ranch's 2024 almonds, which is complete as of the date of this report. Separately, the Receiver  
21 hired a third party to harvest and dry Andersen Ranch's 2024 prune crop, which is also complete  
22 as of the date of this report.

23 ***Huller Operations***

24 Huller operations were completed successfully, and the team maintained a single 12-hour  
25 shift running both huller lines. The Receiver hulled approximately 16-20 loads per day. As of  
26 November 30th, the Receiver has finished the hulling process for all Andersen and third-party nuts.  
27 The Receiver has invoiced third party farmers for the huller services. The Receiver and his third-  
28 party manager are now working to address clean-up of the huller.

***Ranch Leases***

Andersen Ranch has multiple ranch and orchard leases with Gary W. and Sandra S. Finch  
Family Trust, Westover Company LLC, Mead Brothers Partnership and Mead Orchards, Inc. The

1 Receiver has spoken with the related lessors to understand the current balance(s) owed and plans  
2 for the 2024 harvest. This work is ongoing.

3 ***Turnkey Sale***

4 The Receiver separately engaged Hilco Corporate Finance to sell the facilities and  
5 equipment which are being offered as a turnkey facility which includes the hullers and all  
6 processing facilities for both walnut and almond processing and climate controlled nut storage, etc.  
7 Hilco frequently updates the Receiver on the status of the turnkey sale and this work is ongoing.

8 ***Equipment Sales***

9 The Receiver continues to liquidate unused rolling stock and farm equipment from the  
10 Andersen Ranch operation. The Receiver will provide a summary of all miscellaneous equipment  
11 sales in a future report.

12 ***Property and Land Sales***

13 The Receiver has identified 22 properties owned or partially owned by Andersen & Sons or  
14 one of its affiliated entities included in the Receiver's Order. Four of these properties were  
15 determined to be an integral part of the Andersen & Sons core facility at the Vina HQ and were  
16 included in the Receiver's agreement with Hilco to sell as part of the turkey sale process.

17 Prior to the Receiver's appointment, there was a pending offer on one of the properties  
18 referred to as Hopson Ranch. The Receiver renegotiated this offer to achieve a sales price in line  
19 with the Receiver's perceived fair market value of the property and is in the process of closing this  
20 sale. The Receiver presented this sale to this Court and obtained a Sale Approval Order from the  
21 Court on December 2, 2024. Attached as **Exhibit "A"** is the Sale Approval Order related to the  
22 Hopson Ranch sale. The lender on this parcel ultimately reduced their demand to accommodate the  
23 closing of this sale, and net proceeds to the Receivership Estate, after the first deed of trust and  
24 closing costs, but before administrative costs, were \$41,094. These proceeds went to satisfy the  
25 administrative costs related to this sale.

26 For the remaining parcels, the Receiver interviewed and selected AG-LAND Investment  
27 Brokers, a local real estate brokerage with deep agriculture expertise, to list and market eleven  
28 orchards listed as part of the Receivership Estate. The properties are listed on various industry-

1 leading digital marketing platforms. AG-LAND Brokers provide a weekly update on the properties’  
2 status and any showings or offers.

3 The Receiver identified an office building that was partially owned by an Andersen & Sons  
4 subsidiary and entered into a listing agreement with Century 21 Select Real Estate in coordination  
5 with the other equity partner.

6 **VI. JB Cusick Operations**

7 The Receiver continues to focus on collecting the JB Cusick accounts receivable as the  
8 company has been successfully shut down. Customers are hesitant to pay as they have  
9 corresponding payable balances owed by JB Cusick. The Receiver continues to attempt to collect  
10 on these amounts.

11 **VII. A Butter World Operations**

12 The Receiver has engaged Hilco, as mentioned above, and has completed the sale of A  
13 Butter World’s (“ABW”) remaining inventory. Please refer to the Sales and Accounts Receivable  
14 section below for additional details regarding the sale of this inventory.

15 **VIII. Sales and Accounts Receivable**

16 As of the date of the Receiver’s appointment, the Receivership Entities had a significant  
17 accounts receivable (“A/R”) balance outstanding. A substantial portion has been collected, and  
18 additional sales have been made. See below for an A/R roll forward summary as well as additional  
19 sales details.

20	<b>Beginning A/R, 8/8/24</b>	<b>\$ 17,750,077<sup>2</sup></b>
21	Sales	24,822,193
22	Collections	(29,322,361)
23	Adjustments	<u>90,835<sup>3</sup></u>
	<b>Ending A/R, 11/30/24</b>	<b>\$ 13,160,743</b>

24 The Receiver focused significantly on collections during October and November, including  
25 entering into multiple agreements with customers, drafting demand letters and pursuing more  
26 aggressive collection efforts. These collection efforts were successful as the Receiver anticipates

27 \_\_\_\_\_  
28 <sup>2</sup> Note the beginning A/R balance was adjusted by \$18,000 to reflect a pre-receivership adjustment.

<sup>3</sup> Adjustments include sales allowances as well as invoice timing differences.

1 only minimal balances going to collections.

2 ***WIP Conversion***

3 As previously stated, the Receiver completed the WIP conversion process in September,  
4 which resulted in \$8.7 million in sales to Sam’s Club, Trader Joes, Costco and others. No further  
5 processing is contemplated or taking place at the Shelling entity.

6 ***Pearl Crop Sale***

7 The Receiver accepted an offer from Pearl Crop that was negotiated by Hilco for the sale  
8 of 23.95 million pounds of nuts with Bank of America’s approval. The Receiver has been  
9 coordinating with the Andersen team and Hilco to expedite the removal of this inventory. As of the  
10 date of this report, 100% of the \$15 million gross sales have been removed. The Receiver has  
11 accepted an offer from Pearl Crop for 3.4 million pounds of packaging materials. As of the date of  
12 this report, shipments of the packaging materials have been completed.

13 ***Liquidation Sales***

14 In addition to the Pearl Crop sale and WIP conversion mentioned above, the Receiver has  
15 received sales commitments for nearly all 39 million pounds of the goods inventory that existed at  
16 the start of the Receiver’s appointment. As of November 20, 2024, 37.2 million pounds of the  
17 committed inventory has been sold and shipped out. Additionally, the Receiver had offers on  
18 approximately 4 million pounds of packaging materials. By the date of this report, the Receiver  
19 completed the inventory liquidation.

20 **Inventory Liquidation Sales**

<b>Closed Sales</b>	<b>In Pounds</b>
Buyer A	4,313,000
Buyer B	1,816,426
Buyer C	24,597,779
Buyer D	96,821
Buyer E	6,017,851
Buyer F	342,443
Buyer G	-
<b>Total Closed Sales</b>	<b>37,184,320</b>
<b>Committed Sales</b>	
Buyer A	-

1	Buyer B	-
2	Buyer C	4,247,972
3	Buyer D	-
3	Buyer E	-
4	Buyer F	-
4	Buyer G	572,144
5	<b>Total Committed</b>	
5	<b>Sales</b>	<u>4,820,116</u>

6

7 ***2024 Crop Purchase Agreement***

8 For the 2024 crop, the Receiver secured a \$1,000,000 deposit on the 2024 in-shell walnut  
9 crop. After the first four million pounds, the receiver will continue to receive \$0.25 per pound until  
10 the end of the year when the Receiver will receive a true-up based on market pricing.

11 ***Bins***

12 The Receiver was engaged to sell 30,000+ bins, both empty and full, as part of his  
13 comprehensive liquidation process. The Receiver has sold 10,171 plastic bins and 14,539 wooden  
14 bins and collected over \$2,700,000 to date.

15 The following table represents the bin inventory:

16 **Bin Inventory and Sales as of November 30, 2024**

17	Type	Quantity
18	Wood	24,247
18	Plastic	11,186
19	<b>Total Existing Bins</b>	<u>35,433</u>

20

21 **IX. Cash**

22 At the time of the appointment of the Receiver, the Andersen entities had pre-existing bank  
23 accounts at JP Morgan Chase, BofA, and U.S. Bank. The Receiver is leveraging these existing bank  
24 accounts along with the newly established receivership bank account at City National Bank as  
25 required by court orders.

26 The Order authorizes the Receiver to issue receiver’s certificates to GSFC or BofA to pay  
27 for the reasonable and necessary operating expenses, administrative expenses, repair costs,  
28 professional fees and other expenses of the Receivership Estate, including the processing of farm

1 products and other non-real property Collateral. To date, the Receiver has issued Receiver's  
2 Certificates as listed in the cash summary chart below.

3 Below is a summary of cash from inception of the receivership through November 30, 2024.  
4 Attached as **Exhibit "B"** is a summary of cash receipts and disbursements of the Receivership  
5 Estate since inception of the Receivership through November 30, 2024.

6	<b>Beginning Cash, 8/8/24</b>	<b>\$ 2,091,415</b>
7	Cash Receipts	
8	Sales	34,034,149
9	Receiver's Certificates	<u>7,024,453</u>
10	Total Cash Receipts	41,058,603
11	Cash Disbursements	
12	Payroll	(2,307,058)
13	Receiver and Receiver's Counsel	(2,375,000)
14	Employee Benefits	(464,420)
15	Farming Supplies	(572,448)
16	Insurance	(403,066)
17	Utilities	(366,102)
18	Legal and Professional	(331,759)
19	Other	<u>(1,019,898)</u>
20	Total Disbursements	(7,839,751)
21	Escrow / Loan Adjustment	(30,374,524)
22	<b>Ending Cash, 11/30/24</b>	<b><u><u>\$ 4,935,742</u></u></b>

23 **X. Books and Records**

24 The Receiver continues to leverage the company's financial records and systems but is  
25 assessing other systems for maintaining inventory and other accounting functions. The Receiver's  
26 IT Consultant obtained full administrator access to the company's IT systems and implemented a  
27 process to store backups of the company's data in an offsite repository controlled by the Receiver.  
28 The Receiver's staff continues to work with the IT Consultant to maintain continuous backups of  
the company email accounts and key servers.

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1           **XI.    Litigation**

2           The Receiver has become aware of no less than 23 actions pending in multiple counties  
3 against just one of the receivership entities, namely Andersen Shelling. Taking the complaints at  
4 face value, the plaintiffs allege more than \$56 million owed for goods, services, and agricultural  
5 products. The Receiver does not have complete information regarding all of the actions. The  
6 Receiver is defending court actions that were commenced prior to his appointment and certain  
7 actions in which claimants have pursued default judgments. Consistent with the terms of the  
8 Receivership Order, the Receiver is seeking dismissal of actions filed after the Receiver’s  
9 appointment without leave of the Tehama County Superior Court. The Receiver is also responding  
10 to dozens of administrative complaints filed with the California Department of Food and  
11 Agriculture.

12           On December 3, 2024, the Tehama County Superior Court granted permission for  
13 approximately 47 almond and walnut growers, represented by two law firms, to pursue litigation  
14 against Andersen Shelling and its lenders, including claims for declaratory relief regarding the  
15 enforceability of certain producers liens under Food and Ag. Code sections 55631 *et seq.* and the  
16 enforceability of certain contractual agreements to waive or subordinate such liens. The Receiver  
17 supports a coordinated determination of the disputed issues by a court of law; the Receiver takes  
18 no position and makes no representations regarding lien priorities. As a cost-benefit matter, the  
19 Receiver believes that issues of law should take precedence in the litigation and any factual  
20 discovery directed to information under the possession, custody, or control of the Receiver should  
21 be limited in order to prevent unnecessary diminution of the receivership estate and promote a  
22 global resolution.

23           **XII.   Legal Fees and Expenses**

24           According to the Order, the Receiver was authorized to retain the law firm of Pachulski  
25 Stang Ziehl & Jones LLP (“PSZJ”) as Receiver’s legal counsel. PSZJ’s fees and expenses for  
26 October 2024 were \$259,054.71. The Receiver, through this report, is delivering the invoices for  
27 September and October fees and expenses to all parties on the service list and intends to pay these  
28 invoices from the funds of the receivership estate. Attached as **Exhibit “C”** is a copy of PSZJ’s

1 invoices for September and October.

2 **Receiver's Fees and Expenses**

3 The Receiver's fees and expenses for October 2024 were \$368,379.12. The Receiver,  
4 through this report, is delivering the invoice for September and October fees and expenses to all  
5 parties on the service list and intends to pay this invoice from the funds of the receivership estate  
6 under the terms of the Order. Attached as **Exhibit "D"** is a copy of the Receiver's invoices for  
7 September and October.

8  
9 DATED: January 13, 2025

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12 David P. Stapleton  
13 Receiver  
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# **EXHIBIT “A”**

1 John D. Fiero (CA Bar No. 136557)  
jfiero@pszjlaw.com  
2 Teddy M. Kapur (CA Bar No. 242486)  
tkapur@pszjlaw.com  
3 PACHULSKI STANG ZIEHL & JONES LLP  
One Sansome Street, 34<sup>th</sup> Floor, Suite 3430  
4 San Francisco, California 94104-4436  
Telephone: 415-263-7000  
5 Facsimile: 415-263-7010

6 Attorneys for David Stapleton, Receiver

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

8 **COUNTY OF TEHAMA**

9 GOLDEN STATE FARM CREDIT, ACA, a  
10 federal Farm Credit System institution, et al.,

11 Plaintiffs,

12 v.

13 ANDERSEN & SONS SHELLING, INC., et  
14 al,

15 Defendants.

Case No. 24-CI-000197

~~PROPOSED~~ ORDER APPROVING  
RECEIVER'S MOTION FOR APPROVAL  
OF SALE OF REAL PROPERTY AND  
RELATED ASSETS

Date: November 19, 2024

Time: 8:30 a.m.

Judge: Matthew McGlynn

Dept.: 5

Action Filed: August 5, 2024

17 **THIS MATTER** came before the Court at the above-referenced time and place upon  
18 consideration of the *Receiver's Motion for Approval of Sale of Real Property and Related Assets*  
19 (the "**Motion**") together with the supporting declarations of David P. Stapleton (the "**Receiver**")  
20 and John D. Fiero filed therewith (collectively, the "**Moving Papers**").<sup>1</sup> Appearances were made  
21 as reflected in the record. Based on the Court's review of the Moving Papers, there being no  
22 opposition, and good cause appearing therefor,

23 **IT IS HEREBY ORDERED:**

24 1. The Receiver, solely in his capacity as the duly-appointed receiver for A & M  
25 Farming, LLC, is hereby authorized to sell to Nate Oliva Ag, LLC ("**Purchaser**") all of the real  
26 and personal property described in the PSA located at 55 Watkins Road, Orland, California and  
27

28 <sup>1</sup> Capitalized terms used herein but not defined in this Order shall bear the meanings attributed to them in the Moving Papers.

1 commonly known as Hopson Ranch bearing Assessor's Parcel Number 089-330-017-000 together  
2 with the improvements and personal property (the "**Property**") described in the PSA attached to  
3 the Receiver declaration as Exhibit 2.

4 2. The Receiver is further authorized to take all such steps as prove necessary and  
5 appropriate to close the contemplated sale, so long as they are consistent with the Appointment  
6 Order, including but not limited to the payment of all amounts necessary to close the transaction.

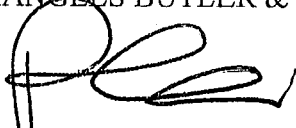
7 3. The Court reserves jurisdiction over Banner Bank and the Receiver to resolve any  
8 disputes which may arise with respect to the disbursement of funds by the Escrow Holder as  
9 required by section 6.6.3 of the PSA including, without limitation, the amount to be paid to  
10 Banner Bank on account of its lien directly by Escrow Holder at the close of Escrow.

11 12/2/2024

12   
13 JUDGE OF THE SUPERIOR COURT

14 APPROVED AS TO FORM:

15 JEFFER MANGELS BUTLER & MITCHELL LLP

16   
17 By: \_\_\_\_\_  
18 ROBERT B. KAPLAN, Esq.  
19 Attorneys for Defendant BANNER BANK

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# **EXHIBIT “B”**

**Schedule of Receipts & Disbursements 8/8/2024 - 11/30/2024**

**DRAFT**

Andersen & Son's Receivership

	A&S Shelling	A&S Ranch	ABW	A&M	Farmers Hill Investments	JB Cusick	Total
<b>Beginning Cash, 8/8/24<sup>1</sup></b>	\$ 1,125,596	\$ 245,994	\$ 661,307	\$ 14,561	\$ 5,960	\$ 37,996	\$ 2,091,415
<b>Cash Receipts</b>							
<b>Sales</b>							
Receipts	32,095,680	1,473,278	381,738	4,508	-	78,946	34,034,149
<b>Total Sales</b>	32,095,680	1,473,278	381,738	4,508	-	78,946	34,034,149
<b>Funding</b>							
GSFC	2,208,585	2,340,715	-	-	-	-	4,549,299
BofA	2,475,154	-	-	-	-	-	2,475,154
<b>Total Funding</b>	4,683,739	2,340,715	-	-	-	-	7,024,453
<b>Total Cash Receipts</b>	<b>36,779,418</b>	<b>3,813,992</b>	<b>381,738</b>	<b>4,508</b>	<b>-</b>	<b>78,946</b>	<b>41,058,603</b>
<b>Cash Disbursements</b>							
Payroll	(1,373,148)	(908,329)	-	-	-	(25,581)	(2,307,058)
Employee Benefits	(191,989)	(136,660)	-	-	-	(7,318)	(335,967)
401K	(124,070)	-	-	-	-	(4,384)	(128,454)
Insurance	(323,866)	(60,343)	(18,857)	-	-	-	(403,066)
Farming Supplies	-	(350,519)	-	-	-	-	(350,519)
Contract Labor	-	(99,778)	-	-	-	-	(99,778)
Utilities	(167,196)	(198,226)	-	-	-	(680)	(366,102)
Diesel/Gas	(5,597)	(216,333)	-	-	-	-	(221,929)
Security	(114,303)	-	-	-	-	-	(114,303)
Repairs & Maintenance	(3,101)	(91,024)	-	-	-	-	(94,125)
Equipment and Vehicle Leases	(49,671)	(82,865)	-	-	-	-	(132,535)
Freight	(21,600)	(33,271)	-	-	-	-	(54,871)
Legal & Professional	(331,759)	-	-	-	-	-	(331,759)
Receiver's Fees	(1,560,000)	(815,000)	-	-	-	-	(2,375,000)
All Other Expenses	(303,575)	(175,039)	-	(1,993)	(4,773)	(38,905)	(524,285)
<b>Total Disbursements</b>	<b>(4,569,877)</b>	<b>(3,167,386)</b>	<b>(18,857)</b>	<b>(1,993)</b>	<b>(4,773)</b>	<b>(76,867)</b>	<b>(7,839,751)</b>
<b>Other Reconciling Items</b>							
Escrow / Loan Adj.	(29,962,409)	(412,115)	-	-	-	-	(30,374,524)
<b>Total Other</b>	<b>(29,962,409)</b>	<b>(412,115)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(30,374,524)</b>
<b>Ending Cash, 11/30/2024<sup>1</sup></b>	<b>\$ 3,372,729</b>	<b>\$ 480,486</b>	<b>\$ 1,024,189</b>	<b>\$ 17,076</b>	<b>\$ 1,187</b>	<b>\$ 40,075</b>	<b>\$ 4,935,742</b>

**Notes**

<sup>1</sup> Note the beginning and ending cash balances were tied to the receivership entity's respective bank statements. The receipts and disbursements were obtained from the respective company's books and records.

# **EXHIBIT “C”**



PACHULSKI  
STANG  
ZIEHL &  
JONES

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

September 30, 2024

Invoice 142446

Client 81001.00001

Stapleton, David (Receiver)  
Stapleton Group  
515 S. Flower Street 18th floor  
Los Angeles, CA 90071  
USA

RE: Andersen & Sons Shelling Receivership

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 09/30/2024**

FEES	\$235,564.00
EXPENSES	\$2,320.10
<b>TOTAL CURRENT CHARGES</b>	<b>\$237,884.10</b>
<b>BALANCE FORWARD</b>	<b>\$241,111.55</b>
<b>LAST PAYMENT</b>	<b>-\$241,111.50</b>
<b>TOTAL BALANCE DUE</b>	<b>\$237,884.10</b>

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**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
JDF	Fiero, John D.	Partner	1,395.00	47.70	\$66,541.50
TMK	Kapur, Teddy M.	Partner	1,195.00	52.10	\$62,259.50
GSG	Greenwood, Gail S.	Counsel	1,195.00	49.00	\$58,555.00
JPN	Nolan, Jeffrey P.	Counsel	1,195.00	37.40	\$44,693.00
RJG	Gruber, Richard J.	Counsel	1,675.00	0.50	\$837.50
PJJ	Jeffries, Patricia J.	Paralegal	595.00	3.90	\$2,320.50
YPD	Derac, Yves P.	Paralegal	595.00	0.60	\$357.00
			<hr/>		
			191.20		<hr/>
					\$235,564.00

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**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BANN	Banner	1.70	\$2,031.50
BINS	Bins	5.60	\$6,752.00
BoA	Bank of America	49.70	\$62,391.50
GEN	General	83.30	\$101,543.50
GSFC	GSFC	50.90	\$62,845.50
		<hr/>	<hr/>
		191.20	\$235,564.00

Pachulski Stang Ziehl & Jones LLP  
Stapleton, David (Receiver)  
Client 81001.00001

Page: 4  
Invoice 142446  
September 30, 2024

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**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Conference Call	\$7.74
Court Fees	\$1,722.79
Lexis/Nexis- Legal Research	\$445.29
Postage	\$66.08
Reproduction Expense	\$78.20
	<hr/>
	\$2,320.10

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Banner</b>						
09/03/2024	TMK	BANN	Review inquiries from Banner Bank regarding sale process.	0.10	1,195.00	\$119.50
09/05/2024	TMK	BANN	Confer with J. Fiero regarding complaints by Banner Bank.	0.10	1,195.00	\$119.50
09/08/2024	TMK	BANN	Review Banner Bank inquiries regarding insurance.	0.10	1,195.00	\$119.50
09/10/2024	TMK	BANN	Review Banner Bank loan balance.	0.10	1,195.00	\$119.50
09/18/2024	TMK	BANN	Confer with Stapleton and J. Fiero regarding Hopson sale.	0.20	1,195.00	\$239.00
09/19/2024	TMK	BANN	Review Banner Bank notice of hearing and follow up emails regarding same.	0.20	1,195.00	\$239.00
09/20/2024	GSG	BANN	Review emails re Banner Bank application re collateral procedures.	0.20	1,195.00	\$239.00
09/26/2024	TMK	BANN	Review and respond to inquiries from B. Kaplan.	0.30	1,195.00	\$358.50
09/27/2024	TMK	BANN	Respond to B. Kaplan inquiries regarding service list.	0.10	1,195.00	\$119.50
09/30/2024	TMK	BANN	Confer with J. Fiero and Stapleton regarding sale of Hopson Ranch.	0.30	1,195.00	\$358.50
				<u>1.70</u>		<u>\$2,031.50</u>
<b>Bins</b>						
09/07/2024	TMK	BINS	Review inquiries from Huron/BofA regarding bin sales.	0.10	1,195.00	\$119.50
09/10/2024	TMK	BINS	Confer with J. Fiero regarding bin sale protocol.	0.10	1,195.00	\$119.50
09/10/2024	TMK	BINS	Review proposed bin stipulation and correspondence regarding same.	0.20	1,195.00	\$239.00
09/11/2024	TMK	BINS	Confer with B. Kaplan, J. Fiero and Stapleton regarding bin sale protocol.	0.30	1,195.00	\$358.50
09/12/2024	TMK	BINS	Confer with Stapleton regarding bin sale protocol; confer with GSFC and Banner Bank regarding stipulation.	0.30	1,195.00	\$358.50
09/12/2024	TMK	BINS	Review bin disposition stipulation.	0.30	1,195.00	\$358.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/13/2024	TMK	BINS	Review correspondence regarding bin sale stipulation.	0.20	1,195.00	\$239.00
09/15/2024	TMK	BINS	Review correspondence regarding bin sale stipulation.	0.10	1,195.00	\$119.50
09/16/2024	TMK	BINS	Review stipulation regarding bins and confer with B. Kaplan, counsel for GSFC and Stapleton team.	0.60	1,195.00	\$717.00
09/17/2024	TMK	BINS	Review revised bin stipulation and confer with Stapleton team multiple times regarding revisions; emails with R. Kaplan.	0.80	1,195.00	\$956.00
09/17/2024	TMK	BINS	Review GSFC revisions to bin stipulation and confer with M. Falhiv.	0.10	1,195.00	\$119.50
09/18/2024	TMK	BINS	Multiple emails with J. Fiero and J. Diiorio regarding bin stipulation.	0.30	1,195.00	\$358.50
09/18/2024	TMK	BINS	Confer with counsel for Banner Bank and GSFC regarding bin stipulation.	0.20	1,195.00	\$239.00
09/20/2024	TMK	BINS	Multiple emails with Stapleton, Banner Bank and GSFC regarding proposed bin sales.	0.80	1,195.00	\$956.00
09/23/2024	JDF	BINS	Review free and clear issues in receivership order	0.30	1,395.00	\$418.50
09/23/2024	TMK	BINS	Confer with Stapleton team regarding bin sales; review emails from GSFC and BofA.	0.40	1,195.00	\$478.00
09/24/2024	TMK	BINS	Confer with Stapleton team and J. Fiero regarding status of bin sales.	0.20	1,195.00	\$239.00
09/25/2024	TMK	BINS	Confer with BofA regarding bin sales.	0.10	1,195.00	\$119.50
09/30/2024	TMK	BINS	Review updates regarding bin sales.	0.20	1,195.00	\$239.00
				<b>5.60</b>		<b>\$6,752.00</b>

**Bank of America**

09/03/2024	JDF	BoA	Review CDFCA complaints and emails with BofA counsel; TC with R. Jones; Conference call with S. Levitt; Confer with J, Diorio re prune sale	1.00	1,395.00	\$1,395.00
09/03/2024	JDF	BoA	Follow up with Turlock Walnut counsel re settlement; Confer with Stapleton re Bidart claim to proceeds; TC with counsel for Bidart	0.50	1,395.00	\$697.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/03/2024	TMK	BoA	Review status of Holt litigation.	0.10	1,195.00	\$119.50
09/03/2024	TMK	BoA	Review inquiries from Western Nut Co and confer with J. Fiero and M. Bergthold.	0.20	1,195.00	\$239.00
09/04/2024	GSG	BoA	Emails to/from J. Fiero and T. Kapur re TSB and hearing prep.	0.20	1,195.00	\$239.00
09/04/2024	GSG	BoA	Confer with J. Fiero re hearing and emails to/from R. Muzzin re TSB's amended complaint and arbitration demand.	0.30	1,195.00	\$358.50
09/04/2024	JDF	BoA	Follow up with almond grower's counsel re lien rights	0.50	1,395.00	\$697.50
09/04/2024	TMK	BoA	Confer with Stapleton team regarding Aldi dispute.	0.20	1,195.00	\$239.00
09/04/2024	TMK	BoA	Review TSB correspondence with Judge Ochoa.	0.10	1,195.00	\$119.50
09/05/2024	JDF	BoA	Review grower agreement and confer with opposing counsel re same; Review CDFAs filings	0.60	1,395.00	\$837.00
09/05/2024	TMK	BoA	Confer with Stapleton and J. Fiero regarding Derco dispute.	0.10	1,195.00	\$119.50
09/05/2024	TMK	BoA	Review inquiries from growers.	0.10	1,195.00	\$119.50
09/05/2024	TMK	BoA	Review status of Aldi dispute.	0.20	1,195.00	\$239.00
09/06/2024	JDF	BoA	Work on online database of grower contracts; Emails with S. Levitt and J. Dreher re same	0.50	1,395.00	\$697.50
09/06/2024	TMK	BoA	Review BofA inquiries regarding grower contracts; confer with J. Fiero and Stapleton.	0.10	1,195.00	\$119.50
09/06/2024	TMK	BoA	Review diligence requests from C. Calderon.	0.10	1,195.00	\$119.50
09/06/2024	TMK	BoA	Confer with Stapleton regarding Turlock sale.	0.10	1,195.00	\$119.50
09/08/2024	TMK	BoA	Confer with L. Marcero and H. Fiero regarding bins.	0.10	1,195.00	\$119.50
09/09/2024	TMK	BoA	Confer with J. Fiero regarding producer liens.	0.10	1,195.00	\$119.50
09/10/2024	JDF	BoA	TC with counsel for BofA; Review order and send email to counsel re deposits and clawback	0.60	1,395.00	\$837.00
09/10/2024	TMK	BoA	Review and revise letter to Judge Ochoa and confer with J. Fiero.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/10/2024	TMK	BoA	Confer with Stapleton regarding access to BofA accounts.	0.10	1,195.00	\$119.50
09/10/2024	TMK	BoA	Confer with J. Fiero and counsel for Bank of America regarding account sweeps.	0.20	1,195.00	\$239.00
09/12/2024	TMK	BoA	Confer with S. Levitt regarding TSB arbitration.	0.20	1,195.00	\$239.00
09/12/2024	TMK	BoA	Review and revise letter submission regarding TSB arbitration.	0.40	1,195.00	\$478.00
09/13/2024	TMK	BoA	Confer with J. Fiero and S. Levitt regarding sale to Pearl Corp.	0.10	1,195.00	\$119.50
09/13/2024	TMK	BoA	Confer with S. Levitt regarding responses to litigation actions.	0.20	1,195.00	\$239.00
09/13/2024	TMK	BoA	Review Valley Pride default judgment and confer with G. Greenwood.	0.20	1,195.00	\$239.00
09/16/2024	GSG	BoA	Draft answer to unverified complaint by Valley Pride.	0.60	1,195.00	\$717.00
09/16/2024	GSG	BoA	Draft recitals and stipulation for relief from stay re Valley Pride.	1.70	1,195.00	\$2,031.50
09/16/2024	GSG	BoA	Call with K. Vote and email re request for discussion of Valley Pride lawsuit.	0.10	1,195.00	\$119.50
09/16/2024	TMK	BoA	Review status of Valley Pride default and confer with G. Greenwood and Stapleton team.	0.40	1,195.00	\$478.00
09/16/2024	TMK	BoA	Confer with J. Fiero regarding Aldi dispute.	0.10	1,195.00	\$119.50
09/16/2024	TMK	BoA	Review status of Derco dispute and prune sale.	0.10	1,195.00	\$119.50
09/16/2024	TMK	BoA	Review inquiries from IFS North America and confer with Stapleton team.	0.20	1,195.00	\$239.00
09/17/2024	GSG	BoA	Call and email K. Vote re proposed stipulation re Valley Pride to vacate default.	0.20	1,195.00	\$239.00
09/17/2024	GSG	BoA	Confer with M. Renck re answer and general denial to TSM complaint.	0.20	1,195.00	\$239.00
09/17/2024	RJG	BoA	Review and respond to T. Kapur regarding Buyer proposed revisions to Bill of Sale.	0.50	1,675.00	\$837.50
09/17/2024	TMK	BoA	Review TSB request for attorneys fees and costs.	0.20	1,195.00	\$239.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/17/2024	TMK	BoA	Review TSB arbitration ruling and confer with S. Levitt.	0.30	1,195.00	\$358.50
09/17/2024	TMK	BoA	Review Pearl Corp bill of sale and confer with R. Gruber and M. Flahive.	0.60	1,195.00	\$717.00
09/17/2024	TMK	BoA	Review correspondence regarding Derco dispute.	0.10	1,195.00	\$119.50
09/17/2024	TMK	BoA	Confer with M. Flahive regarding call with Pearl Corp.	0.10	1,195.00	\$119.50
09/17/2024	TMK	BoA	Review correspondence with counsel for Valley Pride and confer with G. Greenwood.	0.10	1,195.00	\$119.50
09/18/2024	GSG	BoA	Confer with J. Fiero re Valley Pride default.	0.10	1,195.00	\$119.50
09/18/2024	GSG	BoA	Review TSB amended complaint and prepare answer and affirmative defenses; email J. Fiero and T. Kapur re same.	1.20	1,195.00	\$1,434.00
09/18/2024	GSG	BoA	Review/revise TSB answer and Notice of Entry re receivership order.	0.50	1,195.00	\$597.50
09/18/2024	GSG	BoA	Review final TSB documents and proofs of service for Friday filing.	0.20	1,195.00	\$239.00
09/18/2024	GSG	BoA	Review Valley Pride complaint and confer with M. Renck re copies of writ pleadings.	0.50	1,195.00	\$597.50
09/18/2024	TMK	BoA	Prepare for and participate in call with Pearl Corp and M. Flahive regarding Bill of Sale.	0.80	1,195.00	\$956.00
09/18/2024	TMK	BoA	Review Receivership Order and draft response to Pearl Crop regarding Bill of Sale.	0.70	1,195.00	\$836.50
09/18/2024	TMK	BoA	Confer with J. Fiero regarding Pearl Crop bill of sale.	0.20	1,195.00	\$239.00
09/18/2024	TMK	BoA	Confer with G. Greenwood and J. Fiero regarding Valley Pride dispute.	0.10	1,195.00	\$119.50
09/18/2024	TMK	BoA	Confer with Stapleton team regarding sale of prunes.	0.10	1,195.00	\$119.50
09/19/2024	GSG	BoA	Confer with J. Nolan re litigation status and immediate relief from default re Valley Pride.	0.50	1,195.00	\$597.50
09/19/2024	GSG	BoA	Review declaration re request for default judgment by Valley Pride.	0.30	1,195.00	\$358.50
09/19/2024	GSG	BoA	Review CCP 473.5 re Valley Pride issues.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/19/2024	GSG	BoA	Revise draft stipulation re Valley Pride and additional facts.	0.50	1,195.00	\$597.50
09/19/2024	GSG	BoA	Emails to J. Nolan re Valley Pride status.	0.20	1,195.00	\$239.00
09/19/2024	JDF	BoA	Derco Zoom call; PearlCrop lien release call	1.00	1,395.00	\$1,395.00
09/19/2024	JPN	BoA	Telephone conference with G. Greenwood regarding Valley Pride case, litigation status and open issues.	0.50	1,195.00	\$597.50
09/19/2024	JPN	BoA	Legal research case law to assist G. Greenwood to argue to Valley Pride regarding continue various collection actions; Draft approach; Exchange email regarding same.	0.90	1,195.00	\$1,075.50
09/19/2024	JPN	BoA	Review declaration of attorneys for Valley Price regarding extra-judicial relief.	0.40	1,195.00	\$478.00
09/19/2024	TMK	BoA	Confer with J. Nolan regarding Derco dispute.	0.20	1,195.00	\$239.00
09/19/2024	TMK	BoA	Confer with J. Nolan regarding case background and status.	0.30	1,195.00	\$358.50
09/19/2024	TMK	BoA	Confer with BofA and J. Fiero regarding Pearl sale lien release.	0.20	1,195.00	\$239.00
09/19/2024	TMK	BoA	Revise Pearl Corp bill of sale and confer with J. Fiero.	0.40	1,195.00	\$478.00
09/19/2024	TMK	BoA	Confer with S. Levitt and J. Fiero regarding Derco dispute.	0.20	1,195.00	\$239.00
09/19/2024	TMK	BoA	Review status of Valley Pride dispute; confer with J. Nolan and G. Greenwood regarding same.	0.30	1,195.00	\$358.50
09/19/2024	TMK	BoA	Review BofA request for electronic records and correspondence regarding same.	0.20	1,195.00	\$239.00
09/20/2024	GSG	BoA	Review emails from J. Nolan re ASSI/Valley Pride and arbitration.	0.20	1,195.00	\$239.00
09/20/2024	GSG	BoA	Review email and TSB arbitration award.	0.30	1,195.00	\$358.50
09/20/2024	GSG	BoA	Emails from/to S. Levitt re TSB answer to complaint.	0.20	1,195.00	\$239.00
09/20/2024	JDF	BoA	Attention to sale to Pearl Crop, including lien release certificate issue	0.40	1,395.00	\$558.00
09/20/2024	JPN	BoA	Review emails between counsel for Valley Pride and Receiver counsel.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/20/2024	JPN	BoA	Review default, writ and supporting documents in support of Valley Pride's request for relief.	0.60	1,195.00	\$717.00
09/20/2024	JPN	BoA	Draft outline of approach to deal with Valley Pride refusal to set aside default and application for writ.	0.60	1,195.00	\$717.00
09/20/2024	JPN	BoA	Telephone conference with client and T. Kapur regarding compiling facts to support opposition to Valley Pride.	0.40	1,195.00	\$478.00
09/20/2024	JPN	BoA	Draft statement of acts to support various motions and oppositions to Valley Pride.	1.00	1,195.00	\$1,195.00
09/20/2024	JPN	BoA	Draft Procedural Statement to support various motions and opposition to Valley Pride.	1.00	1,195.00	\$1,195.00
09/20/2024	TMK	BoA	Review lien release for Pearl Corp and confer with Pearl Corp regarding same.	0.30	1,195.00	\$358.50
09/20/2024	TMK	BoA	Review answer to TSB complaint.	0.40	1,195.00	\$478.00
09/20/2024	TMK	BoA	Confer with S. Levitt and G. Greenwood regarding answer to TSB litigation.	0.20	1,195.00	\$239.00
09/20/2024	TMK	BoA	Confer with J. Nolan regarding Valley Pride dispute and responsive pleadings.	0.40	1,195.00	\$478.00
09/20/2024	TMK	BoA	Emails with J. Nolan and Stapleton team regarding motion to set aside Valley Pride default.	0.40	1,195.00	\$478.00
09/20/2024	TMK	BoA	Review TSB arbitration award and confer with J. Fiero and BofA.	0.40	1,195.00	\$478.00
09/20/2024	TMK	BoA	Confer with M. Flahive regarding IFS contract and contact M. Good.	0.70	1,195.00	\$836.50
09/22/2024	JPN	BoA	Revise draft answer to Valley Pride complaint and finalize.	1.00	1,195.00	\$1,195.00
09/23/2024	JDF	BoA	Attention to PearlCrop sale and certificate of lien release language for buyer	1.60	1,395.00	\$2,232.00
09/23/2024	JPN	BoA	Telephone conference with Craig Enders regarding service of Valley Pride complaint.	0.30	1,195.00	\$358.50
09/23/2024	TMK	BoA	Confer with J. Fiero regarding Pearl sale lien release.	0.10	1,195.00	\$119.50
09/23/2024	TMK	BoA	Confer with Pearl Corp and Stapleton regarding sale.	0.20	1,195.00	\$239.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/23/2024	TMK	BoA	Confer with J. Nolan regarding Valley Pride dispute and pleadings and review same.	0.70	1,195.00	\$836.50
09/23/2024	TMK	BoA	Confer with counsel for IFS several times regarding contract extension.	0.30	1,195.00	\$358.50
09/24/2024	GSG	BoA	Emails and call to P. Jeffries re Valley Pride filing.	0.20	1,195.00	\$239.00
09/24/2024	JDF	BoA	Work on Valley Pride relief from default issues; Respond to client's question list; Consider bin sale issues; UCC lien priority examination	2.10	1,395.00	\$2,929.50
09/24/2024	TMK	BoA	Review status of Valley Pride dispute and pleadings.	0.20	1,195.00	\$239.00
09/25/2024	GSG	BoA	Review CDFA extension and emails re CDFA claims and confer with P. Jeffries re post-litigation letters.	0.40	1,195.00	\$478.00
09/25/2024	GSG	BoA	Review CCP 1005 and local rules re motion timing and emails to J. Nolan re notices of hearing.	0.40	1,195.00	\$478.00
09/25/2024	GSG	BoA	Draft notice of hearing re Valley Pride motions and emails re same.	0.70	1,195.00	\$836.50
09/25/2024	JDF	BoA	Prepare for and participate in PSZJ team litigation call; Attention to CDFA records request; Consider issues presented TSB objection; Review Aldi and Derco situations	1.70	1,395.00	\$2,371.50
09/25/2024	TMK	BoA	Confer with counsel for IFS and follow up with Stapleton team.	0.30	1,195.00	\$358.50
09/25/2024	TMK	BoA	Review inquiries from growers and responses to same.	0.10	1,195.00	\$119.50
09/25/2024	TMK	BoA	Confer with Stapleton team regarding sale proceeds.	0.20	1,195.00	\$239.00
09/26/2024	GSG	BoA	Update litigation summary and review CDFA calendaring.	0.50	1,195.00	\$597.50
09/26/2024	GSG	BoA	Review Valley Pride reply re writ motion.	0.20	1,195.00	\$239.00
09/26/2024	GSG	BoA	Emails to GSFC and BA re litigation summary and Valley Pride motions.	0.40	1,195.00	\$478.00
09/26/2024	GSG	BoA	Call with J. Nolan re Valley Pride motions.	0.10	1,195.00	\$119.50
09/26/2024	JDF	BoA	Review CDFA complaints	1.40	1,395.00	\$1,953.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/26/2024	TMK	BoA	Review Valley Pride reply and confer with PSZJ team.	0.20	1,195.00	\$239.00
09/26/2024	TMK	BoA	Review status of Aldi dispute.	0.10	1,195.00	\$119.50
09/26/2024	TMK	BoA	Confer with Stapleton and BoA regarding status of bank accounts.	0.20	1,195.00	\$239.00
09/27/2024	GSG	BoA	Emails re CDFA inquiry and claims.	0.30	1,195.00	\$358.50
09/27/2024	GSG	BoA	Confer with M. Renck re CDFA claims analysis.	0.10	1,195.00	\$119.50
09/27/2024	GSG	BoA	Emails and confer with M. Renck re CDFA complaints and virtual file.	0.30	1,195.00	\$358.50
09/27/2024	GSG	BoA	Call with Nolan re Valley Pride motions.	0.20	1,195.00	\$239.00
09/27/2024	GSG	BoA	Emails to/from K. Azlin re Valley Pride.	0.20	1,195.00	\$239.00
09/27/2024	TMK	BoA	Review BofA inquiries regarding CDFA complaints and confer with G. Greenwood.	0.20	1,195.00	\$239.00
09/30/2024	GSG	BoA	Review tentative ruling and emails re same.	0.20	1,195.00	\$239.00
09/30/2024	GSG	BoA	Call with J. Nolan re tentative, writ hearing, and default set aside.	0.30	1,195.00	\$358.50
09/30/2024	JDF	BoA	Follow up on bin sale issues; Consider sale issues presented by Hopson Ranch transaction; Work on TSB filing response; Follow up on Valley Pride issues	1.90	1,395.00	\$2,650.50
09/30/2024	JPN	BoA	Review Valley Pride tentative ruling; Review local rules regarding oral argument; Meet with G. Greenwood regarding issue with filed judgment.	0.50	1,195.00	\$597.50
09/30/2024	TMK	BoA	Confer with B. Farabough regarding case status.	0.40	1,195.00	\$478.00
				<b>49.70</b>		<b>\$62,391.50</b>

**General**

09/01/2024	JDF	GEN	Attention to Patterson situation and emails from I. Keller and R. Muzzin	0.20	1,395.00	\$279.00
09/02/2024	TMK	GEN	Confer with D. Stapleton and J. Fiero regarding ADR invoice.	0.10	1,195.00	\$119.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/03/2024	GSG	GEN	Review oppositions to ex parte stay application and email J. Fiero re same (.2), and emails re status and call scheduling (.1).	0.30	1,195.00	\$358.50
09/03/2024	GSG	GEN	Review emails to/from Downey Brand re CDFA claims.	0.20	1,195.00	\$239.00
09/03/2024	JDF	GEN	Prepare for stay hearing; Email with lenders' counsel re hearing support; TC with I. Keller, counsel for Patterson; Emails with I. Keller; Confer with J. Diiorio re bin sales	3.90	1,395.00	\$5,440.50
09/03/2024	TMK	GEN	Confer with J. Fiero and J. Diiorio regarding claims procedure.	0.10	1,195.00	\$119.50
09/03/2024	TMK	GEN	Confer with J. Fiero and G. Greenwood regarding hearing on ex parte motion for stay.	0.30	1,195.00	\$358.50
09/03/2024	TMK	GEN	Prepare for and participate in call with bank lenders regarding hearing on motion for stay.	0.60	1,195.00	\$717.00
09/03/2024	TMK	GEN	Review TSB opposition to stay motion.	0.30	1,195.00	\$358.50
09/03/2024	TMK	GEN	Review plaintiffs reply to oppositions to stay motion.	0.20	1,195.00	\$239.00
09/03/2024	TMK	GEN	Review debt summary and confer with J. Diiorio.	0.10	1,195.00	\$119.50
09/04/2024	GSG	GEN	Review GSFC reply and Holt opposition re application for litigation stay.	0.30	1,195.00	\$358.50
09/04/2024	GSG	GEN	Attend hearing re ex parte application for 90-day litigation stay.	1.00	1,195.00	\$1,195.00
09/04/2024	JDF	GEN	Prepare for and participate in ex parte hearing on motion for stay; Confer with clients re outcome of hearing; Focus on Aldi issue; examine pending litigation alleging entitlement to a mechanic's lien; Review Jenkins issues	3.60	1,395.00	\$5,022.00
09/04/2024	TMK	GEN	Confer with J. Fiero to prepare for hearing on motion for stay.	0.20	1,195.00	\$239.00
09/04/2024	TMK	GEN	Participate in hearing on motion for stay.	0.90	1,195.00	\$1,075.50
09/04/2024	TMK	GEN	Confer with Stapleton team regarding denial of stay motion.	0.20	1,195.00	\$239.00
09/04/2024	TMK	GEN	Confer with J. Fiero and J. Diiorio regarding claims procedure.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/04/2024	TMK	GEN	Review updates to litigation summary spreadsheet.	0.10	1,195.00	\$119.50
09/04/2024	TMK	GEN	Review status of sale to Turlock.	0.10	1,195.00	\$119.50
09/05/2024	TMK	GEN	Confer with Stapleton regarding funding requests and follow up with J. Fiero and E. Friedman.	0.40	1,195.00	\$478.00
09/05/2024	TMK	GEN	Review inquiry regarding Havel litigation.	0.10	1,195.00	\$119.50
09/06/2024	TMK	GEN	Review and respond to inquiries from creditors.	0.20	1,195.00	\$239.00
09/06/2024	TMK	GEN	Review receiver certificate.	0.10	1,195.00	\$119.50
09/06/2024	TMK	GEN	Confer with M. Bergthold and labor counsel regarding pension inquiries.	0.10	1,195.00	\$119.50
09/06/2024	TMK	GEN	Review dispute with Patterson Electric.	0.10	1,195.00	\$119.50
09/06/2024	TMK	GEN	Review grower contracts between Ranch and Sheller.	0.20	1,195.00	\$239.00
09/09/2024	JDF	GEN	Work on TSB issues; Review UCC-1 filings; Team call	1.10	1,395.00	\$1,534.50
09/09/2024	TMK	GEN	Prepare for and participate in update call with Receiver.	0.60	1,195.00	\$717.00
09/09/2024	TMK	GEN	Review and respond to inquiries from M. Bergthold regarding ERISA issues.	0.10	1,195.00	\$119.50
09/09/2024	TMK	GEN	Follow up emails with Receiver regarding case status.	0.20	1,195.00	\$239.00
09/09/2024	TMK	GEN	Confer with J. Fiero and Stapleton regarding accounts and controls.	0.10	1,195.00	\$119.50
09/09/2024	TMK	GEN	Review correspondence regarding funding requests.	0.10	1,195.00	\$119.50
09/09/2024	TMK	GEN	Review inquiries regarding Sandoval litigation.	0.10	1,195.00	\$119.50
09/09/2024	TMK	GEN	Review Asellus - Lacer LLC complaint.	0.10	1,195.00	\$119.50
09/10/2024	JDF	GEN	Review draft agreements from Finch's counsel; TC with B. Landoll re Finch; Prepare for and participate in Zoom call with counsel for Ms. Finch; Revise Crain agreement in draft; Prepare motion for reconsideration to Judge Ochoa	2.60	1,395.00	\$3,627.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/10/2024	JDF	GEN	TC with C. Jenkins re land and crop; Focus on bin sale protocol stipulation; Work on pasteurizer collateral question and inspection by Cornerstone	0.60	1,395.00	\$837.00
09/10/2024	TMK	GEN	Confer with B. Landoll regarding litigation notice to lenders and prepare same.	0.20	1,195.00	\$239.00
09/10/2024	TMK	GEN	Review status of funding certificate.	0.10	1,195.00	\$119.50
09/10/2024	TMK	GEN	Confer with Stapleton and J. Fiero regarding Cornerstone claim for pasteurizer.	0.20	1,195.00	\$239.00
09/11/2024	JDF	GEN	Review and provide edits to first inventory and report; Prepare for call with counsel for Jenkins; TC with counsel for Jenkins; Review updated litigation summary	1.50	1,395.00	\$2,092.50
09/11/2024	JDF	GEN	Work on bin stipulation issues; TC with counsel for Patterson; Work on Cornerstone PMSI qualification; Review bin sale email text	1.40	1,395.00	\$1,953.00
09/11/2024	TMK	GEN	Review initial inventory report and confer with J. Fiero and Receiver.	0.30	1,195.00	\$358.50
09/11/2024	TMK	GEN	Review and revise schedule of litigation and confer with lenders regarding pending litigation.	0.40	1,195.00	\$478.00
09/12/2024	JDF	GEN	Work on claims procedure motion; Work on Finch lease resolution; Work on revisions to the first inventory and report; Follow up with GSFC re M. Andersen termination terms	3.40	1,395.00	\$4,743.00
09/12/2024	TMK	GEN	Confer with J. Fiero regarding claim procedures.	0.10	1,195.00	\$119.50
09/12/2024	TMK	GEN	Review funding request and correspondence regarding same.	0.10	1,195.00	\$119.50
09/12/2024	TMK	GEN	Confer with T. Stratton and J. Fiero regarding sale process; follow up emails with secured lenders.	0.40	1,195.00	\$478.00
09/12/2024	TMK	GEN	Review emails regarding M. Andersen termination and payment.	0.10	1,195.00	\$119.50
09/13/2024	GSG	GEN	Emails and preliminary research re motion to set aside default.	1.10	1,195.00	\$1,314.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/13/2024	JDF	GEN	Review Hilco sale update report; Request extension from the CDFA; Work on claims procedure motion	1.90	1,395.00	\$2,650.50
09/13/2024	TMK	GEN	Confer with Stapleton team regarding schedule of litigation and review status of cases.	0.50	1,195.00	\$597.50
09/13/2024	TMK	GEN	Confer with Stapleton regarding Joe Yeung Farms CDFA complaint.	0.10	1,195.00	\$119.50
09/13/2024	TMK	GEN	Confer with secured lenders regarding sale bid procedures.	0.20	1,195.00	\$239.00
09/14/2024	TMK	GEN	Confer with Stapleton regarding status of funding requests.	0.10	1,195.00	\$119.50
09/14/2024	TMK	GEN	Confer with J. Diorio and B. Landoll regarding case status.	0.10	1,195.00	\$119.50
09/16/2024	GSG	GEN	Research re evidentiary support re relief from default.	0.90	1,195.00	\$1,075.50
09/16/2024	GSG	GEN	Research/review cases re CCP 473 relief by interested party as assignee.	0.70	1,195.00	\$836.50
09/16/2024	GSG	GEN	Call with J. Fiero re litigation updates and relief from default.	0.10	1,195.00	\$119.50
09/16/2024	GSG	GEN	Call with J. Diiorio re stipulated relief from default and payment of fees.	0.20	1,195.00	\$239.00
09/16/2024	GSG	GEN	Brief review of attachment pleadings by Holt and email T. Kapur re same.	0.30	1,195.00	\$358.50
09/16/2024	GSG	GEN	Review litigation summary and supporting documents re complaints and service.	1.10	1,195.00	\$1,314.50
09/16/2024	GSG	GEN	Email client and T. Kapur re filing and service of notices to all litigants re receivership.	0.30	1,195.00	\$358.50
09/16/2024	GSG	GEN	Emails and call with C. Anton re Lopez lawsuit and pending settlement.	0.20	1,195.00	\$239.00
09/16/2024	GSG	GEN	Call with T. Kapur re call with lenders.	0.10	1,195.00	\$119.50
09/16/2024	GSG	GEN	Confer with M. Renck and review Holt docket re pleadings.	0.20	1,195.00	\$239.00
09/16/2024	GSG	GEN	Email GSFC and BofA counsel re litigation summary and call.	0.40	1,195.00	\$478.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/16/2024	GSG	GEN	Review online dockets re service of complaints and status; and notes re same.	1.10	1,195.00	\$1,314.50
09/16/2024	GSG	GEN	Email client re litigation updates.	0.20	1,195.00	\$239.00
09/16/2024	TMK	GEN	Confer with J. Fiero and participate in call regarding bid procedures.	0.60	1,195.00	\$717.00
09/16/2024	TMK	GEN	Confer with B. Landoll regarding case tasks.	0.20	1,195.00	\$239.00
09/16/2024	TMK	GEN	Confer with G. Greenwood regarding inquiries from R. Hause-Schultz regarding Lopez and PAGA matters.	0.20	1,195.00	\$239.00
09/16/2024	TMK	GEN	Review revisions to litigation schedule.	0.10	1,195.00	\$119.50
09/16/2024	TMK	GEN	Confer with J. Fiero and Stapleton regarding extension for responses on CDFFA complaints.	0.20	1,195.00	\$239.00
09/16/2024	TMK	GEN	Review emails regarding CDFFA complaints.	0.20	1,195.00	\$239.00
09/17/2024	GSG	GEN	Email lenders re litigation service dates and issues.	0.30	1,195.00	\$358.50
09/17/2024	GSG	GEN	Email D. Burger re litigation and attach available dockets for summary.	0.50	1,195.00	\$597.50
09/17/2024	GSG	GEN	Emails to/from S. Levitt, R. Muzzin and others re call scheduling.	0.20	1,195.00	\$239.00
09/17/2024	GSG	GEN	Confer with P. Jeffries re preparation and filing of notices re receivership.	0.30	1,195.00	\$358.50
09/17/2024	GSG	GEN	Review agenda re litigation call with secured lenders.	0.30	1,195.00	\$358.50
09/17/2024	GSG	GEN	Call with S. Levitt and R. Muzzin re litigation summary and defense strategy.	0.60	1,195.00	\$717.00
09/17/2024	GSG	GEN	Emails to/from J. Fiero re Holt of California and ex parte writ of attachment.	0.20	1,195.00	\$239.00
09/17/2024	GSG	GEN	Review/revise litigation summary re deadlines and follow-up with P. Jeffries re notices.	0.60	1,195.00	\$717.00
09/17/2024	GSG	GEN	Review Putah Creek pleadings re complaint and CDFFA investigation and email J. Fiero re same.	0.20	1,195.00	\$239.00
09/17/2024	GSG	GEN	Review Holt complaint, ex parte application for writ of attachment, and supporting papers.	1.60	1,195.00	\$1,912.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/17/2024	GSG	GEN	Conference call with T. Kapur, J. Diiorio, and B. Landoll re case status and updates, including litigation and ex parte writ application.	1.00	1,195.00	\$1,195.00
09/17/2024	GSG	GEN	Call with E. Friedman and S. Levitt re Holt ex parte application for writ of attachment.	0.50	1,195.00	\$597.50
09/17/2024	GSG	GEN	Email J. Fiero and T. Kapur re litigation strategy.	0.30	1,195.00	\$358.50
09/17/2024	GSG	GEN	Call with R. Muzzin re opposition to Holt ex parte application.	0.30	1,195.00	\$358.50
09/17/2024	GSG	GEN	Emails to/from S. Levitt and R. Muzzin re opposition to ex parte application for writ of attachment.	0.30	1,195.00	\$358.50
09/17/2024	GSG	GEN	Review CCP provisions re writs of attachment and procedures.	0.50	1,195.00	\$597.50
09/17/2024	GSG	GEN	Draft opposition to Holt ex parte application for writ of attachment and circulate draft to interested parties.	5.40	1,195.00	\$6,453.00
09/17/2024	PJJ	GEN	Telephone conference with G. Greenwood regarding notices of entry of order (.2); prepare notices of entry of judgment (1.3).	1.50	595.00	\$892.50
09/17/2024	TMK	GEN	Several emails and calls with B. Landoll regarding case tasks.	0.40	1,195.00	\$478.00
09/17/2024	TMK	GEN	Prepare for and participate in case status call with Stapleton team.	0.70	1,195.00	\$836.50
09/17/2024	TMK	GEN	Review pleadings and confer with G. Greenwood regarding Holt ex parte hearing; follow up emails with Andsensens, BofA, GSFC and Stapleton.	0.80	1,195.00	\$956.00
09/17/2024	TMK	GEN	Confer with G. Greenwood regarding Putah Creek Farming Co. complaint.	0.10	1,195.00	\$119.50
09/17/2024	TMK	GEN	Confer with G. Greenwood and GSFC and BofA counsel regarding litigation summary and deadlines.	0.20	1,195.00	\$239.00
09/18/2024	GSG	GEN	Draft Stapleton Declaration and revise/conform opposition to Holt ex parte app with comments from secured lenders.	1.90	1,195.00	\$2,270.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/18/2024	GSG	GEN	Emails to J. Fiero and T. Kapur re litigation status and strategy.	0.10	1,195.00	\$119.50
09/18/2024	GSG	GEN	Confer with M. Renck re Holt opposition exhibits and email counsel and client re updated draft documents.	0.30	1,195.00	\$358.50
09/18/2024	GSG	GEN	Revise Stapleton declaration and re-circulate for signature, review proofs of service, and finalize all documents for filing.	1.10	1,195.00	\$1,314.50
09/18/2024	GSG	GEN	Confer with O. Adler re filing and call with clerk.	0.10	1,195.00	\$119.50
09/18/2024	GSG	GEN	Prepare outline of talking points re Holt hearing.	1.30	1,195.00	\$1,553.50
09/18/2024	GSG	GEN	Prepare form letter re notice to post-receivership plaintiffs.	0.50	1,195.00	\$597.50
09/18/2024	GSG	GEN	Email P. Jeffries re post-receivership litigants and notice letter.	0.20	1,195.00	\$239.00
09/18/2024	GSG	GEN	Email K. Vote re factual bases for relief from default and request for stipulation.	0.40	1,195.00	\$478.00
09/18/2024	PJJ	GEN	Continued preparation of notices of entry of judgment.	1.50	595.00	\$892.50
09/18/2024	TMK	GEN	Confer with J. Fiero, G. Greenwood and J. Nolan regarding case tasks.	0.30	1,195.00	\$358.50
09/18/2024	TMK	GEN	Review status of Holt litigation, review draft opposition and confer with G. Greenwood; confer with Stapleton regarding case status.	0.70	1,195.00	\$836.50
09/18/2024	TMK	GEN	Confer with M. Good regarding case status and IFS contract.	0.40	1,195.00	\$478.00
09/18/2024	TMK	GEN	Confer with G. Greenwood regarding TSB amended lawsuit and response to same.	0.30	1,195.00	\$358.50
09/19/2024	GSG	GEN	Call with J. Fiero re litigation status.	0.10	1,195.00	\$119.50
09/19/2024	GSG	GEN	Call to K. Vote and email re request for stipulated relief from default.	0.20	1,195.00	\$239.00
09/19/2024	GSG	GEN	Update/revise litigation summary spreadsheet.	0.70	1,195.00	\$836.50
09/19/2024	GSG	GEN	Emails to/from J. Fiero and T. Kapur re employment related litigation and representation by counsel.	0.20	1,195.00	\$239.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/19/2024	GSG	GEN	Email from K. Vote refusing relief from default, and email J. Nolan re same.	0.30	1,195.00	\$358.50
09/19/2024	TMK	GEN	Participate in status call with Stapleton and J. Fiero; follow up emails regarding tasks.	0.50	1,195.00	\$597.50
09/19/2024	TMK	GEN	Review inquiries and follow up with J. Nolan regarding Havel dispute.	0.20	1,195.00	\$239.00
09/19/2024	TMK	GEN	Confer with G. Greenwood regarding Juan Lopez litigation.	0.10	1,195.00	\$119.50
09/20/2024	JDF	GEN	Status call with B. Landoll re pending items; Work on Andersen illegal use of receivership estate property; Multiple emails with R. Kaplan re same	0.60	1,395.00	\$837.00
09/20/2024	TMK	GEN	Participate in status call with Stapleton team.	0.60	1,195.00	\$717.00
09/20/2024	YPD	GEN	Analysis of email from J. Nolan re Andersen & Sons; Corporate search on same and review results and format and email response to J. Nolan (.4); Research re Summons/Complaint and deadlines for service in CA and email same to J. Nolan (.2).	0.60	595.00	\$357.00
09/23/2024	GSG	GEN	Review draft arbitration motion, relief from default motion, and opposition to writ of attachment and email comments to J. Nolan.	1.50	1,195.00	\$1,792.50
09/23/2024	JDF	GEN	Attention to Cornerstone lien position; Attention to Valley Pride default briefing; follow up on bin sales	1.80	1,395.00	\$2,511.00
09/23/2024	TMK	GEN	Confer with J. Nolan regarding Kevin Havel matter.	0.10	1,195.00	\$119.50
09/23/2024	TMK	GEN	Review funding requests and correspondence regarding same.	0.10	1,195.00	\$119.50
09/23/2024	TMK	GEN	Review letter to post-receivership plaintiffs and confer with G. Greenwood.	0.20	1,195.00	\$239.00
09/24/2024	PJJ	GEN	Telephone conference with G. Greenwood regarding notice of entry of judgment (.2); revise same and circulate (.2).	0.40	595.00	\$238.00
09/25/2024	GSG	GEN	Emails to J. Fiero and J. Nolan re litigation call and agenda.	0.20	1,195.00	\$239.00
09/25/2024	GSG	GEN	Call with J. Fiero and J. Nolan re litigation strategy and priorities.	0.50	1,195.00	\$597.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/25/2024	PJJ	GEN	Prepare letters to post-receivership plaintiffs.	0.50	595.00	\$297.50
09/25/2024	TMK	GEN	Review status of labor disputes and confer with G. Greenwood and Stapleton.	0.20	1,195.00	\$239.00
09/26/2024	GSG	GEN	Review and finalize letters to post-receivership litigants.	0.30	1,195.00	\$358.50
09/26/2024	GSG	GEN	Review correspondence re Lopez litigation and settlement status.	0.50	1,195.00	\$597.50
09/26/2024	GSG	GEN	Emails to/from client re labor law disputes and engagement of F&P.	0.20	1,195.00	\$239.00
09/26/2024	GSG	GEN	Revise proposed settlement agreements re Lopez and confer with T. Kapur and J. Fiero re same.	1.30	1,195.00	\$1,553.50
09/26/2024	GSG	GEN	Review emails re fee objection.	0.10	1,195.00	\$119.50
09/26/2024	GSG	GEN	Review receivership order and email T. Kapur and J. Fiero re objection procedures.	0.30	1,195.00	\$358.50
09/26/2024	JDF	GEN	Review UCC summaries and compare to UCC records binder	0.90	1,395.00	\$1,255.50
09/26/2024	TMK	GEN	Participate in call regarding case tasks with Stapleton team.	0.80	1,195.00	\$956.00
09/26/2024	TMK	GEN	Confer with G. Greenwood regarding pending litigation.	0.20	1,195.00	\$239.00
09/26/2024	TMK	GEN	Review TSB objection to receiver's report and confer with PSZJ team; review receivership order regarding same.	1.10	1,195.00	\$1,314.50
09/26/2024	TMK	GEN	Confer with Stapleton regarding TSB objection to receiver's report.	0.30	1,195.00	\$358.50
09/26/2024	TMK	GEN	Confer with M. Flahive and review lien summary.	0.20	1,195.00	\$239.00
09/26/2024	TMK	GEN	Confer with G. Greenwood regarding litigation and review summary update.	0.30	1,195.00	\$358.50
09/27/2024	GSG	GEN	Review servicing issues and master service list.	0.30	1,195.00	\$358.50
09/27/2024	GSG	GEN	Emails to client re labor law attorneys.	0.20	1,195.00	\$239.00
09/27/2024	GSG	GEN	Emails to/from Fisher and Phillips re engagement, invoicing, and retainer withdrawal.	0.30	1,195.00	\$358.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/27/2024	GSG	GEN	Review TSB fee objection and receivership order.	0.40	1,195.00	\$478.00
09/27/2024	GSG	GEN	Further emails to/from Fisher and Phillips re retainer.	0.10	1,195.00	\$119.50
09/27/2024	TMK	GEN	Confer with PSZJ and Stapleton teams regarding litigation notice service list.	0.30	1,195.00	\$358.50
09/27/2024	TMK	GEN	Review litigation summary spreadsheet.	0.10	1,195.00	\$119.50
09/30/2024	TMK	GEN	Confer with counsel for GSFC regarding TSB report objection.	0.30	1,195.00	\$358.50
				<b>83.30</b>		<b>\$101,543.50</b>
<b>GSFC</b>						
09/03/2024	JDF	GSFC	Work on receiver's certificate issues with S. Bucey and B. Landoll; Zoom with S. Bucey	0.80	1,395.00	\$1,116.00
09/03/2024	TMK	GSFC	Review receiver certificate and correspondence regarding same.	0.20	1,195.00	\$239.00
09/03/2024	TMK	GSFC	Confer with J. Fiero and B. Landoll regarding Finch lease.	0.10	1,195.00	\$119.50
09/03/2024	TMK	GSFC	Confer with J. Fiero, J. Diiorio and B. Landoll regarding Jenkins dispute.	0.20	1,195.00	\$239.00
09/04/2024	TMK	GSFC	Confer with J. Fiero regarding BCM Construction complaint.	0.10	1,195.00	\$119.50
09/05/2024	JDF	GSFC	TC with R. Muzzin	0.30	1,395.00	\$418.50
09/05/2024	JDF	GSFC	Emails with T. Kapur re Jenkins; TC with B, Landoll re Jenkins; Confer with KBK law firm re Jenkins; Multiple client emails re Jenkins	1.40	1,395.00	\$1,953.00
09/05/2024	TMK	GSFC	Confer with Stapleton and T. Mehr regarding Clementino listing.	0.30	1,195.00	\$358.50
09/05/2024	TMK	GSFC	Confer with Stapleton and J. Fiero regarding Finch lease.	0.10	1,195.00	\$119.50
09/05/2024	TMK	GSFC	Confer with J. Diiorio, B. Landoll and J. Fiero regarding Jenkins dispute.	0.30	1,195.00	\$358.50
09/05/2024	TMK	GSFC	Confer with J. Diiorio and review case tracker and agenda.	0.20	1,195.00	\$239.00
09/06/2024	JDF	GSFC	Attention to Fitch and Jenkins issues	0.30	1,395.00	\$418.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/06/2024	TMK	GSFC	Participate in status call with GSFC.	1.00	1,195.00	\$1,195.00
09/09/2024	TMK	GSFC	Confer with J. Diiorio and J. Fiero regarding Crain agreement.	0.10	1,195.00	\$119.50
09/10/2024	JDF	GSFC	Participate in group call	0.50	1,395.00	\$697.50
09/10/2024	TMK	GSFC	Confer with B. Landoll and J. Fiero regarding Finch and Jenkins disputes.	0.20	1,195.00	\$239.00
09/11/2024	JDF	GSFC	TC with E. Friedman; Emails with E. Friedman	0.40	1,395.00	\$558.00
09/11/2024	TMK	GSFC	Review emails from T. Mehr for Westover Company and confer with J. Fiero.	0.20	1,195.00	\$239.00
09/11/2024	TMK	GSFC	Review status of Jenkins dispute.	0.10	1,195.00	\$119.50
09/11/2024	TMK	GSFC	Confer with A. Moore and J. Fiero regarding pasteurizer.	0.20	1,195.00	\$239.00
09/12/2024	TMK	GSFC	Confer with J. Fiero and Stapleton regarding Jenkins dispute.	0.20	1,195.00	\$239.00
09/13/2024	TMK	GSFC	Participate on call with Receiver and GSFC.	1.00	1,195.00	\$1,195.00
09/13/2024	TMK	GSFC	Confer with GSFC and Stapleton regarding strategy for pending litigation.	0.20	1,195.00	\$239.00
09/17/2024	GSG	GSFC	Call with BCM Construction counsel re extension to respond to answer.	0.30	1,195.00	\$358.50
09/17/2024	GSG	GSFC	Emails to/from BCM Construction and lenders re complaint and service.	0.30	1,195.00	\$358.50
09/17/2024	TMK	GSFC	Review Crain crop management agreement and confer with Stapleton team.	0.50	1,195.00	\$597.50
09/17/2024	TMK	GSFC	Confer with G. Greenwood and counsel for GSFC regarding BCM Construction litigation and extension.	0.20	1,195.00	\$239.00
09/18/2024	JPN	GSFC	Exchange correspondence with G. Greenwood regarding open pleading matters and deadlines.	0.30	1,195.00	\$358.50
09/18/2024	TMK	GSFC	Confer with Stapleton and J. Fiero regarding revisions to Crain agreement.	0.20	1,195.00	\$239.00
09/19/2024	JDF	GSFC	Prepare revised language for Crain agreement	0.60	1,395.00	\$837.00
09/19/2024	JPN	GSFC	Review emails from G. Greenwood regarding receivership and time line of events.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/19/2024	JPN	GSFC	Meet with Havel v. Anderson.	0.20	1,195.00	\$239.00
09/19/2024	JPN	GSFC	Follow-up with G. Greenwood regarding Kurt Vole response.	0.20	1,195.00	\$239.00
09/19/2024	JPN	GSFC	Meet with paralegals regarding filing of TSB Answer.	0.20	1,195.00	\$239.00
09/19/2024	JPN	GSFC	Receive Anderson litigation summary.	0.30	1,195.00	\$358.50
09/19/2024	JPN	GSFC	Receipt and review Deveco email and issues.	0.20	1,195.00	\$239.00
09/19/2024	TMK	GSFC	Review revisions to Crain agreement and confer with Stapleton and J. Fiero.	0.20	1,195.00	\$239.00
09/19/2024	TMK	GSFC	Review status of Finch dispute.	0.10	1,195.00	\$119.50
09/20/2024	JDF	GSFC	Prepare for and participate in team status call	1.00	1,395.00	\$1,395.00
09/20/2024	JPN	GSFC	Legal research enforcement of Arbitration Agreement by non-parties.	1.00	1,195.00	\$1,195.00
09/20/2024	JPN	GSFC	Legal research "arising from" and presumptions in Evidence Code to enforce arbitration.	1.00	1,195.00	\$1,195.00
09/20/2024	JPN	GSFC	Draft motion to compel arbitration.	1.50	1,195.00	\$1,792.50
09/20/2024	JPN	GSFC	Review proof of service for Superior Court complaint and defaults regarding notice under section 473.5.	0.40	1,195.00	\$478.00
09/20/2024	JPN	GSFC	Review Anderson agent for service.	0.30	1,195.00	\$358.50
09/20/2024	JPN	GSFC	Draft motion to set aside entry of default; Review C.C.P. regarding Motion to intervene.	1.00	1,195.00	\$1,195.00
09/20/2024	TMK	GSFC	Participate in status call with GSFC and Stapleton.	0.50	1,195.00	\$597.50
09/21/2024	JDF	GSFC	Confer with R. Muzzin re illegal use of GSFC collateral; Follow email string re same	0.50	1,395.00	\$697.50
09/22/2024	JPN	GSFC	Review Receivership Order and collateral pledged in support thereof.	0.80	1,195.00	\$956.00
09/22/2024	JPN	GSFC	Legal research analogous case law regarding assignment/receivership and excuse, surprise, pursuant to CCP section 473.	1.00	1,195.00	\$1,195.00
09/22/2024	JPN	GSFC	Review complaint for appointment of Receiver and injunction.	0.50	1,195.00	\$597.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/22/2024	JPN	GSFC	Review California common law to support motion to vacate judgment; Incorporate in motion to vacate default judgment.	0.50	1,195.00	\$597.50
09/22/2024	JPN	GSFC	Revise motion to intervene and incorporate into motion to vacate default judgment; Cite pertinent CCP codes for mandatory intervention.	2.00	1,195.00	\$2,390.00
09/22/2024	JPN	GSFC	Draft Declaration of J. Nolan to compel arbitration.	0.60	1,195.00	\$717.00
09/23/2024	JDF	GSFC	Work on Finch issues; Email to A. Stewart; Review Holt repossession issues	0.90	1,395.00	\$1,255.50
09/23/2024	JPN	GSFC	Telephone conference with Betsy Landoll regarding background facts.	0.30	1,195.00	\$358.50
09/23/2024	JPN	GSFC	Draft Declaration of C. Enders in support of motion to vacate default (0.70); Forward to witness (0.20).	0.90	1,195.00	\$1,075.50
09/23/2024	JPN	GSFC	Revise opposition to motion for writ of attachment;; Draft sections of opposition.	2.00	1,195.00	\$2,390.00
09/23/2024	JPN	GSFC	Review Plaintiff's application for writ of attachment by Plaintiff.	0.40	1,195.00	\$478.00
09/23/2024	JPN	GSFC	Draft Declaration of J. Nolan in opposition to writ of attachment.	0.50	1,195.00	\$597.50
09/23/2024	JPN	GSFC	Forward update to litigation team regarding approach to litigation filings on September 24, 2024.	0.40	1,195.00	\$478.00
09/23/2024	JPN	GSFC	Meet with paralegals regarding obtaining hearing dates for motion to vacate default, intervene and compel arbitration; Review local rules.	0.40	1,195.00	\$478.00
09/23/2024	JPN	GSFC	Forward draft motions to litigation team with comment.	0.50	1,195.00	\$597.50
09/23/2024	JPN	GSFC	Shepardize and cite check motions to intervene, compel mediation and set aside default	1.00	1,195.00	\$1,195.00
09/23/2024	JPN	GSFC	Compile exhibits in support of motions to vacate, intervene and compel arbitration.	0.60	1,195.00	\$717.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/23/2024	JPN	GSFC	Draft Declaration of D. Stapleton in support of motion to compel arbitration; Incorporate in J. Nolan Declaration.	0.40	1,195.00	\$478.00
09/23/2024	JPN	GSFC	Draft Declaration of D. Stapleton in support of motion to vacate default and intervene.	0.50	1,195.00	\$597.50
09/23/2024	TMK	GSFC	Review inquiries from GSFC regarding Cornerstone liens.	0.20	1,195.00	\$239.00
09/23/2024	TMK	GSFC	Review inquiries from BMO.	0.10	1,195.00	\$119.50
09/23/2024	TMK	GSFC	Review Finch dispute and rejected rent check.	0.10	1,195.00	\$119.50
09/23/2024	TMK	GSFC	Confer with J. Fiero and Stapleton regarding rent charges for warehouse use.	0.20	1,195.00	\$239.00
09/24/2024	JPN	GSFC	Review and revise motion to compel arbitration into final; Forward to client for approval.	0.80	1,195.00	\$956.00
09/24/2024	JPN	GSFC	Review and revise motion to intervene and vacate entry of default; Review; Finalize.	1.30	1,195.00	\$1,553.50
09/24/2024	JPN	GSFC	Review and revise changes from litigation team; Finalize.	1.20	1,195.00	\$1,434.00
09/24/2024	JPN	GSFC	Review Notice of Entry of Receivership Order.	0.30	1,195.00	\$358.50
09/24/2024	JPN	GSFC	Coordinate filings of paper and proper service on parties.	0.70	1,195.00	\$836.50
09/24/2024	JPN	GSFC	Draft multiple emails with draft papers/motions, strategy going forward to client.	0.50	1,195.00	\$597.50
09/24/2024	JPN	GSFC	Revise Declaration of Enders to set aside default; Forward with redline to witness (0.40); Telephone conference with witness (0.10); Finalize (0.10).	0.60	1,195.00	\$717.00
09/24/2024	TMK	GSFC	Confer with J. Fiero and Stapleton regarding rent charges for warehouse use.	0.20	1,195.00	\$239.00
09/24/2024	TMK	GSFC	Confer with J. Fiero and Stapleton regarding case status and tasks.	0.20	1,195.00	\$239.00
09/24/2024	TMK	GSFC	Confer with Stapleton team regarding Ranch's PACA/Grower Lien claim.	0.10	1,195.00	\$119.50
09/24/2024	TMK	GSFC	Review status of analysis of crops on Anita and Vadney properties.	0.20	1,195.00	\$239.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/25/2024	JDF	GSFC	Review facts and prepare notice letter to Jenkins' counsel; Review equipment lien priority issues and PMSI claim	1.50	1,395.00	\$2,092.50
09/25/2024	JPN	GSFC	Conference call with litigation team regarding WIP; Review numerous emails regarding hearings set on calendar.	0.50	1,195.00	\$597.50
09/25/2024	JPN	GSFC	Receive multiple emails regarding other pending litigation.	0.30	1,195.00	\$358.50
09/25/2024	JPN	GSFC	Address issues with October 1, 2024 hearing.	0.20	1,195.00	\$239.00
09/25/2024	TMK	GSFC	Confer with Stapleton and J. Fiero regarding Jenkins dispute.	0.10	1,195.00	\$119.50
09/25/2024	TMK	GSFC	Confer with counsel for GSFC and Stapleton regarding rent collections.	0.10	1,195.00	\$119.50
09/26/2024	JPN	GSFC	Review Plaintiff's reply to opposition to writ of attachment; Review legal authorities cited therein.	0.50	1,195.00	\$597.50
09/26/2024	JPN	GSFC	Meet with legal team regarding TRO, injunction and stay.	0.30	1,195.00	\$358.50
09/26/2024	JPN	GSFC	Review litigation update.	0.20	1,195.00	\$239.00
09/26/2024	JPN	GSFC	Meet with G. Greenwood regarding labor claims.	0.20	1,195.00	\$239.00
09/26/2024	JPN	GSFC	Respond to opposing counsel regarding labor claim.	0.20	1,195.00	\$239.00
09/26/2024	TMK	GSFC	Confer with A. Stewart regarding Finch dispute.	0.10	1,195.00	\$119.50
09/26/2024	TMK	GSFC	Confer with Stapleton and J. Fiero regarding Crains funding.	0.30	1,195.00	\$358.50
09/26/2024	TMK	GSFC	Review agenda and materials for call with GSFC.	0.10	1,195.00	\$119.50
09/27/2024	JDF	GSFC	Prepare for and participate in pending items call with GSFC	1.20	1,395.00	\$1,674.00
09/27/2024	JPN	GSFC	Review BB arbitration award.	0.30	1,195.00	\$358.50
09/27/2024	JPN	GSFC	Meet with litigation team regarding objection.	0.10	1,195.00	\$119.50
09/27/2024	JPN	GSFC	Review numerous emails regarding filed complaints post-receiver and response.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/27/2024	JPN	GSFC	Receive emails regarding October 1, 2024 hearing and Plaintiff's reply.	0.30	1,195.00	\$358.50
09/27/2024	JPN	GSFC	Review court rules regarding oral arguments.	0.20	1,195.00	\$239.00
09/27/2024	TMK	GSFC	Participate in call with Stapleton and GSFC.	0.70	1,195.00	\$836.50
09/27/2024	TMK	GSFC	Review General Denial filed by Joe Yeung Farms.	0.20	1,195.00	\$239.00
09/27/2024	TMK	GSFC	Review status of Jenkins dispute and demand letter.	0.30	1,195.00	\$358.50
09/30/2024	JDF	GSFC	Attention to revising form of receiver certificates	0.70	1,395.00	\$976.50
09/30/2024	JPN	GSFC	Review issues with ex-parte application; Meet with litigation team regarding same.	0.30	1,195.00	\$358.50
09/30/2024	JPN	GSFC	Summarize open issues with court ruling.	0.20	1,195.00	\$239.00
09/30/2024	JPN	GSFC	Telephone conference with TSB award and entry of an order.	0.20	1,195.00	\$239.00
09/30/2024	TMK	GSFC	Review receiver certificates and propose revisions; confer with J. Fiero.	0.40	1,195.00	\$478.00
09/30/2024	TMK	GSFC	Confer with Stapleton team regarding revisions to certificates.	0.20	1,195.00	\$239.00
09/30/2024	TMK	GSFC	Review status of funding requests.	0.10	1,195.00	\$119.50
				<u>50.90</u>		<u>\$62,845.50</u>

**TOTAL SERVICES FOR THIS MATTER:**

**\$235,564.00**

**Expenses**

08/21/2024	CC	AT&T Conference Call, JDF	1.31
08/23/2024	CC	AT&T Conference Call, JDF	5.12
08/26/2024	FF	ONE LEGAL, SUPERIOR COURT OF CA, TEHAMA COUNTY, DECLARATION, TMK	20.72
08/26/2024	FF	ONE LEGAL, SUPERIOR COURT OF CA, TEHAMA COUNTY, EX PARTE APPLICATION, TMK	82.57
08/26/2024	CC	AT&T Conference Call, GSG	1.31
08/27/2024	FF	ONE LEGAL, SUPERIOR COURT OF CA, TEHAMA COUNTY, NOTICE, TMK	31.02
09/03/2024	RE	SCAN/COPY ( 6 @0.10 PER PG)	0.60
09/03/2024	RE	SCAN/COPY ( 14 @0.10 PER PG)	1.40
09/03/2024	RE	SCAN/COPY ( 9 @0.10 PER PG)	0.90
09/03/2024	RE	SCAN/COPY ( 13 @0.10 PER PG)	1.30
09/03/2024	RE	SCAN/COPY ( 9 @0.10 PER PG)	0.90
09/03/2024	RE	SCAN/COPY ( 6 @0.10 PER PG)	0.60
09/03/2024	RE	SCAN/COPY ( 40 @0.10 PER PG)	4.00
09/03/2024	RE	SCAN/COPY ( 13 @0.10 PER PG)	1.30
09/03/2024	RE	SCAN/COPY ( 9 @0.10 PER PG)	0.90
09/03/2024	RE	SCAN/COPY ( 6 @0.10 PER PG)	0.60
09/03/2024	RE	SCAN/COPY ( 40 @0.10 PER PG)	4.00
09/03/2024	RE	SCAN/COPY ( 14 @0.10 PER PG)	1.40
09/03/2024	RE	SCAN/COPY ( 9 @0.10 PER PG)	0.90
09/03/2024	RE	SCAN/COPY ( 12 @0.10 PER PG)	1.20
09/03/2024	FF	One Legal, Superior Court of CA Tehama County, Order Reply Filed, TMK	21.57
09/05/2024	RE	SCAN/COPY ( 31 @0.10 PER PG)	3.10
09/09/2024	RE	SCAN/COPY ( 23 @0.10 PER PG)	2.30
09/10/2024	FF	Courts/USBC - Filing Fee, JDF	350.00
09/16/2024	LN	81001.00001 Lexis Charges for 09-16-24	1.28

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09/16/2024	LN	81001.00001 Lexis Charges for 09-16-24	8.97
09/16/2024	LN	81001.00001 Lexis Charges for 09-16-24	17.83
09/16/2024	LN	81001.00001 Lexis Charges for 09-16-24	9.61
09/17/2024	LN	81001.00001 Lexis Charges for 09-17-24	3.18
09/17/2024	LN	81001.00001 Lexis Charges for 09-17-24	1.91
09/17/2024	LN	81001.00001 Lexis Charges for 09-17-24	17.94
09/17/2024	LN	81001.00001 Lexis Charges for 09-17-24	14.00
09/17/2024	LN	81001.00001 Lexis Charges for 09-17-24	8.97
09/18/2024	FF	One Legal, Superior Court of CA San Joaquin County, Declaration, TMK	424.87
09/19/2024	RE	SCAN/COPY ( 23 @0.10 PER PG)	2.30
09/19/2024	RE	SCAN/COPY ( 39 @0.10 PER PG)	3.90
09/19/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
09/19/2024	RE	SCAN/COPY ( 6 @0.10 PER PG)	0.60
09/19/2024	RE	SCAN/COPY ( 23 @0.10 PER PG)	2.30
09/19/2024	RE	SCAN/COPY ( 7 @0.10 PER PG)	0.70
09/19/2024	RE	SCAN/COPY ( 16 @0.10 PER PG)	1.60
09/19/2024	RE	SCAN/COPY ( 3 @0.10 PER PG)	0.30
09/19/2024	RE	SCAN/COPY ( 3 @0.10 PER PG)	0.30
09/19/2024	RE	SCAN/COPY ( 3 @0.10 PER PG)	0.30
09/19/2024	RE	SCAN/COPY ( 4 @0.10 PER PG)	0.40
09/19/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
09/19/2024	RE	SCAN/COPY ( 4 @0.10 PER PG)	0.40
09/19/2024	LN	81001.00001 Lexis Charges for 09-19-24	108.53
09/20/2024	PO	Postage	30.45
09/20/2024	LN	81001.00001 Lexis Charges for 09-20-24	162.79
09/22/2024	RE	SCAN/COPY ( 53 @0.10 PER PG)	5.30
09/22/2024	LN	81001.00001 Lexis Charges for 09-22-24	36.17
09/23/2024	RE	SCAN/COPY ( 26 @0.10 PER PG)	2.60
09/23/2024	LN	81001.00001 Lexis Charges for 09-23-24	36.17

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09/23/2024	FF	One Legal, Superior Court of CA Sacramento County, Answer, TMK	469.22
09/23/2024	FF	One Legal, Superior Court of CA Sacramento County, Notice of Entry of Judgment, TMK	19.05
09/24/2024	RE	SCAN/COPY ( 16 @0.10 PER PG)	1.60
09/24/2024	RE	SCAN/COPY ( 16 @0.10 PER PG)	1.60
09/24/2024	RE	SCAN/COPY ( 15 @0.10 PER PG)	1.50
09/24/2024	RE	SCAN/COPY ( 15 @0.10 PER PG)	1.50
09/24/2024	RE	SCAN/COPY ( 15 @0.10 PER PG)	1.50
09/24/2024	RE	SCAN/COPY ( 122 @0.10 PER PG)	12.20
09/24/2024	FF	One Legal, Superior Court of CA Fresno County, Notice of Entry of Judgment, TMK	19.31
09/25/2024	PO	Postage	30.45
09/25/2024	LN	81001.00001 Lexis Charges for 09-25-24	17.94
09/25/2024	FF	One Legal, Superior Court of CA Fresno County, Motion, TMK	82.29
09/25/2024	FF	One Legal, Superior Court of CA Fresno County, Declaration, TMK	144.24
09/25/2024	FF	One Legal, Superior Court of CA Fresno County, Opposition, TMK	19.31
09/26/2024	PO	SF MAIL LOG	5.18
09/26/2024	RE	SCAN/COPY ( 104 @0.10 PER PG)	10.40
09/26/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
09/26/2024	RE	SCAN/COPY ( 3 @0.10 PER PG)	0.30
09/26/2024	FF	One Legal, Superior Court of CA Fresno County, Proof of Service, TMK	19.31
09/26/2024	FF	One Legal, Superior Court of CA Fresno County, Proposed Order Notice, TMK	19.31

**Total Expenses for this Matter**

**\$2,320.10**

**A/R STATEMENT**

**Outstanding Balance from prior invoices as of 09/30/2024**

**(May not include recent payments)**

<b><u>A/R Bill Number</u></b>	<b><u>Invoice Date</u></b>	<b><u>Fee Billed</u></b>	<b><u>Expenses Billed</u></b>	<b><u>Balance Due</u></b>
<b>Total Amount Due on Current and Prior Invoices:</b>				<b>\$237,884.10</b>



PACHULSKI  
STANG  
ZIEHL &  
JONES

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

December 12, 2024

Invoice 143466

Client 81001.00001

Stapleton, David (Receiver)  
Stapleton Group  
515 S. Flower Street 18th floor  
Los Angeles, CA 90071  
USA

RE: Andersen & Sons Shelling Receivership

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 10/31/2024**

FEES	\$257,562.50
EXPENSES	\$1,492.21
<b>TOTAL CURRENT CHARGES</b>	<b>\$259,054.71</b>
<b>BALANCE FORWARD</b>	<b>\$237,884.10</b>
<b>LAST PAYMENT</b>	<b>-\$237,884.10</b>
<b>ADVANCE APPLIED</b>	<b>-\$12,115.90</b>
<b>TOTAL BALANCE DUE</b>	<b>\$246,938.81</b>

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**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
JDF	Fiero, John D.	Partner	1,395.00	54.50	\$76,027.50
TMK	Kapur, Teddy M.	Partner	1,195.00	16.50	\$19,717.50
GSG	Greenwood, Gail S.	Counsel	1,195.00	112.10	\$133,959.50
JPN	Nolan, Jeffrey P.	Counsel	1,195.00	22.10	\$26,409.50
PJJ	Jeffries, Patricia J.	Paralegal	595.00	0.70	\$416.50
LAF	Forrester, Leslie A.	Library	645.00	1.60	\$1,032.00
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			207.50		\$257,562.50

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**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BANN	Banner	9.20	\$12,654.00
BINS	Bins	2.40	\$2,868.00
BoA	Bank of America	101.90	\$126,390.00
GEN	General	83.80	\$102,101.00
GSFC	GSFC	10.20	\$13,549.50
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		207.50	\$257,562.50

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Bloomberg	\$146.80
Conference Call	\$3.14
Federal Express	\$29.42
Court Fees	\$264.73
Lexis/Nexis- Legal Research	\$333.38
Litigation Support Vendors	\$489.82
Pacer - Court Research	\$1.10
Postage	\$83.42
Reproduction Expense	\$140.40
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	\$1,492.21

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Banner</b>						
10/01/2024	JDF	BANN	Correspondence responding to R. Kaplan	0.10	1,395.00	\$139.50
10/02/2024	TMK	BANN	Review and confer with receiver regarding Banner inquiries regarding Orland and Oliva sales.	0.20	1,195.00	\$239.00
10/03/2024	JDF	BANN	Review and analyze purchase and sale agreement and confer with client re same; Confer with client for status request from Banner Bank	1.00	1,395.00	\$1,395.00
10/04/2024	JDF	BANN	Further review of sale agreement and email to client re same	0.60	1,395.00	\$837.00
10/07/2024	TMK	BANN	Review sale agreement and confer with receiver regarding Nate Oliva prune sale.	0.60	1,195.00	\$717.00
10/07/2024	JDF	BANN	Review and approve PSA for Hopson Ranch	0.40	1,395.00	\$558.00
10/16/2024	JDF	BANN	Consider revisions from attorney Hardin and report to client re same; TC with Mr. Olive's counsel	0.50	1,395.00	\$697.50
10/17/2024	JDF	BANN	TC with Mr. Oliva's counsel; Follow email message re same	0.20	1,395.00	\$279.00
10/21/2024	JDF	BANN	Confer with client re sale order requirements; Review emails re bin sales and lender approvals; Work on Nate Oliva sale closing	0.60	1,395.00	\$837.00
10/23/2024	TMK	BANN	Confer with Banner Bank regarding receiver report.	0.10	1,195.00	\$119.50
10/24/2024	JDF	BANN	Work on sale motion	1.60	1,395.00	\$2,232.00
10/25/2024	JDF	BANN	Work on declarations in support of sale	1.60	1,395.00	\$2,232.00
10/29/2024	JDF	BANN	Work on sale motion and closing plan; Emails with counsel for buyer	0.50	1,395.00	\$697.50
10/31/2024	JDF	BANN	Work on sale approval pleadings	1.20	1,395.00	\$1,674.00
				<b>9.20</b>		<b>\$12,654.00</b>

**Bins**

10/01/2024	JPN	BINS	Review emails regarding status of pending litigation.	0.30	1,195.00	\$358.50
10/03/2024	JPN	BINS	Review Turlock complaint and associate emails.	0.20	1,195.00	\$239.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/16/2024	JPN	BINS	Review numerous emails regarding litigation, CDFA and administrative actions.	0.20	1,195.00	\$239.00
10/16/2024	JPN	BINS	Review AG Farm's complaint and leave to intervene.	0.30	1,195.00	\$358.50
10/16/2024	JPN	BINS	Telephone conference with counsel for Plaintiff Kevin Havel.	0.30	1,195.00	\$358.50
10/16/2024	JPN	BINS	Draft response to Plaintiff, Havel regarding demand letter.	0.20	1,195.00	\$239.00
10/16/2024	JPN	BINS	Meet with litigation team regarding Havel.	0.20	1,195.00	\$239.00
10/16/2024	JPN	BINS	Exchange emails with G. Greenwood regarding injunction and Plaintiff's filing suit.	0.30	1,195.00	\$358.50
10/16/2024	JPN	BINS	Review California case law regarding lis pendens.	0.40	1,195.00	\$478.00
10/18/2024	TMK	BINS	Review status of bin sales.	0.10	1,195.00	\$119.50
10/21/2024	TMK	BINS	Review status of bin sales.	0.10	1,195.00	\$119.50
10/29/2024	TMK	BINS	Confer with Stapleton regarding bin sale proceeds.	0.10	1,195.00	\$119.50
				<b>2.40</b>		<b>\$2,868.00</b>
<b>Bank of America</b>						
10/01/2024	GSG	BoA	Call with R. Muzzin re litigation status and Valley Pride motions.	0.90	1,195.00	\$1,075.50
10/01/2024	GSG	BoA	Email K. Azlin re Valley Pride writ hearing.	0.20	1,195.00	\$239.00
10/01/2024	GSG	BoA	Email to/from A. Cummings re post-receivership litigation letters and Turlock complaint.	0.30	1,195.00	\$358.50
10/01/2024	JDF	BoA	Prepare for and participate in team call re BofA pending items and general status; attention to CDFA claims; Work with M. Flahive on grower contract database; Review common interest agreement	1.90	1,395.00	\$2,650.50
10/01/2024	JPN	BoA	Research local rules, Superior Court of Fresno, regarding default judgment and hearing.	0.20	1,195.00	\$239.00
10/01/2024	JPN	BoA	Draft litigation update regarding Valley Pride.	0.30	1,195.00	\$358.50
10/01/2024	GSG	BoA	Review Derco letters/emails re walnut purchase contract.	0.40	1,195.00	\$478.00

				Hours	Rate	Amount
10/01/2024	JDF	BoA	Respond to Holt attorneys; Confer with G, Greenwood re pending litigation, including Valley Pride and TSG; Attention to employment law issues	0.80	1,395.00	\$1,116.00
10/01/2024	JPN	BoA	Meet with G. Greenwood regarding hearings; Review local rules.	0.20	1,195.00	\$239.00
10/01/2024	JPN	BoA	Address issues with entering of judgment; Forward to G. Greenwood.	0.50	1,195.00	\$597.50
10/01/2024	JPN	BoA	Draft email to litigation team regarding Grower's fiings.	0.30	1,195.00	\$358.50
10/01/2024	JPN	BoA	Exchange emails with G. Greenwood regarding ex parte motion to shorten time regarding Valley Pride.	0.30	1,195.00	\$358.50
10/01/2024	JPN	BoA	Meet with paralegals regarding notice of motion filing.	0.20	1,195.00	\$239.00
10/02/2024	JDF	BoA	TC with counsel at Downey Brand re pending grower litigation; Review ALDI agreements and analyze same	0.90	1,395.00	\$1,255.50
10/02/2024	JPN	BoA	Telephone conference regarding declaratory relief action and procedures.	0.30	1,195.00	\$358.50
10/02/2024	JPN	BoA	Telephone conference with G. Greenwood regarding open litigation issues.	0.30	1,195.00	\$358.50
10/02/2024	GSG	BoA	Call with J. Nolan re Valley Pride and hearing date.	0.20	1,195.00	\$239.00
10/03/2024	JDF	BoA	Review Turlock walnut issues and complaint filed by warehouse; Review demand letter from US Horticulture and email to counsel re same	0.50	1,395.00	\$697.50
				0.10	1,195.00	\$119.50
10/03/2024	TMK	BoA	Confer with Receiver regarding TSB arbitration.	0.60	1,195.00	\$717.00
10/04/2024	GSG	BoA	Review federal complaint re declaratory relief and waiver issues, and relevant CDEA actions and correspondence.	0.60	1,195.00	\$717.00
10/04/2024	GSG	BoA	Review TSB arbitration petition and related pleadings and confer with J. Nolan re same.	0.50	1,395.00	\$697.50
10/04/2024	JDF	BoA	Review and analyze amended complaint filed in ED Cal			
10/04/2024	JPN	BoA	Pull up docket for SB; Search regarding deadlines with TSB; Exchange correspondence regarding appeal of award.	0.40	1,195.00	\$478.00
10/04/2024	JPN	BoA	Forward documents regarding TSB award.	0.20	1,195.00	\$239.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/07/2024	GSG	BoA	Revise/update litigation summary and email D. Burger re TSB petition.	0.60	1,195.00	\$717.00
10/07/2024	GSG	BoA	Email GSFC and BofA re litigation updates and TSB petition.	0.40	1,195.00	\$478.00
10/07/2024	GSG	BoA	Call with P. Weber re CDFA claims.	0.30	1,195.00	\$358.50
10/07/2024	GSG	BoA	Review CDFA materials re complaints, deadlines, and document request.	1.10	1,195.00	\$1,314.50
10/07/2024	GSG	BoA	Email client re CDFA deadlines and proposed response.	0.60	1,195.00	\$717.00
10/07/2024	GSG	BoA	Review CDFA website re complaint procedures.	0.20	1,195.00	\$239.00
10/07/2024	GSG	BoA	Emails to/from client re CDFA claimants.	0.10	1,195.00	\$119.50
10/07/2024	JDF	BoA	Review communications regarding CDFA lien process, and analysis of same; Confer with G. Greenwood re CDFA proceedings; Review email string re CDFA matter	1.10	1,395.00	\$1,534.50
10/07/2024	JPN	BoA	Review Anderson complaint; Exchange correspondence regarding same.	0.30	1,195.00	\$358.50
10/07/2024	JPN	BoA	Review emails regarding Holt update.	0.20	1,195.00	\$239.00
10/07/2024	TMK	BoA	Confer with G. Greenwood and Stapleton team regarding CDFA complaints.	0.10	1,195.00	\$119.50
10/08/2024	GSG	BoA	Emails from J. Nolan re Valley Pride and pending motions.	0.10	1,195.00	\$119.50
10/08/2024	GSG	BoA	Research procedure re response to TSB arbitration confirmation and review initial correspondence with Ochoa.	0.70	1,195.00	\$836.50
10/08/2024	GSG	BoA	Research CCP 1280 et seq. and applicable cases re vacating TSB arbitration award.	3.60	1,195.00	\$4,302.00
10/08/2024	GSG	BoA	Draft notice of appearance and request for service re TSB.	0.60	1,195.00	\$717.00
10/08/2024	GSG	BoA	Emails to/from B. Landoll re CDFA claims and documents.	0.20	1,195.00	\$239.00
10/08/2024	GSG	BoA	Emails and call to G. Torres re TSB arbitration and pleadings.	0.30	1,195.00	\$358.50
10/08/2024	GSG	BoA	Begin draft of motion to intervene and request to vacate TSB arbitration award.	3.60	1,195.00	\$4,302.00
10/08/2024	GSG	BoA	Finalize Notice of Hearing with Plaintiff, Valley Pride; Exchange emails with G. Greenwood regarding same	0.30	1,195.00	\$358.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/08/2024	JDF	BoA	TC with counsel for growers re pending items and case approach; Emails re grower issues; Work on ALDI issues	1.30	1,395.00	\$1,813.50
10/08/2024	JPN	BoA	Review CFDSA claimants and open litigation.	0.20	1,195.00	\$239.00
10/08/2024	JPN	BoA	Review TSB emails regarding opposition to arbitration award.	0.30	1,195.00	\$358.50
10/08/2024	TMK	BoA	Confer with G. Greenwood regarding TSB litigation.	0.30	1,195.00	\$358.50
10/09/2024	GSG	BoA	Review pleadings and emails from Torres re TSB arbitration.	0.60	1,195.00	\$717.00
10/09/2024	GSG	BoA	Draft motion to vacate TSB arbitration award and additional facts.	0.90	1,195.00	\$1,075.50
10/09/2024	GSG	BoA	Draft motion to intervene re TSB arbitration.	0.70	1,195.00	\$836.50
10/09/2024	GSG	BoA	Draft arguments re motion to vacate TSB arbitration award.	4.90	1,195.00	\$5,855.50
10/09/2024	JDF	BoA	TC with Patterson landlord re warehouse remediation; Email to client re same; Work on CDFA complaint database; Review and analyze BofA debt breakdown and explication; Client emails with discussion of Patterson warehouse issues; TC with S. Levitt	2.00	1,395.00	\$2,790.00
10/09/2024	JPN	BoA	Review documents from Andreson regarding TSB.	0.30	1,195.00	\$358.50
10/09/2024	JPN	BoA	Review the CDFA request; Review matrix of complaints/litigation.	0.30	1,195.00	\$358.50
10/09/2024	JPN	BoA	Review emails regarding construction liens.	0.20	1,195.00	\$239.00
10/09/2024	JPN	BoA	Telephone conference with litigation team regarding lien/construction theory.78512	0.20	1,195.00	\$239.00
10/09/2024	TMK	BoA	Confer with G. Greenwood regarding CDFA complaints; follow up emails regarding same.	0.10	1,195.00	\$119.50
10/10/2024	GSG	BoA	Draft motion to vacate TSB arbitration award re final arguments and introduction.	3.60	1,195.00	\$4,302.00
10/10/2024	GSG	BoA	Review CRC re motion to vacate TSB arbitration award.	0.20	1,195.00	\$239.00
10/10/2024	GSG	BoA	Email Kinsey re service of TSB arbitration confirmation.	0.10	1,195.00	\$119.50
10/10/2024	GSG	BoA	Review Valley Pride CMC statement and review CRC re response and timing.	0.10	1,195.00	\$597.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/10/2024	GSG	BoA	Draft Kapur declaration in support of motion to vacate TSB arbitration award.	0.50	1,195.00	\$597.50
10/10/2024	GSG	BoA	Collect exhibits and confer with M. Renck re motion to vacate TSB arbitration award.	0.40	1,195.00	\$478.00
10/10/2024	GSG	BoA	Draft Stapleton declaration in support of motion to vacate TSB arbitration award.	0.40	1,195.00	\$478.00
10/10/2024	GSG	BoA	Review/revise motion to vacate TSB arbitration re CCP 1285.6 response contents.	0.60	1,195.00	\$717.00
10/10/2024	GSG	BoA	Confer with J. Fiero and L. Forrester re arbitration procedures and supporting authority.	0.20	1,195.00	\$239.00
10/10/2024	GSG	BoA	Review client spreadsheet and files re production to CDFA	0.50	1,195.00	\$597.50
10/10/2024	GSG	BoA	Emails to client re CDFA documents.	0.20	1,195.00	\$239.00
10/10/2024	JDF	BoA	Review opposition to TSB motion to confirm arbitration award	0.90	1,395.00	\$1,255.50
10/10/2024	GSG	BoA	Confer with J. Nolan re Valley Pride status.	0.10	1,195.00	\$119.50
10/10/2024	JDF	BoA	Work on ALDI issues; Work on CDFA document database; Emails to CDFA re status	1.70	1,395.00	\$2,371.50
10/10/2024	JPN	BoA	Review CMC of Plaintiff Valley Pride (.10); Exchange emails with litigation team regarding same; Review local rules of Superior Court.	0.30	1,195.00	\$358.50
10/10/2024	JPN	BoA	Exchange correspondence with counsel for Plaintiff, Havel.	0.30	1,195.00	\$358.50
10/10/2024	JPN	BoA	Follow-up regarding TSB issues.	0.20	1,195.00	\$239.00
10/10/2024	JPN	BoA	Meet regarding service and issue of Valley Pride hearings for various motions.	0.20	1,195.00	\$239.00
10/10/2024	JPN	BoA	Review draft motion to vacate.	0.30	1,195.00	\$358.50
10/11/2024	GSG	BoA	Calls to TSB counsel re service of petition.	0.20	1,195.00	\$239.00
10/11/2024	GSG	BoA	Emails and call with A. Cummings re litigation summary and current status.	0.50	1,195.00	\$597.50
10/11/2024	GSG	BoA	Call with H. Baydal/CDFA re answers and documents for production.	0.30	1,195.00	\$358.50
10/11/2024	GSG	BoA	Review CDFA complaints and accounting.	0.70	1,195.00	\$836.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/11/2024	GSG	BoA	Draft form of response letter to CDFA re complainants.	1.20	1,195.00	\$1,434.00
10/11/2024	GSG	BoA	Review emails and additional documents re growers/CDFA complainants.	0.20	1,195.00	\$239.00
10/11/2024	GSG	BoA	Review/revise CDFA spreadsheet re outstanding complaints, alleged amounts, and estimates.	0.50	1,195.00	\$597.50
10/11/2024	GSG	BoA	Email counsel to TSB re further request for proof of service.	0.20	1,195.00	\$239.00
10/11/2024	JDF	BoA	Attend Zoom call re grower payables and CDFA data requests; Revise letter to CDFA	1.20	1,395.00	\$1,674.00
10/11/2024	JDF	BoA	TC with J. Dreher re requirements of receivership order; Email to Dreher re same; TC with Paladin re ALDI issues	1.40	1,395.00	\$1,953.00
10/11/2024	TMK	BoA	Review CDFA complaints.	0.20	1,195.00	\$239.00
10/11/2024	TMK	BoA	Participate in call regarding grower payables and case tasks.	0.90	1,195.00	\$1,075.50
10/12/2024	GSG	BoA	Review treatise and additional cases re grounds to vacate arbitration award.	1.30	1,195.00	\$1,553.50
10/14/2024	GSG	BoA	Review and prepare enclosures for production to CDFA.	0.70	1,195.00	\$836.50
10/14/2024	GSG	BoA	Prepare and send CDFA letters in response to complaints.	1.20	1,195.00	\$1,434.00
10/14/2024	GSG	BoA	Review emails and confer with client re harvest reporting due to CDFA.	0.40	1,195.00	\$478.00
10/14/2024	GSG	BoA	Call with S. Lavelle/CDFA re reporting extension and contents of reports.	0.30	1,195.00	\$358.50
10/14/2024	JDF	BoA	Confer with G. Greenwood re TSB dates and deadlines; Revise motion to intervene	0.90	1,395.00	\$1,255.50
10/14/2024	JDF	BoA	Follow up on certificate of lien release for Pearl Crop	0.20	1,395.00	\$279.00
10/14/2024	JPN	BoA	Review emails regarding TSB and deadlines.	0.20	1,195.00	\$239.00
10/14/2024	JPN	BoA	Receive and review various responses of Trustee to state court litigation.	0.30	1,195.00	\$358.50
10/14/2024	TMK	BoA	Confer with Pearl Corp regarding lien releases.	0.20	1,195.00	\$239.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/14/2024	TMK	BoA	Review status of CDFA inquiries and confer with G. Greenwood.	0.10	1,195.00	\$119.50
10/15/2024	GSG	BoA	Review walnut inventory report and spreadsheet for CDFA.	0.50	1,195.00	\$597.50
10/15/2024	GSG	BoA	Email Stapleton Group re TSB arbitration award and motion to vacate.	0.30	1,195.00	\$358.50
10/15/2024	GSG	BoA	Emails to/from G. Kelley re CDFA inventory reporting.	0.20	1,195.00	\$239.00
10/15/2024	GSG	BoA	Email G. Torres re call to discuss TSB history.	0.10	1,195.00	\$119.50
10/15/2024	GSG	BoA	Draft letter to CDFA re walnut and prune reporting and reservations and email Stapleton re same.	1.10	1,195.00	\$1,314.50
10/15/2024	GSG	BoA	Email counsel for secured lenders re CDFA reporting and responses to complaints.	0.40	1,195.00	\$478.00
10/15/2024	GSG	BoA	Draft and finalize documents re TSB: notice of hearing, revised declarations, motion format, exhibits to Response and Notice of Appearance, and proofs of service; confer with M. Renck re signatures and final documents,	2.60	1,195.00	\$3,107.00
10/15/2024	GSG	BoA	Confer with O. Adler re TSB court filing and rules.	0.20	1,195.00	\$239.00
10/15/2024	JDF	BoA	Review ALDI documentation and prepare demand letter re same	1.00	1,395.00	\$1,395.00
10/15/2024	JPN	BoA	Review emails regarding position of CDFA and responding.	0.20	1,195.00	\$239.00
10/15/2024	JPN	BoA	Review responses of Receiver and Grover issues.	0.30	1,195.00	\$358.50
10/15/2024	JPN	BoA	Draft CMC for Valley Pride litigation; Revise; File.	0.40	1,195.00	\$478.00
10/15/2024	JPN	BoA	Telephone conference with G. Greenwood regarding TSB response.	0.20	1,195.00	\$239.00
10/15/2024	JPN	BoA	Review Fresno local rules regarding party in interest.	0.30	1,195.00	\$358.50
10/15/2024	TMK	BoA	Confer with G. Greenwood regarding motion to vacate TSB arbitration award.	0.20	1,195.00	\$239.00
10/15/2024	TMK	BoA	Review and revise declaration in support of motion to vacate TSB award.	0.30	1,195.00	\$358.50
10/16/2024	GSG	BoA	Review Downey Brand motion re dec relief in Tehama court and calendar dates.	0.40	1,195.00	\$478.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/16/2024	GSG	BoA	Prepare CDFA document production and confer with M. Renck re same.	0.80	1,195.00	\$956.00
10/16/2024	GSG	BoA	Draft letter re production of document to CDFA and limitations.	1.10	1,195.00	\$1,314.50
10/16/2024	GSG	BoA	Call and emails to G. Kelley re CDFA reporting.	0.20	1,195.00	\$239.00
10/16/2024	GSG	BoA	Review supplemental email from S. Lavelle/CDFA re reporting and revise response.	0.30	1,195.00	\$358.50
10/16/2024	GSG	BoA	Call and emails with O. Adler re TSB filings in Santa Barbara court.	0.20	1,195.00	\$239.00
10/16/2024	JDF	BoA	Review and analyze grower lawsuit filed in Tehama County; Email to clients re same; Follow email strings re document issues and status of CDFA requests and responses	1.60	1,395.00	\$2,232.00
10/17/2024	GSG	BoA	Follow-up with G. Kelley re CDFA reporting.	0.10	1,195.00	\$119.50
10/17/2024	JDF	BoA	Review notice of producer's lien; Forward same to S. Levitt; Review email from Patterson counsel and forward to client with email discussion;	1.00	1,395.00	\$1,395.00
10/17/2024	JDF	BoA	Follow up with client on Patterson warehouse issues; TC with S. Levitt re pending items; Prepare Derco demand letter for BofA consideration	0.70	1,395.00	\$976.50
10/17/2024	JPN	BoA	Review H&A Charter complaint; Meet with litigation team regarding same.	0.30	1,195.00	\$358.50
10/17/2024	JPN	BoA	Follow-up with Fresno Superior Court regarding October 30., 2024 hearing.	0.10	1,195.00	\$119.50
10/17/2024	JPN	BoA	Meet with litigatoin team regarding CDFA and HA and Farmer's suit in Tehama court.	0.30	1,195.00	\$358.50
10/18/2024	GSG	BoA	Prepare responses to additional CDFA complaints and review relevant documents re enclosures.	1.40	1,195.00	\$1,673.00
10/18/2024	GSG	BoA	Review additional accounting documents and move to CDFA-related files.	0.60	1,195.00	\$717.00
10/18/2024	GSG	BoA	Email L. Belfonte re H&A Charter Farms accounting and CDFA response.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/18/2024	GSG	BoA	Review TSB arbitration communications.	0.20	1,195.00	\$239.00
10/18/2024	GSG	BoA	Draft and send letter to CDFFA re prune report and email client re fee and signature.	0.60	1,195.00	\$717.00
10/18/2024	GSG	BoA	Emails to/from client re CDFFA issues and payment.	0.30	1,195.00	\$358.50
10/18/2024	GSG	BoA	Further updates to litigation summary re CDFFA and labor claims.	0.40	1,195.00	\$478.00
10/18/2024	GSG	BoA	Review email and confer with M. Renck re TSB files.	0.20	1,195.00	\$239.00
10/18/2024	JDF	BoA	Ghost write email to ALDI re payment; Email to counsel re need for privilege protection agreement	0.20	1,395.00	\$279.00
10/18/2024	JPN	BoA	Forward email to G. Greenwood regarding Aesthetic, Inc. complaint.	0.20	1,195.00	\$239.00
10/18/2024	JPN	BoA	Review emails regarding responses of Receiver to liigation.	0.30	1,195.00	\$358.50
10/18/2024	JPN	BoA	Receive email from C. Enders regarding Valley Pride.	0.30	1,195.00	\$358.50
10/21/2024	GSG	BoA	Prepare CDFFA complaint response re Pantaleoni Ranch.	0.30	1,195.00	\$358.50
10/21/2024	GSG	BoA	Prepare CDFFA response letters and enclosures re individual complainants.	2.40	1,195.00	\$2,868.00
10/21/2024	GSG	BoA	Receive grower contracts and finalize CDFFA responses re same.	0.90	1,195.00	\$1,075.50
10/21/2024	JDF	BoA	Follow email strings with CDFFA	0.20	1,395.00	\$279.00
10/21/2024	JPN	BoA	Receive emails regarding grower contracts.	0.10	1,195.00	\$119.50
10/21/2024	JPN	BoA	Review numerous emails regarding status of litigation.	0.30	1,195.00	\$358.50
10/21/2024	JPN	BoA	Review emails regarding CDFFA and Receiver's responses.	0.30	1,195.00	\$358.50
10/21/2024	TMK	BoA	Review status of CDFFA inquiries and confer with G. Greenwood.	0.10	1,195.00	\$119.50
10/21/2024	GSG	BoA	Emails to/from client re additional grower contracts.	0.20	1,195.00	\$239.00
10/22/2024	GSG	BoA	Review current scheduled of CDFFA complaints and email client re additional supporting documents.	0.50	1,195.00	\$597.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/22/2024	GSG	BoA	Emails to/from H. Baydal re CDFA complaints.	0.10	1,195.00	\$119.50
10/22/2024	GSG	BoA	Email M. Renck re CDFA complainant Mumma Bros.	0.10	1,195.00	\$119.50
10/22/2024	GSG	BoA	Call with J. Nolan re litigation status and TSB.	0.30	1,195.00	\$358.50
10/22/2024	GSG	BoA	Review CDFA accounting documents and confer with M. Renck re spreadsheet.	0.30	1,195.00	\$358.50
10/22/2024	GSG	BoA	Emails to/from client re CDFA accounting.	0.20	1,195.00	\$239.00
10/22/2024	JDF	BoA	Work on correspondence to Carriere; Confer with J. Dreher re CDFA proceedings	0.50	1,395.00	\$697.50
10/22/2024	JPN	BoA	Review TSB exchanges.	0.30	1,195.00	\$358.50
10/22/2024	TMK	BoA	Confer with J. Fiero and G. Greenwood regarding TSB litigation.	0.20	1,195.00	\$239.00
10/23/2024	GSG	BoA	Emails to/from Kinsey re TSB actions and change of venue.	0.40	1,195.00	\$478.00
10/23/2024	GSG	BoA	Emails to/from A. Cummings re Holt complaint.	0.10	1,195.00	\$119.50
10/23/2024	GSG	BoA	Confer with J. Nolan re venue and TSB issues.	0.20	1,195.00	\$239.00
10/23/2024	GSG	BoA	Emails to/from L. Belmonte and review requested CDFA documents.	0.30	1,195.00	\$358.50
10/23/2024	JPN	BoA	Draft response regarding Holt answer to complaint.	0.30	1,195.00	\$358.50
10/23/2024	JPN	BoA	Review TSB arguments and offer regarding stipulation to change venue.	0.20	1,195.00	\$239.00
10/23/2024	JPN	BoA	Meet with litigation team regarding same; Draft response regarding approach.	0.40	1,195.00	\$478.00
10/23/2024	JPN	BoA	Draft email to G. Greenwood regarding TSB.	0.30	1,195.00	\$358.50
10/24/2024	JDF	BoA	Work on ALDI deal and report on same to S. Levitt; Revie facts of situation involving Summit Almonds and offset claims	0.60	1,395.00	\$837.00
10/24/2024	JPN	BoA	Meet with VP regarding continuance of CMC for October 30, 2024.	0.20	1,195.00	\$239.00
10/24/2024	JPN	BoA	Review numerous litigation emails; Draft response to litigation team.	0.40	1,195.00	\$478.00
10/24/2024	TMK	BoA	Review status of Valley Pride dispute.	0.20	1,195.00	\$239.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/25/2024	GSG	BoA	Review emails from CDFA re further complaints and extension.	0.10	1,195.00	\$119.50
10/25/2024	JDF	BoA	Work on Turlock storage impeding pending sale of inventory	0.40	1,395.00	\$558.00
10/25/2024	JPN	BoA	Telephone conference with G. Greenwood regarding overall approach with Tehama Superior Court and litigation of lien issues.	0.40	1,195.00	\$478.00
10/28/2024	JDF	BoA	TC with J. Dreher re CDFA campaign and expense; Work on Turlock lien claim, including legal research; Review response to Derco demand letter; Review Turlock storage agreement; Demand email to Tulock arehouse counsel	1.60	1,395.00	\$2,232.00
10/28/2024	JPN	BoA	Telephone conference with litigation team regarding WIP.	0.70	1,195.00	\$836.50
						\$
10/29/2024	GSG	BoA	Review email from K. Azlin re limited objection to pending motion and email J. Fiero re same.	0.10	1,195.00	\$119.50
10/29/2024	GSG	BoA	Emails to/from D. Burger re TSB service of arbitration petition.	0.10	1,195.00	\$119.50
10/29/2024	GSG	BoA	Calls with C. Enders and G. Kelley re CDFA licensing.	0.30	1,195.00	\$358.50
10/30/2024	GSG	BoA	Email to/from client and company re CDFA licensing, document support, and status.	0.60	1,195.00	\$717.00
10/30/2024	GSG	BoA	Review licensing application and instruction re CDFA requirements and statutory basis.	0.40	1,195.00	\$478.00
10/30/2024	JPN	BoA	Meet with N. Brown regarding status of Lis Pendens filing.	0.20	1,195.00	\$239.00
10/30/2024	JPN	BoA	Meet with G. Greenwood regarding Stainles Aesthetics lien.	0.20	1,195.00	\$239.00
10/30/2024	JPN	BoA	Exchange emails with R. Muzzin regarding Plaintiff, Stainless Aesthetics.	0.20	1,195.00	\$239.00
10/30/2024	JPN	BoA	Meet with G. Greenwood regarding assets and Tehama court proceedings.	0.20	1,195.00	\$239.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/30/2024	JPN	BoA	Review email and pleadings from Dept. of Agriculture.	0.20	1,195.00	\$239.00
10/31/2024	GSG	BoA	Email K. Azlin re confidentiality and scheduling.	0.10	1,195.00	\$119.50
10/31/2024	GSG	BoA	Review TSB arbitration pleadings received from former counsel.	1.40	1,195.00	\$1,673.00
10/31/2024	GSG	BoA	Review/revise proposed confidentiality agreement re record inspection and prepare blackline re same.	0.70	1,195.00	\$836.50
10/31/2024	JPN	BoA	Exchange emails with R. Stoner; Telephone conference with R.S. regarding lis pendens	0.40	1,195.00	\$478.00
				<b>101.90</b>		<b>\$126,390.00</b>
<b>General</b>						
10/01/2024	GSG	GEN	Email J. Nolan re hearing scheduling and proposed email to secured lenders.	0.50	1,195.00	\$597.50
10/01/2024	GSG	GEN	Emails to/from J. Diiorio re labor claims.	0.10	1,195.00	\$119.50
10/01/2024	GSG	GEN	Email T. Kapur, J. Fiero, and J. Nolan re litigation status and agenda.	0.20	1,195.00	\$239.00
10/01/2024	GSG	GEN	Email secured creditors re writ hearing and pending motions on 11/19.	0.20	1,195.00	\$239.00
10/01/2024	GSG	GEN	Confer with M. Renck re additional complaints from D. Burger.	0.20	1,195.00	\$239.00
10/01/2024	GSG	GEN	Confer with P. Jeffries re Turlock letter.	0.10	1,195.00	\$119.50
10/01/2024	GSG	GEN	Email J. Fiero and T. Kapur re Sacramento litigation.	0.20	1,195.00	\$239.00
10/01/2024	TMK	GEN	Participate in case status and strategy call with Stapleton team.	0.80	1,195.00	\$956.00
10/01/2024	JPN	GEN	Review emails regarding status of pending litigation.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/02/2024	GSG	GEN	Email R. Hause-Shultz re engagement and claims.	0.10	1,195.00	\$119.50
10/02/2024	TMK	GEN	Confer with Stapleton and J. Fiero regarding recovery analysis.	0.10	1,195.00	\$119.50
10/02/2024	TMK	GEN	Confer with J. Fiero and GSFC regarding receiver certificates.	0.10	1,195.00	\$119.50
10/02/2024	TMK	GEN	Confer with B. Hering regarding case status.	0.40	1,195.00	\$478.00
10/03/2024	GSG	GEN	Emails to/from P. Jeffries and M. Renck re Turlock correspondence.	0.10	1,195.00	\$119.50
10/03/2024	JDF	GEN	Prepare for and participate in team status call; Prepare email seeking lien and debt information from secured lenders	1.50	1,395.00	\$2,092.50
10/03/2024	PJJ	GEN	Prepare post receivership letter (Turlock).	0.30	595.00	\$178.50
10/03/2024	TMK	GEN	Prepare for and participate in status call with receiver.	0.60	1,195.00	\$717.00
10/04/2024	GSG	GEN	Emails to PSZJ team re scheduling and litigation agenda.	0.30	1,195.00	\$358.50
10/04/2024	GSG	GEN	Review client share files and updated summary of litigation received by client.	0.50	1,195.00	\$597.50
10/04/2024	GSG	GEN	Review PR Farms complaint and email J. Fiero re default request and answer.	0.40	1,195.00	\$478.00
10/04/2024	GSG	GEN	Review CCP and prepare answer and notice re PR Farms complaint.	0.60	1,195.00	\$717.00
10/04/2024	GSG	GEN	Receive and review summons re Kiva Energy and call with plaintiff's counsel re complaint.	0.30	1,195.00	\$358.50
10/04/2024	GSG	GEN	Revise/update litigation spreadsheet re additional litigation.	0.30	1,195.00	\$358.50
10/04/2024	GSG	GEN	Confer with M. Renck re service and filing of PR Farms Answer.	0.10	1,195.00	\$119.50
10/04/2024	GSG	GEN	Conference call with J. Fiero, T. Kapur, and J. Nolan re litigation status and agenda items.	0.50	1,195.00	\$597.50
10/04/2024	GSG	GEN	Review engagement letter and email J. Fiero re Fisher Phillips and client shared files.	0.30	1,195.00	\$358.50
10/04/2024	GSG	GEN	Receiver and review Kiva Energy complaint and POS and email team re same.	0.30	1,195.00	\$358.50
10/04/2024	JPN	GEN	Review Kiva Energy; Draft email regarding indemnity issue.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/04/2024	JDF	GEN	Follow email strings re pending litigation issues; Team zoom call with G. Greenwood et al re pending litigation issues	0.90	1,395.00	\$1,255.50
10/04/2024	JPN	GEN	Meet with G. Greenwood regarding unverified complaints.	0.20	1,195.00	\$239.00
10/04/2024	JPN	GEN	Telephone conference with litigation team regarding WIP, litigation matrix and status.	0.30	1,195.00	\$358.50
10/04/2024	TMK	GEN	Participate in status and strategy call with Receiver; review debt schedule.	0.60	1,195.00	\$717.00
10/04/2024	TMK	GEN	Confer with R. Pachulski regarding case status.	0.20	1,195.00	\$239.00
10/05/2024	TMK	GEN	Confer with Stapleton team regarding Andersen rent requests.	0.10	1,195.00	\$119.50
10/07/2024	GSG	GEN	Email D. Burger re shared files for secured lenders.	0.20	1,195.00	\$239.00
10/07/2024	GSG	GEN	Confer with M. Renck re Holt litigation and review additional pleadings re service.	0.40	1,195.00	\$478.00
10/07/2024	GSG	GEN	Brief review of guarantor claims and secondary liability.	0.20	1,195.00	\$239.00
10/07/2024	GSG	GEN	Emails to/from T. Keller re guarantor litigation.	0.30	1,195.00	\$358.50
10/07/2024	GSG	GEN	Confer with L. Forrester re arbitration award procedures.	0.10	1,195.00	\$119.50
10/07/2024	GSG	GEN	Email client re labor law claims and engagement of Fisher & Phillips.	0.30	1,195.00	\$358.50
10/07/2024	GSG	GEN	Brief research re CCP 1280 et seq re arbitration award confirmation/objections.	0.70	1,195.00	\$836.50
10/07/2024	GSG	GEN	Email D. Burger re additional files for shared litigation file.	0.20	1,195.00	\$239.00
10/07/2024	GSG	GEN	Brief review of waiver/subordination of producer liens under CA Food & Ag Code.	0.60	1,195.00	\$717.00
10/07/2024	JDF	GEN	Review the correspondence from D&O carrier (ten letters); Review complaint re: P. Andersen; Review litigation summary and related materials	1.20	1,395.00	\$1,674.00
10/08/2024	GSG	GEN	Confer with L. Forrester re producer lien authority.	0.30	1,195.00	\$358.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/08/2024	GSG	GEN	Emails to/from B. Landoll and team re Patterson Electric.	0.20	1,195.00	\$239.00
10/08/2024	JDF	GEN	Prepare for and participate in weekly team status call; Confer with G. Greenwood re arbitration matters; Review complaint filed by Patterson Electric	1.00	1,395.00	\$1,395.00
10/08/2024	JDF	GEN	Confer re arbitration matters; TC with counsel for solar energy vendor; Report to clients re same; Follow emails regarding arbitration confirmation	0.80	1,395.00	\$1,116.00
10/08/2024	JPN	GEN	Review CRC and CCP regarding Notice of Motion/hearing.	0.40	1,195.00	\$478.00
10/08/2024	LAF	GEN	Legal research re: Stanislaus County docket.	0.30	645.00	\$193.50
10/08/2024	LAF	GEN	Legal research re: Sample motions to vacate arbitration award.	0.80	645.00	\$516.00
10/08/2024	TMK	GEN	Prepare for and participate in status call with receiver.	0.60	1,195.00	\$717.00
10/09/2024	GSG	GEN	Review AMD decision re judicial review of private arbitration.	0.60	1,195.00	\$717.00
10/09/2024	GSG	GEN	Research/review additional cases re CCP 1286.2 and vacatur of arbitration decision.	2.10	1,195.00	\$2,509.50
10/09/2024	JDF	GEN	Work on Cornerstone PMSI lien claim; Work on BMO forklift issues; Review and analyze issue response from Jenkins	0.90	1,395.00	\$1,255.50
10/09/2024	TMK	GEN	Confer with J. Fiero and E. Friedman regarding receiver certificates.	0.20	1,195.00	\$239.00
10/10/2024	GSG	GEN	Email from/to counsel for BCM Construction re amended complaint.	0.10	1,195.00	\$119.50
10/10/2024	JDF	GEN	TC with BMO re forklifts; Confer with clients re forklifts; Team call with Stapleton re pending items.	0.90	1,395.00	\$1,255.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/10/2024	GSG	GEN	Draft/revise letter to claimant re post-receivership litigation and confer with M. Renck re interested parties.	0.40	1,195.00	\$478.00
10/10/2024	TMK	GEN	Participate in status call with receiver.	0.60	1,195.00	\$717.00
10/11/2024	GSG	GEN	Emails and call from E. McDonough re Patterson Electric complaint.	0.40	1,195.00	\$478.00
10/11/2024	GSG	GEN	Review PR Farms docket and calls to/from counsel (M. Titus) re relief from default.	0.50	1,195.00	\$597.50
10/11/2024	GSG	GEN	Call with C. Enders, L. Belmonte, G. Kelley, and J. Fiero re internal accounting and documents.	0.70	1,195.00	\$836.50
10/11/2024	GSG	GEN	Call with L. Belmonte re accounting documents and review samples.	0.60	1,195.00	\$717.00
10/11/2024	GSG	GEN	Revise and update litigation summary and email secured lenders re same.	0.60	1,195.00	\$717.00
10/11/2024	GSG	GEN	Review Rutter Guide forms re procedures to vacate arbitration award.	0.70	1,195.00	\$836.50
10/13/2024	GSG	GEN	Review CCP re response contents and draft response to verified petition and verification.	1.10	1,195.00	\$1,314.50
10/13/2024	GSG	GEN	Conform pleadings and T. Kapur and DJS declarations re response to petition and motion to vacate.	0.70	1,195.00	\$836.50
10/13/2024	GSG	GEN	Email from/to Kinsey re service of petition to confirm arbitration award.	0.10	1,195.00	\$119.50
10/13/2024	GSG	GEN	Review emails from L. Belmonte re accounting documents.	0.20	1,195.00	\$239.00
10/14/2024	GSG	GEN	Emails to/from client re additional default notices, and internal emails re same.	0.30	1,195.00	\$358.50
10/14/2024	GSG	GEN	Revise motion to vacate re caselaw requiring court approval to withdraw from representation.	0.70	1,195.00	\$836.50
10/14/2024	GSG	GEN	Review J. Fiero comments and revise Stapleton declaration to conform.	0.40	1,195.00	\$478.00
10/14/2024	GSG	GEN	Review Lentec complaint re mechanics lien, email secured lenders, and prepare post-receivership letter.	0.40	1,195.00	\$478.00
10/14/2024	GSG	GEN	Review/revise motion to vacate re final edits.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/14/2024	PJJ	GEN	Draft letter to post-receivership plaintiff Lentec.	0.20	595.00	\$119.00
10/14/2024	TMK	GEN	Confer with J. Fiero and E. Friedman regarding receiver certificates.	0.20	1,195.00	\$239.00
10/15/2024	GSG	GEN	Emails to/from client and T. Kapur re litigation status and reporting.	0.30	1,195.00	\$358.50
10/15/2024	GSG	GEN	Review emails from client re insurer on notice of claims.	0.10	1,195.00	\$119.50
10/15/2024	GSG	GEN	Confer with T. Kapur re receivership status, litigation, and timeline.	0.30	1,195.00	\$358.50
10/15/2024	GSG	GEN	Email Hause-Schultz re Alcaraz claim and treatment of post-receivership claims.	0.20	1,195.00	\$239.00
10/15/2024	JDF	GEN	TC with B. Landoll re settlement of dispute; Prepare "ghosted" letter for client re same	0.20	1,395.00	\$279.00
10/15/2024	TMK	GEN	Confer with Stapleton regarding receiver interim report.	0.20	1,195.00	\$239.00
10/15/2024	TMK	GEN	Confer with Stapleton and G. Greenwood about recording receivership order.	0.30	1,195.00	\$358.50
10/16/2024	GSG	GEN	Confer with J. Fiero re financial reporting.	0.10	1,195.00	\$119.50
10/16/2024	GSG	GEN	Emails to/from J. Nolan re labor claims.	0.20	1,195.00	\$239.00
10/16/2024	GSG	GEN	Email to/from Stainless Aesthetics counsel re complaint and copy of receivership order.	0.40	1,195.00	\$478.00
10/16/2024	GSG	GEN	Emails to/from T.Kapur and client re recordation of receivership order.	0.20	1,195.00	\$239.00
10/16/2024	GSG	GEN	Review further email re service of complaint and lis pendens re Stainless Aesthetics.	0.20	1,195.00	\$239.00
10/16/2024	GSG	GEN	Revise letter re walnut handler report and email client re fee assessment and signatures.	0.40	1,195.00	\$478.00
10/16/2024	GSG	GEN	Telephone calls to B. Landoll and J. Diiorio re handler reports and further emails re same.	0.30	1,195.00	\$358.50
10/16/2024	GSG	GEN	Review Pape complaint and send post-receivership letter re order and leave of court.	0.30	1,195.00	\$358.50
10/16/2024	GSG	GEN	Email S. LaVelle re walnut handler data and cover letter.	0.20	1,195.00	\$239.00
10/16/2024	JPN	GEN	Review complaint, lis pendens and mechanic's lien regarding Plaintiff, Stainless Aesthetics.	0.40	1,195.00	\$478.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/16/2024	JDF	GEN	Work on D&O insurer issues and insurance company correspondence; Review pending litigation summary	0.70	1,395.00	\$976.50
10/16/2024	PJJ	GEN	Prepare receivership letter regarding PAPE.	0.20	595.00	\$119.00
10/16/2024	TMK	GEN	Confer with G. Greenwood regarding case status and tasks.	0.30	1,195.00	\$358.50
10/16/2024	TMK	GEN	Confer with R. Muzzin regarding revisions to receiver certificates and coordinate execution.	0.40	1,195.00	\$478.00
10/16/2024	TMK	GEN	Confer with Stapleton and G. Greenwood regarding recording receivership order.	0.20	1,195.00	\$239.00
10/17/2024	GSG	GEN	Review labor claims for call with R. Hause-Schultz.	0.60	1,195.00	\$717.00
10/17/2024	GSG	GEN	Call with D. Burger re litigation summary and shared files.	0.20	1,195.00	\$239.00
10/17/2024	GSG	GEN	Brief review of secured creditor discovery demand.	0.10	1,195.00	\$119.50
10/17/2024	GSG	GEN	Review additional complaints and revise/update litigation summary.	0.50	1,195.00	\$597.50
10/17/2024	GSG	GEN	Review emails from J. Diiorio and default letters from Nuveen/Liu.	0.30	1,195.00	\$358.50
10/17/2024	GSG	GEN	Call with R. Hause-Schultz re labor claims and strategy.	0.50	1,195.00	\$597.50
10/17/2024	GSG	GEN	Email client re WARN Act issues.	0.50	1,195.00	\$597.50
10/17/2024	GSG	GEN	Confer with M. Renck re changes to litigation summary.	0.20	1,195.00	\$239.00
10/17/2024	GSG	GEN	Review and respond to grower letter re lien priority.	0.70	1,195.00	\$836.50
10/17/2024	GSG	GEN	Review order re resolution of lien disputes and email re same.	0.30	1,195.00	\$358.50
10/17/2024	GSG	GEN	Confer re master service list.	0.20	1,195.00	\$239.00
10/17/2024	JDF	GEN	Prepare for and participate in weekly legal call	1.00	1,395.00	\$1,395.00
10/17/2024	TMK	GEN	Confer with Stapleton and GSFC regarding revised receiver certificates.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/17/2024	TMK	GEN	Participate in call with receiver regarding case tasks.	0.60	1,195.00	\$717.00
10/18/2024	GSG	GEN	Finalize and send response letter to Soares.	0.10	1,195.00	\$119.50
10/18/2024	GSG	GEN	Call with G. Torres re arbitration history and request for pleading file.	0.80	1,195.00	\$956.00
10/18/2024	GSG	GEN	Follow-up email to G. Torres re files.	0.10	1,195.00	\$119.50
10/18/2024	GSG	GEN	Email client re Andersen individuals and potential indemnification demands.	0.30	1,195.00	\$358.50
10/18/2024	GSG	GEN	Confer with J. Fiero re insurance issues.	0.20	1,195.00	\$239.00
10/18/2024	GSG	GEN	Draft letter to Abramson Law re employee demands.	0.70	1,195.00	\$836.50
10/18/2024	GSG	GEN	Email counsel to secured lenders re litigation summary and recent actions.	0.30	1,195.00	\$358.50
10/18/2024	JDF	GEN	Work on forklift issues; Email to BMO re same	0.30	1,395.00	\$418.50
10/18/2024	TMK	GEN	Confer with Receiver regarding recordation of receivership order .	0.10	1,195.00	\$119.50
10/20/2024	TMK	GEN	Confer with Stapleton and R. Stoner regarding receiver certificates.	0.20	1,195.00	\$239.00
10/21/2024	GSG	GEN	Review email and subpoena re Alcaraz, call with Hause-Schultz, and email client re response.	0.30	1,195.00	\$358.50
10/21/2024	GSG	GEN	Review second amended complaint of BCM and email/stipulation to amend.	0.50	1,195.00	\$597.50
10/21/2024	GSG	GEN	Revise stipulation and order re BCM, prepare blackline, and email Tilbury.	1.00	1,195.00	\$1,195.00
10/21/2024	GSG	GEN	Review Badyal email re late complaint responses and confer with M. Renck re same.	0.30	1,195.00	\$358.50
10/21/2024	GSG	GEN	Review insurance correspondence and confer with J. Fiero re same.	0.30	1,195.00	\$358.50
10/21/2024	GSG	GEN	Emails to/from client re Palomar policy and calendar notice deadline.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/21/2024	GSG	GEN	Review walnut assessment report, emails to/from client re signature, and email P. Dotson et al. re submission.	0.40	1,195.00	\$478.00
10/21/2024	GSG	GEN	Email P. Dotson/R. Verloop re reporting.	0.10	1,195.00	\$119.50
10/21/2024	JDF	GEN	Confer with BMO re forklifts; Confer with G. Greenwood re D&O issues; Review D&O letter from carrier and analyze same; Respond to creditor inquiry re status; Email to D&O carrier; TC with G. Greenwood re status	1.40	1,395.00	\$1,953.00
10/21/2024	TMK	GEN	Confer with Stapleton and R. Stoner regarding receiver certificates.	0.20	1,195.00	\$239.00
10/22/2024	GSG	GEN	Review Kinsey email re venue and Sacramento complaint, and emails re same.	0.40	1,195.00	\$478.00
10/22/2024	JDF	GEN	Follow up on solar panel payments; Confer with G, Greenwood re request to transfer to Tehama county	0.40	1,395.00	\$558.00
10/22/2024	JPN	GEN	Telephone conference with G. Greenwood regarding venue transfer request and D/B motion to Superior Court; Tehamea.	0.40	1,195.00	\$478.00
10/22/2024	JPN	GEN	Review various emails regarding procedural issues and Tehamea Superior Court.	0.30	1,195.00	\$358.50
10/23/2024	GSG	GEN	Draft verified answer to complaint of Holt of California.	1.30	1,195.00	\$1,553.50
10/23/2024	GSG	GEN	Draft letter to CDFA re revised Hart computation.	0.20	1,195.00	\$239.00
10/23/2024	GSG	GEN	Emails to/from Tilbury re BCM stipulation to filed second amended complaint.	0.20	1,195.00	\$239.00
10/23/2024	GSG	GEN	Emails from company and R. Hause-Schultz re additional labor claims.	0.20	1,195.00	\$239.00
10/23/2024	GSG	GEN	Prepare letter to Aegis law firm re proposed class action and pending receivership.	0.40	1,195.00	\$478.00
10/23/2024	GSG	GEN	Confer with J. Fiero re Holt and verified answer.	0.20	1,195.00	\$239.00
10/23/2024	GSG	GEN	Draft/revise additional affirmative defenses and verification re Holt answer.	0.70	1,195.00	\$836.50
10/23/2024	GSG	GEN	Confer with M. Renck re filing and service of Holt answer.	0.20	1,195.00	\$239.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/23/2024	GSG	GEN	Review revised stipulation re BCM complaint and emails to/from Tilbury re same.	0.30	1,195.00	\$358.50
10/23/2024	GSG	GEN	Confer with L. Forrester re mechanic lien research.	0.10	1,195.00	\$119.50
10/23/2024	GSG	GEN	Review newly served complaints and emails to/from D. Burger re same.	0.20	1,195.00	\$239.00
10/23/2024	GSG	GEN	Emails to/from T. Kapur and J. Nolan re litigation status.	0.10	1,195.00	\$119.50
10/23/2024	JDF	GEN	Prepare for and participate in Team legal issues call; Email to RSB counsel re venue questions; Common on Holt answer draft; Follow up re Turlock storage facility	1.40	1,395.00	\$1,953.00
10/23/2024	TMK	GEN	Confer with E. Kingsley and G. Greenwood regarding class action litigation.	0.20	1,195.00	\$239.00
10/24/2024	TMK	GEN	Prepare for and participate in status call with receiver.	0.70	1,195.00	\$836.50
10/25/2024	GSG	GEN	Update and email litigation summary to secured creditors.	0.30	1,195.00	\$358.50
10/25/2024	GSG	GEN	Confer re filing of answer and docket re request for dismissal.	0.20	1,195.00	\$239.00
10/25/2024	GSG	GEN	Review letter from G. Torres re Andersen individual indemnity claims and confer with J. Fiero re status and call agenda.	0.20	1,195.00	\$239.00
10/25/2024	JPN	GEN	Exchange emails regarding WIP meeting on October 28, 2024.	0.20	1,195.00	\$239.00
10/25/2024	JPN	GEN	Review litigation summary.	0.20	1,195.00	\$239.00
10/25/2024	TMK	GEN	Confer with G. Greenwood and E. Kingsley regarding class action lawsuit.	0.60	1,195.00	\$717.00
10/27/2024	JPN	GEN	Pull case law on venue transfers.	0.50	1,195.00	\$597.50
10/28/2024	GSG	GEN	Review litigation status re active cases and strategy.	0.30	1,195.00	\$358.50
10/28/2024	GSG	GEN	Call with P. Gorman re BCM litigation and 90-day stay.	0.20	1,195.00	\$239.00
10/28/2024	GSG	GEN	Review Master Packaging complaint and prepare post-receivership letter re leave of court.	0.40	1,195.00	\$478.00
10/28/2024	JPN	GEN	Review numerous emails regarding administrative actions.	0.30	1,195.00	\$358.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/28/2024	GSG	GEN	Review Nuveen defaults and demand letters and prepare post-receivership letter.	0.60	1,195.00	\$717.00
10/28/2024	GSG	GEN	Conference call with J. Fiero, T. Kapur, and J. Nolan re litigation status, including venue and lien priority disputes.	0.70	1,195.00	\$836.50
10/28/2024	GSG	GEN	Draft stipulation and order re P-R Farms and relief from default and stay of litigation.	1.00	1,195.00	\$1,195.00
10/28/2024	GSG	GEN	Review indemnity letter and conflict issues re Torres/KPC, and call with Torres.	0.60	1,195.00	\$717.00
10/28/2024	GSG	GEN	Review mechanic lien issues and timing re BCM and related cases and brief research re same.	0.70	1,195.00	\$836.50
10/28/2024	GSG	GEN	Finalize stipulation and order re P-R Farms and email counsel re same.	0.40	1,195.00	\$478.00
10/28/2024	JDF	GEN	Litigation team strategy call; Work on former counsel's conflict of interest question with G. Greenwood	1.10	1,395.00	\$1,534.50
10/28/2024	TMK	GEN	Participate in call regarding pending litigation.	0.80	1,195.00	\$956.00
10/29/2024	GSG	GEN	Call with G. Torres re indemnity claim and conflict.	0.20	1,195.00	\$239.00
10/29/2024	GSG	GEN	Call and email client re CDFA licensing.	0.20	1,195.00	\$239.00
10/29/2024	GSG	GEN	Review letter from Tilbury re BCM and email client re same.	0.20	1,195.00	\$239.00
10/29/2024	GSG	GEN	Review stipulation and corrected notice for filing re BCM.	0.10	1,195.00	\$119.50
10/29/2024	JDF	GEN	Review and forward claim from BCM	0.20	1,395.00	\$279.00
10/29/2024	JPN	GEN	Review pleadings with Stainless Aesthetics.	0.30	1,195.00	\$358.50
10/29/2024	JPN	GEN	Review emails regarding mechanic's lien issues.	0.20	1,195.00	\$239.00
10/29/2024	JPN	GEN	Review complaint summary of pending litigation.	0.20	1,195.00	\$239.00
10/30/2024	GSG	GEN	Emails from/to R. Muzzin re litigation and shared files.	0.20	1,195.00	\$239.00
10/30/2024	GSG	GEN	Emails from/to creditor attorney re receivership order and priority lien dispute.	0.20	1,195.00	\$239.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/30/2024	GSG	GEN	Review documents re labor claims and settlement and email R. H-Schultz re proposed scheduling.	0.50	1,195.00	\$597.50
10/30/2024	GSG	GEN	Emails from/to J. Fiero re Blue Diamond communications.	0.20	1,195.00	\$239.00
10/30/2024	GSG	GEN	Review docket re BofA action and issues re courtesy NEF.	0.30	1,195.00	\$358.50
10/30/2024	GSG	GEN	Call with J. Nolan re lis pendens allegations by Stainless Aesthetics.	0.10	1,195.00	\$119.50
10/30/2024	JDF	GEN	Respond to creditor inquiries; Work with BMO on forklift questions	0.60	1,395.00	\$837.00
10/30/2024	LAF	GEN	Legal research re: Courtesy NEF.	0.50	645.00	\$322.50
10/31/2024	GSG	GEN	Confer with M. Renck re NEF notice and BofA docket.	0.10	1,195.00	\$119.50
10/31/2024	GSG	GEN	Research re indemnification under Labor Code 2802 et seq and Corporations Code.	1.80	1,195.00	\$2,151.00
10/31/2024	GSG	GEN	Review Food and Ag Code re additional indemnity provisions.	0.40	1,195.00	\$478.00
10/31/2024	GSG	GEN	Review indemnity demand and prepare response to KPC re Andersen individuals.	2.90	1,195.00	\$3,465.50
10/31/2024	GSG	GEN	Email P. Gorman re P-R Farms stipulation.	0.10	1,195.00	\$119.50
10/31/2024	JDF	GEN	Prepare for and participate in legal call; Review pending litigation schedule; Confer with G. Greenwood re same; Review warehouse lease questions	1.80	1,395.00	\$2,511.00
10/31/2024	TMK	GEN	Confer with Stapleton and review funding request.	0.10	1,195.00	\$119.50
10/31/2024	TMK	GEN	Prepare for and participate in status call.	0.70	1,195.00	\$836.50
				<b>83.80</b>		<b>\$102,101.00</b>

**GSFC**

			.			\$
10/01/2024	JDF	GSFC	Confer with counsel re amendments to receiver's certificate language; draft language; Review UCC-1 files	1.70	1,395.00	\$2,371.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/02/2024	JDF	GSFC	Review attorney email re Clementino; Confer with counsel re Clementino status	0.70	1,395.00	\$976.50
10/02/2024	TMK	GSFC	Confer with Stapleton and GSFC regarding sale of Clementino property.	0.20	1,195.00	\$239.00
10/03/2024	JDF	GSFC	Analyze liens re A Butter World and communicate with client re same	0.80	1,395.00	\$1,116.00
10/03/2024	TMK	GSFC	Confer with A. Stewart regarding Finch dispute.	0.10	1,195.00	\$119.50
10/04/2024	TMK	GSFC	Participate in standing call with receiver and GSFC.	0.80	1,195.00	\$956.00
10/04/2024	TMK	GSFC	Confer with J. Fiero and Receiver regarding Clementino dispute.	0.10	1,195.00	\$119.50
10/08/2024	JDF	GSFC	Prepare for and participate in call with E. Friedman; Confer with J. Diiorio re matters raised by Sierra Constellation	0.80	1,395.00	\$1,116.00
10/09/2024	JDF	GSFC	Email to clients re discussion with GSFC counsel; TC with T. Mehr, counsel to Clementino; Email to E. Friedman re same; Confer with client re Clementino; Work on revisions to Receiver's Certificates and send same to E. Friedman	1.60	1,395.00	\$2,232.00
10/11/2024	GSG	GSFC	Email to/from R. Muzzin re Patterson Electric.	0.10	1,195.00	\$119.50
10/11/2024	TMK	GSFC	Confer with G. Greenwood regarding Patterson Electric dispute.	0.20	1,195.00	\$239.00
10/16/2024	GSG	GSFC	Email to/from R. Muzzin re BCM complaint and status.	0.10	1,195.00	\$119.50
10/16/2024	GSG	GSFC	Call with R. Muzzin re recordation of receivership order and response to mechanic lien complaints.	0.20	1,195.00	\$239.00
10/16/2024	JDF	GSFC	Follow up on Clementino issues and ability to sell free and clear; Review revised form of receiver's certificates from GSFC	0.70	1,395.00	\$976.50
10/22/2024	GSG	GSFC	Call with R. Muzzin re litigation status and complaints.	0.40	1,195.00	\$478.00
10/25/2024	JDF	GSFC	TC with R. Muzzin; Email to G. Greenwood re litigation status	0.50	1,395.00	\$697.50
10/25/2024	TMK	GSFC	Participate in standing call with GSFC.	0.50	1,195.00	\$597.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/29/2024	GSG	GSFC	Review lien recordations re mechanic lien claimants and timing and email summary to team.	0.70	1,195.00	\$836.50
				<u>10.20</u>		<u>\$13,549.00</u>

**TOTAL SERVICES FOR THIS MATTER:**

**\$257,562.50**

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**Expenses**

09/17/2024	CC	AT&T Conference Call, GSG	3.14
10/01/2024	RE	SCAN/COPY ( 3 @0.10 PER PG)	0.30
10/01/2024	RE	SCAN/COPY ( 86 @0.10 PER PG)	8.60
10/01/2024	RE	SCAN/COPY ( 18 @0.10 PER PG)	1.80
10/01/2024	RE	SCAN/COPY ( 18 @0.10 PER PG)	1.80
10/02/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/03/2024	PO	PSZJ SF, Mail log	2.59
10/03/2024	RE	( 11 @0.20 PER PG)	2.20
10/03/2024	RE	( 11 @0.20 PER PG)	2.20
10/03/2024	RE	( 25 @0.20 PER PG)	5.00
10/03/2024	RE	( 168 @0.20 PER PG)	33.60
10/03/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/03/2024	RE	SCAN/COPY ( 52 @0.10 PER PG)	5.20
10/04/2024	PO	PSZJ SF, Mail log	0.69
10/04/2024	LN	81001.00001 Lexis Charges for 10-04-24	56.37
10/04/2024	LN	81001.00001 Lexis Charges for 10-04-24	10.62
10/04/2024	RE	SCAN/COPY ( 4 @0.10 PER PG)	0.40
10/04/2024	RE	SCAN/COPY ( 5 @0.10 PER PG)	0.50
10/07/2024	LN	81001.00001 Lexis Charges for 10-07-24	45.84
10/07/2024	LN	81001.00001 Lexis Charges for 10-07-24	37.18
10/08/2024	FE	81001.00001 FedEx Charges for 10-08-24	29.42
10/08/2024	BB	81001.00001 Bloomberg Charges through 10-08-24	40.00
10/08/2024	BB	81001.00001 Bloomberg Charges through 10-08-24	26.60
10/08/2024	BB	81001.00001 Bloomberg Charges through 10-08-24	10.00
10/08/2024	BB	81001.00001 Bloomberg Charges through 10-08-24	10.00
10/08/2024	BB	81001.00001 Bloomberg Charges through 10-08-24	10.00
10/08/2024	BB	81001.00001 Bloomberg Charges through 10-08-24	10.00
10/08/2024	RE	SCAN/COPY ( 34 @0.10 PER PG)	3.40

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10/08/2024	RE	SCAN/COPY ( 46 @0.10 PER PG)	4.60
10/08/2024	RE	SCAN/COPY ( 11 @0.10 PER PG)	1.10
10/08/2024	RE	SCAN/COPY ( 12 @0.10 PER PG)	1.20
10/08/2024	RE	SCAN/COPY ( 6 @0.10 PER PG)	0.60
10/08/2024	RE	SCAN/COPY ( 9 @0.10 PER PG)	0.90
10/08/2024	RE	SCAN/COPY ( 60 @0.10 PER PG)	6.00
10/08/2024	RE	SCAN/COPY ( 28 @0.10 PER PG)	2.80
10/08/2024	RE	SCAN/COPY ( 11 @0.10 PER PG)	1.10
10/08/2024	RE	SCAN/COPY ( 20 @0.10 PER PG)	2.00
10/08/2024	RE	SCAN/COPY ( 8 @0.10 PER PG)	0.80
10/08/2024	RE	SCAN/COPY ( 44 @0.10 PER PG)	4.40
10/08/2024	RE	SCAN/COPY ( 14 @0.10 PER PG)	1.40
10/09/2024	OS	One Legal, outside Service	470.51
10/09/2024	LN	81001.00001 Lexis Charges for 10-09-24	152.80
10/10/2024	RE	SCAN/COPY ( 17 @0.10 PER PG)	1.70
10/10/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/10/2024	RE	SCAN/COPY ( 3 @0.10 PER PG)	0.30
10/10/2024	RE	SCAN/COPY ( 7 @0.10 PER PG)	0.70
10/10/2024	RE	SCAN/COPY ( 1 @0.10 PER PG)	0.10
10/10/2024	FF	One Legal, Superior Court of California Fresno, Notice of Hearing, TMK	19.31
10/11/2024	PO	PSZJ SF, Mail log	2.87
10/11/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/11/2024	RE	SCAN/COPY ( 14 @0.10 PER PG)	1.40
10/15/2024	PO	PSZJ SF, Mail log	2.87
10/15/2024	RE	SCAN/COPY ( 52 @0.10 PER PG)	5.20
10/15/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/15/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/16/2024	PO	Postage	32.00
10/16/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20

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10/16/2024	RE	SCAN/COPY ( 52 @0.10 PER PG)	5.20
10/16/2024	FF	One Legal, Superior Court of California Santa Barbara, Filing Fee, TMK	15.44
10/16/2024	FF	One Legal, Superior Court of California Fresno, Filing Fee, TMK	19.31
10/17/2024	PO	Postage	32.00
10/17/2024	RE	SCAN/COPY ( 92 @0.10 PER PG)	9.20
10/17/2024	RE	SCAN/COPY ( 21 @0.10 PER PG)	2.10
10/17/2024	RE	SCAN/COPY ( 4 @0.10 PER PG)	0.40
10/17/2024	RE	SCAN/COPY ( 4 @0.10 PER PG)	0.40
10/18/2024	PO	PSZJ SF, Mail log	2.87
10/18/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/18/2024	RE	SCAN/COPY ( 52 @0.10 PER PG)	5.20
10/21/2024	PO	PSZJ SF, Mail log	2.59
10/21/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/21/2024	RE	SCAN/COPY ( 52 @0.10 PER PG)	5.20
10/21/2024	RE	SCAN/COPY ( 1 @0.10 PER PG)	0.10
10/21/2024	FF	One Legal, Superior Court of California Santa Barbara, Filing Fee, TMK	114.81
10/21/2024	FF	One Legal, Superior Court of California Santa Barbara, Filing Fee, TMK	20.86
10/23/2024	FF	Filing fee for response to PAGA	75.00
10/28/2024	PO	PSZJ SF, Mail log	2.87
10/28/2024	RE	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/28/2024	RE	SCAN/COPY ( 23 @0.10 PER PG)	2.30
10/28/2024	RE	SCAN/COPY ( 52 @0.10 PER PG)	5.20
10/28/2024	RE	SCAN/COPY ( 18 @0.10 PER PG)	1.80
10/30/2024	PO	PSZJ SF, Mail log	2.07
10/30/2024	BB	81001.00001 Bloomberg Charges through 10-30-24	0.20
10/30/2024	BB	81001.00001 Bloomberg Charges through 10-30-24	10.00
10/30/2024	BB	81001.00001 Bloomberg Charges through 10-30-24	10.00

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10/30/2024	BB	81001.00001 Bloomberg Charges through 10-30-24	10.00
10/30/2024	BB	81001.00001 Bloomberg Charges through 10-30-24	10.00
10/31/2024	OS	One Legal, outside Service	19.31
10/31/2024	LN	81001.00001 Lexis Charges for 10-31-24	30.57
10/31/2024	PAC	Pacer - Court Research	1.10
<b>Total Expenses for this Matter</b>			<b>\$1,492.21</b>

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**A/R STATEMENT**

**Outstanding Balance from prior invoices as of 10/31/2024**

**(May not include recent payments)**

<b><u>A/R Bill Number</u></b>	<b><u>Invoice Date</u></b>	<b><u>Fee Billed</u></b>	<b><u>Expenses Billed</u></b>	<b><u>Balance Due</u></b>
<b>Total Amount Due on Current and Prior Invoices:</b>				<b>\$246,938.81</b>

# **EXHIBIT “D”**



**STAPLETON**  
GROUP

**Stapleton Group**  
514 Via De La Valle  
Ste 210  
Solana Beach, CA 92075  
213-235-0600  
www.stapletoninc.com

September 30, 2024

**Andersen & Sons Shelling**

**Invoice Number: 7944**  
Invoice Period: 09-01-2024 - 09-30-2024

**Time Details**

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
09-03-2024	YL	A/R and Inventory (BofA) Confer w/ Lindsey from Hilco Wholesale Solutions re: confirmation of wire instructions.	0.10	32.50
09-03-2024	JD	A/R and Inventory (BofA) Review status of sales of in-shell and WIP inventory. Confer w/ MF re: same and inquiry from buyer. Review status of 2023 prunes and finalizing sale re: same.	1.70	892.50
09-03-2024	BL	A/R and Inventory (BofA) Review emails and documents provided including inventory sales, insurance, grower contracts and funding requests.	1.50	742.50
09-03-2024	BL	A/R and Inventory (BofA) T/C w/ MF re: division of work, A/R collections and inventory sales.	0.30	148.50
09-03-2024	MF	A/R and Inventory (BofA) Travel to project, billed at 50% of time.	2.50	1,237.50
09-03-2024	MF	A/R and Inventory (BofA) Review updated inventory reports, confer with Hilco and Andersen staff to address any reporting variances and questions, setup procedures for site visits, and coordinate other logistics.	5.10	2,524.50
09-03-2024	DS	A/R and Inventory (BofA) Review inventory samples and next steps. Discuss w/ team. Review offer from Crain.	0.80	440.00
09-04-2024	AN	A/R and Inventory (BofA) Review sample analysis for Howard walnuts stored at Patterson location. Review and respond to multiple emails and confer w/ team re: approximate weight of full bin of Howard walnuts and expense estimate to gain access to remove product. Follow up email to and review response from team re: status of fumigation schedule. T/C and email to guard service re: same. Follow up T/C and email to PG&E re: status of electric service transition to Receiver's control. Review insurance details for all accounts. T/C to and lvm for broker re: status of coverage and additionally insured certs. Updates to team re: status of multiple items for Receiver's	4.00	1,300.00

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
		initial reporting.		
09-04-2024	DS	A/R and Inventory (BofA) T/C w/ BL and JD re: B of A issues, Hilco, etc. Notes and emails re: same. Review Patterson issues. Update w/ MF re: Hilco. Determine next steps.	1.00	550.00
09-04-2024	MF	A/R and Inventory (BofA) Travel to Vina, billed at 50% of time.	1.10	544.50
09-04-2024	MF	A/R and Inventory (BofA) Coordinate logistics re: fumigation w/ Andersen team.	0.60	297.00
09-04-2024	MF	A/R and Inventory (BofA) Onsite meetings w/ Hilco and prospective buyers. Coordinate and attend meeting to finalize inventory report and layer inventory quality data, if available. Setup Hilco in ERP system and discuss pending sales and closing process.	8.20	4,059.00
09-04-2024	OJ	A/R and Inventory (BofA) Review Aldi and Andersen master purchase agreement. Confer w/ MF re: same.	1.40	595.00
09-04-2024	OJ	A/R and Inventory (BofA) Review correspondence re: Patterson inventory sample testing.	0.10	42.50
09-04-2024	JD	A/R and Inventory (BofA) Meet w/ Hilco re: sale of inventory. Confer w/ MF re: same. Review status of Turlock sale, Sac Valley sale and other. Follow up w/ DS re: same. Review plan for prunes.	1.70	892.50
09-05-2024	JD	A/R and Inventory (BofA) PM follow ups re: fumigation plan. Review and approve bills of sale for inventory sold. Review request list provided by C. Calderon for weekly reports.	0.80	420.00
09-05-2024	MF	A/R and Inventory (BofA) Video conf. call w/ prospective buyer and Hilco. Meet w/ Hilco and applicable Andersen staff re: inventory quality bridge. Coordinate invoice payments and sales closing re: Mariani.	2.30	1,138.50
09-05-2024	MF	A/R and Inventory (BofA) Confer w/ C. Enders re: A/R collections. Confer w/ team re: disposal of recalled macadamia nuts. Review and execute weekly BBC forms.	1.40	693.00
09-05-2024	MF	A/R and Inventory (BofA) Review Walmart PO cancellation threat, confer w/ applicable team members, and coordinate calls w/ Walmart representatives. Diagnose issue w/ Walmart, compile and provide additional product info requested, and coordinate w/ Andersen team to assess capacity for loading trucks.	5.40	2,673.00
09-05-2024	JD	A/R and Inventory (BofA) Confer w/ MF re: status of inventory sales. Confer w/ AN and BL re: sale of inventory at Patterson warehouse. PM updates re: Sam's club sales and fumigations and sheduling re: same. Various follow ups to same pre- and post-Sam's club call.	1.60	840.00
09-05-2024	DS	A/R and Inventory (BofA) T/C w/ JD re: B of A issues. T/C w/ C. Gil. Update w/ team. Review Hilco progress.	0.90	495.00
09-06-2024	DS	A/R and Inventory (BofA)	0.30	165.00

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
		Review and update w/ team.		
09-06-2024	OJ	A/R and Inventory (BofA) Confer w/ C. Enders and MF re: A/R reconciliation. Review IFS for inventory, A/R and cash reports.	1.50	637.50
09-06-2024	JD	A/R and Inventory (BofA) Travel from Vina HQ at 50% of time.	1.30	682.50
09-06-2024	JD	A/R and Inventory (BofA) Review emails re: Costco and Sam's Club orders and ship dates. Confer w/ G. Kelley and S. Alvarado re: load-out and collection of payments for same. Review updates re: Sam's Club and scheduling for fumigation, etc. Emails w/ team re: same and updates on inventory in Patterson warehouse.	0.80	420.00
09-06-2024	MF	A/R and Inventory (BofA) Return travel from project, billed at 50% of time.	2.50	1,237.50
09-06-2024	MF	A/R and Inventory (BofA) Confer w/ C. Enders and OJ re: A/R reporting and collections. Review and execute weekly BBC.	1.20	594.00
09-06-2024	MF	A/R and Inventory (BofA) Compile additional reports and follow-up meeting w/ Walmart to fulfill POs. Coordinate w/ Walmart and Andersen re: information needed, completing PO cost revision file, and booking shipments.	5.40	2,673.00
09-06-2024	OJ	A/R and Inventory (BofA) T/C w/ JD, BL, MF, GSFC and CR3 re: status updates.	0.40	170.00
09-08-2024	JD	A/R and Inventory (BofA) Review and respond to emails re: BofA collateral.	0.20	105.00
09-08-2024	DS	A/R and Inventory (BofA) Review and respond to emails. Prepare for Monday.	0.30	165.00
09-09-2024	OJ	A/R and Inventory (BofA) Confer w/ MF re: sales updates. Create A/R summary reconciliation for report exhibit. Review correspondence re: inventory and spoilage.	0.80	340.00
09-09-2024	BL	A/R and Inventory (BofA) Review and assign Huron request list items. Compile company files. T/C w/ MF re: inventory report and legal update.	1.50	742.50
09-09-2024	MF	A/R and Inventory (BofA) Review A/R report and confer w/ team re: collections process. Review Huron request list w/ BL and coordinate production of documents.	1.50	742.50
09-09-2024	MF	A/R and Inventory (BofA) Coordinate w/ Walmart re: shipments, payments, and outstanding questions. Confer w/ Huron re: Walmart process and status of same. Finalize sales to smaller buyers excluded from Hilco sales. Coordinate inventory reporting reconciliation and file updates re: Hilco sales process.	6.10	3,019.50
09-09-2024	DS	A/R and Inventory (BofA) Review fumigation, Hilco, sales, etc. Confer w/ team re: same.	0.70	385.00
09-09-2024	AN	A/R and Inventory (BofA)	1.00	325.00

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
		Review revised schedule for site fumigation, follow up email to R. Bughao re: arrange guard relief station. Update guard service provider re: scheduled off site monitoring during fumigation. Review email from R. Bughao and review and respond to propane gas provider re: tank identification for service.		
09-10-2024	DS	A/R and Inventory (BofA) Review values, sales, fumigation and other issues w/ MF.	0.50	275.00
09-10-2024	MF	A/R and Inventory (BofA) Coordinate w/ team re: shipments and confer w/ Walmart re: payments. Direct team to draft sales invoices re: miscellaneous inventory sales. Confer w/ Huron and Hilco re: inventory reports, pending offers, and sales process.	6.30	3,118.50
09-10-2024	MB	A/R and Inventory (BofA) Travel to project, billed @ 50% of time.	2.50	1,312.50
09-10-2024	MB	A/R and Inventory (BofA) Emails and T/Cs w/ counsel and lender re: equipment inspection.	0.60	315.00
09-10-2024	JD	A/R and Inventory (BofA) Updates re: inventory sales, Patterson warehouse inventory, update call w/ BofA and status of request list for Huron.	0.90	472.50
09-10-2024	BL	A/R and Inventory (BofA) T/Cs w/ MF re: status of request list and inventory sales.	0.80	396.00
09-10-2024	BL	A/R and Inventory (BofA) Correspondence w/ Huron re: request list follow up and sale offer. Review emails and company files related to warehouse liens. F/U re: recall claim and related clean-up required.	2.80	1,386.00
09-10-2024	OJ	A/R and Inventory (BofA) Confer w/ MF and JD re: inventory and sales. Review inventory reconciliation from C. Enders and confer w/ MF re: same.	1.80	765.00
09-11-2024	JD	A/R and Inventory (BofA) Review status of inventory sales. Confer w/ MF re: same. Review emails re: same. Review staffing for inventory liquidation.	0.70	367.50
09-11-2024	MF	A/R and Inventory (BofA) Review Huron request list, discuss same w/ BL, and compile files available.	1.90	940.50
09-11-2024	MF	A/R and Inventory (BofA) Confer w/ Hilco and C. Calderon to reconcile inventory report, finalize sales process, and confirm available inventory amounts.	2.80	1,386.00
09-11-2024	MF	A/R and Inventory (BofA) Confirm pick up of remaining Walmart shipments. Confer w/ team re: reconciliation of payments to POs, respond to Walmart re: same.	1.20	594.00
09-11-2024	MF	A/R and Inventory (BofA) Coordinate sales, invoicing, and bill of sale re: various inventory sales.	1.10	544.50
09-11-2024	BL	A/R and Inventory (BofA) Review inventory reports for potential Patterson sale. Correspondence w/ Huron re: same. Communicate with	1.80	891.00

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
		prospective buyer.		
09-11-2024	BL	A/R and Inventory (BofA) T/C w/ MF re: request list and open items for inventory sales. Update Huron's request list.	1.10	544.50
09-11-2024	AN	A/R and Inventory (BofA) Review and respond to request from C. Calderon re: pictures supporting infestation claim and approval to proceed with sale of Patterson walnuts to Crain. Review and prepare picture document re: same.	1.30	422.50
09-12-2024	DS	A/R and Inventory (BofA) Update w/ JD. Review issues / plan. Discuss same.	0.30	165.00
09-12-2024	BL	A/R and Inventory (BofA) Draft cumulative budget vs actual analysis and confer w/ Huron re: same.	0.70	346.50
09-12-2024	MF	A/R and Inventory (BofA) Confer w/ BL re: update on compiling items for Huron list and provide link to grower contracts to Bank counsel.	0.90	445.50
09-12-2024	MF	A/R and Inventory (BofA) Review sales updates from Hilco, confer w/ Hilco team re: pending sales, and coordinate w/ team to sell inventory at Patterson	4.80	2,376.00
09-12-2024	MB	A/R and Inventory (BofA) Travel from project, billed @ 50% of time.	2.50	1,312.50
09-12-2024	JD	A/R and Inventory (BofA) Review status of BofA / Huron requests, confer w/ BL re: same. Review details to finalize sale of walnut inventory in Patterson warehouse. Confer w/ MF re: status of inventory sales, summary of offers nad closed sales, and prep for Fri AM call w/ BofA.	1.30	682.50
09-13-2024	MF	A/R and Inventory (BofA) Complete sales and confirm receipt of wire re: product at Patterson warehouse. Confer w/ warehouse owner re: removal of product.	1.30	643.50
09-13-2024	MF	A/R and Inventory (BofA) Review Walmart POs to payments reconciliation and confer w/ team re: same. Confer w/ potential buyers of other product and finalize Patterson sale.	2.80	1,386.00
09-13-2024	MF	A/R and Inventory (BofA) Confer w/ C. Calderon re: pending inventory sales and smaller sales completed. Review large inventory offer received and confer w/ team, approve offer, and draft bill of sale. Coordinate w/ Andersen team to discuss logistics of sale.	4.10	2,029.50
09-13-2024	JD	A/R and Inventory (BofA) Review update re: inventory sales. Confer w/ MF re: bulk sale. Review prep for Monday BofA call. Review status of funding from BofA.	1.10	577.50
09-13-2024	BL	A/R and Inventory (BofA) Update request list for open items. F/U on weekly BBC. Review online bank account for escrow account access.	0.80	396.00
09-13-2024	AN	A/R and Inventory (BofA)	1.50	487.50

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
		Review email from Hub re: renewal quote for product recall policy. Forward same to team, discuss payment, premium adjustments and product liability. Follow up emails to and review responses from Hub and team re: update sales estimate and premium amount for new term. Review multiple emails from and to MF and D. Chun re: prepared prepayment invoice to Crain for Patterson walnut stock.		
09-14-2024	MF	A/R and Inventory (BofA) Review weekly BBC reports, discuss loan balance w/ C. Enders, and indicate approval. Review updates re: pending sale to Pearl Corp.	1.10	544.50
09-14-2024	BL	A/R and Inventory (BofA) Review weekly BBC. Emails w/ MF and C. Enders re: BBC.	0.50	247.50
09-14-2024	JD	A/R and Inventory (BofA) Review and respond to emails re: inventory sales. Review offer and complexities.	0.30	157.50
09-16-2024	MF	A/R and Inventory (BofA) Coordinate bulk inventory sales logistics, reporting, and payment process. Confer w/ other buyers re: inventory interest and introduce to Hilco. Update team re: same.	2.90	1,435.50
09-16-2024	MF	A/R and Inventory (BofA) Compile information re: Huron request list. Confer w/ BL re: same and attend conf. call w/ Huron and BofA team.	1.70	841.50
09-16-2024	MF	A/R and Inventory (BofA) Compile reports and confer w/ C. Enders re: collections strategy, and coordinate meeting w/ team to implement process. Correspondence w/ certain customers re: open A/R balance. Review BBC and confer w/ C. Calderon re: reporting errors, revise and submit.	3.00	1,485.00
09-16-2024	BL	A/R and Inventory (BofA) Review bank accounts for intercompany transactions. Confer w/ C. Enders re: same. Obtain ABL online access.	2.00	990.00
09-16-2024	BL	A/R and Inventory (BofA) Conf. call w/ DS, MF, BofA and Huron representatives re: update on key items. Prep for call and draft agenda. T/C w/ DS and MF re: post call.	1.20	594.00
09-16-2024	JD	A/R and Inventory (BofA) Review status of fumigation and plan for liquidation of inventory.	0.40	210.00
09-16-2024	DS	A/R and Inventory (BofA) Review and prepare for call w/ B of A. Attend same.	0.70	385.00
09-17-2024	DS	A/R and Inventory (BofA) Review inventory sales and A/R collection summary. Meeting w/ team.	0.40	220.00
09-17-2024	MF	A/R and Inventory (BofA) Meeting w/ team re: A/R collections, draft stock language, and create tracker re: same.	1.70	841.50
09-17-2024	MF	A/R and Inventory (BofA) Conf. call w/ Pearl Corp and Andersen team re: inventory move-out logistics. Review and confer w/ counsel re: bill of sale redlines. Confer w/ customers re: pending pickups of purchased inventory. Internal discussion re: economics and process for same.	3.90	1,930.50
09-17-2024	MF	A/R and Inventory (BofA)	1.20	594.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>A/R and Inventory (BofA)</u>				
		Confer w/ DS and RB re: lender dashboard reporting. Compile files and forward to RB re: same.		
09-17-2024	OJ	A/R and Inventory (BofA) Review A/R, sales and collections reports. Meeting w/ MF and DS to discuss lender dashboard.	1.40	595.00
09-17-2024	BL	A/R and Inventory (BofA) Administrative work related to ABL access. Emails w/ C. Calderon re: budget vs funding analysis.	1.00	495.00
09-17-2024	JD	A/R and Inventory (BofA) Review additional details related to same of substantial inventory. Confer w/ team re: same. Confer w/ BL re: follow-ups from BofA lender call from Mon. Review litigation defense requests w/ counsel related to GSFC counsel. Review emails re: same. Review status of BofA request list.	1.40	735.00
09-18-2024	JD	A/R and Inventory (BofA) Review inquiries re: IT data requests from counsel for BofA. Review plan for current week funding request.	0.50	262.50
09-18-2024	DS	A/R and Inventory (BofA) Review Derco.	0.30	165.00
09-18-2024	MF	A/R and Inventory (BofA) Coordinate w/ Andersen team re: inventory sales planning and process. Confer w/ buyers re: inventory sales and prepare bills of sale re: same.	3.70	1,831.50
09-18-2024	MF	A/R and Inventory (BofA) Conf. call w/ Hilco re: inventory sales process. Confer w/ buyers re: sales of inventory, interest in and quality of same. Review and forward reports re: inventory and A/R dashboard. Confer w/ broker re: inventory recall coverage.	2.20	1,089.00
09-18-2024	MF	A/R and Inventory (BofA) Coordinate w/ staff and draft stock language re: A/R collections.	1.40	693.00
09-18-2024	AN	A/R and Inventory (BofA) Review, research and respond to MF re: status of renewal for Recall policy, Q&A re: cause and cure for prior claim.	0.50	162.50
09-19-2024	AN	A/R and Inventory (BofA) Review and respond to team re: South Ave warehouse and description of content stored.	0.40	130.00
09-19-2024	MF	A/R and Inventory (BofA) Coordinate w/ team and review updates re: A/R collections.	1.40	693.00
09-19-2024	MF	A/R and Inventory (BofA) Review updates re: inventory sales coordination. Confer w/ OJ re: dashboard reporting, KPIs and review logistics of inventory sampling.	1.80	891.00
09-19-2024	BL	A/R and Inventory (BofA) Conf. call w/ J. Fiero, T. Kapur and S. Levitt re: BofA related legal items. F/U post-call re: same.	0.70	346.50
09-19-2024	JD	A/R and Inventory (BofA) Confer w/ BL re: critical items for BofA weekly call. Confer w/ OJ re: inventory interest. T/C w/ potential inventory buyer. Review status of inventory sales dashboard. Review Sheller intercompany transactions.	1.10	577.50
09-20-2024	JD	A/R and Inventory (BofA)	1.20	630.00

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
		Prepare for and attend BofA weekly call. Follow ups to same w/ team. Review emails w/ Huron and Hilco team re: sale of nut inventory. Confer w/ BL re: intercompany analysis to provide to BofA.		
09-20-2024	BL	A/R and Inventory (BofA) Conf. call w/ JD, MF, L. Marcero, C. Calderon and R. Bleichner re: weekly update for BofA and Huron. Create Pearlcrop bin offer summary for approval. Draft email for lender approval for inventory and bin counter sale. Confer w/ Hilco re: expenses and review weekly sales tracker.	1.70	841.50
09-20-2024	BL	A/R and Inventory (BofA) T/C w/ MF re: A/R collections, inventory sales and dashboard view. Review recall insurance. T/C w/ C. Calderon re: same. Correspondence w/ AN re: same.	1.30	643.50
09-20-2024	DS	A/R and Inventory (BofA) T/C w/ BL. Prepare for call w/ B of A. Debrief w/ BL re: all issues. Notes re: same. T/C w/ JD re: all matters. Notes re: same.	0.80	440.00
09-20-2024	MF	A/R and Inventory (BofA) Coordinate w/ parties re: Pearl crop bill of sales and logistics plan. Review updates and confer w/ customers re: collections status.	3.60	1,782.00
09-20-2024	MF	A/R and Inventory (BofA) Review updates and confer w/ team re: dashboard reporting. Review and reports and circulate BBC files to Huron. Prepare for and attend conf. call w/ lender and Huron.	3.10	1,534.50
09-23-2024	OJ	A/R and Inventory (BofA) Review correspondence re: grower communications and respond to emails accordingly.	0.60	255.00
09-23-2024	BL	A/R and Inventory (BofA) F/U w/ L. Marcero re: Pearlcrop sale. Confirm approval with team to begin executing. Check on A/R collections w/ key staff.	0.80	396.00
09-23-2024	MF	A/R and Inventory (BofA) Review updates and respond to customers. Confer w/ BL re: A/R collections, and discuss same w/ Andersen staff.	1.60	792.00
09-23-2024	MF	A/R and Inventory (BofA) Draft bills of sales re: inventory sales and discuss legal concerns re: same. Coordinate outgoing shipments and check in w/ staff re: same.	1.80	891.00
09-23-2024	JD	A/R and Inventory (BofA) Review updates re: Hilco inventory liquidation process. Review sheller budget details. Review emails re: PearlCrop offer.	0.50	262.50
09-24-2024	AN	A/R and Inventory (BofA) Confer w/ onsite team re: status of payment for and readiness of customer shipment. Advise JD re: same.	0.50	162.50
09-24-2024	MF	A/R and Inventory (BofA) Confer w/ BL re: A/R collections, review updates, and discuss same w/ Andersen staff.	1.60	792.00
09-24-2024	MF	A/R and Inventory (BofA) Multiple conf. calls w/ Hilco, Andersen staff, and buyers re: inventory sales and load out scheduling. Coordination and correspondence re: same.	4.70	2,326.50
09-24-2024	BL	A/R and Inventory (BofA)	0.90	445.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>A/R and Inventory (BofA)</u>				
		Conf. call w/ MF, D. Chun and R. Bughao re: A/R collections and invoicing. Review press release related to inventory sales. Review receivership bank account ledger for BofA sales.		
09-24-2024	JD	A/R and Inventory (BofA) Confer w/ team re: load-out of PearlCrop, status of receipt of wires, etc. Discuss allocation of team assisting w/ same. Confer w/ OJ and BL re: accounting and depreciation schedules for C. Calderon to approve asset sales.	0.80	420.00
09-25-2024	JD	A/R and Inventory (BofA) Review and approve inventory sale details. Confer w/ MF re: same.	0.40	210.00
09-25-2024	BL	A/R and Inventory (BofA) Conf. call w/ MF and S. Alvarado re: A/R collections process and update. T/C w/ MF re: inventory sales. Update A/R schedule based on feedback. Conf. call w/ accounting team and MF re: IFS system.	2.00	990.00
09-25-2024	MF	A/R and Inventory (BofA) Conf. calls w/ Hilco, w/ Andersen and w/ Huron re: inventory sales, reporting, and payment process. Coordinate w/ multiple customers re: same.	2.90	1,435.50
09-25-2024	MF	A/R and Inventory (BofA) Review collections updates. Conf. call w/ BL and S. Alvarado re: same. Follow up / customers re: disputed balances owed, and update tracker re: same.	1.90	940.50
09-25-2024	MF	A/R and Inventory (BofA) Conf. call w/ BL and accounting team re: IFS status and pending tasks.	0.70	346.50
09-25-2024	MF	A/R and Inventory (BofA) Conf. call w/ Hilco and Huron re: pending sales and excel tracker.	1.30	643.50
09-25-2024	DS	A/R and Inventory (BofA) Meetings w/ JD. Prepare for site visit. Review and respond to emails. Confer w/ MF on sales.	0.70	385.00
09-26-2024	DS	A/R and Inventory (BofA) Review sales and next steps. Update w/ BL.	0.40	220.00
09-26-2024	AN	A/R and Inventory (BofA) Review email and claims historical data from Avrit insurance for crop insurance, prepare schedule re: same. F/ U email to C. Avrit re: request open claims data.	1.50	487.50
09-26-2024	BL	A/R and Inventory (BofA) Review invoices, payroll information and funding request matrix for BofA collateral. Update matrix and follow up w/ C. Enders re: same. Conf. call w/ C. Enders and OJ re: BBC calculation and company systems related to inventory and A/R.	2.20	1,089.00
09-26-2024	BL	A/R and Inventory (BofA) T/C w/ MF re: BofA A/R and inventory update. Review A/R collections file and update based on discussion.	1.50	742.50
09-26-2024	MF	A/R and Inventory (BofA) Review collections updates. Follow up w/ customers re: disputed balances owed, and update tracker re: same.	1.90	940.50
09-26-2024	MF	A/R and Inventory (BofA) Confer w/ Hilco, Andersen and customers re: inventory sales, scheduling, reporting, and payments received. Coordinate w/ multiple stakeholders re: same.	2.60	1,287.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>A/R and Inventory (BofA)</u>				
09-26-2024	JD	A/R and Inventory (BofA) Confer w/ MF, BL and counsel re: producer lien issues and BofA sweep issues. Updates re: accounting on BofA escrow account, etc. Review on-site progress w/ shipment of in-shell.	1.20	630.00
09-27-2024	MF	A/R and Inventory (BofA) Prepare for and attend weekly conf. call w/ BofA and Huron. Review inventory sales updates, load process, and Pearl Crop trackers. Review collections updates and correspondence w/ customer re: disputed invoices.	2.90	1,435.50
09-27-2024	JD	A/R and Inventory (BofA) Prepare for and attend weekly bank call w/ BofA. Follow-ups w/ team re: same.	0.60	315.00
09-27-2024	BL	A/R and Inventory (BofA) Conf. call w/ JD, MF, BofA and Huron re: weekly update call. Prepare agenda for BofA call. T/C w/ C. Calderon re: funding request. F/U w/ C. Enders re: grower contracts available.	1.80	891.00
09-27-2024	DS	A/R and Inventory (BofA) Review and discuss prep for bank call. Debrief w/ JD.	0.40	220.00
09-28-2024	BL	A/R and Inventory (BofA) Review BBC files provided by L. Belmonte. Emails w/ L. Belmonte re: same.	0.80	396.00
09-30-2024	OJ	A/R and Inventory (BofA) Review correspondence re: inventory sales.	0.20	85.00
09-30-2024	JD	A/R and Inventory (BofA) Confer w/ team re: Pearlcrop sale, on-site management re: same and follow-ups re: quality of all in-shell and WIP product. T/C and leave VM for L. Marcero. Confer w/ team re: additional details re: on-site management, negotiations w/ buyers and other inventory product for sales.	1.50	787.50
09-30-2024	BL	A/R and Inventory (BofA) T/Cs w/ MF re: A/R collections and inventory sale to Pearlcrop. Update A/R schedule based on emails and comments. T/C w/ C. Calderon re: BBC and inventory.	3.10	1,534.50
09-30-2024	BL	A/R and Inventory (BofA) Conf. call w/ MF, Hilco and Huron re: Pearl crop sale status. Conf. call w/ G. Kelley and R. Bughao re: sale logistics. Conf. call w/ Hilco re: same. Conf. call w/ Hilco and Pearlcrop re: same.	2.30	1,138.50
09-30-2024	BL	A/R and Inventory (BofA) Conf. call w/ MF and Andersen accounting re: inventory and A/R files. F/U re: same. Emails w/ C. Calderon re: inventory roll forward.	2.30	1,138.50
09-30-2024	AN	A/R and Inventory (BofA) Multiple Teams meetings re: Pearl outbound shipments.	1.00	325.00
09-30-2024	MF	A/R and Inventory (BofA) Review updates and confer w/ BL re: collections efforts. Conf. call w/ accounting team re: invoice process and A/R discrepancies.	1.70	841.50
09-30-2024	MF	A/R and Inventory (BofA) Multiple conf. calls and coordination w/ team and Pearl Crop re: inventory sales process, streamlining move-out, scheduling pick ups and internal process coordination.	7.40	3,663.00
09-30-2024	DS	A/R and Inventory (BofA)	1.00	550.00

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
		Review budget. Confer w/ BL. Review Hilco sale / logistics issues. Confer w/ MF and JD.		
			230.70	112,967.00
<u>Bins</u>				
09-03-2024	OJ	Bins Confer w/ JD re: bin sales. Review correspondence re: sale consents and process. Confer w/ R. Armendariz re: bin sales. Confer w/ JD re: next steps. Review bin sales updates as well as Hilco engagement letter.	1.80	765.00
09-04-2024	JD	Bins Review sale of bins, follow-ups to same.	0.40	210.00
09-06-2024	OJ	Bins Confer w/ JD re: bin sales and bid solicitation re: same. Draft emails re: bin sales and bins.	1.00	425.00
09-06-2024	JD	Bins T/Cs w/ bin buyers and parties re: sale of crop.	0.40	210.00
09-07-2024	OJ	Bins Draft and send email correspondence to all potential bin buyers without current pending offers. Update bin buyer matrix. Confer w/ JD re: same.	2.60	1,105.00
09-07-2024	JD	Bins Confer w/ OJ re: sale of bins and solicitation of offers.	0.30	157.50
09-08-2024	JD	Bins Follow-ups re: bin offers.	0.20	105.00
09-10-2024	OJ	Bins Confer w/ A. Kennedy re: bin bid.	0.20	85.00
09-11-2024	OJ	Bins Review Hilco bin offer matrix and other offers. Confer w/ MF re: bin recovery matrix.	0.80	340.00
09-11-2024	OJ	Bins Research potential additional bidders for bins. Update draft email and confer w/ counsel re: same. Confer w/ A. Kennedy and JD re: prune bins and inventory.	1.80	765.00
09-11-2024	JD	Bins PM follow-ups re: prune bin sales. Review and respond to emails. Review status of draft report.	0.50	262.50
09-12-2024	JD	Bins Review bin offers. Confer w/ OJ re: same. T/C w/ Cal Prune re: same.	0.50	262.50
09-16-2024	OJ	Bins Review email correspondence re: bins, utilities and other status updates. Review most recent master funding request file. Compile updated offers and update bid and inventory matrices. Confer w/ JD re: bin sales and other updates.	2.30	977.50
09-17-2024	MF	Bins Confer w/ team re: process for approving bin sales, review loan files, setup process, and draft language addressing same.	2.90	1,435.50
09-17-2024	BL	Bins Thank you for trusting Stapleton Group, we appreciate your business.	1.50	742.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Bins</u>				
		T/C w/ JD and OJ re: bin collateral and status on offers. T/C w/ MF and JD re: same. Strategize sale options. F/U re: bins and related inventory sales.		
09-17-2024	OJ	Bins Review correspondence w/ bin buyers and confer w/ same. Update master bin tracker. Confer w/ R. Bughao re: sale logistics.	2.10	892.50
09-17-2024	OJ	Bins Confer w/ MF re: bin liens and inventory counts and values. Confer w/ BL and MF re: same. Update bin inventory files.	1.70	722.50
09-18-2024	OJ	Bins Confer w/ JD re: grower liens and communications re: same. Confer w/ JD re: bins. Review bin offers and confer w/ bidders re: same. Update tracker accordingly.	0.70	297.50
09-18-2024	BL	Bins Review inventory and bin sale. Develop summary table of offer related to bins. Correspondence w/ MF re: same. Set-up call w/ counsel to review Derco issue.	1.10	544.50
09-18-2024	JD	Bins Review bin offers. Confer w/ team re: same.	0.30	157.50
09-19-2024	OJ	Bins Confer w/ JD and MF re: bin sales waterfall and pending offers. Confer w/ MF re: bins needed for harvest and other pending issues. Confer w/ R. Bughao re: same. Review final bin inventory count and confer w/ R. Bughao re: same.	2.30	977.50
09-19-2024	JD	Bins Review bins. Review prunes. Confer w/ OJ re: analysis and sales re: same.	0.80	420.00
09-20-2024	JD	Bins Review waterfall analysis re: sale of bins. Confer w/ OJ re: same. Review various emails to send to lenders to approve bin sales. Discuss strategies for counter offers to bin buyers. Updates re: prune liens.	0.90	472.50
09-20-2024	BL	Bins Manage bin sale related to Pearl crop sale. Draft offer for lenders.	0.90	445.50
09-20-2024	OJ	Bins Confer w/ bin bidders re: timeline. Confer w/ R. Bughao re: bin inventory and process and review correspondence re: same.	1.20	510.00
09-20-2024	OJ	Bins Confer w/ JD re: bin offer waterfall. Update bin offer and inventory waterfall. Create market summary for bins and confer w/ BL re: same.	1.50	637.50
09-20-2024	OJ	Bins Draft bin bank consents and confer w/ MF and JD re: same.	1.80	765.00
09-23-2024	OJ	Bins Confer w/ C. Calderon re: bin book value and market values. Confer w/ JD and C. Enders re: same. F/u w/ lenders re: consents and standard bin price approvals.	1.20	510.00
09-23-2024	OJ	Bins	2.20	935.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Bins</u>				
		Confer w/ JD and MF re: bin sales and process. Confer w/ MF re: book values and record keeping. Review bin costing and depreciation schedules and circulate to C. Calderon. Confer w/ MF re: same. Confer w/ M. Winslow re: bin and inventory bid and process.		
09-23-2024	MF	Bins Review bins sales waterfall. Confer w/ team re: updates, and coordinate load out capacity of same.	0.90	445.50
09-23-2024	JD	Bins Follow ups re: bin sales. Confer w/ OJ re: pricing. Respond to lender email re: same.	0.80	420.00
09-23-2024	BL	Bins F/U with other lenders re: offer for bins.	0.40	198.00
09-23-2024	OJ	Bins Review and update correspondence re: inventory bin bids. Update bid matrix and circulate same.	1.70	722.50
09-24-2024	OJ	Bins Confer w/ JD, MF, C. Enders, BL and C.Calderon re: purchase orders, bin depreciation and book value. Review files re: same. F/u re: same. Confer w/ bin bidders and re: pricing. Confer w/ BL and JD re: lender requests. Confer w/ JD re: bin sales and process.	3.00	1,275.00
09-25-2024	OJ	Bins Confer w/ JD re: bin consents. Review correspondence re: same. Confer w/ lenders re: same. Summarize bin bids previously sent to lenders and confer w/ JD re: same.	2.10	892.50
09-25-2024	OJ	Bins Confer w/ JD and D. Gibson re: bin bids and communications with bidders.	0.80	340.00
09-25-2024	JD	Bins Review and approve bin sale details. Confer w/ OJ re: same.	0.40	210.00
09-25-2024	OJ	Bins Confer w/ D. Gibson re: bin offer and inventory. Confer w/ D. Gibson re: older bin pricing. Confer w/ JD re: same. Confer w/ bin buyers and JD re: inspections.	1.60	680.00
09-26-2024	OJ	Bins Confer w/ various bin buyers re: bids and pickup logistics. Confer w/ JD and R. Bughao re: same.	1.70	722.50
09-26-2024	JD	Bins Review bins and prunes.	0.30	157.50
09-26-2024	OJ	Bins Review correspondence re: bin pickup.	0.20	85.00
09-27-2024	OJ	Bins Confer w/ bin buyers re: bids and load out logistics. Confer w/ JD, R. Bughao and B. Carriere re: bin pickup and payment. Confer w/ MF re: Patterson warehouse and bins logistics.	1.40	595.00
09-28-2024	OJ	Bins Review correspondence re: bin pickup and confer w/ R. Bughao re: same.	0.40	170.00
09-30-2024	OJ	Bins	1.90	807.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Bins</u>				
		Review correspondence re: additional bin sales. Request consents from lenders. Confer w/ JD and counsel re: same. Review correspondence re: Carriere farms bin pickup and confer w/ R. Bughao re: same.		
09-30-2024	JD	Bins	0.50	262.50
		Review status of bin sales. Confer w/ OJ re: same. Review emails and payments received re: same.		
09-30-2024	OJ	Bins	2.80	1,190.00
		Confer w/ JD and C. Calderon re: bin consents. Confer w/ buyers re: logistics. Review correspondence re: future load out planning and Patterson warehouse and confer w/ JD and R. Bughao re: same. Circulate fixed price matrix to wooden bin bidders and solicitate additional offers.		
			56.80	25,309.00
<u>Case Management</u>				
09-02-2024	CG	Case Management	0.60	195.00
		Prepare report for exhibit and provide same to team for review.		
09-03-2024	DB	Case Management	1.80	495.00
		Prepare 2 receiver's certificates. Process incoming mail. Process wire transfers. Review and respond to emails. Process returned mail and update proof of service.		
09-03-2024	OJ	Case Management	2.40	1,020.00
		Confer w/ BL re: cash management and IFS. Review correspondence re: past due balances and other open items. Review Andersen email inbox. Review IFS system and generate G/L reports. Confer w/ AN, MF, BL, and JD re: status updates and open items.		
09-03-2024	YL	Case Management	0.60	195.00
		Review wire instruction. Confer w/ team re: incoming wire. Confer w/ Laila re: signature card and newly opened MMA. Confer w/ team re: setup same in Yardi. Download and archive wire instruction letter.		
09-03-2024	CG	Case Management	0.30	97.50
		Updates to report exhibit.		
09-03-2024	MB	Case Management	0.30	157.50
		T/C and emails w/ creditor attorney re: status of claim.		
09-03-2024	OJ	Case Management	1.60	680.00
		Confer w/ L. Belmonte re: cash management and reports. Review cash reports and consolidate same.		
09-03-2024	MF	Case Management	0.90	445.50
		Confer w/ team re: action items, urgent tasks, Receiver's report preparation, and sales strategy.		
09-03-2024	JD	Case Management	0.90	472.50
		Confer w/ DS re: various open items. T/C w/ BL re: same. All-hands call w/ team re: open items and delegation of various items. Review status of retention agreements w/ team		
09-03-2024	JD	Case Management	2.50	1,312.50
		Travel to Andersen HQ @ 50% of time.		
09-03-2024	BL	Case Management	1.00	495.00
		T/C w/ JD, OJ, MF and AN re: project all hands and updates on critical items.		
09-03-2024	BL	Case Management	1.00	495.00
		T/C w/ Chase bank representative and P. Andersen re: setting up ABW bank account. Review bank accounts		

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		for all entities.		
09-03-2024	BL	Case Management Confirm utilities, workers comp, fumigation and other workstreams are on track. Organizing invoices received and demand letters. T/C w/ JD re: project status, receivership reporting, staffing and budgets.	2.20	1,089.00
09-03-2024	MF	Case Management Confer w/ IT consultant re: data backups and admin access.	0.60	297.00
09-03-2024	DS	Case Management Review legal issues and docs. Confer w/ team.	0.40	220.00
09-03-2024	YL	Case Management Process Yardi Bill Pay setup.	0.10	32.50
09-03-2024	OJ	Case Management Review cash reporting and build financial reports for initial inventory. Reconcile all reports w/ bank statements and review activity for same. Confer w/ BL re: same.	3.10	1,317.50
09-03-2024	AN	Case Management Follow up email to and review response from C. Enders re: status of Cargo insurance questionnaire. Review and forward completed questionnaire to T. Cady for policy quotes. All hands teams meeting re: review and assign tasks of open items, update completed items, discuss onsite access. Review email from C. Crain and JD re: discuss offer to purchase Howard walnuts stored at Patterson facility.	1.90	617.50
09-04-2024	DS	Case Management Review legal result from court, emails w/ counsel. Confer w/ JD and BL.	0.30	165.00
09-04-2024	OJ	Case Management Update cash reconciliation and review all cash balances. Confer w/ BL re: cash reporting, initial inventory and bank accounts.	1.80	765.00
09-04-2024	OJ	Case Management Review IFS system for bank detail and confer w/ BL re: same. Confer w/ D. Chun re: invoices retrieval and management. Confer w/ C. Enders re: same. Confer w/ BL, MB, C. Enders and M. Andersen re: JB Cusick banking. Confer w/ JD re: bin sales, cash reporting and initial inventory. Review and code disbursements from all bank accounts.	2.10	892.50
09-04-2024	BL	Case Management T/Cs w/ OJ re: cash reconciliation for receivership report. Setup new accounts for vendors. Review invoices for listeria clean up.	1.80	891.00
09-04-2024	BL	Case Management Draft initial receivership report and F/U re: open items for report.	4.50	2,227.50
09-04-2024	BL	Case Management T/C w/ C. Enders re: accounting set-up post-terminations and weekly funding request.	1.00	495.00
09-04-2024	OJ	Case Management Revise and edit INV and equipment listing schedules. Confer w/ MF re: same.	1.50	637.50
09-04-2024	OJ	Case Management Draft and update financial exhibits for the initial inventory.	1.90	807.50

Thank you for trusting Stapleton Group, we appreciate your business.

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
09-04-2024	YL	Case Management Review cash balance and confer w/ team.	0.20	65.00
09-04-2024	OJ	Case Management Confer w/ BL re: cash reporting, bank accounts and initial inventory draft.	0.60	255.00
09-04-2024	OJ	Case Management Consolidate cash reconciliations across all bank accounts for each entity and reformat same.	1.80	765.00
09-04-2024	JD	Case Management Updates w/ BL re: reporting and other. Confer w/ DS and BL re: various open items on case management, details re: funding requests and other. Review plan for claims procedures. Confer w/ DB re: same. Confer w/ counsel re: same.	1.20	630.00
09-04-2024	DB	Case Management Review and respond to email inquiries. Update emails for creditors. Process NDA. Review and approve revised NDA. Process change of contact information for 401K. Send sample claims procedure motion and ABC claims package to Atty. Kapur along w/ updated creditor mailing list. Process incoming litigation filed by BCM Construction, update litigation summary and send to counsel. Process returned mail and update creditor mailing list.	1.90	522.50
09-05-2024	DB	Case Management Review and respond to email inquiries. Update email list of creditors. Process NDA.	0.80	220.00
09-05-2024	OJ	Case Management Confer w/ BL re: report, funding requests status updates and cash reconciliations. Review bank statements and update cash reconciliation. Confer w/ DB and BL re: initial inventory. Confer w/ S. Sira re: IT updates and books and records. Update report accordingly.	2.20	935.00
09-05-2024	CG	Case Management Review edits to exhibit for report. Process same and provide amended exhibit to team for additional review. Confer w/ team re: same.	1.80	585.00
09-05-2024	BL	Case Management F/U's to initial receiver reporting re: inventory listing, sales/AR, payroll reconciliation, status of real estate listings, etc.	3.50	1,732.50
09-05-2024	BL	Case Management Gather weekly funding request for both entities. Review related invoices and supporting workbooks for payroll allocation, etc.	2.70	1,336.50
09-05-2024	BL	Case Management T/C w/ JD and T. Kapur re: lease agreements. T/C w/ J. Fiero re: same. T/C w/ OJ re: receivership report, cash reconciliation and other open items.	1.80	891.00
09-05-2024	BL	Case Management T/C w/ JD and DS re: leases, initial report and key open items. Confer w/ K. Andersen re: JB Cusick open invoices and services.	1.10	544.50
09-05-2024	OJ	Case Management Revise and edit INV and equipment reports re: receivership report. Confer w/ BL and MF re: same.	3.10	1,317.50
09-05-2024	OJ	Case Management	1.30	552.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		Confer w/ JD re: retention. Prepare retention and release agreement and related exhibits.		
09-05-2024	BL	Case Management T/C w/ JD re: open items and critical tracker for all-hands call.	0.20	99.00
09-05-2024	AN	Case Management Return call from and email to broker re: status of coverage and additionally insured certs. Updates to team re: status of multiple items for Receiver's initial reporting. Review and respond to MF re: request for insurance certs related to Shelling to be provided to fumigation service provider. T/C w/ guard service provider re: restroom breaks and facility for same. Email to and review response from team re: port a potty access. T/C w/ and review email from Thompson Gas re: service locations. Confer w/ N. Oliva re: propane uses on Ranches (tenants only) and fill credit applications for Thompson Gas re: both accounts. Email to C. Enders re: tenant credit applications and current balances for same. Review email from P. Andersen re: tenant lease agreements. Review email from C. Enders re: monthly rent amount and status of past due for Patterson facility.	5.10	1,657.50
09-05-2024	OJ	Case Management Review and update report and exhibits.	3.80	1,615.00
09-06-2024	OJ	Case Management Confer w/ BL re: report and cash reconciliation updates. Update exhibit formatting.	1.40	595.00
09-06-2024	OJ	Case Management Review retention exhibits and finalize agreements. Confer w/ JD re: same.	0.70	297.50
09-06-2024	AN	Case Management Teams call w/ D. Chung re: IFS training to navigate and locate documents in accounting. Tour and review documents in IFS. Review and respond to insurance broker re: mailing address for Receiver. Review multiple emails from team re: propane tank uses and filling requirements, finalize credit applications and update provider re: same.	2.30	747.50
09-06-2024	OJ	Case Management T/C w/ MF to review POs, lender dashboard, and case management deliverables. Analyze open POs. re: Sam' Club PO review and confirmation.	1.10	467.50
09-06-2024	OJ	Case Management Review open POs and data analysis re: Sam's Club PO processes.	1.80	765.00
09-06-2024	YL	Case Management Process cash receipt.	0.20	65.00
09-06-2024	BL	Case Management Review and compile invoices for cash reconciliation, inventory detail and other exhibits needed for initial inventory.	2.50	1,237.50
09-06-2024	BL	Case Management Review and compile all bank account statements for August.	0.40	198.00
09-06-2024	BL	Case Management T/C w/ MF re: lender request lists and open items. Review files provided by C. Enders re: same. Review Finch lease. Assign weekly requests to team. T/C w/ OJ re: receivership report and cash reconciliation. T/C w/ JD re: open items and lender document requests.	2.10	1,039.50
09-06-2024	YL	Case Management Research and confer w/ MF and JD re: incoming funds. Review and post same. Perform bank reconciliation	0.50	162.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		and archive same.		
09-06-2024	OJ	Case Management Update cash reconciliation and initial inventory.	3.80	1,615.00
09-06-2024	YL	Case Management Review cash balance and confer w/ team re: incoming wire and bank account access.	0.40	130.00
09-06-2024	MB	Case Management Emails w/ K. Andersen re: shut down matters and payment approvals.	0.30	157.50
09-06-2024	DB	Case Management Process organic walnuts bill of sale. Process receiver's certificates. Process undeliverable mail and update proof of service.	1.40	385.00
09-06-2024	AN	Case Management Review schedule change for fumigation service, advise guard service provider re: same. T/C w/ and email to and complete credit application for North Valley Ag. Review multiple emails from Thompson Gas and North Valley Ag and update team with new account details. Review multiple emails from S. Alvarado re: weigh tickets for Prune shipments. Review location for same in IFS program.	1.40	455.00
09-07-2024	CG	Case Management Review correspondence re: payments and status of same.	0.20	65.00
09-07-2024	JD	Case Management Review and respond to emails re: asset sales and interested parties and accounting of intercompany transactions and other.	0.60	315.00
09-08-2024	MB	Case Management Emails w/ exec team and MF re: insurance coverage.	0.20	105.00
09-09-2024	CG	Case Management Confer w/ DS re: cash activity and provide recap. Various exchanges w/ BL re: same. T/C w/ YL re: bank activity.	0.60	195.00
09-09-2024	CG	Case Management Confer w/ team re: status of comments for report exhibit. F/U's re: same.	0.30	97.50
09-09-2024	OJ	Case Management Confer w/ MF re: sales process and logistics w/ on-site team. Update master funding request tracker. Review and reconcile escrow account detail. Review report comments.	1.00	425.00
09-09-2024	DB	Case Management Process incoming lawsuit and update litigation summary. Prepare photo exhibit for initial inventory. Process returned mail and update proof of service. Process incoming mail.	1.30	357.50
09-09-2024	OJ	Case Management Review cash reconciliation and bank balance detail. Review correspondence re: bin inventory and banking activity. Confer w/ MF, DB and BL re: same.	2.40	1,020.00
09-09-2024	YL	Case Management Prepare and process deposits.	0.80	260.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
09-09-2024	OJ	Case Management Confer w/ BL re: cash reconciliation, A/R and bank accounts.	0.80	340.00
09-09-2024	JD	Case Management Conf. call w/ BL and counsel to review open legal issues and progress on same. Discuss UCCs, collateral and lender positions on same and other.	0.50	262.50
09-09-2024	JD	Case Management Review draft receiver's report. Redline same. Provide comments to team for follow ups.	1.40	735.00
09-09-2024	BL	Case Management T/C w/ JD, J. Fiero and T. Kapur re: critical legal items. F/U re: same.	1.80	891.00
09-09-2024	BL	Case Management Reconcile accounting and open invoices.	0.80	396.00
09-09-2024	BL	Case Management T/C w/ OJ re: receivership schedules and cash reconciliation. Review cash reconciliation and master funding request file. T/C w/ JD re: legal call agenda, collateral and UCC filings.	1.90	940.50
09-09-2024	OJ	Case Management Confer w/ JD re: retention and create ShareFile for same.	0.30	127.50
09-09-2024	OJ	Case Management Analyze INV and equipment schedules reports. Classify by description, location and type. Confer w/ MF re: additional edits and revisions.	3.30	1,402.50
09-09-2024	OJ	Case Management Review UCC filing statements.	0.60	255.00
09-09-2024	MF	Case Management Confer w/ team re: IT preservation process and confer w/ vendor re: same.	0.60	297.00
09-09-2024	MF	Case Management Confer w/ BL re: lender reporting dashboard.	0.40	198.00
09-09-2024	AN	Case Management Review and update file re: vendor set up documents for accounting. Review and respond to JD re: status of w/ c policy. Email to and review response from C. Enders re: status of payment for workers' comp insurance policy. Email to Hub re: adding equipment vendors as additionally insured re: hoppers.	0.60	195.00
09-09-2024	YL	Case Management Review bank activity and confer w/ MF re: confirming incoming funds.	0.20	65.00
09-10-2024	AN	Case Management Email to R. Bughoa re: arrange escort to tour and identify machinery. Review contractor additionally insured COI's and forward same with signed rental agreements to H. Crain. Review and respond to counsel for Verdant, lienholder for forklifts re: status of payment and or return.	1.30	422.50
09-10-2024	AN	Case Management Review and respond to JD re: guard service time and location during fumigation. Review multiple emails from C. Enders and S. Cartier re: request for corrected allocations for workers comp policy invoice. Advise C. Enders to process payment re: same. Review and respond to HYG Financial re: status of receivership and	1.70	552.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		leased equipment. Confer w/ JD re: same. Review and respond to multiple emails from Hilco and JD re: scheduled appraisal date for M&E and request for equipment list.		
09-10-2024	MF	Case Management Review IT services coming due for payment and confer w/ consultant re: same.	0.50	247.50
09-10-2024	MF	Case Management Provide accounting details and sales info for report. Confer w/ BL re: inventory reports available. Confer w/ BL re: reporting of sales progress and urgent tasks.	1.70	841.50
09-10-2024	OJ	Case Management Confer w/ JD re: retention matters.	0.20	85.00
09-10-2024	OJ	Case Management Draft shutdown checklist for JB Cusick and confer w/ MB re: same. Review files and correspondence re: same. Incorporate additional report comments and supporting tables. Circulate inventory report. Confer w/ MF re: same.	1.10	467.50
09-10-2024	JD	Case Management Review JB Cusick matters w/ MB and OJ. Review Farmer's Hill cash and real estate asset in Chico. Provide update to team re: same.	0.80	420.00
09-10-2024	BL	Case Management Update report re: operations overview and other items. T/C w/ OJ re: same and open items. Work on budget vs actuals for professional fees. T/C w/ J. Fiero re: leases. Review legal contracts re: termination of service.	2.90	1,435.50
09-10-2024	CG	Case Management Confer w/ OJ re: properties for report. F/U w/ team re: review of exhibit for same.	0.20	110.00
09-10-2024	OJ	Case Management Update report and exhibits. Confer w/ MF and BL re: same. Confer w/ MF re: sales and inventory and review reports re: same.	3.50	1,487.50
09-10-2024	MB	Case Management T/C w/ M. Andersen re: shut down planning. Emails w/ former employees, insurance carriers and OJ re: shutdown matters.	0.30	157.50
09-10-2024	OJ	Case Management Confer w/ BL, MF and JD re: Stretto expense. Confer w/ BL re: report updates, master funding reconciliation and tasks list. Review correspondence re: JB Cusick. Confer w/ MF re: inventory reconciliation table for initial inventory report and formatting re: same. Confer w/ JD re: bin sales, report status and other open items. Confer w/ MF re: same.	1.80	765.00
09-10-2024	DB	Case Management Process NDA. Prepare receiver's certificate. Process wire transfer forms. T/Cs w/ creditors. Review and respond to email inquiries and update creditor list of emails. Process undeliverable mail and updated proof of service.	1.70	467.50
09-10-2024	OJ	Case Management Confer w/ ML and BL re: report. Review comments and updates.	1.10	467.50
09-10-2024	CG	Case Management Additional correspondence w/ BL and C. Enders re: payments. F/U w/ BL re: additional payments and process invoices for same.	0.50	162.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
09-11-2024	CG	Case Management Confer w/ BL re: bank statement.	0.10	32.50
09-11-2024	OJ	Case Management Review correspondence re: tax return fees, preparation and status. Confer w/ JD re: same. Review Order for details re: tax returns and confer w/ MB re: same. Confer w/ BL re: cash reconciliation, report exhibits and master funding request reconciliation. Review detail re: same.	1.90	807.50
09-11-2024	YL	Case Management Review and approve PayScan invoice payment processing. Post, commit and process in-house check payment. Setup money market bank account. Review, post and process incoming funds. Archive confirmations for same.	1.10	357.50
09-11-2024	YL	Case Management Create new user profile on CNB online banking, add newly opened accounts to various users. Review cash balance and confer w/ JD and MF re: transfer of funds. Confer w/ CNB re: opening MMA. T/C w/ BL re: MMA account number.	1.20	390.00
09-11-2024	YL	Case Management Process check run. Process cash receipts. Process A/P.	1.20	390.00
09-11-2024	DB	Case Management Review and respond to email inquiries. Review and approve changes to NDA.	1.00	275.00
09-11-2024	OJ	Case Management Review updated bin offers and update bin matrix. Confer w/ JD re: same and communications with remaining bidders. Confer w/ A. Kennedy re: prune bin offer.	2.30	No Charge
09-11-2024	JD	Case Management Updates w/ MB re: on-site management, inspection for pasteurizer, JB Cusick visit and security. Follow-ups re: status of Receiver's Report and other. Confer w/ OJ re: bin sales.	1.80	945.00
09-11-2024	OJ	Case Management Compile report exhibits. Review correspondence re: same. Confer w/ BL, JD and counsel re: same.	0.80	340.00
09-11-2024	MF	Case Management Follow up re: IT preservation efforts and strategize w/ consultant re: next steps to complete process.	0.80	396.00
09-11-2024	BL	Case Management T/C w/ C. Enders re: intercompany, funding requests, payroll reporting, etc. T/C w/ OJ re: cash reconciliation. Correspondence w/ insurance broker re: company's coverage.	2.80	1,386.00
09-11-2024	AN	Case Management Follow up request to Hub re: COI's for Receiver as additionally insured to policies. Review and bookmark 380 pages of COI certificate holder packages. Follow up email re: Receiver's certs not included. T/C w/ unsecured creditor for propane re: unpaid balance. Forward OAR to same.	2.90	942.50
09-12-2024	AN	Case Management Research and review documents and email to and review and respond to multiple emails from Hub re: request for COI and or policy declarations for Product Recall D&O policies.	1.70	552.50
09-12-2024	BL	Case Management Review invoices and draft funding requests for Sheller and Ranch. Confer w/ C. Enders re: same.	2.20	1,089.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
09-12-2024	BL	Case Management T/C w/ JD re: initial report, update on budget and open items.	0.80	396.00
09-12-2024	BL	Case Management Review August bank statements, update cash reconciliation and initial report, follow up on open items re: same. Review invoices received by accounting.	3.90	1,930.50
09-12-2024	MF	Case Management Confer w/ BL re: financial reporting and inventory sales. Provide additional files re: same.	0.80	396.00
09-12-2024	MF	Case Management Coordinate meeting re: IT wind down and next steps in data preservation process.	0.60	297.00
09-12-2024	OJ	Case Management Confer w/ JD and RB re: bins. Draft and send correspondence to prospective bin buyers. Update bin tracker and send correspondence soliciting additional offers. Confer w/ JD re: same.	3.00	No Charge
09-12-2024	YL	Case Management Revising GL coding. Archive and reconcile backup. Attach details backup. Review, post and process incoming funds and internal cash transfer.	0.90	292.50
09-12-2024	CG	Case Management Various f/u re: payments.	0.20	65.00
09-12-2024	DB	Case Management Review file for certificates of insurance exhibit. Process incoming mail. Process 401K distributions for 24 employees and one loan application.	2.60	715.00
09-12-2024	OJ	Case Management Update cash reconciliation for outstanding checks and bank balance detail. Confer w/ BL re: same.	0.80	340.00
09-12-2024	CG	Case Management F/U w/ JD re: exhibit for report and provide additional reports for review of same.	0.30	97.50
09-12-2024	MB	Case Management Emails w/ IT provider and exec team re: shut down. Emails w/ external CPA re: going forward services needed to winddown JB Cusick. Emails w/ JBC and ASSI creditors. Emails w/ AN and OJ re: winddown process.	0.80	420.00
09-12-2024	YL	Case Management Confer w/ team re: PGE invoice.	0.10	32.50
09-12-2024	OJ	Case Management Review UCC filings and template.	2.00	850.00
09-12-2024	JD	Case Management Review and revise Receiver's Report. Confer w/ BL re: same, cash rec, bins sales and other. Review open items, security, IT and insurance.	1.70	892.50
09-12-2024	OJ	Case Management Confer w/ BL re: report exhibits.	0.20	85.00

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<u>Case Management</u>				
09-13-2024	MF	Case Management Conf. call w/ IT consultant and company IT person. Coordinate next steps in process to preserve data and trim down services.	1.40	693.00
09-13-2024	MF	Case Management Confer w/ BL re: accounting reconciliation and financial inputs.	1.10	544.50
09-13-2024	DB	Case Management Process Golden State wire transfer forms. Process Golden State Receiver's Certificate. Process incoming mail. Review all litigation and update litigation summary to include deadlines. T/C w/ B. Yeung at Joe Yeung Farms. Process returned undeliverable mail and update proof of service. Process 401K rollovers.	2.30	632.50
09-13-2024	MB	Case Management Confer w/ MF re: status of IT systems. Email w/ JB Cusick banker re: status of accounts.	0.50	262.50
09-13-2024	YL	Case Management Confer w/ AN and BL re: PGE new account. Prepare and process deposit. Confer w/ team re: checks received and deposited.	0.50	162.50
09-13-2024	MB	Case Management Review QB reports. Review external CPA contract and approve.	0.80	420.00
09-13-2024	CG	Case Management Review edits to exhibit for report. Process same and provide finalized report to team. F/U w/ JD re: same. Confer w/ JD and BL re: check and various exchanges re: allocation of same. Confer w/ BL re: updated invoice.	1.50	487.50
09-13-2024	BL	Case Management Reconcile bank statements for August. Draft receivership report and review related detailed schedules. T/C w/ MF re: same.	3.60	1,782.00
09-13-2024	BL	Case Management Review insurance and other invoices sent by AN and N. Oliva. T/C w/ L. Belmonte re: accounting work and cash reconciliation.	1.20	594.00
09-13-2024	AN	Case Management Review NOC for Sheller Umbrella policy, forward same to and review response from team for status of payment for same. Review multiple emails from team re: schedule for annual air quality control inspection.	1.20	390.00
09-13-2024	JD	Case Management Follow-ups re: finalizing Receiver's Report.	0.40	210.00
09-14-2024	BL	Case Management Draft cash reconciliation schedule for report and verify beginning and ending balances to bank statements. Review GL detail provided by L. Belmonte. Emails w/ T. Kapur and J. Fiero re: lender agreements.	3.20	1,584.00
09-15-2024	JD	Case Management Review and respond to emails. Review details of prune contract, sign same. Review plan for on-site this week.	0.40	210.00
09-15-2024	AN	Case Management T/C w/ guard service provider re: request onsite guard service and confirm continued secured status of property. Review and approve payment re: PG&E new account for Shelling.	0.70	227.50
09-16-2024	DB	Case Management	3.90	1,072.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		Review court website, download copy of Complaint for Valley Pride Farms matter and forward same to Atty. Greenwood. Create updated photo exhibit. Review and edit final report and combine w/ exhibits. Process NDAs. Update litigation summary. File report w/ court and serve on all parties. Review and respond to email inquiries. Update creditor email list. Process returned undeliverable mail and update proof of service.		
09-16-2024	OJ	Case Management T/C w/ MF and BL re: open items, cash reporting, sales, communications and process.	0.90	382.50
09-16-2024	BL	Case Management T/C w/ J. Pretzer and MF re: insurance coverage and litigation against the company. Review litigation summary to prep for call. Review final draft of receivership report prior to filing. Draft agenda for receiver's counsel call.	2.20	1,089.00
09-16-2024	OJ	Case Management Respond to various bin buyers and confer w/ same re: bin bids. Confer w/ JD re: same. Update master bin tracker and circulate. Review stipulated order re: bin sales. Confer w/ MF re: same and other open items.	2.60	No Charge
09-16-2024	OJ	Case Management Review initial inventory updates as well as call notes. Review correspondence and Order re: payment and process for tax returns. Draft email and confer w/ JD re: same. Review correspondence re: JB Cusick, line of credit draws and A/R. Confer w/ BL re: cash reconciliation. Review correspondence and documents re: insurance cancellations. Confer w/ AN re: same.	1.80	765.00
09-16-2024	BL	Case Management Review files provided for intercompany transactions. Review bank account activity between entities. Download bank account detail. T/C w/ MF and OJ re: priority items and status on open items. T/C w/ JD re: same.	2.80	1,386.00
09-16-2024	MB	Case Management Review accounting agreement w/ outside CPA.	0.40	210.00
09-16-2024	JD	Case Management Review final draft of Receiver's Reports. Send same to counsel w/ comments. Follow-ups to open items related to same. Review updates re: IT back-up. Review and provide comments on bill of standard bill of sale.	1.40	735.00
09-16-2024	MF	Case Management Confer w/ BL and OJ re: urgent tasks, priorities, and addressing new issues.	0.90	445.50
09-17-2024	AN	Case Management Review voicemail from workers' comp attorney from former employee. Review email from A. Liams re: same. Meeting with MF, S. Alvarado and D. Chum re: A/R collection. Review and respond to multiple emails from team re: US Bank. Follow up email to banker re: access to defendant accounts for JB Cusick.	1.00	325.00
09-17-2024	AN	Case Management Travel to property, billed at 50% of time.	3.50	1,137.50
09-17-2024	OJ	Case Management Analyze UCC statements. Meeting w/ DB to review UCC filing analysis data entry analysis.	2.10	892.50
09-17-2024	BL	Case Management T/C w/ C. Enders and OJ re: accounting set-up, core functions (A/P, A/R, funding requests, etc.) and roles and responsibilities post-RIF. F/U based on conversation.	1.80	891.00
09-17-2024	BL	Case Management Review loan agreements and related collateral listed. T/C w/ P. Andersen re: same. Review bank account	2.50	1,237.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		activity.		
09-17-2024	BL	Case Management T/C w/ T. Kapur, G. Greenwood and JD re: litigation and legal matters. Review call notes from lenders. Prep agenda for call. Email re: litigation summaries and related follow-up.	1.40	693.00
09-17-2024	OJ	Case Management Review correspondence in Andersen's inbox and respond accordingly. Confer w/ BL and C. Enders re: cash processes.	1.80	765.00
09-17-2024	DB	Case Management Review email from counsel for Pattersons requesting they be added to service list. Update service list and respond to email to confirm same. Update litigation summary. Process returned undeliverable mail and update proof of service. Process incoming ex parte notice re: Holt litigation. Send same to counsel and update calendar re: same. Process Merrill Lynch signature card. Review email re: notarizing receiver's certificates for Golden State Farm and begin to prepare same.	3.20	880.00
09-17-2024	CG	Case Management Coordinate payment w/ team. F/U w/ counsel and BL re: same. Prepare billing statements and provide same to BL. Confer w/ OJ and BH re: UCC's.	0.70	227.50
09-17-2024	OJ	Case Management Review correspondence re: bin purchase and draft email re: same. T/C w/ BL, JD, DS and Golden State lenders re: bin sales and other updates.	1.50	No Charge
09-17-2024	MB	Case Management Confer w/ MF re: accounts receivable collection.	0.20	105.00
09-17-2024	YL	Case Management Set up template. Process wire.	0.50	162.50
09-17-2024	DB	Case Management Analysis and Process UCC Filing. Confer w/ OJ re: same.	3.20	880.00
09-18-2024	DB	Case Management Notarize 6 receiver's certificates. Prepare cover letter to Golden State re: same and coordinate mailing of same. Process escrow documents and check run. Process DS declaration in support of opposition to Holt application for writ of attachment. Review email from Atty. Kaput re: change in service list. Update same and send for counsel's review. Process incoming mail.	2.40	660.00
09-18-2024	YL	Case Management Review and approve wire template. Review outgoing wire transfer.	0.30	97.50
09-18-2024	CG	Case Management T/C w/ counsel re: payment. F/U T/C w/ YL. Provide payment confirmation and timeline to team.	0.30	97.50
09-18-2024	BL	Case Management Release marketing company from obligations with the company. Organize bin related files. Work w/ DB on receivership certificates. Set-up password management system. Correspondence w/ R. Andersen and MF re: same.	2.10	1,039.50
09-18-2024	OJ	Case Management Review correspondence re: open invoices. Confer w/ MF and BL re: same and respond accordingly.	1.80	765.00

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<u>Case Management</u>				
09-18-2024	OJ	Case Management Review correspondence re: various topics including insurance policies, potential bids and grower payments. Review drafted responses, confer w/ team and respond accordingly.	3.30	1,402.50
09-18-2024	OJ	Case Management Review correspondence re: recall insurance. Confer w/ JD re: open items. Review correspondence re: intercompany transactions and prune sales. Confer w/ BL and MF re: 401K policy. Review litigation documents re: grower liens.	1.40	595.00
09-18-2024	DB	Case Management Process UCC filling information to UCC Summary.	4.00	1,100.00
09-18-2024	BL	Case Management Review intercompany detail related to prune sales provided by accounting team. Review bank account activity. Correspondence w/ legal and other advisors re: same.	2.00	990.00
09-18-2024	BL	Case Management F/U on JBC bank account, insurance policies, 401k audit, and real estate sales. Update accounting task list w/ C. Enders.	1.50	742.50
09-18-2024	JD	Case Management Review details re: Appointment Order and collateral identified in Exhibit A as collateral of the Receivership Estate. Follow-ups to same. Review and respond to emails w/ team re: intercompany transactions and implications re: liens on prune collateral. Review emails re: 2023 401k audit.	0.80	420.00
09-18-2024	JD	Case Management Review Opposition re: Holt litigation and declaration supporting same. Follow-up w/ counsel re: same.	0.70	367.50
09-18-2024	OJ	Case Management Review UCC filings. Confer w/ MF and BH re: same.	2.30	977.50
09-18-2024	MF	Case Management Coordinate w/ IT consultant re: admin access to systems.	0.60	297.00
09-19-2024	AN	Case Management Review and respond to email from MB and banker re: status of defendant's US Bank account for JB Cusick. Research files, retrieve EIN, prepare new account request application for Receiver's CNB account. Email to and review response from M. Andersen and request meeting.	0.60	195.00
09-19-2024	MF	Case Management Meet w/ IT consultant and Andersen representative re: full control of systems. Review various systems and access to data storage. Confer w/ team and review analysis re: UCC filings.	3.00	1,485.00
09-19-2024	OJ	Case Management Review UCC filings and summarize data. Confer w/ DB re: same.	3.00	1,275.00
09-19-2024	OJ	Case Management Create bin sale waterfall analysis and confer w/ JD re: same. Review bin offer matrix.	2.80	No Charge
09-19-2024	BL	Case Management Prepare funding request for Sheller and Ranch. Review invoices and emails related to funding request provided by C. Enders.	1.80	891.00

2.10 1,039.50

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<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
09-19-2024	BL	Case Management T/C w/ JD re: key open items. T/C w/ DS re: same. Conf. call w/ C. Enders and L. Belmonte re: tracking funding request and cash reconciliations. F/U post-call re: same.		
09-19-2024	OJ	Case Management Confer w/ C. Enders and BL re: funding request process. Confer w/ DB re: mail forwarding.	0.90	382.50
09-19-2024	DB	Case Management Finalizing UCC filing summary. Confer w/ MF OJ re: same.	6.00	1,650.00
09-20-2024	BL	Case Management Review intercompany schedule provided by C. Enders. Email funding requests to lenders for approval. F/U re: funding request questions. Provide L. Belmonte ABW Chase bank account statements. T/C w/ JD, J. Fiero and T. Kapur re: legal-business open items and litigation request.	2.20	1,089.00
09-20-2024	JD	Case Management T/C w/ S. Barkley re: Banner Bank collateral, sale of Hopson Ranch property and other. Update team re: same.	0.30	157.50
09-20-2024	BL	Case Management T/C w/ JD, J. Fiero and T. Kapur re: legal status. Draft and update legal tracker.	1.60	792.00
09-20-2024	DB	Case Management Confer w/ OJ re: UCC filing summary review. Forward UCC filing summary to team for review.	0.80	220.00
09-20-2024	OJ	Case Management Revise and edit dashboard for bank presentation.	2.80	1,190.00
09-20-2024	YL	Case Management Review, revise, post and process ACH payment adjustment. Download and archive incoming wire confirmation.	0.30	97.50
09-20-2024	MF	Case Management Coordinate w/ consultant and Andersen re: IT systems access and backups.	1.20	594.00
09-20-2024	JD	Case Management Review IT inquiries. Review details of Mike Andersen properties and crop and rentals re: same. Emails re: same. Update call w/ BL and counsel re: all pending legal matters.	0.90	472.50
09-22-2024	JD	Case Management Review and respond to emails. Review planning for open items.	0.40	210.00
09-23-2024	OJ	Case Management Confer w/ JD re: bin sales. Review correspondence re: bank consents and pending bin bids. Update bid matrix.	2.40	No Charge
09-23-2024	DB	Case Management Review loan agreements re: Cornerstone Community bank. F/U w/ MF re: same.	0.60	165.00
09-23-2024	JD	Case Management Review and discuss open items w/ BL. Review all on-site tasks w/ AN.	0.80	420.00
09-23-2024	DB	Case Management Review and approve draft NDAs. Review and respond to email inquiries. Update email list of creditors. Process NDA. Process returned undeliverable mail and update proof of service.	1.20	330.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
09-23-2024	BL	Case Management Respond to JD's email re: case items. Review J. Fiero's email re: intercreditor agreement and facility use charge. Review invoices and insurance coverage for company.	1.50	742.50
09-23-2024	BL	Case Management Emails and T/C w/ J. Nolan re: Valley Pride dispute. F/U w/ C. Enders re: same.	1.00	495.00
09-23-2024	MF	Case Management Conf. call w/ IT consultant and Andersen IT manager re: IT systems review. Additional discussion w/ consultant and reviewed access/searchability of certain items.	2.80	1,386.00
09-23-2024	AN	Case Management Confirm, inspect and store returned F-150 Ford Lightning truck.	0.30	97.50
09-24-2024	OJ	Case Management Review creditor inbox and confer w/ growers re: liens. Confer w/ DB and BH re: NDA. Circulate same. Review correspondence and documents re: insurance claims. Confer w/ BL, MF and AN re: deal updates and status.	1.80	765.00
09-24-2024	MF	Case Management Review updates and confer w/ IT consultant re: data backups, searches, and services needed.	0.90	445.50
09-24-2024	BL	Case Management Review bank account activity. Emails w/ CG re: same. Review invoices for security and insurance. Check bank accounts and process ABW wires. Review files related to ABW insurance and other. T/C w/ C. Enders re: accounting team and key tasks for the week.	2.80	1,386.00
09-24-2024	OJ	Case Management Confer w/ BL re: budget to actuals analysis. Draft budget to actuals based on lender funding for ranch. Analyze and record variances.	2.20	935.00
09-24-2024	YL	Case Management Process ACH. Confer w/ BL and JD re: general ledger report, run report and e-mail. Confer w/ CG re: bank activity.	0.80	260.00
09-24-2024	YL	Case Management Confer w/ team re: money market account, legal fee reimbursement, funds transfer and new bank accounts. Set up new GL accounts for various money market accounts. Review cash balance and reconcile same.	0.80	260.00
09-24-2024	YL	Case Management Setup GL account for multiple money market accounts. Create cash general ledger for money market accounts. Setup bank account for money market #2.	0.70	227.50
09-24-2024	BL	Case Management Conf. call w/ OJ and MF re: project update and status. T/C w/ OJ re: budget vs actual analysis. T/C w/ JD re: open items.	1.20	594.00
09-24-2024	DB	Case Management Process and input offer re: Andersen miscellaneous equipment.	0.40	110.00
09-24-2024	DB	Case Management Process and forward NDA to OJ.	0.20	55.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
09-24-2024	JD	Case Management AM T/C w/ BL re: all open items. Review status of bin sales and approvals from various parties. Review details related to intercompany and accounting issues. Update re: IT. Updates re: insurance coverages and right-sizing same.	1.30	682.50
09-25-2024	YL	Case Management Confer w/ BL and JD re: cash reconciliation and various bank accounts. Confer w/ DS and CG re reimbursement and payment to counsel.	0.80	260.00
09-25-2024	CG	Case Management Prepare additional invoices for funding request and provide to BL and Andersen team. Confer w/ DB re: UCC schedules.	0.40	130.00
09-25-2024	MB	Case Management T/C w/ BL and MF re: JB Cusick A/R, wind down and administrative matters. T/C w/ grower counsel re: producer claims and receivership process. Review JB Cusick records to confirm amount owed and email w/ grower counsel re: same. Review Blue Demand communication and emails w/ AN and BL re: response.	1.30	682.50
09-25-2024	JP	Case Management Update Receiver's addendum for Andersen & Shelling and share.	0.70	297.50
09-25-2024	JD	Case Management Meeting w/ BL and MF to discuss tasks / request by lender group. Discuss insurance, accounting, liquidation efforts, core team responsibilities and critical items to address. Summarize notes from same. Review emails re: JB Cusick. Confer w/ MF re: same.	0.80	420.00
09-25-2024	JD	Case Management Travel to Vina HQ at 50% of time.	2.50	1,312.50
09-25-2024	BL	Case Management T/C w/ MF and JD re: open and key items. Review order regarding proceeds. Emails w/ counsel re: same. Update recovery analysis.	2.20	1,089.00
09-25-2024	BL	Case Management Conf. call w/ MB and AN re: JB Cusick open items. Review financials and available files prior to call.	0.80	396.00
09-25-2024	DB	Case Management Review and respond to email inquiries. Update list of creditor emails for future noticing. Process incoming mail. T/C w/ E. Church re: leased warehouses.	0.80	220.00
09-25-2024	MF	Case Management Review IT service updates and confer w/ IT consultant re: access control of same.	0.80	396.00
09-25-2024	OJ	Case Management Review creditor inbox and confer w/ correspondents re: same. Confer w/ BL and C. Enders re: same. Review open invoices and creditor emails in the designated inbox. Respond accordingly.	2.00	850.00
09-25-2024	AN	Case Management Review and sort incoming mail. Organize and collect legal summons and complaints from multiple creditors to transfer to main office. Coordinate mailing of envelope containing incoming cash. Review incoming mail and legal summons. Advise team re: Blue Diamond demand letter to JB Cusick for refund of commissions paid due to conflict of interest.	1.50	487.50
09-25-2024	OJ	Case Management	1.70	722.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		Review and update master funding request. Create budget to funding comparison. Confer w/ BL re: same.		
09-26-2024	OJ	Case Management Confer w/ BL and C. Enders re: borrowing base calculation and processes. Confer w/ BL re: ranch budget. Review same.	1.20	510.00
09-26-2024	OJ	Case Management Review and prepare budget to actuals and confer w/ BL re: same.	1.60	680.00
09-26-2024	AN	Case Management T/C w/ US Bank representative re: steps to open new account for Receiver to secure cash on hand from and closing or removing defendants as signatory on accounts, request historical account activity re: same. Update team re: same. Review phone and internet bill, confer w/ and email to team re: phone company policies for Receiver control. Review email from R. Andersen re: terms and costs for early termination of services for Marguerite.	1.00	325.00
09-26-2024	JD	Case Management Review litigation updates. Review inquiries from vendors and status of emails from creditors and responses to same.	0.80	420.00
09-26-2024	BL	Case Management Review invoices, payroll information and funding request matrix for Sheller and Ranch. Update matrix and follow up w/ C. Enders re: same. T/C w/ YL re: CNB account activity.	2.80	1,386.00
09-26-2024	BL	Case Management Conf. call w/ J. Fiero, T. Kapur, JD and MF re: legal update. Prep agenda for legal update call.	1.30	643.50
09-26-2024	YL	Case Management Download and archive internal cash transfer confirmation. Review, revise and post internal cash transfer.	0.40	130.00
09-26-2024	JD	Case Management Meet w/ G. Kelley re: rightsizing insurance. Review budgets. Confer w/ team re: banking, etc. T/Cs re: same.	0.70	367.50
09-26-2024	MF	Case Management Conf. call w/ JD, BL and counsel re: status of various legal issues.	0.90	445.50
09-26-2024	YL	Case Management Prepare a cash reconciliation. Confer w/ team re: cash balances and account activity. T/C w/ DS re: retainer balance. MS Teams meeting w/ BL re same. T/C w/ CNB re: various money market account, submit a request to open 2 more MMA.	1.20	390.00
09-26-2024	DB	Case Management Process NDAs. Process incoming mail and bill of sale.	1.50	412.50
09-26-2024	YL	Case Management Process A/P. Process cash receipt.	0.40	130.00
09-27-2024	DB	Case Management T/C w/ E. Wright re: warehouses. Process 401K distribution forms. Process 401K change of contact information. Update litigation summary. Forward link to HUB adjuster. Review and approve revisions to NDA. Prepare receiver's certificate and notarize same. Coordinate mailing of same to Golden State. Process incoming mail. Review and respond to email inquiries and update list of creditor emails.	3.00	825.00
09-27-2024	YL	Case Management	1.60	520.00

Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
		T/C w/ team re: various money market and account numbers. T/C w/ CNB re: opening new MM 3 and MM 4, request transfers to various money market accounts. Provide wire instruction to JD and OJ. Review cash balance and update cash reconciliation. Review cash balance and incoming wire. Confer w/ team re: accounting records.		
09-27-2024	BL	Case Management Review ABW financials and related schedules provided by C. Enders. Review JB Cusick financials pulled for QBs.	1.70	841.50
09-27-2024	YL	Case Management Review bank activity, download and archive ACH/ Wire incoming and internal cash transfer confirmations. Confirm money market GL account and GL coding for incoming funds.	0.80	260.00
09-27-2024	DB	Case Management Process share link re: Andersen litigation.	0.40	110.00
09-27-2024	JD	Case Management Travel from Vina HQ at 50% of time.	2.50	1,312.50
09-27-2024	AN	Case Management Review A/R in accounting, prepare customer statements and compose and email notice of receivership and Receivers duties and authorities and demand for payment to multiple customers re: outstanding invoices. T/C w/ and review responses from multiple customers re: status of payment for same.	3.00	975.00
09-27-2024	AN	Case Management Review and distribute incoming mail.	0.50	162.50
09-27-2024	OJ	Case Management Update sheller master funding request. Analyze budget to funding from lenders.	0.80	340.00
09-27-2024	YL	Case Management Review and download multiple bank confirmations. Record various A/R transactions.	1.10	357.50
09-30-2024	YL	Case Management Review cash balance. Confer w/ JD re: same. Process transfer and provide confirmation to team. CNB online administration to add newly opened money market accounts. Confer w/ CNB re: various transfers to the newly opened MM 3 and MM 4 accounts. Confer w/ team re: accounting records.	1.50	487.50
09-30-2024	DB	Case Management Review and respond to email inquiries re: past due balances. T/Cs w/ U.S. Bank to provide identification for bank account and send emails re: same. Process returned undeliverable mail and update proof of service. Review and respond to email re: claims process. Update list of creditor emails. Process NDA.	1.60	440.00
09-30-2024	CG	Case Management Review order and report re: authorities.	0.50	162.50
09-30-2024	OJ	Case Management Review order for fee objection language. Confer w/ DS and JD re: same.	0.40	170.00
09-30-2024	BL	Case Management T/Cs w/ JD and MF re: project status and lender requests. T/C w/ JD re: project updates.	1.20	594.00
09-30-2024	BL	Case Management	0.40	198.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		Emails w/ YL re: bank accounts.		
09-30-2024	AN	Case Management Review and respond to email from G. Kelly re: CA Walnut Board & Commission. Review and respond to insurance reinstatement letter. Multiple T/Cs w/ tenants responding to letters redirecting rents to Receiver. Review responses from multiple creditors re: status of payment. Review multiple emails from US Bank and JD re: instructions for access to defendant's bank accounts and direct cash on hand to Receiver's possession.	1.40	455.00
09-30-2024	JD	Case Management Review all staffing, IT back-up detail and reporting.	0.60	315.00
			361.00	145,063.50
<u>Hopson Ranch (Banner)</u>				
09-03-2024	CG	Hopson Ranch (Banner) Confer w/ DK re: next steps. Confer w/ DK and JD re: Banner Bank properties. Research same and provide details.	0.80	260.00
09-03-2024	JP	Hopson Ranch (Banner) Finalize listing agreement.	1.40	595.00
09-17-2024	DK	Hopson Ranch (Banner) Review, draft and edit contract for buyer. Confer w/ JD and JP re: status. Confer w/ agent re: status.	1.30	682.50
09-17-2024	JP	Hopson Ranch (Banner) Draft PSA for Hopson Farm property.	2.60	1,105.00
09-18-2024	JP	Hopson Ranch (Banner) Confirm assets on property, incorporate DKs comments and provide PSA draft. Execute contracts and return.	1.40	595.00
09-18-2024	JD	Hopson Ranch (Banner) Review status of form contract for Hopson Ranch sale. Send same to buyer. Send to counsel. Follow-up w/ team.	0.40	210.00
09-27-2024	DK	Hopson Ranch (Banner) Review and coordinate sale.	0.80	420.00
09-30-2024	CG	Hopson Ranch (Banner) Confer w/ JP re: Banner Bank property. Review list of prelims received and respond to JP re: status and next steps for sale. F/U w/ title re: same. Various exchanges w/ title re: ownership questions. Confer w/ JP re: loan balances. Review and respond to title re: mobile home APN.	1.30	422.50
09-30-2024	JP	Hopson Ranch (Banner) Review Title reports, update Hopson Ranch contract and discuss court process with counsel and Title.	1.40	595.00
09-30-2024	DK	Hopson Ranch (Banner) Review and coordinate sale.	0.90	472.50
			12.30	5,357.50
<u>JB Cusick</u>				
09-05-2024	OJ	JB Cusick Request and review JB Cusick bank detail. Add same to cash reconciliation. Confer w/ BL, MB and C.Enders re: all applicable accounts and review order re: same.	2.30	977.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>JB Cusick</u>				
09-06-2024	JD	JB Cusick Review JB Cusick items. Review security on-site and accounting processes and staffing.	1.00	525.00
09-07-2024	JD	JB Cusick Confer w/ MB re: plan for JB Cusick wind-down.	0.30	157.50
09-09-2024	MB	JB Cusick Confer w/ MF re: status of lender visit. Emails w/ BL re: report content for JBC and draft same. Emails w/ insurance providers re: JBC coverage. Review and terminate worker's comp policy.	0.90	472.50
09-11-2024	MB	JB Cusick Onsite meeting w/ M. Andersen re: JB Cusick A/R, winddown plan, and ASSI matters. Review JB Cusick wind-down plan. Emails w/ OJ, AN and M. Andersen re: same.	3.50	1,837.50
09-13-2024	AN	JB Cusick Review and respond to email from MB re: continue service contract with CPA firm for JB Cusick accounting. Review multiple emails to and from MB and CPA re: accounting. Gain access to and review accounting in QuickBooks. Prepare multiple reports from same. Confer w/ MB re: schedule to manage winddown and request drill down and prepare transaction details reports from multiple income and expense entries.	2.70	877.50
09-19-2024	DB	JB Cusick Process change of Address re: J.B Cusick Company Inc.	0.20	55.00
09-20-2024	AN	JB Cusick Email to and T/C w/ M. Andersen, schedule meeting and meet with M. Andersen at JB Cusick Chico office to retrieve contracts and documents for copier and Ford truck, discuss rent collections for residential properties. Confirm and picture document retrieved computers.	1.20	390.00
09-23-2024	MB	JB Cusick Emails w/ insurance broker and MF re: JB Cusick coverage. Emails w/ AF and M. Andersen re: JB Cusick transfer of files and termination of leases.	0.20	105.00
09-24-2024	AN	JB Cusick Teams meeting re: winddown and A/R collections and review A/R in accounting for J.B Cusick.	0.50	162.50
09-24-2024	BL	JB Cusick Review JB Cusick files related to financials, A/R aging and bank account information. Correspondence w/ US Bank.	1.80	891.00
09-24-2024	MB	JB Cusick T/C w/ counsel for grower. Emails w/ team re: JB Cusick accounts receivable. Emails w/ counsel and JD re: pre-receivership payroll related obligation.	0.80	420.00
			15.40	6,871.00
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
09-02-2024	DS	Land, Facilities & Equipment (GSFC) Review and respond to emails on harvest, broker, Lindauer, etc.	0.70	385.00
09-02-2024	CG	Land, Facilities & Equipment (GSFC) Review broker update. Confer w/ DK and JD re: life estate parcels, identify properties affected and details for same.	0.40	130.00
09-03-2024	JD	Land, Facilities & Equipment (GSFC)	2.80	1,470.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		Follow-ups re: funding, status of NDAs and turnkey buyer tours, etc. Review harvest details. Multiple T/Cs w/ N. Oliva re: critical expenses for harvest. T/C w/ H. Crain re: same. Confer w/ DK and CG land listings.		
09-03-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate listing.	0.90	472.50
09-03-2024	BL	Land, Facilities & Equipment (GSFC) Review and f/u re: lease agreements related to ranches.	1.00	495.00
09-03-2024	DS	Land, Facilities & Equipment (GSFC) Meeting w/ JD re: hulling, harvesting and open issues. Emails re: same.	1.00	550.00
09-03-2024	OJ	Land, Facilities & Equipment (GSFC) Prep Crain skeleton draft agreement. Confer w/ JD re: same.	2.60	1,105.00
09-04-2024	OJ	Land, Facilities & Equipment (GSFC) Further edits to Crain draft agreement.	0.50	212.50
09-04-2024	JP	Land, Facilities & Equipment (GSFC) Execute agreements and attachments.	0.30	127.50
09-04-2024	DS	Land, Facilities & Equipment (GSFC) Review ranch operations, harvest, Crain agreement, sale of parcel to Nate, etc. T/C w/ team. Debrief re: same. Review and approve listing contracts. Review crop contract, discuss w/ JD. Review sale to Nate.	1.40	770.00
09-04-2024	BL	Land, Facilities & Equipment (GSFC) T/C w/ JD and DS re: update on leases and status of GSFC open items.	0.80	396.00
09-04-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate listing and sale process and confer w/ JP and agent re: same. Review of status w/ JD.	1.60	840.00
09-04-2024	CG	Land, Facilities & Equipment (GSFC) Research Jenkins lands and provide mapping w/ property details to JD, DK and BL.	0.70	227.50
09-04-2024	JD	Land, Facilities & Equipment (GSFC) Review various details re: harvest and hulling plan w/ Hal Crain. Confer w/ BL re: various leases for Jenkins and Finch. Review and provide comments on crop purchase contract for Walnuts. Confer w/ OJ re: status of agreement for harvest and huller proposal. Review emails re: same. Review plan for Tree-O and Seven Oaks. Follow-ups re: Mead leases and arrangement for crop harvested re: same.	2.90	1,522.50
09-05-2024	JD	Land, Facilities & Equipment (GSFC) On-site meetings w/ H. Crain and N. Oliva re: harvest decisions and huller operation. Meet w/ R. Faris. H. Crain and N. Oliva re: same. Follow ups re: all funding request details for GSFC portion. Review status of GSFC critical task tracker, updates on facility sale, ranch listings and expenses.	3.30	1,732.50
09-05-2024	JD	Land, Facilities & Equipment (GSFC) Tour certain ranch properties and leaseholds w/ H. Crain. Review condition of crop. Prepare for all-hands call, finalize task tracker and agenda. Confer w/ team re: progress on leases and other.	1.80	945.00
09-05-2024	BL	Land, Facilities & Equipment (GSFC) T/C w/ J. Fiero re: ranch leases.	0.20	99.00
09-05-2024	DS	Land, Facilities & Equipment (GSFC)	0.80	440.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		Review issues w/ JD. Prepare for call w/ GSFC tomorrow. Review real estate w/ DK. Review and respond to emails.		
09-05-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale and requirements for same.	0.90	472.50
09-06-2024	DK	Land, Facilities & Equipment (GSFC) T/C w/ all parties re: sale and update on operations. Confer w/ agent re: sale and marketing process and coordinate same.	1.90	997.50
09-06-2024	DS	Land, Facilities & Equipment (GSFC) Review and update w/ team. Confer w/ JD re: issues post call.	0.50	275.00
09-06-2024	BL	Land, Facilities & Equipment (GSFC) Conf. call w/ JD, R. Faris, GSFC and counsel re: Hilco and receivership update. T/C w/ C. Jenkins re: lease agreement. T/C w/ J. Fiero re: status on ranch leases. T/C w/ N. Olivia re: ranch expenses and funding process.	2.50	1,237.50
09-06-2024	JD	Land, Facilities & Equipment (GSFC) Travel from Vina HQ at 50% of time.	1.30	682.50
09-06-2024	JD	Land, Facilities & Equipment (GSFC) On-site. Meet w/ N. Oliva and G. Kelley re: various pending matters related ranch and turnkey sale respectively.	1.40	735.00
09-06-2024	JD	Land, Facilities & Equipment (GSFC) Attend conf. call re: HCF turnkey sale process. Summarize notes re: same. Prepare for and attend all-hands call re: status of real property listings, harvest and huller, misc. assets sales, leaseholds, case management and legal matters. T/C w/ DK re: real property sales and process. Summarize notes from same. Debrief w/ team.	1.40	735.00
09-07-2024	CG	Land, Facilities & Equipment (GSFC) Review correspondence re: listing and confer w/ DK and broker re: same.	0.30	97.50
09-07-2024	AN	Land, Facilities & Equipment (GSFC) Review email and attachments from H. Crain re: Hopper Rental agreements, email to JD re: status of approvals. Review and respond to multiple emails from team and providers re: account changes and ordering details for North Valley Ag and Thompson Gas. Review and respond to JD re: assign tenant relations.	1.00	325.00
09-08-2024	DS	Land, Facilities & Equipment (GSFC) Review and respond to emails. Prepare for Monday.	0.30	165.00
09-09-2024	CG	Land, Facilities & Equipment (GSFC) Research various options for listing exposure and provide recap of same to DK. Various f/u's re: same. Review title reports, update tracker and confer w/ title re: same. Prepare list of properties for title report requests and provide same to title.	2.60	845.00
09-09-2024	OJ	Land, Facilities & Equipment (GSFC) Update, consolidate and circulate call notes.	0.20	85.00
09-09-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale and listing requirements. Review of property and title status.	0.70	367.50
09-09-2024	JD	Land, Facilities & Equipment (GSFC) Thank you for trusting Stapleton Group, we appreciate your business.	2.20	1,155.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		Review and make revisions to farm management and huller management agreement. Review GSFC open items and confer w/ BL re: same. T/Cs w/ N. Oliva re: critical ranch items and harvest plans. Follow ups re: Jenkins leases.		
09-09-2024	BL	Land, Facilities & Equipment (GSFC) Review contract farming invoices. Review debt agreement and receivership order. Review and approve of ranch related invoices.	0.80	396.00
09-09-2024	DS	Land, Facilities & Equipment (GSFC) Review property sales, huller, Crains and other issues. Meetings w/ team.	0.80	440.00
09-09-2024	AN	Land, Facilities & Equipment (GSFC) Review tenant lease agreements, compose new lease for tenant with no lease. Email to JD re: create new and amend existing lease agreements. T/C w/ H. Crain and confer w/ JD and review and sign contracts for equipment rental for PT Welding and L.A. Hearne Company re: hoppers for transport. Advise team re: funding for same. T/C w/ N. Oliva re: Trio & Seven Oaks ranches transition to Andersen. T/C w/ and email to B. Lindaur re: utility meters associated with same.	4.00	1,300.00
09-10-2024	DS	Land, Facilities & Equipment (GSFC) T/C w/ GSFC. Debrief re: same.	0.50	275.00
09-10-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate property sale and marketing.	0.60	315.00
09-10-2024	JD	Land, Facilities & Equipment (GSFC) Confer w/ BL re: various open items prior to bank call. Follow-ups w/ H. Crain and N. Oliva re: harvest matters. Update GSFC task tracker. Confer w/ BL and DS re: items re: same, including pending lease decisions, key updates from last week related to real property listings, huller and harvest, turnkey sale process and other. Attend bank call. Debrief w/ DS and BL re: same.	1.50	787.50
09-10-2024	JD	Land, Facilities & Equipment (GSFC) Review and finalize agreement for farm management and huller management w/ Crain. T/C w/ counsel re: same. Deliver draft agreement to Crain.	1.20	630.00
09-10-2024	BL	Land, Facilities & Equipment (GSFC) T/C w/ A. Stewart and J. Fiero re: Finch lease. Review Finch lease and share with attorneys. T/C w/ S. Finch re: same. T/C w/ DS, JD, R. Faris and GSFC re: status of open items.	1.20	594.00
09-10-2024	BL	Land, Facilities & Equipment (GSFC) Work w/ P. Andersen and U.S. Bank on administrative access.	0.80	396.00
09-10-2024	CG	Land, Facilities & Equipment (GSFC) Confer w/ title re: life estate missing from title report. Respond to additional questions from title re: same. T/C w/ vendor re: listing options.	0.60	195.00
09-11-2024	MB	Land, Facilities & Equipment (GSFC) T/C w/ JD re: lender meetings. Onsite meeting w/ secured lender and exec team. Meeting w/ G. Kelley.	3.40	1,785.00
09-11-2024	CG	Land, Facilities & Equipment (GSFC) Zoom meeting w/ vendor to review marketing options.	0.40	130.00
09-11-2024	JD	Land, Facilities & Equipment (GSFC) Confer w/ DK and JP re: sale of ranches, review emails re: same. T/C w/ H. Crain re: status of harvest and huller progress. Updates re: budget, funding requests and other.	0.90	472.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
09-11-2024	JP	Land, Facilities & Equipment (GSFC) Prepare update on current offer vs take to market. Discuss same w/ DK and JD.	0.50	212.50
09-11-2024	BL	Land, Facilities & Equipment (GSFC) T/C w/ N. Oliva re: lease ranches and budget updates. Review invoices received from N. Oliva. F/U w/ B. Lindauer re: farming invoices.	0.80	396.00
09-11-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinaet sale requirements.	0.90	472.50
09-11-2024	AN	Land, Facilities & Equipment (GSFC) Review and respond to email from Hilco re: confirm schedule for Real Estate appraisal. Email to and review response from team re: arrange onsite guide re: same.	0.40	130.00
09-11-2024	DS	Land, Facilities & Equipment (GSFC) Meeting and discussion w/ JD re: harvest and ops. Review emails re: same.	0.70	385.00
09-11-2024	OJ	Land, Facilities & Equipment (GSFC) Draft email to banks re: approval requests. Confer w/ JD re: same.	0.50	212.50
09-12-2024	DS	Land, Facilities & Equipment (GSFC) Update w/ JD. Review issues / plan. Discuss same.	0.30	165.00
09-12-2024	DK	Land, Facilities & Equipment (GSFC) Multiple T/Cs to negotiate sale requirements and review of same. Confer w/ JD re: same.	2.20	1,155.00
09-12-2024	JP	Land, Facilities & Equipment (GSFC) Review listing agreement on office space and discuss same with broker.	1.10	467.50
09-12-2024	BL	Land, Facilities & Equipment (GSFC) T/C w/ H. Crain re: ranch budget. Clean up notes and budget from call. Review payroll reporting and update funding request based on terminated employee.	1.60	792.00
09-12-2024	JD	Land, Facilities & Equipment (GSFC) Various T/Cs w/ N. Oliva re: ranch matters. Review updates re: revised budget for harvest and hulling. Follow-up re: Mariani contract. Review farm management and huller agreement. Follow ups to prepare for Friday all-hands call. Prepare agenda for same. T/Cs w/ K. Tim re: custom farming and invoices re: same.	2.50	1,312.50
09-13-2024	JD	Land, Facilities & Equipment (GSFC) AM T/Cs w/ N. Oliva re: ranch staffing matters. T/C w/ H. Crain re: same, agreement, securing equipment and other. Attend turnkey facility sale update w/ T. Stratton, CR3 and GSFC. Prepare agenda and update notes on in-progress items for GSFC all-hands call w/ attys. Attend same. Follow ups re: harvest, ranch employee and other matters.	2.30	1,207.50
09-13-2024	JP	Land, Facilities & Equipment (GSFC) Discuss new contract amendment with broker.	0.60	255.00
09-13-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale.	0.70	367.50
09-13-2024	BL	Land, Facilities & Equipment (GSFC)	3.50	1,732.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		Conf. call w/ JD, GSFC and CR3 re: weekly update with attorneys. Review Finch lease and ensure payment. T/C w/ C. Enders re: same. T/C w/ J. Fiero re: same. Verify wire instructions and update funding tracker. Update task tracker for weekly call. Review emails and correspondence w/ GSFC.		
09-13-2024	AN	Land, Facilities & Equipment (GSFC) Review and respond to Hilco re: follow up confirmation for scheduled M&E meeting.	0.20	65.00
09-15-2024	AN	Land, Facilities & Equipment (GSFC) Review and respond to JD re: notice and assign management of scheduled incoming walnut loads. Email to JD and team re: review and confirm transition of Trio and Seven Oaks Ranches and approval to transfer PG&E service to Andersen. Review multiple emails from H. Crain re: trucking quote for green loads from ranches to huller and status of pick up from Patterson warehouse.	0.90	292.50
09-15-2024	AN	Land, Facilities & Equipment (GSFC) Review and respond to Hilco re: request for list of M&E. Research and review files and forward revised consolidated master list.	0.30	97.50
09-16-2024	CG	Land, Facilities & Equipment (GSFC) Draft listing and marketing options memo to DK.	0.60	195.00
09-16-2024	BL	Land, Facilities & Equipment (GSFC) Update management agreement based on redlines provided. F/U on lease payment and other ranch funding items.	1.80	891.00
09-16-2024	JD	Land, Facilities & Equipment (GSFC) Follow-ups re: farm and huller management. Updates re: on-site. Updates re: harvest. Review progress on turnkey efforts.	0.70	367.50
09-16-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sales.	0.80	420.00
09-16-2024	AN	Land, Facilities & Equipment (GSFC) Review PG&E statement and confirm takeover date and service address for Trio & Seven Oaks Ranches. Confer w/ MF re: A/R collections.	0.70	227.50
09-17-2024	DS	Land, Facilities & Equipment (GSFC) Prepare and attend call w/ lender.	0.50	275.00
09-17-2024	BL	Land, Facilities & Equipment (GSFC) Conf. call w/ JD, DS, GSFC and CR3 re: weekly status call. Prep for weekly status call. Review task tracker. Update Ranch budget for exhibit in management agreement.	1.00	495.00
09-17-2024	CG	Land, Facilities & Equipment (GSFC) Confer w/ DK re: title status. Various exchanges w/ title re: misc properties and status or reports. Update lien tracker. Review various updates from Broker.	1.50	487.50
09-17-2024	OJ	Land, Facilities & Equipment (GSFC) Review correspondence re: sales. Confer w/ BL and MF re: same. Confer w/ JP, AN and DK re: Hopson Ranch sale and site visit. Review master inventory file.	1.60	680.00
09-17-2024	JD	Land, Facilities & Equipment (GSFC) Attend AM farm credit consortium call. Debrief from same w/ T. Stratton re: turnkey sale efforts and bidding procedures. Review and respond to email from W. Mar re: bidding procedure plan. Prepare for and attend PM conf. call w/ SG, CR3 and GSFC teams re: status of all efforts related to collateral, turnkey, real property and	2.80	1,470.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		other. Update on harvest and hulling. Review and finalize edits to harvest and huller management agreement. T/C w/ counsel re: same. Review litigation defense requests w/ counsel related to GSFC counsel.		
09-18-2024	OJ	Land, Facilities & Equipment (GSFC) Confer w/ JP and MF re: property purchase inquiries.	0.40	170.00
09-18-2024	BL	Land, Facilities & Equipment (GSFC) Finalize administrative access to US bank. Approve ranch related invoices from N. Oliva.	0.50	247.50
09-18-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale and marketing.	0.40	210.00
09-18-2024	JD	Land, Facilities & Equipment (GSFC) Review and finalize harvest mgmt and huller mgmt contract. Communicate w/ team re: advance for harvest/huller costs, put same in process. T/Cs w/ BL re: same. Review and respond to emails from A. Moosally re: ranch property update. Review employee matters for ranch staff, confer w/ A. liams re: same.	1.30	682.50
09-18-2024	DS	Land, Facilities & Equipment (GSFC) Review Crain agreement. Confer w/ BL.	0.40	220.00
09-18-2024	AN	Land, Facilities & Equipment (GSFC) On site at corporate ranch, meet with Hilco to discuss process to log and confirm M&E inventory. Meet w/ N. Oliva, travel to and visit Hopson ranch to confirm and picture document M&E inventory. Review pictures and locate items from master equipment list. Review payment from buyer for vaporizers from Spanfellner ranch. Update team re: same.	7.10	2,307.50
09-19-2024	AN	Land, Facilities & Equipment (GSFC) Meet w/ H. Crain, tour huller operation, discuss supply needs, confirm approval from JD to start propane service and T/C to and lvm for Thompson Gas re: same.	6.30	2,047.50
09-19-2024	DS	Land, Facilities & Equipment (GSFC) Meeting w/ T. Stratton. Meeting w/ DK. Review turnkey options.	0.40	220.00
09-19-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale.	0.60	315.00
09-19-2024	BL	Land, Facilities & Equipment (GSFC) Update farm management agreement with redlines and comments as well as set-up all exhibits. Provide wire transfer instructions to J. Rabo and confirm same. T/C w/ J. Rabo re: agreement and wire confirmation.	2.70	1,336.50
09-19-2024	DB	Land, Facilities & Equipment (GSFC) Finalize Crain Management Agreement. Process Crain grower contract. Review and respond to email inquiries and update creditor list of emails. Process returned undeliverable mail and update proof of service.	1.80	495.00
09-19-2024	JD	Land, Facilities & Equipment (GSFC) Confer w/ BL re: critical items for GSFC weekly call. Review requests / open items from CR3 list. confer w/ DS and BL re: same. Review harvest progress and huller updates. T/Cs w/ N. Oliva re: harvest and ranch property details. Review updates from S. Mudd re: interest from properties. Finalize farm mgmt and huller mgmt agreement and wire advance re: same.	1.40	735.00
09-20-2024	JD	Land, Facilities & Equipment (GSFC) Prepare for and attend GSFC weekly call. Follow ups to same w/ team. T/Cs w/ N. Oliva re: harvest. T/C w/ H. Crain re: same and hulling operation. T/C w/ AN re: same and equipment valuation meetings. Confer w/ DS re: turnkey sale, harvest, reporting and other. Confer w/ BL re: open items.	1.60	840.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
09-20-2024	BL	Land, Facilities & Equipment (GSFC) Conf. call w/ JD, DS, OJ, CR3 and GSFC re: weekly status call. Prep for call and update task tracker. T/C w/ DS and JD re: GSFC updates and open items. T/C w/ A. Moosally re: open items and priority list.	2.80	1,386.00
09-20-2024	OJ	Land, Facilities & Equipment (GSFC) T/C w/ BL, JD and GSFC re: updates, litigation and sales.	0.80	340.00
09-20-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale requirements.	0.60	315.00
09-20-2024	OJ	Land, Facilities & Equipment (GSFC) Update and send bank consents. Confer w/ JD re: same.	2.70	1,147.50
09-20-2024	DS	Land, Facilities & Equipment (GSFC) T/C w/ BL. Prepare for call w/ GSFC. Attend GSFC call. Debrief w/ team. Debrief w/ BL re: all issues. Notes re: same. T/C w/ JD re: all matters. Notes re: same.	2.20	1,210.00
09-20-2024	AN	Land, Facilities & Equipment (GSFC) Visit Durham ranch, picture document visit.	2.00	650.00
09-20-2024	AN	Land, Facilities & Equipment (GSFC) On site, follow up T/C and lvm for and email to Thompson Gas re: add separate account for Huller propane tank. Review, research and respond to BL re: Recall policy history and term options.	4.50	1,462.50
09-21-2024	AN	Land, Facilities & Equipment (GSFC) Onsite monitoring huller operation. Research county website and confirm property APN's and addresses re: rental property. Prepare notice to tenants re: same.	6.00	1,950.00
09-21-2024	JD	Land, Facilities & Equipment (GSFC) Address harvest issues related to Tulare crop on certain parcels. Emails from counsel for creditors. Communicate w/ N. Oliva and H. Crain re: same.	0.50	262.50
09-22-2024	AN	Land, Facilities & Equipment (GSFC) Site visit, meet w/ B. Crain, discuss limited operations, picking and hauling green to huller, no walnut transport off site. Confer w/ security guard re: same.	1.00	325.00
09-23-2024	CG	Land, Facilities & Equipment (GSFC) F/U w/ DK re: listings.	0.20	65.00
09-23-2024	BL	Land, Facilities & Equipment (GSFC) Review intercompany activity between entities and review schedules provided by C. Enders. Emails w/ A. Moosally re: Cornerstone debt and 2023 crop.	1.30	643.50
09-23-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale.	0.40	210.00
09-23-2024	JD	Land, Facilities & Equipment (GSFC) Review updates re: HCF turnkey process and tours / interest. Review sheller budget details.	0.40	210.00
09-23-2024	AN	Land, Facilities & Equipment (GSFC) On site for monitoring and tour re: walnut huller process during operations. Finalize tenant notices, prepare packages to include a copy of Order and existing lease agreements. Confer w/ onsite accounting team re:	7.00	2,275.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		invoices, account balances and other supporting documents for ranch operating expenses. Review confirmed account set up for fuel services re: huller operations. T/C w/ and email to waste collection services for Receiver account for ranch and huller operations.		
09-24-2024	AN	Land, Facilities & Equipment (GSFC) On site and monitoring re: walnut huller operations. Review and respond to email from JD and meet w/ N. Oliva and H. Crain re: identify cost for cultural expenses and other improvements re: bill back property owner for same. Identify and relocate personal property for Jenkins ranch. Review LNOG for multiple policies, discuss scheduled payments re: same w/ team. Review and confirm approval to process payment for guard service and sign monthly renewal agreement re: same.	5.90	1,917.50
09-24-2024	DS	Land, Facilities & Equipment (GSFC) Review and prep w/ JD for upcoming call w/ bank.	0.40	220.00
09-24-2024	DK	Land, Facilities & Equipment (GSFC) Confer w/ agent and team re: sale and review of same. Coordinate sale and accounting.	1.10	577.50
09-24-2024	BL	Land, Facilities & Equipment (GSFC) F/U w/ key employees re: facilities and equipment questions. Research standard and market comparables. Develop analysis related to monthly fee for facility use.	1.50	742.50
09-24-2024	BL	Land, Facilities & Equipment (GSFC) Conf. call w/ JD, GSFC and CR3 re: weekly business update. Pre-call prep and post-call follow up re: open items.	1.20	594.00
09-24-2024	OJ	Land, Facilities & Equipment (GSFC) Confer w/ R. Bughao and MF re: sales logistics.	0.80	340.00
09-24-2024	CG	Land, Facilities & Equipment (GSFC) Confer w/ title re: status of title reports. Review broker correspondence.	0.30	97.50
09-24-2024	JD	Land, Facilities & Equipment (GSFC) T/Cs w/ harvest team. Review status of various equipment items. Review emails from R. Faris and W. Mar and follow up responses to same. Confer w/ BL re: same. Prepare for and attend conf. call w/ P. Huffine, J. Nunes, W. Mar, A. Moosally and BL re: GSFC request list and critical items. Discuss leases, equipment, accounting details and other. Review updates from AgLand broker. T/Cs w/ N. Oliva re: Jenkins leases, equipment, other. Review status of crop insurance.	2.20	1,155.00
09-25-2024	JP	Land, Facilities & Equipment (GSFC) Prepare template of properties for tracker and check additional property discovered for listing agreement.	0.60	255.00
09-25-2024	CG	Land, Facilities & Equipment (GSFC) Confer w/ DK re: 4150 Rowles property. Confer w/ JP re: listing agreement. Review title reports received. Update tracker and f/u w/ title re: duplicate report. F/U w/ vendor re: listings.	0.80	260.00
09-25-2024	JD	Land, Facilities & Equipment (GSFC) Update task tracker. Updates w/ team re: harvest, budget, etc.	0.80	420.00
09-25-2024	BL	Land, Facilities & Equipment (GSFC) Emails w/ DK and JP re: real estate tracker. Create real estate tracker template for S. Mudd. Incorporate prior week's real estate updates. F/U w/ A. Moosally re: 2023 crop payments.	1.50	742.50
09-25-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate marketing and sale process.	0.60	315.00

Thank you for trusting Stapleton Group, we appreciate your business.

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
09-25-2024	DS	Land, Facilities & Equipment (GSFC) Meetings w/ JD. Prepare for site visit. Review and respond to emails.	0.50	275.00
09-25-2024	AN	Land, Facilities & Equipment (GSFC) On site and monitoring re: walnut huller operations. Review open invoices from fuel service provider, T/C w/ and compose email to provider re: Receiver payment authorities and duties re: terms of OAR. Review lease agreements and compose email to and review response from Hilco re: leased forklifts and agreements for same for advice to return to lessors or sale for equity return. Site visits to multiple tenant locations hand deliver tenant notices.	7.50	2,437.50
09-26-2024	AN	Land, Facilities & Equipment (GSFC) On site at main facility, monitor incoming and outgoing harvested walnuts and huller operations. Visit Red Bluff ranches. Tour Ohms harvest and sweep operations. Deliver tenant notice and payment demand and directions to Ohm tenant. Identify and picture document pumps and meters for Jenkins ranch. Confer w/ JD and CG re: property identified in Exhibit A of OAR but not owned by defendants. Review and respond to email from Crain re: documents for dry walnut production including weight tickets and grade reports and delivery preference re: same. Review multiple emails from team and advise team re: status of contact with diesel fuel service provider for pump operations at ranches.	5.50	1,787.50
09-26-2024	DS	Land, Facilities & Equipment (GSFC) Review harvest and discuss w/ JD.	0.30	165.00
09-26-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate marketing requirements.	0.40	210.00
09-26-2024	BL	Land, Facilities & Equipment (GSFC) Prepare use of facilities analysis. T/C w/ CR3 and JD re: same. Correspondence w/ G. Kelley re: same.	1.70	841.50
09-26-2024	BL	Land, Facilities & Equipment (GSFC) T/C w/ JD re: GSFC key open items and prepare for upcoming call. Update critical items tracker.	1.50	742.50
09-26-2024	CG	Land, Facilities & Equipment (GSFC) Exchanges w/ title re: revised title reports. Review files re: listing agreement. Confer w/ DK and JP re: same and misc. property and research same.	0.70	227.50
09-26-2024	JD	Land, Facilities & Equipment (GSFC) On-site at Vina HQ. Attend tour w/ Empire. Follow-ups to same. Review open items re: harvest. Meet w/ H. Crain re: status. Review Finch and Jenkins lease details. Review facility use charge calculations. Confer w/ MF, BL and counsel re: ABW assets, equipment and distributions related to same. T/C w/ BL, W. Mar and A. Moosally re: various items. T/Cs w/ T. Stratton re: turnkey sale and interest. Prepare and send agenda for Friday call. Review Mead lease and harvest details.	3.80	1,995.00
09-26-2024	DB	Land, Facilities & Equipment (GSFC) Process and forward facility video to T. Stratton re: Andersen facility.	0.30	82.50
09-27-2024	OJ	Land, Facilities & Equipment (GSFC) Confer w/ E. Wright re: rent payment. Confer w/ AN re: Patterson warehouse and load outs.	0.70	297.50
09-27-2024	JD	Land, Facilities & Equipment (GSFC) Prepare for and attend weekly bank call w/ GSFC and counsel. Follow-ups w/ team from same.	0.90	472.50
09-27-2024	BL	Land, Facilities & Equipment (GSFC) Conf. call w/ JD, CR3 and GSFC re: weekly update. T/C w/ J. Fiero and T. Kapur re: legal action items from	1.80	891.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		GSFC call. Review letter to Westover letter.		
09-27-2024	BL	Land, Facilities & Equipment (GSFC) Update facility use analysis based on feedback. Update Ranch budget based on Crain operating budget. Correspondence w/ H. Crain re: same.	2.50	1,237.50
09-27-2024	CG	Land, Facilities & Equipment (GSFC) Confer w/ AN re: Rhode property. Research same and provide ownership details. Confer w/ JD and T. Stratton re: CIM misc. parcel and provide details for same. Confer w/ team re: status of title reports.	0.80	260.00
09-27-2024	JD	Land, Facilities & Equipment (GSFC) On-site at HQ. Meet w/ H. Crain. T/Cs w/ N. Oliva. Review ranch budget items.	0.50	262.50
09-27-2024	DS	Land, Facilities & Equipment (GSFC) Review and discuss prep for bank call. Debrief w/ JD.	0.40	220.00
09-27-2024	AN	Land, Facilities & Equipment (GSFC) On site monitoring re: harvest and huller processing. Update meter details for electric service complete with meter additions and rate schedules. Compose follow up email to PG&E re: service to multiple ranches.	4.50	1,462.50
09-28-2024	CG	Land, Facilities & Equipment (GSFC) Review tracking sheet provided by BL.	0.30	97.50
09-30-2024	BL	Land, Facilities & Equipment (GSFC) Review intercompany invoices related to crop sales. Review head count allocation. Emails re: facility fee. Review and approve invoices for harvest. Provide ABW and JB Cusick financial information.	1.50	742.50
09-30-2024	AN	Land, Facilities & Equipment (GSFC) On site monitoring re: shipments. Review email and schedule of expected harvest dates from H. Crain. Review and approve payment for utilities. Review email from C. Crain re: weight adjustment for Patterson walnuts. Review and respond to email from MF re: Patterson inventory. T/C w/ counsel for OHM Partnership re: client to retrieve equipment from property. Review multiple emails from H. Crain and service provider re: harvest equipment service and repairs and payment options. Review, research and respond to BL re: Grower contracts.	3.10	1,007.50
09-30-2024	CG	Land, Facilities & Equipment (GSFC) Begin title abstracts, update schedules w/ liens, itemize and label same.	1.60	520.00
09-30-2024	JD	Land, Facilities & Equipment (GSFC) Review ranch budget details. Follow-ups re: facility sale. Review status of ABW product and sale of same. Review and respond to email from W. Mar re: GSFC open items.	0.90	472.50
09-30-2024	DS	Land, Facilities & Equipment (GSFC) Review order and objections. Meeting w/ JD re: critical issues, etc.	0.70	385.00
			207.00	90,045.00
			<b>Total</b>	<b>883.20 385,613.00</b>

### Time Summary

Timekeeper	Hours	Amount
Audrey Nefkens	117.60	38,220.00
Betsy Landoll	171.40	84,843.00
Cathy Garnica	22.40	7,325.00
David Kieffer	18.30	9,607.50

<b>Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
David Stapleton	23.00	12,650.00
Deborah Burger	50.30	13,832.50
Jake Diiorio	100.00	52,500.00
Justin Picardi	10.60	4,505.00
Matthew Flahive	160.50	79,447.50
Michael Bergthold	19.50	10,237.50
Olivia Jones	170.30	66,172.50
Yenni Liang	19.30	6,272.50
	<b>Total</b>	<b>385,613.00</b>
<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
A/R and Inventory (BofA)	230.70	112,967.00
Bins	56.80	25,309.00
Case Management	361.00	145,063.50
Hopson Ranch (Banner)	12.30	5,357.50
JB Cusick	15.40	6,871.00
Land, Facilities & Equipment (GSFC)	207.00	90,045.00
	<b>Total Fees</b>	<b>385,613.00</b>

### **Expense Summary**

<b>Expense</b>	<b>Amount</b>
Airfare	4,031.93
Copies	28.60
Court Filing Fee	62.20
Fuel	326.53
Lodging	3,522.53
Meals	1,343.20
Mileage	7.91
Notary	105.00
Other	32.00
Postage & Correspondence	48.93
Rent a Car	2,268.05
Transportation	140.89
	<b>Total Expenses</b>
	11,917.77
	<b>Total for this Invoice</b>
	397,530.77

**Stapleton Group**  
 514 Via De La Valle  
 Ste 210  
 Solana Beach, CA 92075  
 213-235-0600  
 www.stapletoninc.com

October 31, 2024

**Andersen & Sons Shelling**

**Invoice Number: 8109**  
 Invoice Period: 10-01-2024 - 10-31-2024

**Time Details**

<u>Date</u>	<u>Timekeeper</u>	<u>Activity</u>	<u>Hours</u>	<u>Amount</u>
<u>A/R and Inventory (BofA)</u>				
10-01-2024	BL	A/R and Inventory (BofA) Review inventory and A/R detail and reconcile for reporting. Conf. call w/ Hilco and Huron re: Pearl crop sale. Conf. call w/ Huron and S. Levitt re: open legal items. Emails w/ Huron re: forklifts and inventory calculation. F/U w/ S. Levitt re: filing cabinets.	3.00	1,485.00
10-01-2024	MF	A/R and Inventory (BofA) Emails and conf. call w/ accounting team re: BBC revisions and discrepancies.	1.10	544.50
10-01-2024	MF	A/R and Inventory (BofA) Onsite meetings, calls, emails, and assessment of staffing capacity re: inventory liquidation and load out. Build out projection model for outgoing loads.	7.10	3,514.50
10-01-2024	JD	A/R and Inventory (BofA) Review invoicing and other re: Pearl Crop sale and status of additional inventory sales. Review emails.	0.40	210.00
10-01-2024	AN	A/R and Inventory (BofA) Research and review multiple grower files to locate documents from missing documents list. Advise team of findings. Confer w/ MF re: Pearl Crop shipments. Review contracts for Verdant & Linde, prepare schedule and email to and confer w/ R. Bughao re: confirm equipment in use. Calculate balance due and request payment to and advise lessors re: same.	2.50	812.50
10-02-2024	BL	A/R and Inventory (BofA) Conf. call w/ Hilco and Huron re: Pearlcrop sale. T/C w/ MF and JD re: retention plan. F/U related to legal items for BofA.	2.60	1,287.00
10-02-2024	MF	A/R and Inventory (BofA) Meet w/ HR to discuss staff retentions, timeline, and funding.	0.80	396.00
10-02-2024	MF	A/R and Inventory (BofA) Onsite meetings, calls, emails, and assessment of staffing capacity re: inventory liquidation and load out. Meetings w/ Pearl Crop and collateral inspections.	6.90	3,415.50
10-02-2024	JD	A/R and Inventory (BofA)	0.90	472.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>A/R and Inventory (BofA)</u>				
		Updates w/ MF re: on-site liquidation efforts. Discuss timeline and review detailed mapping of load-out. Confer w/ BL and MF re: need for extended retention dates for staff assisting w/ inventory liquidation.		
10-03-2024	MF	A/R and Inventory (BofA) Multiple calls, emails, and assessment of staffing capacity re: inventory liquidation and load out.	7.30	3,613.50
10-03-2024	JD	A/R and Inventory (BofA) Updates w/ MF re: on-site load-out of inventory sales. Brief T/C w/ L. Marcero re: same. Updates w/ BL re: all other BofA collateral items and accounting support. Review opportunities to shorten load-out time.	0.80	420.00
10-03-2024	BL	A/R and Inventory (BofA) Conf. call w/ MF and Huron re: Pearlcrop sale. Develop employee retention plan and reconciling available retention funding.	3.50	1,732.50
10-03-2024	BL	A/R and Inventory (BofA) F/U w/ customers w/ outstanding A/R balance. Updating A/R tracker. T/C and emails w/ G. Kelley re: best contact and strategy.	1.50	742.50
10-03-2024	DS	A/R and Inventory (BofA) Review sales of inventory and issues.	0.30	165.00
10-03-2024	AN	A/R and Inventory (BofA) Teams meeting w/ Hilco and Pearl re: crop pick ups and updates. Review and approve invoices for multiple forklift leases re: Verdant & Linde.	1.10	357.50
10-04-2024	AN	A/R and Inventory (BofA) Review team emails re: status of payment for Verdant & Linde forklift leases. Review email from guard service provider re: confirm payment receipt.	0.30	97.50
10-04-2024	DS	A/R and Inventory (BofA) Review and prepare for and attend bank call. Debrief re: same.	1.00	550.00
10-04-2024	JD	A/R and Inventory (BofA) Prepare for and attend weekly BofA call. Discuss inventory liquidation plans, alternative options for expedited load-out, collection of A/R and retention proposals. Follow-ups w/ BL re: retention, funding, staff and other.	0.90	472.50
10-04-2024	MF	A/R and Inventory (BofA) Onsite meetings re: inventory liquidation process and logistics. Conf. calls w/ lender and sales agent re: concerns w/ bulk buyer. Additional discussions re: staff retentions and BBC accounting.	6.40	3,168.00
10-04-2024	BL	A/R and Inventory (BofA) Conf. call w/ BofA, Huron, DS, JD and MF re: weekly update. Create agenda and prepare for call. Conf. call w/ Hilco, Huron, MF and company re: Pearlcrop sale logistics. Review A/R aging and update based on emails w/ C. Enders.	1.80	891.00
10-04-2024	BL	A/R and Inventory (BofA) T/C w/ MF re: employee retention plan and inventory sales. Correspondence w/ A. liams and R. Bughao re: executing on employee retention plan.	1.50	742.50
10-07-2024	JD	A/R and Inventory (BofA) Review updates from AM Hilco / BofA call and progress w/ inventory liquidation. Review on-site plan w/ team and logistics / timing.	0.60	315.00
10-07-2024	KC	A/R and Inventory (BofA)	2.00	790.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>A/R and Inventory (BofA)</u>				
		BofA cash reconciliation and review same w/ Linda.		
10-07-2024	MF	A/R and Inventory (BofA) Meetings and coordination w/ Andersen team re: pending inventory sales, load out process, and inventory reporting. Review missing and degraded inventory file, then discuss estimating total w/ team.	4.60	2,277.00
10-07-2024	MF	A/R and Inventory (BofA) Review BBC draft, advise re: reconciling items to complete, then approve final.	0.90	445.50
10-07-2024	AN	A/R and Inventory (BofA) T/C w/ P. O'Gorman of RCC re: collections. Review and respond to email from C. Calderon re: request for spreadsheet for missing grower contracts and terms and conditions.	0.70	227.50
10-07-2024	BL	A/R and Inventory (BofA) Confer w/ JD and MF re: sales progress. Conf. call w/ Hilco, Huron and Andersen re: inventory sales.	0.50	247.50
10-07-2024	DS	A/R and Inventory (BofA) Review inventory sales and confer w/ team.	0.30	165.00
10-08-2024	DS	A/R and Inventory (BofA) Update w/ BL and MF and progress and sales. Update re: B of A call. Review lien issues.	0.70	385.00
10-08-2024	BL	A/R and Inventory (BofA) Negotiate and obtain BofA approval for A/R collections. Confer w/ MF re: Pearlcrop sale. Review emails. Conf. call w/ Hilco, Huron and Andersen re: inventory sales.	1.80	891.00
10-08-2024	JD	A/R and Inventory (BofA) Review A/R and collections.	0.40	210.00
10-08-2024	MF	A/R and Inventory (BofA) Hilco and Andersen team meeting re: Pearl Crop sale.	0.60	297.00
10-08-2024	KC	A/R and Inventory (BofA) Check-in with Andersen accounting. A/R reconciliation for September.	2.00	No Charge
10-08-2024	KC	A/R and Inventory (BofA) Review Andersen inventory and sales to date.	1.50	No Charge
10-08-2024	MF	A/R and Inventory (BofA) Coordination of Pearl Corp sales, inventory discrepancy identification, Crain sales, and draft bill of sale. Work w/ Andersen team to generate reports for locating discrepancies.	3.90	1,930.50
10-09-2024	BL	A/R and Inventory (BofA) Conf call w/ MF, Huron, Hilco and Andersen re: inventory sales. Confer w/ MF re: same.	0.80	396.00
10-09-2024	JD	A/R and Inventory (BofA) Review status of BofA open items, confer w/ BL and MF re: same. Review producer lien litigation updates.	0.40	210.00
10-09-2024	KC	A/R and Inventory (BofA) Confer w/ Huron & HWS re: inventory sales.	1.00	No Charge
10-09-2024	MF	A/R and Inventory (BofA)	0.80	396.00

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
		Conf. call w/ RB and KC re: potential missing inventory and misclassification of good inventory to spoiled.		
10-09-2024	AN	A/R and Inventory (BofA) F/U email to R. Bughao re: out of service equipment. T/C w/ N. Root from Wells Fargo Finance and email to R. Bughao re: arrange staging to return out of service leased forklifts. Review, research and respond to email from D. McGowan from Flagstar re: claim forklift lease payments assigned.	2.30	747.50
10-09-2024	MF	A/R and Inventory (BofA) Multiple calls and coordination w/ Hilco and Huron re: Pearl Crop load out and potential discounts on spoiled inventory. Review status of pending Crain sales offer.	3.70	1,831.50
10-10-2024	JD	A/R and Inventory (BofA) T/C w/ AN re: on-site activities re: inventory. Review agenda for Friday BofA update call w/ BL and MF. Updates re: Pearlcrop. T/C w/ counsel re: all pending legal matters re: inventory issues, Derco, BofA district court litigation, etc.	1.10	577.50
10-10-2024	AN	A/R and Inventory (BofA) Review and respond to D. McGowan from Flagstar Bank re: receivership. Review and forward BofA Conforming Changes Amendment document to JD.	0.50	162.50
10-10-2024	MF	A/R and Inventory (BofA) Hilco and Andersen team call re: Pearl Crop sales status. Update outbound loads schedule w/ Pearl Crop assumed ramp up of 10/14/24.	1.40	693.00
10-10-2024	MF	A/R and Inventory (BofA) Review file, prepare summary analysis, and convey observations to team re: potential inventory write-downs due to quality or missing.	1.60	792.00
10-10-2024	MF	A/R and Inventory (BofA) Coordination of pending sales, draft bills of sale to awarded bids. Review Crain offer and counter, and discuss reserve required estimate on inventory sales due to quality issues.	4.10	2,029.50
10-10-2024	BL	A/R and Inventory (BofA) T/C w/ C. Calderon re: funding request. F/U w/ C. Enders and AN re: same.	1.00	495.00
10-11-2024	BL	A/R and Inventory (BofA) Update A/R collections table. Prep for weekly call. Conf. call w/ BofA and Huron re: weekly update.	1.20	594.00
10-11-2024	JD	A/R and Inventory (BofA) Prepare for and attend weekly update call w/ BofA to discuss inventory sales, A/R collections and other. Debrief from same w/ team.	0.70	367.50
10-11-2024	KC	A/R and Inventory (BofA) Current status inventory analysis.	0.50	No Charge
10-11-2024	MF	A/R and Inventory (BofA) Prepare for and attend conf. call w/ BofA and Huron.	0.80	396.00
10-11-2024	MF	A/R and Inventory (BofA) Coordination and calls w/ Hilco, Huron, and Andersen team re: inventory sales, Pearl Crop outbound loads ramp up, and Crain offer.	3.80	1,881.00
10-11-2024	DS	A/R and Inventory (BofA)	0.40	220.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>A/R and Inventory (BofA)</u>				
		Review for B of A call and update w/ team. Review issues on quality, etc.		
10-12-2024	DS	A/R and Inventory (BofA) Review and respond to emails. Review sales.	0.40	220.00
10-14-2024	KC	A/R and Inventory (BofA) Update T/C w/ Hilco and Huron re: inventory removal.	0.50	No Charge
10-14-2024	MF	A/R and Inventory (BofA) Update calls and review of pending offers re: inventory sales. Coordinate sales efforts and draft bills of sale for approved sales. Confer re: Pearl Crop updated schedule.	4.10	2,029.50
10-14-2024	MF	A/R and Inventory (BofA) Compile information and draft details re: inventory sales for the Receiver's report.	1.60	792.00
10-15-2024	MF	A/R and Inventory (BofA) Travel time to Andersen to oversee inventory liquidation. Billed at 50% of time.	2.80	1,386.00
10-15-2024	MF	A/R and Inventory (BofA) Conf. call w/ Hilco re: sales updates. Compile additional accounting reports and provide edits to receivership report.	1.30	643.50
10-15-2024	MF	A/R and Inventory (BofA) Confer w/ BL and KC re: task priorities and reporting needs.	4.00	1,980.00
10-15-2024	MF	A/R and Inventory (BofA) Onsite meetings w/ staff, review reports, evaluate sales offers, and coordinate efforts to expedite removal of inventory.	3.20	1,584.00
10-15-2024	BL	A/R and Inventory (BofA) F/U on A/R balance w/ TJs, Hill View, ALDI and others. Confer w/ C. Enders and L. Belmonte re: same. Notate A/R aging based on conversations and CNB bank account activity. Review A/R roll forward provided by L. Belmonte.	3.00	1,485.00
10-15-2024	BL	A/R and Inventory (BofA) Conf. call w/ Hilco, Huron and Andersen re: Pearl Crop sale.	0.50	247.50
10-15-2024	AN	A/R and Inventory (BofA) T/C w/ and email to Lomo Cold Storage re: Order Appointing Receiver and receiver's duties and responsibilities.	0.30	97.50
10-16-2024	JD	A/R and Inventory (BofA) Review progress on Pearlcrop load-out, confer w/ team re: same. Review Crain offer and bill of sale. Suggest edits to same. Approve final for signature.	0.50	262.50
10-16-2024	DS	A/R and Inventory (BofA) Meeting w/ team. Review progress. Confer w/ JD.	0.30	165.00
10-16-2024	KC	A/R and Inventory (BofA) T/C w/ Crain senior leadership to review inventory deal.	0.50	197.50
10-16-2024	BL	A/R and Inventory (BofA) Review emails re: Pearl crop logistics. Conf. call w/ Hilco and Huron re: same.	1.50	742.50

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
10-16-2024	BL	A/R and Inventory (BofA) Review A/R aging and roll forward w/ L. Belmonte. F/U w/ customers re: same. Conf. call w/ Andersen team re: A/R open balances. Related email f/u w/ customers. Reviewing invoices and communications w/ Andersen team. T/C w/ MF re: inventory status and update for report.	2.50	1,237.50
10-16-2024	MF	A/R and Inventory (BofA) Confer w/ accounting re: IFS reporting and coordination of invoicing process re: inventory. Roundtrip travel to Andersen site re: inventory liquidation. Billed at 50% of time.	1.80	891.00
10-16-2024	MF	A/R and Inventory (BofA) Confer w/ accounting and compile additional inventory reporting for report revisions made.	1.30	643.50
10-16-2024	MF	A/R and Inventory (BofA) Conf. calls and coordination of inventory sales. Update schedule projections and raise concerns w/ sales agent re: scheduling. Work w/ staff to identify efficiencies and streamline processes. Evaluation and finalization of Crain offer.	5.10	2,524.50
10-17-2024	MF	A/R and Inventory (BofA) Return travel from Andersen. Billed at 50% of time.	2.60	1,287.00
10-17-2024	MF	A/R and Inventory (BofA) Draft additional report updates and continue preparation of inventory update.	1.10	544.50
10-17-2024	MF	A/R and Inventory (BofA) Conf. calls and coordination of inventory sales, outbound logistics, and Pearl Crop schedule updates.	4.10	2,029.50
10-17-2024	KC	A/R and Inventory (BofA) Pearl Crop and Andersen update w/ MF. Andersen removal update.	1.00	395.00
10-17-2024	JD	A/R and Inventory (BofA) Confer w/ team re: inventory sales, timing, fumigation for Patterson, bank call and other.	0.40	210.00
10-17-2024	BL	A/R and Inventory (BofA) Write inventory and A/R section of report and Sheller update. T/C w/ MF and KC re: inventory sales update. T/C w/ Hilco, Huron and Andersen re: Pearl Crop sale logistics. T/C w/ JD and MF re: update on inventory sales. T/C w/ MF re: weekly call agenda and updates.	3.00	1,485.00
10-17-2024	BL	A/R and Inventory (BofA) F/U w/ A/R collections and related customers. Review invoices and support provided by customers. Update A/R collections file. Confer w/ L. Belmonte re: same.	2.00	990.00
10-18-2024	BL	A/R and Inventory (BofA) Update A/R collections file and expected value. Conf. call w/ BofA, Huron and MF re: weekly status update call. Post-call discussion w/ MF re: next steps. Review BBC and Huron requests. Share bank account activity related to BofA and collections table.	3.50	1,732.50
10-18-2024	DS	A/R and Inventory (BofA) Review sales. Confer w/ team.	0.40	220.00
10-18-2024	KC	A/R and Inventory (BofA) Crop to cash follow-up call including DS, SP, and JP. Daily Andersen removal update.	1.50	592.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>A/R and Inventory (BofA)</u>				
10-18-2024	JD	A/R and Inventory (BofA) Review updates re: inventory load-out, Crain sale, and other re: logistics and Hilco efforts.	0.50	262.50
10-18-2024	MF	A/R and Inventory (BofA) Review and comment re: BBC reports. Finalize inventory analysis and input to Receiver's report. Conf. call w/ BofA and Huron re: status.	2.20	1,089.00
10-18-2024	MF	A/R and Inventory (BofA) Update outbound loads schedule to include estimated sales and bifurcate by customer.	1.80	891.00
10-18-2024	MF	A/R and Inventory (BofA) Conf. call re: sales status update and review outbound loading details. Coordinate testing review for Crain sales and review updates from Pearl Crop. Confer w/ staff re: same.	2.80	1,386.00
10-21-2024	KC	A/R and Inventory (BofA) Daily Andersen removal T/C.	0.50	197.50
10-21-2024	MF	A/R and Inventory (BofA) Update calls with sales agent and buyers re: pending offers, inventory removal process, cash deposit tracking, and sales schedules.	4.60	2,277.00
10-21-2024	MF	A/R and Inventory (BofA) Review Huron reporting request and confer w/ accounting re: same. Review file and update load out schedule tracking.	1.40	693.00
10-21-2024	BL	A/R and Inventory (BofA) Draft receivership report related to BofA collateral. Review A/R rollforward. Inquire w/ L. Belmonte re: same. F/U w/ accounting team re: customer issues. F/U w/ customer invoices and review documentation provided.	3.30	1,633.50
10-21-2024	AN	A/R and Inventory (BofA) Revise and update schedule with return details.	0.50	162.50
10-21-2024	JD	A/R and Inventory (BofA) Review in-shell walnut offers and plan for controls on pricing w/ testing reports, etc. Confer w/ MF re: same. Review and respond to emails from C. Calderon and M. Fisher re: appraisal values.	0.60	315.00
10-22-2024	JD	A/R and Inventory (BofA) Review and respond to emails from C. Calderon and M. Fisher re: equipment listed on liquidation analysis and approximate value of same. Follow-ups re: inventory sales.	0.40	210.00
10-22-2024	CG	A/R and Inventory (BofA) Various exchanges re: Hopson title and escrow w/ same. Review title report.	0.60	195.00
10-22-2024	DS	A/R and Inventory (BofA) Update w/ JD re: onsite visit. Emails re: same.	0.30	165.00
10-22-2024	MF	A/R and Inventory (BofA) Conf. calls w/ team re: inventory sales process and coordinate information transfer. Respond to miscellaneous sales requests. Confer w/ BL re: inventory sales and reporting.	2.90	1,435.50
10-22-2024	KC	A/R and Inventory (BofA) Review Sheller Budgets with BL	0.80	316.00

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Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
10-22-2024	KC	A/R and Inventory (BofA) Finalize BofA Sheller budgets for BL Review	1.00	395.00
10-22-2024	BL	A/R and Inventory (BofA) Emails re: A/R collections. T/Cs w/ C. Calderon and M. Fisher re: reporting and budgets. Review A/R rollforward w/ L. Belmonte and C. Enders. Draft A/R rollforward for reporting. T/C w/ MF re: inventory and status of sales. Review Sheller budget for BofA portion w/ KC.	3.50	1,732.50
10-22-2024	BL	A/R and Inventory (BofA) Review invoices re: Hill View collections and prior correspondence. Confer w/ C. Enders. Email BofA for approval.	1.50	742.50
10-23-2024	JD	A/R and Inventory (BofA) On-site, review staging in Bldg 10 for inventory sale to Crain. Confer w/ C. Calderon re: progress, Crain metrics and other. Follow-up w/ R. Bughao re: same. Review status of inventory at storage facilities. Confer w/ J. Patterson re: fumigation of Patterson warehouse.	1.20	630.00
10-23-2024	KC	A/R and Inventory (BofA) Sheller budget model revamp & actualization	1.50	592.50
10-23-2024	KC	A/R and Inventory (BofA) Invoice processing review with MF and DaHye	1.00	395.00
10-23-2024	KC	A/R and Inventory (BofA) Funding/budget reviews with Craig and Linda	1.00	395.00
10-23-2024	MF	A/R and Inventory (BofA) Confer w/ legal team re: pending collections issues and warehouse lease issues. Review sales invoicing process to plan for departure of A/R representative.	1.90	940.50
10-23-2024	MF	A/R and Inventory (BofA) Coordinate sales, confer w/ sales agent re: pending sales and removal process, and verify documentation for credits due to testing results.	4.80	2,376.00
10-23-2024	BL	A/R and Inventory (BofA) Prep agenda for legal call. T/C w/ JD, J. Fiero and T. Kapur re: BofA related legal items. Post legal call F/U w/ customers. Review specific A/R customers and invoices.	1.90	940.50
10-23-2024	BL	A/R and Inventory (BofA) T/C w/ MF and KC re: sales, Sheller staffing and open items. Review A/R roll forward from L. Belmonte. Update A/R rollforward in receiver report. Confer w/ KC re: funding request for BofA items.	2.80	1,386.00
10-23-2024	DS	A/R and Inventory (BofA) T/C and update w/ JD re: site visit, Hilco and inventory sales.	0.40	220.00
10-24-2024	BL	A/R and Inventory (BofA) Review and update Sheller budget related to BofA. Confer w/ KC re: same. F/U on customer balances. Email w/ D. Chun re: disputed customer balances. T/C w/ KC re: Huron request incl. receivership fee rec and Sheller budget.	3.70	1,831.50
10-24-2024	BL	A/R and Inventory (BofA) F/U on outstanding customer balances. Email w/ D. Chun re: disputed customer balances. Emails w/ ALDI re: payment options.	1.30	643.50

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
10-24-2024	KC	A/R and Inventory (BofA) BofA budgets & funding request review with BL	1.00	395.00
10-24-2024	KC	A/R and Inventory (BofA) Weekly Check-in with BL + funding request & budget finalization	1.00	395.00
10-24-2024	KC	A/R and Inventory (BofA) Weekly Pearl Crop update meeting with MF, Pearl Crop, and Hilco	0.50	197.50
10-24-2024	KC	A/R and Inventory (BofA) Daily Andersen call with MF	0.50	197.50
10-24-2024	KC	A/R and Inventory (BofA) Actualization of Sheller budget	0.50	197.50
10-24-2024	MF	A/R and Inventory (BofA) Coordinate inventory sales, update trackers, review testing stipulated credits and approve. Conf. calls re: sales updates, and begin updates to outgoing shipments tracker.	6.80	3,366.00
10-24-2024	JD	A/R and Inventory (BofA) Review on-site progress w/ PearlCrop and Crain sales. Meet w/ R. Bughao re: same.	0.60	315.00
10-25-2024	BL	A/R and Inventory (BofA) Update reporting for Huron including A/R collections. F/U w/ customers w/ outstanding balances. Review invoices provided. Request invoices from D. Chun. Email C. Enders and L. Belmonte re: A/R aging questions. Review CNB account and provide balances. Confer w/ MF re: inventory sales to date.	3.70	1,831.50
10-25-2024	MF	A/R and Inventory (BofA) Conf. call re: sales update and coordination w/ team to approve offers and organize sales logistics. Review equipment costs re: removal of equipment.	2.90	1,435.50
10-25-2024	KC	A/R and Inventory (BofA) Andersen Daily Call	0.50	197.50
10-25-2024	KC	A/R and Inventory (BofA) Inventory analyses for MF around ABW and PearlCrop	1.00	395.00
10-25-2024	AN	A/R and Inventory (BofA) Review email response from and T/C w/ K. Brisko re: outstanding invoice and payment activity for for insurance policy. T/C to Chubb re: policy cancellation, review account charges and payments, confirm amount due. Confer w/ and update team re: same. Prepare schedule of out of service rented forklifts and calculate unpaid rents for in use items. Compose email to Toyota Financial Services re: advise to schedule pick up for out of service forklifts. Review and respond to email from BMO re: forklift pick up scheduling. Research documents and files, and confer w/ D. Chun re: invoice and contact data for customer A/R. Email to and set up invoice delivery online access for Albertsons.	3.40	1,105.00
10-26-2024	BL	A/R and Inventory (BofA) F/U w/ AN re: security fees.	0.20	99.00
10-27-2024	MF	A/R and Inventory (BofA) Review BBC reports and provide comments. Review emails and check testing reports re: inventory sales and outgoing shipments. Review potentially missing inventory re: Pearl Crop analysis and draft email to Hilco re: findings.	1.80	891.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>A/R and Inventory (BofA)</u>				
10-27-2024	MF	A/R and Inventory (BofA) Update outbound loads analysis w/ actual shipment figures. Draft inquiry to Hilco re: potential variances.	2.30	1,138.50
10-28-2024	JD	A/R and Inventory (BofA) Review updates re: Turlock storage and inventory retrieval. Review status of Crain sale and testing results.	0.40	210.00
10-28-2024	AN	A/R and Inventory (BofA) Review online billing for PG&E, confirm added meters to new accounts. Confer w/ L. Belmonte and review email from re: request report detailing payments made to PG&E post receivership.	0.50	162.50
10-28-2024	KC	A/R and Inventory (BofA) Budget reconciliation w/ MF and f/u w/ BL re: same.	2.50	987.50
10-28-2024	KC	A/R and Inventory (BofA) Inventory and grower reconciliation.	1.00	395.00
10-28-2024	KC	A/R and Inventory (BofA) Data room setup and maintenance. Cash recon w/ Craig and Linda. Andersen removal T/C w/ Hilco, Andersen and MF. Andersen and Pearl Crop meeting w/ MF.	2.00	790.00
10-28-2024	MF	A/R and Inventory (BofA) Prepare and attend weekly conf. call w/ BofA.	0.80	396.00
10-28-2024	MF	A/R and Inventory (BofA) Attend sales update conf. calls. Coordinate inventory removal logistics w/ team. Confer w/ team and update load out schedule w/ actuals. Confer w/ counsel re: Turlock removal efforts, evaluate pending sales and draft bills of sale re: same. Discuss invoicing process post-departure of A/R team member.	7.20	3,564.00
10-28-2024	MF	A/R and Inventory (BofA) Review sheller budget updates and confer w/ BL and KC re: same.	2.70	1,336.50
10-28-2024	BL	A/R and Inventory (BofA) Confer w/ KC and MF re: BofA Sheller budget. T/C w/ J. Fiero re: Turlock. Review emails re: same.	1.20	594.00
10-29-2024	MF	A/R and Inventory (BofA) Travel to Andersen-Vina, billed at 50% of time.	2.80	1,386.00
10-29-2024	BL	A/R and Inventory (BofA) T/C w/ C. Calderon re: BofA collateral. T/C w/ M. Fisher re: same. Emails w/ J. Fiero re: same. Review Sheller funding request. Confer w/ KC re: same. Review emails re: Turlock warehouse.	1.10	544.50
10-29-2024	KC	A/R and Inventory (BofA) Budget reconciliation w/ MF and f/u w/ BL re: same.	2.00	790.00
10-29-2024	MF	A/R and Inventory (BofA) Daily Hilco update conf. call. Review inventory logistics coordination, deposits received, and open questions.	1.00	495.00
10-29-2024	MF	A/R and Inventory (BofA) Onsite at Andersen to oversee inventory removal coordination. Attend buyer coordination calls, discuss staffing, and work through buyer issues.	4.20	2,079.00
10-29-2024	KC	A/R and Inventory (BofA)	2.00	790.00

Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
		Budget reconciliation in prep for funding requests.		
10-29-2024	KC	A/R and Inventory (BofA) Andersen removal T/C w/ MF.	0.50	197.50
10-29-2024	AN	A/R and Inventory (BofA) Follow up email to and confer w/ C. Enders and review responses from team re: status of payment for Guard Services. Confer w/ C. Calderon re: guard service needs.	0.60	195.00
10-30-2024	AN	A/R and Inventory (BofA) Review, research and respond to BMO re: additional forklifts to return.	0.50	162.50
10-30-2024	KC	A/R and Inventory (BofA) T/C w/ SG team, Huron and HWS update call. Daily Andersen removal T/C w/ MF. Sheller Budget finalization to forward same to Carlos.	1.80	711.00
10-30-2024	KC	A/R and Inventory (BofA) Funding request reconciliation and data compilation for Sheller.	2.00	790.00
10-30-2024	BL	A/R and Inventory (BofA) T/C w/ JD and MF re: inventory invoicing options. Review funding request invoices and files provided by C. Enders related to BofA. Review files re: workers comp. F/U w/ H&D re: open A/R.	1.20	594.00
10-30-2024	MF	A/R and Inventory (BofA) R/T travel time to site to oversee inventory logistics.	0.40	198.00
10-30-2024	MF	A/R and Inventory (BofA) Onsite oversight of inventory liquidation process. Conf. calls re: inventory removal process and review equipment brought in to load additional trucks. Confer w/ staff re: packaging liquidation opportunities and availability. Confer w/ staff re: accounting workflow and invoicing process. Review testing and coordinate pending sales w/ team.	8.20	4,059.00
10-30-2024	JD	A/R and Inventory (BofA) Review load-out progress of inventory, A/R collections, Aldi details and other.	0.30	157.50
10-31-2024	BL	A/R and Inventory (BofA) Review Sheller PG&E account. Review invoices provided by C. Enders for BofA funding request. Confer w/ KC and AN re: same. Emails w/ C. Enders re: employee milestone bonus.	2.80	1,386.00
10-31-2024	BL	A/R and Inventory (BofA) F/U w/ ALDI re: payment. Conf. call w/ J. Fiero, T. Kapur, JD and MF re: legal items related to BofA.	1.00	495.00
10-31-2024	MF	A/R and Inventory (BofA) Onsite coordination of inventory sales, inventory removal process, invoicing and reporting, and staffing same.	6.80	3,366.00
10-31-2024	MF	A/R and Inventory (BofA) Conf. call w/ counsel re: pending legal items re: inventory sales.	0.40	198.00
10-31-2024	MF	A/R and Inventory (BofA) Return travel from Andersen, billed at 50% of time.	2.90	1,435.50
10-31-2024	KC	A/R and Inventory (BofA) PG&E reconciliation w/ BL and f/u w/ AN re: same.	1.00	395.00

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Date	Timekeeper	Activity	Hours	Amount
<u>A/R and Inventory (BofA)</u>				
10-31-2024	AN	A/R and Inventory (BofA) Review, research and respond to email from KC re: PG&E billing and credits. Teams meeting w/ BL and KC re: review PG&E billing for Receiver's accounts for Shelling meters. Review updated account details online, review current statement, confirm meters and locations and update schedule and reconcile billing re: same. Create new scheduling for guard service adjustment for future period. Advise service provider and confer w/ team re: same.	1.80	585.00
			294.10	137,725.50
<u>Bins</u>				
10-01-2024	KC	Bins Confer w/ JD re: bin status. Review correspondence re: logistics and bins. Confer w/ MF re: invoicing, wire and bin load out. Confer w/ Kathi re: wire instructions. Confer w/ A. Kennedy re: Patterson Warehouse.	1.00	395.00
10-02-2024	MF	Bins Confer w/ KC and pull reports re: bin sales, coordination, and locations.	0.90	445.50
10-03-2024	KC	Bins Confer w/ D. Gibson re: bins pickup and logistics. Confer w/ MF re: Patterson warehouse. Confer w/ MF, A. Kennedy and S. Alvarado re: bin pickup, invoicing and logistics.	1.20	474.00
10-04-2024	KC	Bins Confer w/ various buyers re: bin bids. Coordinate bin inspection w/ buyers, G. Kelley and R. Bughao. Review wire and pictures from bin pickup and updates from other buyers.	1.60	632.00
10-04-2024	KC	Bins Confer w/ R. Bughao, D. Gibson and A. Kennedy re: sale and load out logistics across warehouses.	0.60	237.00
10-04-2024	JD	Bins Updates re: bin sales. Confer w/ parties re: same.	0.30	157.50
10-07-2024	KC	Bins Draft and send bills of sale to buyers. Confer w/ A. Kennedy and team re: invoicing and update same. F/U w/ D. Gibson re: Patterson bins. Confer w/ BL re: prune bin pricing and inventory status.	1.10	434.50
10-07-2024	MF	Bins Confer w/ team re: bin sales.	0.40	198.00
10-08-2024	KC	Bins Confer w/ Mariani Nut re: funding. Confer w/ bin buyers re: standard pricing from lenders. Confer w/ R. Bughao re: bin pickup logistics.	1.10	434.50
10-08-2024	KC	Bins Confer w/ D. Gibson, R. Bughao and BL re: bin pickup, Patterson warehouse visit, logistics and prune bins. Prepare bills of sales and invoices.	1.80	711.00
10-09-2024	KC	Bins Confer w/ R. Bughao re: bin pickups by buyers.	0.40	158.00
10-09-2024	KC	Bins Update bin waterfall and matrix. Confer w/ JD and BL re: same.	1.60	632.00
10-10-2024	JD	Bins	0.40	210.00

Thank you for trusting Stapleton Group, we appreciate your business.

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Bins</u>				
		Review progress and bin waterfall file. T/C w/ J. Patterson re: removal details. Review and respond to email from W. Mar re: same.		
10-10-2024	MF	Bins Coordinate w/ team re: bin sales, cash received, and coordination of shipments.	0.90	445.50
10-10-2024	KC	Bins Review, update and create new views for status of bins sales.	2.00	No Charge
10-11-2024	KC	Bins Misc. bin updates and analysis.	0.50	No Charge
10-11-2024	MF	Bins Confer w/ KC re: buyer feedback and T/C w/ RB. re: loading out bins at Patterson.	0.70	346.50
10-11-2024	JD	Bins Review updates re: bin buyers.	0.30	157.50
10-14-2024	KC	Bins Confer w/ BL and MF re: bin load outs and progress. Review and update bin waterfall and matrix. Confer w/ additional buyers.	2.40	948.00
10-14-2024	KC	Bins Confer w/ R. Bughao and MF re: bin sorting effort in both warehouses and updated timeline. Review correspondence re: bin sales and logistics. Confer w/ MF re: same.	1.30	513.50
10-14-2024	JD	Bins Follow-up w/ KC re: bin sales and timing. Review plan for Patterson warehouse.	0.20	105.00
10-14-2024	KC	Bins Bins reconciliation.	1.00	395.00
10-14-2024	MF	Bins Review status of bin sales w/ KC. Discuss next steps and strategy to push additional sales.	1.40	693.00
10-15-2024	KC	Bins Update bin waterfall and bin matrix. Review correspondence related to same.	1.30	513.50
10-15-2024	MF	Bins Confer w/ KC and Ryan B. re: bin sales, counts, and Patterson move-out.	0.90	445.50
10-15-2024	KC	Bins Create bins tracker.	3.00	1,185.00
10-16-2024	KC	Bins Review updated bin offers and confer w/ team re: pricing. Review, organize and save down bin pictures. F/U w/ prospective bin buyers re: purchase and plans moving forward. Confer w/ BL re: bin matrix and report.	2.10	829.50
10-16-2024	KC	Bins Review of bins with R. Belden. Bins file upgrades and misc. data cuts.	2.50	987.50
10-16-2024	BL	Bins	1.00	495.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Bins</u>				
		T/C w/ KC re: bin sales and questions for reporting. Correspondence w/ KC re: bin sales strategy.		
10-16-2024	MF	Bins Review updates re: bin sales and confer w/ KC re: draft analysis.	0.80	396.00
10-17-2024	MF	Bins Updates re: bin sales and review analysis. Confer w/ BL and KC re: same.	0.80	396.00
10-17-2024	KC	Bins Return travel from project, billed @ 50% of time.	2.50	987.50
10-17-2024	BL	Bins T/C w/ KC re: bin communications for lender approval on offers and pricing.	0.60	297.00
10-18-2024	BL	Bins Work w/ KC to update bin table and review offers. Email for lender approval on current bin offer and pricing. Draft emails confer w/ JD.	1.00	495.00
10-18-2024	KC	Bins Review responses re: email blasts. Confer w/ team re: same and updated pricing. Review correspondence re: same. Update matrix for same.	1.80	711.00
10-18-2024	KC	Bins Process and updates re: bin requests for JD and BL.	1.70	671.50
10-18-2024	KC	Bins Drafts and models to lenders seeking approval on new deal structure.	1.00	395.00
10-21-2024	KC	Bins Bins inventory updates.	1.00	395.00
10-21-2024	KC	Bins Bins model updates and analysis for new deals.	1.00	395.00
10-22-2024	MF	Bins Review bin updates and confer w/ KC re: same.	0.60	297.00
10-22-2024	KC	Bins R/T travel from project, billed @ 50% of time.	3.30	1,303.50
10-22-2024	KC	Bins Bin reconciliation & emails	1.00	395.00
10-22-2024	BL	Bins F/U w/ KC and MF re: bin sales and exhibit for report.	0.50	247.50
10-23-2024	KC	Bins Review correspondence re: bin sales and Patterson. Confer w/ team re: same.	0.60	237.00
10-23-2024	MF	Bins Review bin inventory. Confer w/ buyers re: sales offers and update figures for reporting.	1.60	792.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Bins</u>				
10-23-2024	BL	Bins Discuss bin sales w/ KC. Review bin waterfall.	0.80	396.00
10-23-2024	KC	Bins Travel from Andersen, billed @ 50% of time.	3.30	1,303.50
10-23-2024	JD	Bins Meet w/ J. Patterson at Patterson warehouse re: status of bin inventory.	0.30	157.50
10-24-2024	KC	Bins Update of bin tracker and follow-up emails to potential buyers	1.00	395.00
10-24-2024	MF	Bins Solicit offers and negotiate sales re: bins.	1.80	891.00
10-24-2024	KC	Bins Confer w/ MF re: bills of sale.	0.20	79.00
10-25-2024	BL	Bins Review bins offer. Confer w/ KC re: same.	0.80	396.00
10-25-2024	KC	Bins Update and reconcile bins per new data from Ryan.	1.00	395.00
10-25-2024	KC	Bins Selling process of bins to Select Harvest and Nava Farms.	1.00	395.00
10-27-2024	MF	Bins Compile information and present bin carveout details to Hilco re: Pearl Crop.	0.40	198.00
10-28-2024	KC	Bins Bin deal follow-ups, tracker updates, invoicing, and wire requests.	2.00	790.00
10-28-2024	MF	Bins Follow up w/ potential bin buyers and discuss processing bills of sale w/ KC.	0.70	346.50
10-29-2024	BL	Bins Confer w/ KC re: bin sales and bill of sale.	0.30	148.50
10-29-2024	MF	Bins Review pending bin offers and confer w/ Kai re: same.	0.30	148.50
10-29-2024	KC	Bins Bin sales processes. Email follow-ups and T/Cs re: tracker updates.	2.50	987.50
10-29-2024	JD	Bins Review status of bin sales.	0.10	52.50
10-30-2024	KC	Bins Bin sales processes. Email follow-ups and T/Cs re: tracker updates.	2.00	790.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Bins</u>				
10-30-2024	MF	Bins Confer w/ KC re: bin sales and buyer coordination.	0.30	148.50
10-30-2024	JD	Bins Approve bin sales and pricing.	0.20	105.00
10-31-2024	BL	Bins Confer w/ KC and MF re: bin sales. Emails w/ Hilco re: Pearlcrop transaction.	0.80	396.00
10-31-2024	MF	Bins Confer w/ team re: pending bins sales and additional opportunities.	0.40	198.00
10-31-2024	KC	Bins Bin sales processes. Email follow-ups, T/Cs and tracker updates.	3.00	1,185.00
			76.90	31,492.00
<u>Case Management</u>				
10-01-2024	AR	Case Management Confer w/ JD re: marketing update. Process wire. Confer w/ MF re: flight to Sacramento confirmation. Process A/P.	0.50	112.50
10-01-2024	CG	Case Management Confer w/ BL and JD re: billing and provide recap of same.	0.20	65.00
10-01-2024	DB	Case Management Process NDAs. Process incoming pleadings sent from Andersen and confer w/ BH re: same. Send email to counsel re: same. Process incoming mail. Review emails re: USMCA/CUSMA certificates and send to team. Review and respond to email inquiries and list of creditor emails. Review email from Atty. Fiero re: new CDFA action. Update litigation summary and send to counsel.	1.40	385.00
10-01-2024	YL	Case Management Download, review and provide transaction lists from various bank accounts to BL. CNB online administration to add new accounts to various users. Confer w/ CNB re: online access for MM 3 and MM 4 and submit various transfer. Prepare cash reconciliation and provide wire instructions to team. Confer w/ team re: GL account for money market accounts. Review outgoing wire transfer.	2.00	650.00
10-01-2024	YL	Case Management Archive Bill Pay penny testing confirmation. Review, revise and post J/E batch for Bill Pay penny testing.	0.10	32.50
10-01-2024	BH	Case Management Process and file litigation files re: Holt of CA, Valley Pride, BCM Construction and Putah Creek.	1.30	253.50
10-01-2024	BL	Case Management Update head count allocation file for Sheller. Conf. call w/ T. Kapur and J. Fiero re: open legal items. Review and update legal tracker. T/C w/ L. Belmonte re: accounting and cash reconciliation. Review cash reconciliation for Sheller. Emails w/ R. Bughao re: employee allocation.	3.50	1,732.50
10-01-2024	BH	Case Management Forward Sync link to J. Fiero re: Anderson litigation.	0.30	58.50
10-01-2024	MF	Case Management T/C w/ IT consultant re: wind down process.	0.40	198.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
10-01-2024	MF	Case Management Travel to Vina, billed at 50% of time.	2.70	1,336.50
10-01-2024	KC	Case Management Review correspondence re: litigation.	0.20	79.00
10-01-2024	YL	Case Management Process and archive bank statement. Review wire.	0.40	130.00
10-01-2024	JP	Case Management Review additional contract updates, finalize Title and legal questions to open escrow.	1.20	510.00
10-01-2024	JD	Case Management Update re: IT back-ups. Review plan for forklifts. Review and respond to emails re: employment matters and engaging labor counsel to address same.	0.70	367.50
10-02-2024	KC	Case Management Confer w/ JD re: open items. Confer w/ BL re: budget.	0.50	197.50
10-02-2024	AN	Case Management Travel from Sacramento, billed at 50% of time.	3.50	1,137.50
10-02-2024	YL	Case Management Record JE G/L.	0.20	65.00
10-02-2024	BL	Case Management T/C w/ JD and MF re: project status and resources/staffing. Update headcount allocation based on lender for October payroll and share with lender advisors.	1.80	891.00
10-02-2024	BL	Case Management Reviewing cash reconciliation provided by L. Belmonte.	1.00	495.00
10-02-2024	JD	Case Management T/C w/ BL re: retention matters. Confer w/ BH re: updates to retention docs. Review same and send to BL and team.	0.50	262.50
10-02-2024	MF	Case Management R/T travel to site billed at 50% of time.	0.40	198.00
10-02-2024	MF	Case Management Meet w/ IT manager re: wind down process and services.	0.70	346.50
10-02-2024	AR	Case Management Confer w/ BH re: change of address. Confer w/ YL re: check received. F/U w/ CG re: same.	0.30	67.50
10-02-2024	DB	Case Management Review and respond to email inquiries and update list of creditors' emails. Process incoming mail. T/C w/ creditor. Begin draft of report no. 1.	1.90	522.50
10-02-2024	YL	Case Management Confer w/ BL re: weekly report and online banking. Confer w/ CNB re: wire fees reversal. Confer w/ CG re: check received.	0.40	130.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
10-02-2024	CG	Case Management Coordinate deposit w/ accounting.	0.20	65.00
10-02-2024	YL	Case Management Review and post J/E batch for interest income.	0.10	32.50
10-02-2024	BH	Case Management Process new employee data re: new retention amount and new recommend dates. Confer w/ JD re: same.	1.60	312.00
10-02-2024	JD	Case Management Follow-ups re: progress of load-out of bins and additional marketing and sales efforts.	0.60	315.00
10-03-2024	MF	Case Management R/T travel to site billed at 50% of time. Conf. call w/ counsel re: pending legal matters.	1.10	544.50
10-03-2024	YL	Case Management Review and approve PayScan invoice payment processing. Post, commit and process Bill Pay check payment. Perform bank reconciliation and complete bank reconciliation folder for money market account.	0.40	130.00
10-03-2024	DB	Case Management Review and respond to email from insurance carrier re: litigation claims. Process incoming mail. Process 401K loan application.	1.00	275.00
10-03-2024	YL	Case Management Review cash balance and online banking administration. T/C w/ CNB re: online access and bank balance. Provide bank balance to BL and JD. Confer w/ AR re: manual wire form.	0.60	195.00
10-03-2024	BH	Case Management Forward Sync link to P. Huffine re: Anderson litigation.	0.30	58.50
10-03-2024	BL	Case Management T/C w/ JD, J. Fiero and T. Kapur re: weekly check-in on key legal matters. Update legal open items tracker.	1.50	742.50
10-03-2024	BL	Case Management T/C w/ JD and MF re: project status and prep for Friday calls. T/C w/ C. Enders re: funding requests, accounting key critical items and planning for upcoming weeks.	2.00	990.00
10-04-2024	AN	Case Management Review email and attachment from G. Kelley and A. Liam re: status of Hartford W/C insurance audit. Review email from YL and MF re: deposits and cash application and accounting procedures.	0.40	130.00
10-04-2024	AR	Case Management Confer w/ YL and JD re: manual wire, prepare and process same. Confer w/ YL and MF re: backup documentation. Confer w/ JD and YL re: CNB call. Confer w/ DB re: incoming mail for JB Cusick.	0.50	112.50
10-04-2024	DB	Case Management Process 401K rollovers for numerous ex-employees. Process incoming mail. Review incoming emails and update email creditor list. Process returned undeliverable mail and update proof of service.	1.80	495.00
10-04-2024	YL	Case Management T/C w/ BL re: change of wire amount and bank account number. Revise wire form and obtain signature. Confer w/ CNB re: manual wire. F/u w/ team re: incoming wires and back up documents. CNB online banking	1.50	487.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		administration, create user and assign entitlements. T/C w/ Laila re: wire and transfer confirmation. Review bank balance and provide status update to team.		
10-04-2024	CG	Case Management Confer w/ BL re: billing, deposits and payments. Issue invoices and provide same to Andersen team and BL.	0.40	130.00
10-04-2024	BH	Case Management Analysis of UCC files re: loan documents.	0.90	175.50
10-04-2024	JD	Case Management Review staffing, review retention, review insurance, review IT.	0.50	262.50
10-04-2024	MF	Case Management Return travel from Vina facility, billed at 50% of time.	2.80	1,386.00
10-04-2024	BL	Case Management Updating master funding request file. Reviewing deposits and payments. T/C and emails w/ YL re: same. T/C w/ L. Belmonte re: accounting reconciliations and next steps.	1.50	742.50
10-05-2024	JD	Case Management T/C w/ ranch manager re: status of rental properties. Follow up w/ counsel for all parties re: same.	0.40	210.00
10-06-2024	CG	Case Management Prepare, review and edit exhibit for report. Provide same w/ backup to JD, BL and DS for review.	2.70	877.50
10-07-2024	YL	Case Management Confer w/ CG re: retainer. Prepare cash reconciliation. MS Teams meeting w/ BL and MF re: cash balance, retainer and accounting role. Various f/u's re: same.	1.20	390.00
10-07-2024	BH	Case Management Forward Sync link to BofA and GSFC Attorneys.	0.40	78.00
10-07-2024	BH	Case Management Analysis of UCC filings re: loan number.	1.00	195.00
10-07-2024	KC	Case Management Review expectations and initial insight into project. Review receivership order. Daily call with Andersen re: misc. status updates.	2.50	No Charge
10-07-2024	MF	Case Management Meeting w/ BL and KC re: inventory sales process, funding requests, and bank reporting.	0.90	445.50
10-07-2024	MF	Case Management Confer w/ KC re: accounting reports and reconciliation of same.	0.80	396.00
10-07-2024	DB	Case Management Review numerous email from HUB re: claims and send to counsel. Review emails from counsel re: same. Process 401K loan request. Review and approve edits to NDA. Process incoming mail. Review and respond to email inquiries re: unpaid invoices. Update creditor email list. T/C w/ R. Douglas re: plastic bin purchase. Update litigation summary. Review email from insurance carrier and provide requested litigation files.	1.80	495.00
10-07-2024	CG	Case Management Update to exhibit per BL and JD's comments and resend.	0.90	292.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
10-07-2024	AR	Case Management Prepare and process deposit. Process A/P.	0.70	157.50
10-07-2024	JD	Case Management Review and sign health insurance broker agreement. Review IT transition. Review email re: CDFA investigations and respond to counsel re: same.	0.70	367.50
10-07-2024	BL	Case Management Work on exhibits for receivership report. Emails w/ G. Greenwood and C. Enders re: CDFA.	1.80	891.00
10-07-2024	BL	Case Management Confer w/ KC and MF re: project update and open items. Confer w/ KC re: bins and reporting.	1.50	742.50
10-07-2024	BL	Case Management Confer w/ YL re: flow of funds. Confer w/ KC re: budgets and cash reconciliation for report. Review COBRA broker agreement and insurance policies. Emails w/ C. Enders and G. Kelley re: same.	1.50	742.50
10-08-2024	BL	Case Management Confer w/ KC re: cash reconciliation, Sheller budget and other.	1.00	495.00
10-08-2024	BL	Case Management Confer w/ JD and MF re: staffing and critical items. Conf. call w/ T. Kapur, J. Fiero and JD re: legal items.	1.50	742.50
10-08-2024	JP	Case Management Find examples of filed motions and order to prepare with counsel.	0.30	127.50
10-08-2024	JD	Case Management T/C w/ counsel re: litigation, liens, collateral, letters to lessors and letters to Derco/Carriere. Review emails re: equipment leases. Confer w/ AN re: same.	0.80	420.00
10-08-2024	AN	Case Management Travel to Chico, billed at 50% of time.	3.50	1,137.50
10-08-2024	KC	Case Management Updates to funding request.	1.00	No Charge
10-08-2024	KC	Case Management Status updates and misc. Confer w/ RB re: same. Daily call with Andersen on misc. status updates.	1.50	592.50
10-08-2024	MF	Case Management Update re: pending IT items w/ Andersen and IT consultant. Confer w/ BL and JD re: delegation of tasks, pending items, and order of magnitude.	1.40	693.00
10-08-2024	MF	Case Management Review on hand reports and confer w/ BL re: financial reporting exhibit for report and updates on major pending tasks.	0.80	396.00
10-08-2024	AR	Case Management Confer w/ YL re: transactions backup files and archive. Scan and save US bank Statements. Confer w/ KC re: wire received on the CNB account for bins.	0.30	67.50
			1.70	467.50

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Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
10-08-2024	DB	Case Management Process NDAs. Transfer incoming pleadings to server and organize same. Process 401K rollover forms. Process returned mail and update proof of service. Process D&O potential claim notices. Process incoming litigation and update summary.		
10-08-2024	YL	Case Management Confer w/ KC re: sales of bins and incoming wire. Review cash balance and provide status update.	0.30	97.50
10-08-2024	KC	Case Management Confer w/ MF and BL re: Wright warehouse. Confer w/ R. Wright re: inventory. Review inventory file. Confer w/ owner of Wright warehouse, BL and MF re: inventory value and rent. Confer w/ DB, G. Kelley, and R. Andersen re: Cannon printers.	1.30	513.50
10-08-2024	BH	Case Management Forward Sync link re: legal and litigation folder to S. Bucey and E. Hanson.	0.20	39.00
10-08-2024	BL	Case Management Prepare receivership report. Review edits provided by DB. Confer w/ CG re: funding requests. Confer w/ MF, OJ and KC re: same. Conf. call w/ C. Enders and L. Belmonte re: accounting check in.	2.50	1,237.50
10-09-2024	BH	Case Management Process Cornerstone UCC filing. F/U w/ MF re: same.	0.40	78.00
10-09-2024	AR	Case Management Confer w/ BL re: payment on invoice from The Zennit. Confer w/ YL re: same. Prepare and process deposits.	0.80	180.00
10-09-2024	YL	Case Management Confer w/ BL re: invoices and payment process. Review bank balance. T/C w/ CNB re: wire transfer services.	0.30	97.50
10-09-2024	KC	Case Management Update receiver's report number 1. Review updated A/R reconciliation and update A/R roll forward for report.	1.60	632.00
10-09-2024	DB	Case Management Review and respond to email inquiries. Update list of creditor emails. Process NDA.	0.50	137.50
10-09-2024	BL	Case Management Review invoices and payroll from C. Enders and compile weekly funding request. Update master funding reconciliation. Review and confirm ABW insurance payment.	2.60	1,287.00
10-09-2024	KC	Case Management Daily call with Andersen on misc. status updates	0.50	No Charge
10-09-2024	KC	Case Management Confer w/ Andersen accounting re: status updates.	1.00	395.00
10-09-2024	KC	Case Management Review and update cross-company cash reconciliation.	2.00	790.00
10-10-2024	YL	Case Management Review wire.	0.20	65.00
10-10-2024	BL	Case Management	2.50	1,237.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		Prepare and consolidate receivership reporting. Confer w/ KC and MF re: same.		
10-10-2024	JD	Case Management Review status of labor lawsuits, sign engagement letter re: same. Confer w/ staff re: same.	0.40	210.00
10-10-2024	JP	Case Management T/C w/ brokers re: active listings and market. Provide update on broker call and market to JD.	0.80	340.00
10-10-2024	AN	Case Management Review and confirm charges on credit card statements w/ accounting. Advise BL re: same.	0.50	162.50
10-10-2024	AN	Case Management Review and respond to BL re: request to retrieve statements from US Bank re: JB Cusick. T/C to and lvm for banker. Review email from banker re: statements attached. Review statement detail and advise BL re: status.	0.50	162.50
10-10-2024	MF	Case Management Conf. call w/ legal re: pending matters and status of each item.	0.80	396.00
10-10-2024	KC	Case Management Cross company cash flow reconciliation for September. Further review of September cash flow and confer w/ Linda re: same.	3.50	1,382.50
10-10-2024	KC	Case Management Daily call with Andersen on misc. status updates. Review and updates w/ legal.	1.50	No Charge
10-10-2024	CG	Case Management Additional edits to exhibit for report. Confer w/ BL re: same. Forward amended exhibit w/ details to JD and BL for review.	1.60	520.00
10-10-2024	BL	Case Management Confer w/ KC re: cash reconciliation and accounting. Confer w/ CG and YL re: accounting for project.	1.80	891.00
10-10-2024	DB	Case Management T/C w/ Atty. Nims office. Send email to same. Review responses from same. Process NDAs. Process Fisher Phillips engagement letter. Review and respond to email inquiries. Update creditor list of emails.	1.40	385.00
10-10-2024	AR	Case Management Confer w/ MH re: expenses. Confer w/ YL re: same. Process wire. Process A/P. Process check run. Process ACH.	1.10	247.50
10-10-2024	YL	Case Management CNB online banking administration. Confer w/ JD and BL re: expenses. Confer w/ CNB re: wire fee reversal. Confer w/ CG re: transfer of funds. Process funds transfer from MM 3 to OP. Review outgoing wire transfer.	1.00	325.00
10-11-2024	KC	Case Management Daily T/C w/ Andersen on misc. status updates.	0.50	No Charge
10-11-2024	DB	Case Management Process Form 5500 tax documents. Process incoming mail. Process Golden State wire transfer forms. Process returned undeliverable mail and update proof of service.	0.90	247.50
10-11-2024	YL	Case Management Review outgoing wire transfer.	0.20	65.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
10-11-2024	KC	Case Management Begin setup of cash reconciliation templates for client.	2.00	790.00
10-11-2024	KC	Case Management Cross-company cash reconciliation.	1.00	395.00
10-11-2024	MF	Case Management Review IT service, discuss monthly arrangement w/ vendor, and discuss alternative options w/ IT consultant.	0.80	396.00
10-11-2024	AN	Case Management Review multiple emails from A. Liam and team re: retention paperwork.	0.20	65.00
10-11-2024	AN	Case Management Follow up email to R. Bughao re: status of out of service equipment list. Review and respond to email from counsel re: status of lease payment or return for forklift. Review multiple emails from MF, G. Kelley and R. Bughao re: Somic America shipment.	0.40	130.00
10-11-2024	YL	Case Management Review wire.	0.20	65.00
10-14-2024	JD	Case Management Review status of rent payments and employee retention. Review and comment re: 401k letter and execution of same. Review plan for response to CDFA re: ongoing complaint investigations.	0.70	367.50
10-14-2024	KC	Case Management Cash reconciliation for September.	2.00	790.00
10-14-2024	KC	Case Management Master funding requests for Andersen and Sons.	2.00	790.00
10-14-2024	KC	Case Management Process improvement templates for Linda. T/C w/ Linda re: questions for September cash reconciliation.	1.50	592.50
10-14-2024	BL	Case Management Update receivership report. Review invoices for report exhibits and cash reconciliation.	3.50	1,732.50
10-14-2024	BL	Case Management Emails w/ YL re: bank accounts. Updating wire instructions for Hilco.	0.60	297.00
10-14-2024	DB	Case Management Process 401K rollover documents, release agreements and retention agreements for 27 ex-employees. Process incoming mail. Review representation letter and send comments to JD. Process incoming Summons and Complaint filed by Ledec, update litigation summary and send to counsel. Process CDFA responses.	3.60	990.00
10-14-2024	BH	Case Management Process and forward employee documents and confer w/ DB re: same.	1.70	331.50
10-15-2024	AR	Case Management Prepare and process deposits. Set up template. Confer w/ KC re: Smarter Solutions invoice. Process A/P.	1.00	225.00
10-15-2024	BL	Case Management	1.20	594.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		Conf. call w/ KC and C. Enders re: funding requests vs actuals, intercompany and other.		
10-15-2024	JD	Case Management T/C w/ BL re: all pending case matters, attorney items for completion, sale efforts, Receiver's Report and weekly updates. Review equipment and facility usage.	0.80	420.00
10-15-2024	DB	Case Management Process incoming letter from D&O insurance carrier. T/C w/ counsel for creditor and send emails to same and review responses. T/C w/ creditor. Process incoming mail. Review and respond to email from Atty. Fiero re: insurance claims. T/C w/ Rachel at R. Harten's office re: PSA for real property. Process verification and declaration for TSB litigation response. Review and respond to email inquiries and update email list of creditors.	2.10	577.50
10-15-2024	YL	Case Management Confer w/ BL and JD re: incoming check, approval, outgoing wire transfer and internal transfer. Confer w/ CNB re: wire fees reversal.	0.50	162.50
10-15-2024	JP	Case Management T/C w/ title to coordinate closing schedule and documents. Contact additional title companies to determine best closing strategy.	0.80	340.00
10-15-2024	BL	Case Management Update report and related F/U w/ KC. F/U w/ T. Kapur and J. Fiero re: legal letters.	1.50	742.50
10-15-2024	BL	Case Management Conf. call w/ KC and C. Enders re: funding request vs actual analysis. Review related files provided by C. Enders. T/C w/ JD re: project status and staffing.	2.30	1,138.50
10-15-2024	BL	Case Management Review funding request information for Sheller and Ranch provided by C. Enders. T/C w/ T. Kapur re: receivership report. T/C w/ Hilco to confirm wire instructions for CNB. T/C w/ MF and KC re: open items and key focus areas.	1.70	841.50
10-15-2024	KC	Case Management Travel to project, billed @ 50% of time.	2.50	987.50
10-15-2024	KC	Case Management T/C w/ Hilco. T/C w/ MF and BL re: Andersen updates.	0.80	316.00
10-15-2024	KC	Case Management Work with Linda and Craig on cash process improvement tasks.	1.00	395.00
10-15-2024	KC	Case Management September cash reconciliation review.	2.00	790.00
10-15-2024	JD	Case Management Review employee litigation matters and forward same to labor counsel.	0.30	157.50
10-16-2024	YL	Case Management Review wire.	0.20	65.00
10-16-2024	AN	Case Management Review summons served to headquarters and forward to DB.	0.20	65.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
10-16-2024	KC	Case Management A/R and A/P review w/ BL, Craig and Linda.	1.00	395.00
10-16-2024	KC	Case Management Update call w/ team and Huron. Hilco T/C w/ MF. Daily Anderson T/C.	1.00	395.00
10-16-2024	KC	Case Management Review Hillview payments to Andersen w/ BL and Linda.	1.00	395.00
10-16-2024	KC	Case Management Funding request T/C w/ BL. Process improvements for month-end reconciliations w/ Linda.	1.50	592.50
10-16-2024	BL	Case Management Updating report w/ information provided by A. liams and others. F/U w/ team re: report sections. T/C w/ JD re: case update. T/C w/ KC re: funding request and sale of bins.	3.00	1,485.00
10-16-2024	BL	Case Management Review funding request invoices and F/U w/ C. Enders and L. Belmonte re: same. Forward funding request to lenders for approval.	1.00	495.00
10-16-2024	CG	Case Management Review updates to report exhibit. Process same and provide updated report to team.	0.30	97.50
10-16-2024	AR	Case Management Confer w/ YL re: follow up on template approval. Process wire. Archive transfer backup. Archive deposits made.	0.60	135.00
10-16-2024	YL	Case Management Review and approve wire template. Process transfer. Review cash balance and confer w/ BL re: various incoming wires and transfer. Review outgoing wire transfer.	0.50	162.50
10-16-2024	DB	Case Management Update service list. Review and respond to email inquiries re: past due invoices and update creditor email list. Process incoming litigation and update litigation summary. Review email from CDFA re: walnut handlers survey and forward to counsel. Process walnut handlers' report questionnaire.	1.60	440.00
10-16-2024	JD	Case Management Review emails and respond to same re: litigation, insurance, 401k audit, reporting and other. Confer w/ BL re: same.	0.90	472.50
10-17-2024	MF	Case Management Review IT access and confer w/ consultant re: backups and services wind down. Confer w/ counsel re: pending legal issues.	1.20	594.00
10-17-2024	MF	Case Management Confer w/ accountant re: invoicing process and training.	0.60	297.00
10-17-2024	DB	Case Management Notarize 6 revised GSFC receiver's certificates and coordinate shipment of same. Review and respond to email inquiries re: past due balances. Update creditor email list. T/C w/ Atty. Hardin's office re: sale. Review email from same and forward to counsel. T/C w/ Atty Greenwood re: litigation summary and potential litigation. Move all demands into shared folder and update litigation summary to include same. Review email re: labor claim. Prepare 5 new receiver's certificates for GFSC.	3.20	880.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
10-17-2024	CG	Case Management Draft invoices and provide same to BL and Andersen team. F/U re: status of report and review of same.	0.50	162.50
10-17-2024	KC	Case Management Final accounting edits w/ Linda.	1.00	395.00
10-17-2024	KC	Case Management Sheller budget and 13 week cashflow update.	2.00	790.00
10-17-2024	KC	Case Management Sheller Budget review with Craig. Headcount refresh and review with Angie. Payroll and headcount modeling update for sheller budget.	1.80	711.00
10-17-2024	KC	Case Management Review correspondence re: grower payments and reports.	0.30	118.50
10-17-2024	AR	Case Management Archive back up.	0.10	22.50
10-17-2024	JD	Case Management T/C w/ BL and MF re: all open items and strategies, legal call, pending litigation, disputed collateral, and liquidation strategies. Discuss status of monthly receiver's report and accounting for same. Follow-ups to same. Review and respond to emails.	1.30	682.50
10-17-2024	BL	Case Management T/C w/ JD, MF and PSZJ re: legal items.	0.50	247.50
10-18-2024	BL	Case Management Reconcile cash receipts and transfers in bank account. Confer w/ YL re: same.	1.00	495.00
10-18-2024	DB	Case Management Notarize receiver's certificates, send copies to counsel and coordinate shipment to GFSC. Process incoming motion pleadings filed by H&A seeking to initiate legal action. Calendar same. Process Crain Walnut bill of sale. Process incoming mail. Process CDFA Prune Questionnaire. Process PSA and joint escrow instructions. Process bill of sale w/ Select Harvest USA.	2.20	605.00
10-18-2024	YL	Case Management Review various emails and confer w/ team re: incoming check and general MM account. T/C w/ BL re: JB Cusick.	0.50	162.50
10-18-2024	KC	Case Management Review and circulate correspondence re: materials pricing and buyers.	0.30	118.50
10-18-2024	AR	Case Management Confer w/ YL re: check received. Confer w/ CG re: JB Cusick check. Confer w/ YL and BL re: deposit instructions. Prepare and process deposit.	0.50	112.50
10-18-2024	JD	Case Management Review reporting. Updates to same. Confer w/ team re: open tasks. Review additional litigation complaints / summonses received.	0.70	367.50
10-18-2024	KC	Case Management Funding request, forecast, and budget review with Craig.	1.00	395.00

Thank you for trusting Stapleton Group, we appreciate your business.

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
10-18-2024	KC	Case Management Weekly review with BL.	0.50	197.50
10-18-2024	KC	Case Management Sheller budget updates per Craig and BL.	2.50	987.50
10-21-2024	AR	Case Management Confer w/ BL re: deposits. Reconcile Smarter Solutions account and confer w/ BL re: payment for same. Confer w/ Kim at Smarter Solutions re: missing invoice.	0.50	112.50
10-21-2024	YL	Case Management Process transfer and provide status update to JD.	0.30	97.50
10-21-2024	DB	Case Management T/C w/ Atty. Kapur re: receiver's certificates. Prepare 5 replacement certificates and 1 new certificate and notarize same. Coordinate shipment of same. Process email from insurance carrier. Process incoming mail. Review complaint filed by BofA and send to counsel. Review and respond to email from counsel requesting copy of Palomar insurance policy. Process CA Walnut Commission.	2.60	715.00
10-21-2024	KC	Case Management Andersen All-Hands T/C w/ team.	1.00	395.00
10-21-2024	KC	Case Management Pearl Crop and Hilco T/C w/ MF. Reconcile Andersen and Crain inventory and confer w/ BL re: same.	0.90	355.50
10-21-2024	KC	Case Management Sheller budget updates.	0.40	158.00
10-21-2024	BL	Case Management Conf. call w/ team re: project status and priorities. Draft receivership report re: general items.	1.20	594.00
10-21-2024	JD	Case Management Travel to Andersen HQ, billed @ 50% of time.	2.50	1,312.50
10-21-2024	MF	Case Management Confer w/ team re: pending legal issues, action items, and task updates.	0.40	198.00
10-21-2024	AN	Case Management On site property and admin monitoring. Review and respond to emails from DB and G. Greenwood re: request copy of D&O insurance policy.	2.30	747.50
10-22-2024	KC	Case Management Funding request for Ranch	0.30	118.50
10-22-2024	AN	Case Management On site property and admin monitoring. Review f/u email from guard service provider re: status of payment for bill for current service period. Follow up email to and review response from team re: same. Review email from S. Cartier and email to accounting team re: status of payment for Workers' comp premium. Review and respond to email from C. Enders and BL re: PG&E statements. T/C w/ PG&E re: online access to accounts. Set up new access log in re: same. Review available statements and T/C to PG&E re: missing accounts and meter data.	4.90	1,592.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
10-22-2024	AN	Case Management T/C w/ and review and respond to follow up email from T. Polich, stated attorney for North State Solar Energy re: unpaid solar construction / installation loan contract. Review contract and confirm meter number and location re: same. Gain online access to Receiver's PG&E account. Review billing for multiple shelling meters. Update data on schedule re: same.	1.70	552.50
10-22-2024	MF	Case Management Confer w/ team re: Receiver's accounting and banking information.	0.60	297.00
10-22-2024	KC	Case Management Funding Request for Sheller	0.70	276.50
10-22-2024	JD	Case Management T/C w/ BL re: budget review and refresh, receiver's report, planning calls and next steps. Review 401k emails and payroll submission details re: American Funds accounts. Follow-up w/ A. liams re: same and retirement plan service agreement.	0.80	420.00
10-22-2024	DB	Case Management Review and respond to emails re: past due invoices and update email creditor list.	0.80	220.00
10-22-2024	BL	Case Management T/C w/ creditor re: status of claim. T/C w/ JD re: project status and critical items. T/C w/ MF re: same. Confer w/ KC re: reporting requests. Draft reporting.	2.00	990.00
10-22-2024	AR	Case Management Confer w/ YL BL re: checks received. Prepare and process deposits. Confer w/ JD re: BidCal Auction proposal. Confer w/ YL and BL re: check received and instructions on where to deposit. Confer w/ AN re: payment to Atta Boy Plumbing and archive backup.	1.10	247.50
10-23-2024	CG	Case Management Prepare recap and provide same to BL and JD. F/U w/ BL re: status of report review.	0.30	97.50
10-23-2024	DB	Case Management Review and approve proposed changes to NDA. Process notice of default and demand for payment, update litigation summary and send to counsel. Process NDA. Process complaints served for 2 legal matters. Update litigation summary again and send to counsel.	1.00	275.00
10-23-2024	AR	Case Management Prepare and process deposit.	0.30	67.50
10-23-2024	JP	Case Management Coordinate potential use of Pacer Title on future sales.	0.50	212.50
10-23-2024	KC	Case Management Funding requests for Sheller	1.00	395.00
10-23-2024	KC	Case Management Funding request for Ranch	1.00	395.00
10-23-2024	KC	Case Management Andersen Priority sync with MF and BL	0.50	197.50
10-23-2024	MF	Case Management	0.60	297.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		Confer w/ IT consultant re: data security needs and confer w/ vendor re: renewal terms.		
10-23-2024	BL	Case Management Review invoices and payments in CNB for reconciliation. Review latest invoice. Email team re: entries. Confer w/ KC re: same.	1.30	643.50
10-23-2024	AN	Case Management On site property and admin monitoring. Review, organize and scan incoming mail and litigation documents.	3.70	1,202.50
10-23-2024	AN	Case Management Review, research and respond to email from KC re: confirm umbrella policy information. Review and respond to multiple emails from T. Polich re: timing to pay past due invoices for North State Solar Energy. Arrange funding and payment with accounting team.	0.80	260.00
10-23-2024	JD	Case Management Review status of various leases / landlord negotiations for warehouses, etc. Review details re: misc. assets and UCCs to determine status of liens on same.	0.60	315.00
10-24-2024	BL	Case Management Review mailed invoices.	0.40	198.00
10-24-2024	KC	Case Management Budget model updates & automation	1.00	395.00
10-24-2024	KC	Case Management Payroll reconciliation - sheller & ranch	0.50	197.50
10-24-2024	AN	Case Management On site property and admin monitoring. Confer w/ JD re: continuing guard service and on-site schedule adjustment and DocuSign contract for current service re: same. T/C to and lvm for guard service provider re: schedule adjustment and costs.	2.40	780.00
10-24-2024	AN	Case Management Review NOC from Pacific Employers Insurance Company re: property and liability policy, T/C and email to Hub re: same. T/C w/ and gain online access to and review and approve propane fuel invoices. Review and respond to and T/C w/ Lomo Cold Storage re: request for copy of OAR.	1.40	455.00
10-24-2024	JD	Case Management Review details re: solar and payments re: same. Review IT back-up progress.	0.30	157.50
10-24-2024	AR	Case Management Confer w/ BL and KC re: Chub insurance. Prepare and process deposit.	0.50	112.50
10-24-2024	JD	Case Management Travel from Vina HQ, billed at 50% of time.	2.50	1,312.50
10-24-2024	CG	Case Management Confer w/ BL re: status and provide recap for same. Exchanges w/ team re: exhibit for report. Finalize same and provide to team.	0.40	130.00
10-24-2024	DB	Case Management Review and respond to email inquiries re: past due balances. Update creditor list. Process incoming mail.	0.40	110.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
10-25-2024	DB	Case Management Review and respond to email inquiries re: past due invoices and update list of creditors. Process incoming mail. Process NDA. Process GFSC wire transfer. Prepare and notarize receiver's certificate and coordinate shipment of same. Process updated litigation summary.	1.50	412.50
10-25-2024	KC	Case Management Budget reconciliation; mainly focused on professional fees	1.00	395.00
10-25-2024	AN	Case Management On site property and admin monitoring.	1.80	585.00
10-25-2024	JP	Case Management Coordinate with title companies re: requirements.	0.40	170.00
10-25-2024	KC	Case Management Funding requests & wire follow through	1.00	395.00
10-26-2024	AN	Case Management On site HQ admin. Review multiple emails and review and organize attachments from L. Belmonte re: property tax statements.	1.00	325.00
10-27-2024	JD	Case Management Review and respond to email from creditor.	0.10	52.50
10-28-2024	JD	Case Management Review emails from creditors, follow-ups to same. Review plan for insurance reductions.	0.40	210.00
10-28-2024	JP	Case Management Review and check latest property offers.	0.40	170.00
10-28-2024	MB	Case Management Emails and T/C w/ counsel, BL and MF representing creditor - freight company.	0.20	105.00
10-28-2024	MF	Case Management Review Sheller budget updates and confer w/ BL and KC re: same.	0.40	198.00
10-28-2024	DB	Case Management Review and respond to email inquiry re: status. Process incoming mail. Process incoming demand letters and update litigation summary. Process rollover form. T/C w/ attorney who represents group interested in bidding for assets.	1.20	330.00
10-29-2024	DB	Case Management Review and respond to email inquiries and update email creditor list. Notarize bill of sale. Process GSFC wire transfer and prepare receiver's certificate for same. Notarize same and coordinate shipment of original to GSFC. Process incoming TSB summons and complaint and update litigation summary. Send to counsel.	2.00	550.00
10-29-2024	AR	Case Management Confer w/ JD re: Andersen Marketing update. Prepare and process deposits.	0.90	202.50
10-29-2024	CG	Case Management Draft invoices and provide same to team.	0.40	130.00
10-29-2024	MF	Case Management	0.40	198.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Case Management</u>				
		Confer w/ IT representatives re: status of file backups.		
10-29-2024	JD	Case Management Confer w/ team re: edits to Receiver's Report. Review IT emails and services and budget for same.	0.40	210.00
10-30-2024	AN	Case Management Travel from Sacramento at 50% time. Review, research and respond to MF re: workers' comp insurance billing structure re: PTO and retention bonuses inclusion as wages.	3.50	1,137.50
10-30-2024	BH	Case Management Process undeliverable mail re: Proof of Service.	0.20	39.00
10-30-2024	AR	Case Management Archive deposits backup.	0.30	67.50
10-30-2024	MF	Case Management Review IT service invoices and confer w/ staff re: domain access issue.	0.40	198.00
10-31-2024	DB	Case Management T/Cs w/ creditors. T/C w/ T. Mayol from Pacific Southwest Container. Process incoming mail and emails.	0.90	247.50
10-31-2024	AR	Case Management Confer w/ BL and MF re: check received.	0.10	22.50
10-31-2024	JD	Case Management T/C w/ G. Kelley to review insurance decisions and right-sizing same. Review schedules re: same. Follow-ups w/ CR3. Follow ups re: review of IT data. Conf. call w/ BL, MF and counsel re: all pending legal matters.	0.80	420.00
			250.90	94,678.50
<u>JB Cusick</u>				
10-14-2024	AN	JB Cusick Confer w/ BL re: status possession for US Bank account	0.20	65.00
10-14-2024	MB	JB Cusick Discuss A/R collection w/ MH and AN.	0.30	157.50
10-14-2024	YL	JB Cusick Confer w/ BL and AN re: request for a new account for JB Cusick.	0.20	65.00
10-14-2024	BL	JB Cusick Reviewing intercompany schedules provided by C. Enders.	0.40	198.00
10-15-2024	AN	JB Cusick T/C w/ Ford Motor credit re: F-150 Lightning, obtain current payoff amount, discuss repossession or sale option. T/C to Ford of Corning. Research Carmax re: same.	1.30	422.50
10-16-2024	AN	JB Cusick Review email from BL to US Bank re: close existing account and request status of cash on hand and statements. T/C to banker re: schedule visit to pick up same. Follow up email to team re: same.	0.40	130.00
10-16-2024	BL	JB Cusick Emails w/ YL confirming checks received. F/U w/ US Bank re: check for bank balance.	0.80	396.00

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<u>JB Cusick</u>				
10-17-2024	AN	JB Cusick Visit US bank Yuba City Branch to close operating account and retrieve cashier's check for cash on hand and historical account statements.	3.00	975.00
10-18-2024	AN	JB Cusick Review and organize US bank statements. Follow up email to banker re: missing statements.	0.50	162.50
10-21-2024	MB	JB Cusick Emails and T/C w/ BL re: compensation claim. Emails w/ secured lender and AN re: status of collections. Emails w/ team re: related party receivables.	0.60	315.00
10-21-2024	BL	JB Cusick Confer w/ MB and AN re: JBC receivables and tracker. Review open A/R and org chart.	1.00	495.00
10-21-2024	AN	JB Cusick Forward 2nd demand emails to A/R customers re: status of payment. Update aging spreadsheet and team re: status of customer responses.	1.10	357.50
10-22-2024	AN	JB Cusick Follow up emails to and review and respond to emails from and T/Cs w/ multiple customers re: status of payment for A/R.	0.50	162.50
10-23-2024	AN	JB Cusick Review, confirm and respond to email from BL re: status of receipt of US Bank statements.	0.20	65.00
10-24-2024	BL	JB Cusick Review bank statements provided by AN. Emails w/ AN re: questions on JBC.	0.50	247.50
10-29-2024	AN	JB Cusick Review and respond to US Bank statement request from BL re: request from CR3 partners.	0.30	97.50
10-30-2024	AN	JB Cusick T/C w/ and review and respond to email from D. McGowan re: status of payment for forklifts. Request supporting documents re: same.	0.50	162.50
10-30-2024	BL	JB Cusick Review financials and confer w/ AN re: bank statements.	0.40	198.00
10-31-2024	MB	JB Cusick Review vendor claim. Emails w/ insurance co and AN re: same.	0.40	210.00
10-31-2024	AN	JB Cusick Review email request from BL re: research QB files, confirm financing and payments dates and amounts for bins. Review, research and respond to email from MB re: confirm outstanding A/P for unsecured creditor.	0.90	292.50
			13.50	5,174.50
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
10-01-2024	CG	Land, Facilities & Equipment (GSFC) Continue title abstracts, update schedules w/ liens, itemize and label same. Create property files and upload title reports, liens. Draft update to team. Confer w/ JP and provide title report for Hawkins property and abstract.	2.90	942.50
10-01-2024	JD	Land, Facilities & Equipment (GSFC) Thank you for trusting Stapleton Group, we appreciate your business.	1.90	997.50

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		T/C w/ A. Moosally and BL re: payroll charges and other administrative costs, ranch budget and other. Prepare for GSFC call. Updates re: facility details. Emails to T. Stratton re: facility interest. Emails w/ B. Bonham re: FF&E valuation. Review ranch real estate marketing update, share same w/ GSFC.		
10-01-2024	BL	Land, Facilities & Equipment (GSFC)	2.00	990.00
		T/C w/ JD and A. Moosally re: GSFC critical items. Update Ranch budget. Emails re: ABW A/R. Review ABW financials and bank statements.		
10-01-2024	MF	Land, Facilities & Equipment (GSFC)	0.40	198.00
		Review inventory details re: South Ave facility and potential recovery value.		
10-01-2024	DK	Land, Facilities & Equipment (GSFC)	0.40	210.00
		Review and coordinate sale requirements.		
10-01-2024	AN	Land, Facilities & Equipment (GSFC)	5.80	1,885.00
		Onsite monitoring shipping and huller operations. Review and confirm approvals for multiple invoices re: huller repair and pesticides, forward to accounting for payment. Confer with shipping and harvest team re: extend gate hours. Arrange same with R. Andersen. Follow up T/C to waste services re: 3-yd dumpster. Representative setup for new account due to delayed process for receivership verification. Schedule drop and advise team. Review and respond to email from Toyota Commercial finance re: status of payment for forklift equipment. Request list and contract for same.		
10-02-2024	AN	Land, Facilities & Equipment (GSFC)	0.60	195.00
		T/C w/ tenants for multiple residential properties re: explain OAR and notice for rent remittance.		
10-02-2024	DK	Land, Facilities & Equipment (GSFC)	0.80	420.00
		Review and coordinate sale requirements.		
10-02-2024	BL	Land, Facilities & Equipment (GSFC)	1.00	495.00
		Conf. call w/ GSFC, CR3 and JD re: weekly business update. T/C w/ JD re: prep for call.		
10-02-2024	BL	Land, Facilities & Equipment (GSFC)	3.00	1,485.00
		Redevelop budget for Ranch based on information provided. T/C w/ JD re: same. T/C w/ H. Crain re: same. Updates to Crain budget and email to GSFC.		
10-02-2024	JD	Land, Facilities & Equipment (GSFC)	2.10	1,102.50
		Review status of all ranch matters, budget and staffing. Review GSFC open items and make progress re: same. Prepare for and attend conf. call w/ GSFC. T/C to BidCal. T/C w/ Hilco re: interim equipment liquidation. Follow-ups w/ BL re: same and ranch budget matter. T/C w/ N. Oliva re: excess equipment. Review and respond to emails re: ranch properties, including Eno Clementino matter.		
10-02-2024	JD	Land, Facilities & Equipment (GSFC)	0.80	420.00
		T/Cs w/ N. Oliva re: harvest details, critical expenses and other details re: real estate. Follow-ups to same. Review and respond to emails w/ team.		
10-03-2024	MF	Land, Facilities & Equipment (GSFC)	0.60	297.00
		Review details re: packaging collateral and potential recovery options.		
10-03-2024	JD	Land, Facilities & Equipment (GSFC)	1.80	945.00
		Review and follow up regarding facility sale. Review draft liquidation analysis of real estate related to same. Emails with B. Bonham same. TC with equipment auctioneers re: plan for sale of equipment. T/Cs with Nate and Howell re: ranch budget, confer w/ KC re: ranch budget. Planning call w/ BL re: weekly GSFC call.		
10-03-2024	BL	Land, Facilities & Equipment (GSFC)	3.00	1,485.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		Reviewing funding request for Ranch and related invoices provided by C. Enders. Update the Ranch budget and review updates done by KC. T/C w/ H. Crain re: payroll expense in budget. T/C w/ KC re: same.		
10-03-2024	DS	Land, Facilities & Equipment (GSFC) Prepare for upcoming call.	0.30	165.00
10-03-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale.	0.40	210.00
10-03-2024	AN	Land, Facilities & Equipment (GSFC) T/C w/ claims adjuster for crop insurance policies. Update spreadsheet w/ status of 2024 claims data and application of credits applied re: Tehama and Glenn counties. Review policy terms. T/C to Relation-Agro Insurance Agency re: Butte County crop policy and claims. Review and respond to Hilco re: questions to Ryan for M&E. Review, research and respond to email from North Valley Ag re: statement of account. Confirm payments re: same. Review email from and T/C w/ Toyota Commercial Finance re: status of rented equipment. Review contracts for 25 rented forklifts. Confer w/ R. Bughao re: request for list equipment and status of service for same.	3.60	1,170.00
10-04-2024	AN	Land, Facilities & Equipment (GSFC) T/C w/ PG&E re: account services transfer to Receiver, representative confirmed email address for correspondence. Review and respond to email from B. Marquart re: rented equipment contracts w/Tehama County Air Pollution Control District. Review and respond to email and attachment from counsel for OHM re: personal property identification. Schedule site visit re: same. Review multiple emails from BL and GSFC re: schedule of available funds and approval to use funds until depleted. Update team re: pending items and status of same. Review Crain weekly delivery and analysis report.	2.10	682.50
10-04-2024	DS	Land, Facilities & Equipment (GSFC) Review, prepare and attend bank call. Debrief re: same. Follow up w/ counsel.	1.30	715.00
10-04-2024	JD	Land, Facilities & Equipment (GSFC) Prepare for and attend weekly GSFC call. Discuss real estate, Clementino deed, harvest and huller operation, turnkey updates, equipment liquidation plan and proposals, ABW collateral and charge for facility use. Follow-ups w/ DS, BL and Atty. Fiero re: retention, funding, staff and other.	1.50	787.50
10-04-2024	BL	Land, Facilities & Equipment (GSFC) Conf. call w/ GSFC, CR3, PSZJ, DS and JD re: weekly full team update. T/C w/ JD re: agenda and budget. Update Ranch budget and clean up formatting.	2.50	1,237.50
10-05-2024	DS	Land, Facilities & Equipment (GSFC) T/C w/ CR3. Follow ups re: same.	0.30	165.00
10-06-2024	AN	Land, Facilities & Equipment (GSFC) Review email from N. Oliva re: vehicle incident report. Schedule follow up re: same.	0.20	65.00
10-06-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale requirements.	0.40	210.00
10-07-2024	DK	Land, Facilities & Equipment (GSFC) T/C w/ agent and coordinate marketing and sale requirements. Review of marketing update and property requirements.	1.10	577.50
10-07-2024	CG	Land, Facilities & Equipment (GSFC) Review correspondence re: Vina and Rowles properties and respond to same. Confer w/ DK re: closings.	0.40	130.00
			2.30	747.50

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<u>Land, Facilities &amp; Equipment (GSFC)</u>				
10-07-2024	AN	Land, Facilities & Equipment (GSFC) Review email notice from team and service termination tag for Massachusetts Ave ranch. T/C with and work with PG&E re: Receiver documents verification. Confer w/ JD and OJ re: status of sales for bins at Patterson.		
10-07-2024	BL	Land, Facilities & Equipment (GSFC) Update Ranch update and share w/ GSFC. T/C w/ N. Oliva re: PG&E. Confer w/ AN re: same.	0.80	396.00
10-07-2024	JD	Land, Facilities & Equipment (GSFC) Confer w/ BL re: budgets, A/P process for ranch. Review harvest update from H. Crain. Review on-site plan w/ team and oversight of huller and load ticket audit.	0.90	472.50
10-07-2024	DS	Land, Facilities & Equipment (GSFC) Review sale process. Confer w/ JD. Review emails. Update on harvest from Crain.	0.50	275.00
10-08-2024	DS	Land, Facilities & Equipment (GSFC) Prepare for and attend call w/ GSFC. Update w/ JD and Hilco re: progress. Review bin sales.	1.10	605.00
10-08-2024	BL	Land, Facilities & Equipment (GSFC) Confer w/ JD re: GSFC critical items and other updates. Conf. call w/ GSFC, CR3, T. Stratton and JD re: weekly update and sale of facility update.	1.20	594.00
10-08-2024	JD	Land, Facilities & Equipment (GSFC) Prepare for and attend conf. call w/ GSFC, SG team and T. Stratton from HCF re: status of turnkey efforts and all other pending GSFC collateral items. Review R.E. for facility and follow up w/ B. Bonham at Hilco re: equipment values.	1.40	735.00
10-08-2024	AN	Land, Facilities & Equipment (GSFC) Review and respond to BL re: status of payment for PG&E. Review and respond to email from BL re: breakdown the Nau country crop insurance policies and premiums.	2.80	910.00
10-08-2024	KC	Land, Facilities & Equipment (GSFC) Attend GSFC update call.	0.50	No Charge
10-08-2024	MF	Land, Facilities & Equipment (GSFC) Confer w/ KC and BL re: liquidation of packaging and issues.	0.60	297.00
10-08-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale.	0.60	315.00
10-09-2024	BL	Land, Facilities & Equipment (GSFC) Emails w/ CR3 re: funding request and Patterson warehouse.	0.50	247.50
10-09-2024	JD	Land, Facilities & Equipment (GSFC) Review status of GSFC open items, confer w/ BL re: same. Review ABW assets, ranch properties and listing and equipment.	0.50	262.50
10-09-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale and marketing requirements. Review of offer and listing requirements.	0.70	367.50
10-09-2024	AN	Land, Facilities & Equipment (GSFC) On site at headquarters. Meet w/ N. Oliva re: vehicle involved accident dated 10/06/2024. Review insurance policy and confer w/ HR re: insured driver details. T/C w/ BL re: breakdown the Nau country crop insurance policies and premiums. T/C w/ PG&E started at 10:50am to 12:15pm re: credit verification approved and	4.30	1,397.50

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		review meter numbers to transfer from debtor to Receiver and restore service to disconnected meter. Review and confirm approval for multiple invoices re: huller repairs. Meet w/ new vendor re: required documents for accounting. Arrange payments re: same. Email to and review response from agent re: request claims history for Butte County crop insurance.		
10-10-2024	DS	Land, Facilities & Equipment (GSFC) Review harvest and confer w/ JD re: same.	0.30	165.00
10-10-2024	DS	Land, Facilities & Equipment (GSFC) Review sales and confer w/ team.	0.30	165.00
10-10-2024	JD	Land, Facilities & Equipment (GSFC) T/Cs w/ N. Oliva re: harvest and equipment. T/C w/ AN re: on-site activities re: huller and harvest. Review agenda for Friday update call. Updates w/ JP re: real estate call, offer and timeline. T/C w/ counsel re: all pending legal matters re: ranch, leases, etc.	1.30	682.50
10-10-2024	BL	Land, Facilities & Equipment (GSFC) Draft agenda items for weekly call. Review same w/ JD.	0.70	346.50
10-10-2024	AN	Land, Facilities & Equipment (GSFC) On site at headquarters and visit Ohm ranch, meet with prior owner re: identify and picture document Ohm personal property to protect from liquidation. T/C w/ N. Oliva re: first meter back on and second meter at Whitley now off. T/C to PG&E re: same. Review contracts re: incentive grants from Air Pollution Control District. Compose memo and email to Hilco re: same. Review invoice and T/C to Air Pollution Control and respond to email from BL re: APCD invoice permit and coverage period. Review, approve and arrange payment for propane invoice for huller operations.	5.10	1,657.50
10-10-2024	DK	Land, Facilities & Equipment (GSFC) T/C w/ agent re: status. Review of marketing and sale requirements. Coordinate and status of property.	1.10	577.50
10-10-2024	CG	Land, Facilities & Equipment (GSFC) Team meeting w/ DK, JP and broker re: offers, market, etc. Debrief w/ JP re: motions and upcoming call w/ title.	0.70	227.50
10-10-2024	BL	Land, Facilities & Equipment (GSFC) Reviewing Ranch budget and Crain agreement for deposits. Confer w/ J. Rabo re: same.	1.50	742.50
10-11-2024	KC	Land, Facilities & Equipment (GSFC) Update T/C w/ GSFC lender.	1.00	No Charge
10-11-2024	AN	Land, Facilities & Equipment (GSFC) On site at headquarters. Tour equipment yard w/ N. Oliva, picture document and record VIN, SN, plate numbers and company identification numbers for unused equipment and confirm details and arrange pictures for potential sale. Review and respond to F/U email from JD re: operation status of same. Review multiple emails from JD and N. Oliva re: equipment stored at Mead ranch. Prepare schedule of same. Update and share schedule of crop insurance claims and history. Picture document damage and confirm VIN for vehicle involved in 10/06/2024 incident. Review insurance policy details re: same.	5.80	1,885.00
10-11-2024	BL	Land, Facilities & Equipment (GSFC) T/C w/ JD re: harvest deposits.	0.20	99.00
10-11-2024	JD	Land, Facilities & Equipment (GSFC) Prepare for and attend weekly update call w/ GSFC to discuss ranch properties and sales process, harvest and yield indicators, legal issues and other. Debrief w/ team re: same. Follow up re: funding and wire forms for same. Updates w/ DS re: bank call, harvest details.	1.70	892.50

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<u>Land, Facilities &amp; Equipment (GSFC)</u>				
10-11-2024	DS	Land, Facilities & Equipment (GSFC) Review GSFC call prep. Update on yields and quality. Confer w/ JD. T/C w/ CR3. Emails re: same.	0.80	440.00
10-11-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale.	0.40	210.00
10-13-2024	DS	Land, Facilities & Equipment (GSFC) Review and respond to emails. Review update.	0.30	165.00
10-14-2024	JD	Land, Facilities & Equipment (GSFC) Review outline for weekly update. Confer w/ BL re: same. Respond to emails re: Seven Oaks offer. Respond re: insurance claim for incident at Clementino ranch.	0.40	210.00
10-14-2024	AN	Land, Facilities & Equipment (GSFC) On site monitoring for harvest operations. Multiple T/Cs w/ tenant for Clementino Ranch and N. Oliva reporting backyard fence caught fire. Visit property to assess and document damage, review insurance policy for coverages. Source fence repair contractor. T/C w/ agent, file claim for repairs. Advise and confer w/ team re: same. Confer w/ H. Crain re: hopper billing and cross-referencing w/ weight tickets.	4.10	1,332.50
10-14-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate title for sale.	0.80	420.00
10-14-2024	BL	Land, Facilities & Equipment (GSFC) Review Ranch invoices.	0.50	247.50
10-15-2024	JD	Land, Facilities & Equipment (GSFC) Review status of harvest. Emails w/ N. Oliva. T/C w/ P. Huffine re: status of all matters including ranch properties, facility sale and other. Review and respond to marketing matrix re: ranch properties. Forward same to GSFC. Follow-ups re: sale of equipment and proposals re: same.	1.40	735.00
10-15-2024	CG	Land, Facilities & Equipment (GSFC) F/U w/ title re: additional info for remaining reports. Confer w/ JP re: title and request from underwriter. Research county recorders records re: filed order. F/U w/ Atty. Kapur re: same. Various exchanges re: status of title. Provide background info to alternative title company.	1.60	520.00
10-15-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate marketing and sale and contract and title requirements.	0.60	315.00
10-15-2024	AN	Land, Facilities & Equipment (GSFC) On site monitoring for harvest operations. Review email from K. Ito re: leased items for Leaf Capital. Email to operations manager re: confirm forklift usage. Email to and review response from R. Andersen re: confirm server usage and calculate arrears and arrange payment for same.	4.50	1,462.50
10-16-2024	JD	Land, Facilities & Equipment (GSFC) Updates re: turnkey sale process, ranch property offers, etc.	0.40	210.00
10-16-2024	DS	Land, Facilities & Equipment (GSFC) Meeting w/ team. Review progress. Confer w/ JD.	0.40	220.00
10-16-2024	AN	Land, Facilities & Equipment (GSFC) On site monitoring for harvest operations. T/C w/ insurance adjuster re: fire damaged fence at Clementino residence. Update team re: estimated damage costs and insurance and calculated payout re: same. T/C w/ and follow up email to Arrow Fencing re: request repair quote for same. Review, research and prepare response to email from PG&E re: request for additional documents. Review email response from R. Bughao	3.50	1,137.50

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		and finalize list of equipment to return forklifts to Leaf Capital. Email details to K. Ito re: same. Review invoice for guard service and forward same to JD re: approval to continue service for one month.		
10-16-2024	KC	Land, Facilities & Equipment (GSFC) Review inventory with Ryan Bughao at the warehouse	1.00	395.00
10-16-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale and contract requirements for same.	0.60	315.00
10-16-2024	CG	Land, Facilities & Equipment (GSFC) Confer w/ title rep re: requirements. F/U w/ counsel re: recording order at county levels. Review buyers review of Hopson Ranch title and confer w/ team re: same.	0.60	195.00
10-17-2024	CG	Land, Facilities & Equipment (GSFC) Confer w/ DK re: title.	0.20	65.00
10-17-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale.	0.60	315.00
10-17-2024	JD	Land, Facilities & Equipment (GSFC) Review equipment liquidation plans and proposals. Emails w/ Hilco and BidCal. T/C w/ R. Ramay from Bidcal. Review ranch property and issue w/ scale at Beck property. Updates for written update re: turnkey facility sale and harvest. Emails w/ HCF re: turnkey progress.	0.70	367.50
10-17-2024	BL	Land, Facilities & Equipment (GSFC) Write weekly update, solicit information from Crain, Mead, Hilco, etc. T/C w/ A. Moosally re: intercompany.	2.40	1,188.00
10-17-2024	AN	Land, Facilities & Equipment (GSFC) On site monitoring for harvest operations. T/C w/ D. McGowen from Flagstar Capital re: status of payment for leased equipment. Follow up email re: assignment documents re: Verdant leased forklift. Review payment detail for Verdant and Linde and confirm check re: same. Review list of equipment currently in use, review lease and rental contracts and email to and review response from R. Bughoa re: Holt leases and Toyota rental items. Update schedule of forklifts re: status and returns. T/C w/ tenant for Spanfelner re: central air heat is non-op. Email to JD re: approval to assess and repair.	4.30	1,397.50
10-18-2024	AN	Land, Facilities & Equipment (GSFC) On site monitoring. Review and respond to email from JD re: request and schedule meeting w/ BidCal re: evaluate out of service ranch equipment. Meet w/ H. Crain re: potential purchase of semi's. Meet w/ N. Oliva, D. Sproket re: out of service equipment, visit Beck ranch and picture document additional item and update list for BidCal. Confirm and advise JD re: potential fraud sale. Review message from insurance co re: request for quote to repair damage to pick up truck. Dispatch driver re: same. Review response from operations manager re: status of leased/rented equipment. Email to J. Fiero re: status of Holt forklifts. Review, research and respond to email from Lomo Cold Storage re: status of request for copy of Order Appointing Receiver. T/C from PG&E re: service connect for multiple meters. Review notice from DMV re: tow lien on truck. T/C to and confirm owner responsibilities re: same. T/C from tenant for Anita Ranch reporting leak under sink.	5.60	1,820.00
10-18-2024	BL	Land, Facilities & Equipment (GSFC) Work on weekly update. Compile feedback from JD. Work w/ KC on bin table for reporting. T/C w/ A. Moosally re: GSFC requests for Sheller. T/C w/ JD re: reporting.	3.50	1,732.50
10-18-2024	DS	Land, Facilities & Equipment (GSFC) Review report for bank. Discuss same. Review huller results / ops. Discuss same.	0.70	385.00
10-18-2024	DK	Land, Facilities & Equipment (GSFC)	1.10	577.50

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		T/C and coordinate marketing and confer w/ agent and JD re: same. Review of status of marketing and property and confer w/ JP re: escrow on live contract.		
10-18-2024	JD	Land, Facilities & Equipment (GSFC) Review funding and cash flow and status of turnkey sale. Review written update. Finalize and send to GSFC. Review and respond to emails re: ranch property offers and status. Review equipment details and confer w/ R. Ramay at BidCal re: same. Coordinate site visit.	1.80	945.00
10-18-2024	CG	Land, Facilities & Equipment (GSFC) Confer w/ JP re: status of contract for Hopson Ranch and escrow for same. Various exchanges w/ counsel re: recording order.	0.50	162.50
10-18-2024	JD	Land, Facilities & Equipment (GSFC) Finalize weekly update for GSFC and send same. Updates re: production, and other.	0.60	315.00
10-20-2024	CG	Land, Facilities & Equipment (GSFC) Review correspondence re: offer.	0.30	75.00
10-21-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate PSA and sale status and confer w/ CG re: same.	0.70	367.50
10-21-2024	BL	Land, Facilities & Equipment (GSFC) Review harvest load files. Download from Crain website. Inquire from S. Alvarado. Confer w/ KC re: same. Draft report related to GSFC collateral. Review weekly update.	3.00	1,485.00
10-21-2024	JP	Land, Facilities & Equipment (GSFC) Draft real estate sales update for Receiver's Report.	0.60	255.00
10-21-2024	AN	Land, Facilities & Equipment (GSFC) T/C w/ tenant for Spanfellner re: heater is non-op. T/C and schedule repair assessment w/ licensed contractor for same. T/c w/ and schedule plumber for leak at Anita. T/C with tenant re: same. Follow up T/C's to multiple tenants re: lease agreements, status of payment for rent. Review and prepare deposits, visit US Bank, deposit tenant rents. T/C w/ contractor for fence repair re: status of site visit and proposal to repair Clementino residential fence.	2.50	812.50
10-21-2024	JD	Land, Facilities & Equipment (GSFC) Review status of harvest crop yields. Plan meeting w/ H. Crain re: same and final week of huller activity / maintenance, etc.	0.80	420.00
10-22-2024	DK	Land, Facilities & Equipment (GSFC) Multiple T/Cs and coordinate sale related marketing requirements. Confer w/ agent re: status.	0.80	420.00
10-22-2024	DS	Land, Facilities & Equipment (GSFC) Update w/ JD re: onsite visit. Emails re: same.	0.30	165.00
10-22-2024	AN	Land, Facilities & Equipment (GSFC) Review and respond to email from B. Lindauer re: Lindauer ranch PG&E billing.	0.20	65.00
10-22-2024	KC	Land, Facilities & Equipment (GSFC) Crain deal updates with JD, Hal & Chuck Crain	1.30	513.50
10-22-2024	CG	Land, Facilities & Equipment (GSFC) Review offers, archive and update files.	1.40	455.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
10-22-2024	JD	Land, Facilities & Equipment (GSFC) On-site at Vina HQ. Meet w/ N. Oliva re: harvest progress and hulling. Meet w/ G. Kelley re: controls and review of testing of loads. Confer w/ KC re: same. Meet w/ H. Crain and C. Crain re: harvest, hulling, ranch properties and turnkey sale. Follow-ups w/ team re: same. T/C w/ T. Stratton re: turnkey sale.	1.80	945.00
10-22-2024	BL	Land, Facilities & Equipment (GSFC) Review CR3 request list w/ C. Enders. Review ranch invoices sent by N. Oliva.	1.00	495.00
10-23-2024	CG	Land, Facilities & Equipment (GSFC) Confer w/ title re: status. Draft offer, sales and closing tracker. Review updates from broker.	1.60	520.00
10-23-2024	JD	Land, Facilities & Equipment (GSFC) Attend tour w/ prospective turnkey buyer. Meet w/ H. Crain re: ranch staffing. Meet w/ N. Oliva re: various ranch matters, Finch lease, etc. Discuss Finch lease w/ counsel. Review turnkey buyers. Review ranch funding request. T/C w/ DS re: status of all and harvest / huller. Emails and responses re: R.E. offers.	1.70	892.50
10-23-2024	DK	Land, Facilities & Equipment (GSFC) T/C w/ agent and coordinate sale requirements. Review of status of title and pending contract and escrow.	0.80	420.00
10-23-2024	BL	Land, Facilities & Equipment (GSFC) Review GSFC Ranch and Sheller funding requests. Confer w/ KC re: same. Post legal call F/U w/ lease. Review Finch lease. Confer w/ JD re: same.	1.20	594.00
10-23-2024	AN	Land, Facilities & Equipment (GSFC) Review and prepare deposits, visit US Bank, deposit tenant rents. T/C w/ tenant for 3850 Vadney re: receivership and rent payable to. Schedule visit re: same. Email to and review response from MF re: Toyota forklift returns. Review quote to repair damaged fence at Clementino residence. Forward invoice and insurance support to JD for approval to proceed w/ repair. Confer w/ plumber on site at 5429 Anita re: leaking busted pipe, confirm approvals to proceed with repairs.	2.50	812.50
10-23-2024	DS	Land, Facilities & Equipment (GSFC) Review hulling/harvest pricing and sampling. Confer w/ JD.	0.30	165.00
10-24-2024	DS	Land, Facilities & Equipment (GSFC) Update w/ Hilco on sale. Confer w/ JD.	0.30	165.00
10-24-2024	JP	Land, Facilities & Equipment (GSFC) Coordinate responses on lease value and sale updates.	0.40	170.00
10-24-2024	BL	Land, Facilities & Equipment (GSFC) Prep agenda and update task tracker for Friday's call. T/C w/ JD re: status of harvest and other. Update Sheller budget for GSFC. Emails w/ A. Moosally re: Sheller request list. Emails w/ DK and KP re: Finch lease. Review lease. Emails w/ AN re: crop insurance.	2.10	1,039.50
10-24-2024	AN	Land, Facilities & Equipment (GSFC) Meet w/ tenant for 3850 Vadney re: rent payments. Set up online access to service provider site re: propane invoices and payment history. Review and approve invoices re: same. Confer w/ H. Crain and review and respond to multiple emails from BL and JD re: status of claims for crop insurance.	1.60	520.00
10-24-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale and leasing requirements and confer w/ agent re: same.	0.80	420.00
10-24-2024	JD	Land, Facilities & Equipment (GSFC)	1.00	525.00

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		Review harvest completion items and RIFs for ranch team. T/C w/ M. Mead re: same. Updates w/ N. Oliva and H. Crain. Prepare for weekly update call. Review agenda and task tracker.		
10-24-2024	CG	Land, Facilities & Equipment (GSFC) Confer w/ JP re: status of title. Update to tracker w/ offers. Confer w/ broker re: same.	1.60	520.00
10-25-2024	BL	Land, Facilities & Equipment (GSFC) T/C w/ JD re: GSFC call prep. Conf. call w/ GSFC, CR3 and counsel re: weekly status update. Review Crain harvest reporting.	2.50	1,237.50
10-25-2024	KC	Land, Facilities & Equipment (GSFC) GSFC update call with JD, MF, BL, DK	0.50	No Charge
10-25-2024	AN	Land, Facilities & Equipment (GSFC) Gain online access to Receiver's PG&E account. Review billing for multiple statements for ranch meters. Review and prepare deposits, visit US Bank, deposit tenant rents. T/C w/ tenant for Spanfellner re: status of HVAC visit.	2.50	812.50
10-25-2024	DK	Land, Facilities & Equipment (GSFC) Multiple T/Cs and confer w/ agent re: status of property. Coordinate contract and court requirements and confer w/ escrow re: same.	0.80	420.00
10-25-2024	JD	Land, Facilities & Equipment (GSFC) Prepare for and attend GSFC weekly call. Review and update harvest schedule. T/C w/ brokers re: ranch property offers. Confer w/ DK re: same. Follow-ups re: same.	1.40	735.00
10-25-2024	DS	Land, Facilities & Equipment (GSFC) Prepare for and attend meeting w/ bank.	1.00	550.00
10-26-2024	BL	Land, Facilities & Equipment (GSFC) Review and compile Sheller request list items. Write disclaimer for files. Confer w/ J. Fiero re: same.	1.00	495.00
10-26-2024	AN	Land, Facilities & Equipment (GSFC) On site HQ monitoring and admin. Meet w/ H. Crain, discuss final huller operations and close out. Review multiple emails and review and organize attachments from L. Belmonte re: property tax statements.	2.50	812.50
10-27-2024	AN	Land, Facilities & Equipment (GSFC) Site visit to confirm no activity on site and advise same to guard. Review and confirm updated website re: meter statements added to Receiver account.	0.40	130.00
10-27-2024	AN	Land, Facilities & Equipment (GSFC) Site visit to confirm no activity on site and advise same to guard. Review and confirm updated website re: meter statements added to Receiver account.	0.40	130.00
10-27-2024	JD	Land, Facilities & Equipment (GSFC) Review status of sale of equipment. Follow up w/ H. Crain re: equipment interest.	0.20	105.00
10-27-2024	MF	Land, Facilities & Equipment (GSFC) Review ABW inventory comparative analysis and present to Hilco for sales and marketing purposes.	0.60	297.00
10-28-2024	DS	Land, Facilities & Equipment (GSFC) Follow up on budget w/ CR3. Confer w/ team.	0.50	275.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
10-28-2024	AN	Land, Facilities & Equipment (GSFC) Visit property at 12262 Hwy 99E meet w/ tenant re: repair visit w/ HVAC service provider.	2.30	747.50
10-28-2024	JD	Land, Facilities & Equipment (GSFC) Review marketing update and status of offers. T/C from M. Mead re: turnover of lease and equipment. Follow-ups re: yield analysis and review of testing for loads through huller.	0.50	262.50
10-28-2024	AN	Land, Facilities & Equipment (GSFC) On site at HQ, review and organize mail, update DB re: ranch creditor demand notice. Review online billing for PG&E, confirm added meters to new accounts. Confer w/ and review email from L. Belmonte re: request report detailing payments made to PG&E post receivership. Follow up T/C to guard service provider re: advise and request proposed cost for reduced hours. Prepare schedule for services and cost to date and calculate estimated cost for reduced hours. Review proposal from BidCal re: estimated sales recover for equipment auction sales re: current out of service items.	3.50	1,137.50
10-28-2024	KC	Land, Facilities & Equipment (GSFC) Funding request and f/u for week of 10/26.	0.50	197.50
10-28-2024	BL	Land, Facilities & Equipment (GSFC) Confer w/ KC and MF re: GSFC Sheller budget. Email w/ A. Moosally re: same.	0.40	198.00
10-29-2024	BL	Land, Facilities & Equipment (GSFC) Provide files requested to A. Moosally. Confer w/ KC re: same. Conf. call w/ A. Moosally, W. Marr and JD re: requested items.	1.20	594.00
10-29-2024	JD	Land, Facilities & Equipment (GSFC) Review status of all matters re: harvest, ranch operations, misc. sheller details related to GSFC and other to prepare for meeting w/ BL, W. Mar and A. Moosally. Attend call re: same. Debrief w/ BL re: same. Follow-ups re: real estate offers and insurance. T/C w/ T. Stratton re: bids for turnkey facility sale. Follow-ups re: crop yields and huller shutdown.	1.60	840.00
10-29-2024	DK	Land, Facilities & Equipment (GSFC) Review of property sale and confer w/ agent re: status. Review of offers.	0.80	420.00
10-29-2024	MF	Land, Facilities & Equipment (GSFC) Confer w/ Hilco re: ABW inventory and sales opprotunities.	0.60	297.00
10-29-2024	AN	Land, Facilities & Equipment (GSFC) On site at HQ , meet w/ H. Crain re: update progress and completion for Huller operations. Meet w/ tenant for 3700 Vadney re: status of payment for rent. Review and respond to team email re: details and recommendations for inventory at Wright storage facilities. Meet w/ N. Oliva re: Mead equipment interest. T/C w/ tenant for Anita ranch, advise to pay rent to M. Mead. T/C w/ tenant for Clemetino Ranch re: update fence repair quote and insurance payment. Confer w/ C. Enders re: lease terms for same. Follow up email to JD re: status of Order defined by counsel re: same. Follow up email to and confer w/ C. Enders and review responses from team re: status of payment for Guard Services.	4.70	1,527.50
10-29-2024	AN	Land, Facilities & Equipment (GSFC) T/C w/ M. Mead and visit Durham ranch. Meet w/ M. Mead and D. Mead re: discuss, identify and review equipment list to acquire. T/C w/ banker to request, confirm and visit US Bank Yuba City re: retrieve missing statements.	2.80	910.00
10-30-2024	KC	Land, Facilities & Equipment (GSFC) Funding request reconciliation and data compilation for Ranch. Sheller budget finalization sent to GSFC.	1.00	395.00
10-30-2024	DK	Land, Facilities & Equipment (GSFC) Thank you for trusting Stapleton Group, we appreciate your business.	1.10	577.50

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities &amp; Equipment (GSFC)</u>				
		T/C and coordinate best and final requirements. Review of offers and status of contract and coordinate same.		
10-30-2024	CG	Land, Facilities & Equipment (GSFC) Review offers and brokers updates. Update tracker and property folders re: same.	0.40	130.00
10-30-2024	JD	Land, Facilities & Equipment (GSFC) T/C w/ N. Oliva re: post-harvest cultivation budget items and other details re: ranch properties. Confer w/ BL re: outstanding items re: yields, funding from proceeds from harvest and budget items.	0.60	315.00
10-31-2024	BL	Land, Facilities & Equipment (GSFC) Review Sheller and Ranch PG&E account. Review invoices provided by C. Enders for GSFC funding request. Confer w/ KC and AN re: same. Conf. call w/ J. Fiero, T. Kapur, JD and MF re: legal items related to GSFC.	1.50	742.50
10-31-2024	BL	Land, Facilities & Equipment (GSFC) Emails w/ GSFC and B. Lindauer. Review invoices re: same. Confer w/ C. Enders re: payments. F/U w/ AN re: JBC bank statements for CR3 request.	1.00	495.00
10-31-2024	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale activity.	0.40	210.00
10-31-2024	AN	Land, Facilities & Equipment (GSFC) Review, research and respond to email from KC re: PG&E billing and credits re: current funding request. Teams meeting w/ BL and KC re: review PG&E billing for Receiver's accounts for Ranch meters. Review updated account details online, review current statement, confirm meters and locations and update schedule and reconcile billing re: same. Review and confirm approval for post-harvest consumables. Create new scheduling for guard service adjustment for future period. Advise service provider and confer w/ team re: same.	2.60	845.00
10-31-2024	JD	Land, Facilities & Equipment (GSFC) Confer w/ counsel re: status of real estate leases. Review Lindauer expenses. Follow-ups w/ BL re: same. Review harvest yields and ranch cash flow and A/P.	0.60	315.00
			196.50	81,438.50
		<b>Total</b>	831.90	350,509.00

### Time Summary

Timekeeper	Hours	Amount
Alicia Rodmel	10.10	2,272.50
Audrey Nefkens	139.70	45,402.50
Betsy Landoll	160.20	79,299.00
Blake Hayes	8.30	1,618.50
Cathy Garnica	20.70	6,705.00
David Kieffer	15.80	8,295.00
David Stapleton	13.20	7,260.00
Deborah Burger	35.50	9,762.50
Jake Diiorio	60.00	31,500.00
Justin Picardi	5.40	2,295.00
Kai Celle	153.90	54,470.50
Matthew Flahive	196.30	97,168.50
Michael Bergthold	1.50	787.50
Yenni Liang	11.30	3,672.50
	<b>Total</b>	350,509.00
Activity	Hours	Amount
A/R and Inventory (BofA)	294.10	137,725.50

<b>Activity</b>	<b>Hours</b>	<b>Amount</b>
Bins	76.90	31,492.00
Case Management	250.90	94,678.50
JB Cusick	13.50	5,174.50
Land, Facilities & Equipment (GSFC)	196.50	81,438.50
	<b>Total Fees</b>	<b>350,509.00</b>

### **Expense Summary**

<b>Expense</b>	<b>Amount</b>
Airfare	3,422.73
Copies	104.20
Fuel	454.19
Lodging	5,893.77
Meals	2,265.53
Mileage	7.91
Notary	285.00
Other	1,392.00
Postage & Correspondence	120.10
Rent a Car	3,530.79
Transportation	393.90
	<b>Total Expenses</b>
	17,870.12

**Total for this Invoice** 368,379.12

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**PROOF OF SERVICE**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of San Diego, State of California. My business address is 514 Via de la Valle, Suite 210, Solana Beach, CA 92075.

On January 13, 2025, I served true copies of the following document(s) described as on the interested parties in this action as follows:

***RECEIVER'S REPORT NO. 2***

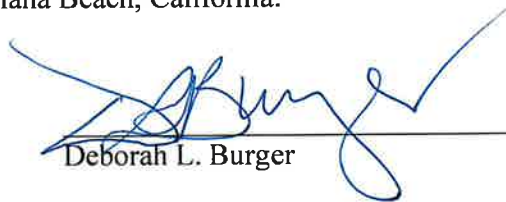
**SEE ATTACHED SERVICE LIST**

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Stapleton Group for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Los Angeles, California.

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address oadler@pszjlaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on January 13, 2025, at Solana Beach, California.



Deborah L. Burger

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