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4 COURT APPOINTED RECEIVER
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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. 5

19 David P. Stapleton, the court-appointed receiver (“Receiver”) for the above-entitled action,
20 respectfully submits the following Report No. 5.

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

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

17 **II. Operations Overview**

18 The Receiver continues to maintain the hulling and shelling plant in an inactive state at the
19 Vina HQ in an effort to minimize costs to the Receivership Estate while the Receiver advances go-
20 forward plans for the facility with GSFC. The Receiver organized winddown operations into five
21 key phases. The first three phases are complete. The two remaining phases are: (Phase 4) selling
22 the Ranch real estate and any unused farm equipment; and (Phase 5) preserving the facilities and
23 equipment for a turnkey sale. The Receiver coordinating Phase 4 and working with an investment
24 banker to complete Phase 5.

25 ***Budget, Funding and Cash Reporting***

26 The Receiver continues to issue funding requests on an as-need basis to the lenders based
27 on the immediate cash needs to continue operations.

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1 ***Staffing & RIFs***

2 Upon the Receiver’s appointment, there were 136 employees. The current employee
3 headcount is 23 (13 at Andersen Ranch and 10 at Andersen Shelling). There are no full-time
4 employees in back-office administrative roles, including HR and Accounting, so the Receiver’s
5 team has taken on the back-office and accounting functions. The Receiver will continue to assess
6 which employees need to be retained to fulfill the Receiver’s objectives.

7 **III. Collateral**

8 ***2023 Inventory***

9 The 2023 inventory was comprised of products in various forms, including raw in-shell
10 walnuts, WIP (at various stages), and finished retail packaged product, which was completely
11 liquidated by early January 2025.

12 ***2024 Inventory***

13 The Receiver harvested a total of 5.8 million pounds of walnuts in 2024. As previously
14 reported, the harvest yields were significantly down in 2024 as predicted by USDA’s National
15 Agricultural Statistics Service. The Receiver executed an agreement with Charles Crain to purchase
16 all of the 2024 raw in-shell walnut inventory.

17 ***Bins***

18 The Receiver led an effort to sell 30,000+ bins, both empty and full, as part of his
19 comprehensive liquidation process. As of the date of this report, the Receiver has sold over 28,000
20 bins (approx. 10,000 plastic bins and approx. 18,000 wooden bins) and collected over \$3,000,000.

21 **IV. Sheller Operations**

22 ***Winddown Plan***

23 The Receiver completed the fumigation work to mitigate any pests that may have remained
24 after the inventory was liquidated. The remaining skeleton crew manages the facility and prepares
25 it for future operations.

26 ***Turnkey Sale***

27 The Receiver separately engaged Hilco Corporate Finance to sell the facilities and
28 equipment which are being offered as a turnkey facility, which includes the hullers and all

1 processing facilities for both walnut and almond processing and climate-controlled nut storage, etc.
2 Hilco frequently updates the Receiver on the status of the turnkey sale, and this work is ongoing.

3 **V. Ranch Operations**

4 ***Equipment Sales***

5 The Receiver continues to liquidate unused rolling stock and farm equipment from the
6 Andersen Ranch operation. Any upcoming sales will be included in future reports.

7 ***Property and Land Sales***

8 As of the date of this report, the Receiver has sold three of the twenty-two total properties
9 owned or partially owned by Andersen & Sons or one of its affiliated entities included in the
10 Receiver's Order. Four of these properties were determined to be an integral part of the Andersen
11 & Sons core facility at the Vina HQ and were included in the Receiver's agreement with Hilco to
12 sell as part of the turkey sale process.

13 As stated in previous reports, AG-Land Investments Brokers, was engaged to list and
14 market eleven orchards. During the listing period, following a marketing campaign setting a date
15 for initial offers, AG-Land Investment Brokers procured several offers for several of the orchards.
16 The Receiver reviewed all offers, performed its analysis and instructed AG-Land Investment
17 Brokers to counter the offers and request buyers submit their best and final offers. Several buyers
18 submitted amended offers, and the Receiver proceeded with the following offers.

19 In December 2025, the Receiver went under contract for the orchard known as Rowles.
20 Following the transfer of water shares and delivery of stock certificates to buyer, the sale was
21 completed on February 13, 2025.

22 In January 2025, the Receiver went under contract for the orchard known as "Anita" that is
23 located on Anita Road in Chico, California. However, the sale stalled due to the personal
24 bankruptcy of Michael and Krista Andersen. Following clearance from the bankruptcy court, the
25 Receiver completed the sale of Anita on June 30, 2025.

26 The Receiver concluded that the remaining offers did not meet the price per acre threshold
27 and declined to proceed with the offers. With no new offers or interest, marketing efforts were
28 paused, and the listing agreement was terminated as of June 1, 2025.

1 In March 2025, Edward Clementino, who was the previous owner and held a Life Estate as
2 well as a junior lien on the orchard known as “Clementino” expressed interest in repurchasing the
3 property located in Glenn County, California. The Receiver determined that Edward Clementino’s
4 offer was the best offer and completed the sale on May 15, 2025.

5 In May 2025, Charles Crain submitted an offer for the orchard known as “Ohm” located in
6 Red Bluff, California. Crain’s company also managed the Ohm orchard. The Receiver determined
7 that Crain’s offer was the best offer given the Buyer’s familiarity with the property and his
8 additional agreement to enter into a Farm Management Agreement. In June 2025 the Receiver went
9 under contract. The sale is expected to be completed in July 2025.

10 The Receiver identified an office building located in Chico, California that is partially
11 owned by Farmers Hill Investments LLC, an Andersen & Sons subsidiary. The Receiver received
12 an offer from the retained broker following an aggressive marketing campaign. The Receiver
13 determined that this was the best offer following two lower offers submitted and considering the
14 level of interest, various price reductions, and accessibility issues with the property. In June 2025,
15 the Receiver went under contract. The sale is expected to be completed in July 2025. The sale is
16 ongoing, and the Receiver will report the status of the closing in future reports.

17 **VI. JB Cusick Operations**

18 To date, over \$63,000 has been collected from customers. There was one customer that
19 represents over 60% of the open receivable balance. This receivable balance was assigned to
20 Cornerstone Community Bank.

21 As previously reported, the Receiver continues to manage the closure of the Companies and
22 ongoing requests from vendors and management.

23 **VII. Cash**

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

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1 The Order authorizes the Receiver to issue receiver's certificates to GSFC or BofA to pay
2 for the reasonable and necessary operating expenses, administrative expenses, repair costs,
3 professional fees and other expenses of the Receivership Estate, including the processing of farm
4 products and other non-real property Collateral. To date, the Receiver has issued Receiver's
5 Certificates as listed in the cash summary chart below.

6 BofA is holding the following funds for the benefit of the Receivership Estate: (i) \$22.7
7 million, which is held in a BofA loan ledger account within Andersen Shelling's BofA asset-based
8 lending online portal (the "BofA Escrow Account Balance"), and (ii) \$8.5 million of reserves that
9 was either swept against the BofA line of credit (the "BofA Reserves"). BofA has acknowledged
10 that it is obligated to return the BofA Reserves to the Receiver and has assured the Receiver that it
11 has sufficient reserves to fund this obligation to the extent that it does not prevail in the grower
12 litigation.

13 Below is a summary of cash receipts and disbursements of the Receivership Estate since
14 inception of the Receivership through June 30, 2025.

15		
16	Beginning Cash, 8/8/24	\$ 2,091,415
17	Cash Receipts	
18	Sales	41,791,705
19	Receiver's Certificates	<u>15,939,439</u>
20	Total Cash Receipts	57,731,144
21	Cash Disbursements	
22	Payroll	(3,439,226)
23	Receiver and Receiver's Counsel	(3,370,000)
24	Equipment	(1,817,362)
25	Taxes	(1,426,942)
26	Farming Supplies	(847,890)
27	Utilities	(794,202)
28	Contract Services	(791,204)
	Employee Benefits	(638,701)
	Insurance	(606,128)
	Legal and Professional	(336,741)
	Other	<u>(1,679,404)</u>
	Total Disbursements	(15,747,800)

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BofA Escrow Account Balance	(22,660,495)
BofA Reserves	(8,519,082)
Repayment of Receiver Certificates	(6,060,473)
Ending Cash, 6/30/25 ¹	<u><u>\$ 6,834,708</u></u>

VIII. Books and Records

The Receiver, through his IT Consultant, maintains full administrator access to the Companies’ IT systems and oversees a process to store backups of the Companies’ data in an offsite repository controlled by the Receiver. The Receiver’s staff continues to work with the IT Consultant to maintain continuous backups of the company email accounts and key servers.

IX. Litigation

The Receiver has become aware of no less than 23 actions pending in multiple counties against the receivership entities, including Andersen Shelling. Accepting the stated complaints and judgments at face value, the plaintiffs allege more than \$50 million owed for goods, services, and agricultural products. The actions are pending, and litigation is not complete. The Receiver is defending litigation against the Receivership Entities and certain actions in which claimants have pressed for judgments or attachment. Consistent with the terms of the Receivership Order, the Receiver is seeking dismissal of actions filed after the Receiver’s appointment and/or is coordinating for matters to be transferred to the Tehama County Superior Court. The Receiver is also responding to dozens of administrative complaints filed with the California Department of Food and agriculture.

XI. Claims Process

As of the date of this report, the Court granted the Receiver’s motion to establish a claims process and set September 30, 2025, as the claims bar date. This will allow the Court to oversee an orderly process wherein all creditors, secured and unsecured, are given the opportunity to file claims with the Receiver to better assess the claims against the estate, reconcile them, and facilitate

¹ Please note that of the \$6.8M cash balance, approximately \$3M is related to disputed bins sales.

1 the resolution of creditor claims in an efficient manner.

2 **XII. Legal Fees and Expenses**

3 According to the Order, the Receiver was authorized to retain the law firm of Pachulski
4 Stang Ziehl & Jones LLP (“PSZJ”) as Receiver’s legal counsel. PSZJ’s fees and expenses were the
5 following: \$152,128.30 for April 2025, and \$179,381.94 for May 2025. The Receiver, through this
6 report, is delivering the invoices for April and May 2025 to all parties on the service list and intends
7 to pay these invoices from the funds of the Receivership Estate. Attached as **Exhibit “A”** is a copy
8 of PSZJ’s invoices for April and May 2025.

9 **X. Receiver’s Fees and Expenses**

10 The Receiver’s fees and expenses were \$56,694.21 for May 2025, and \$77,983.00 for June
11 2025. The Receiver, through this report, is delivering the invoice for May and June 2025 to all
12 parties on the service list and intends to pay this invoices from the funds of the receivership estate
13 under the terms of the Order. Attached as **Exhibit “B”** is a copy of the Receiver’s invoices for May
14 and June 2025.

15 DATED: July 29, 2025



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17 David P. Stapleton
18 Receiver
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EXHIBIT “A”



PACHULSKI
STANG
ZIEHL &
JONES

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

June 11, 2025
Invoice 147569
Client 81001.00001

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

RE: Andersen & Sons Shelling Receivership

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2025

FEES	\$150,855.00
EXPENSES	\$1,273.30
TOTAL CURRENT CHARGES	\$152,128.30
BALANCE FORWARD	\$85,246.60
LAST PAYMENT	-\$85,246.60
TOTAL BALANCE DUE	\$152,128.30

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

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Invoice 147569
June 11, 2025

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	1,525.00	32.50	\$49,562.50
TMK	Kapur, Teddy M.	Partner	1,325.00	7.70	\$10,202.50
GSG	Greenwood, Gail S.	Counsel	1,325.00	1.20	\$1,590.00
JPN	Nolan, Jeffrey P.	Counsel	1,250.00	71.60	\$89,500.00
			<hr/> 113.00		<hr/> \$150,855.00

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BANN	Banner	1.20	\$1,680.00
BINS	Bins	0.50	\$762.50
BoA	Bank of America	48.00	\$62,870.00
CO	Claims Administration and Objections	29.70	\$39,202.50
GEN	General	18.70	\$24,095.00
GSFC	GSFC	14.90	\$22,245.00
		<hr/> 113.00	<hr/> \$150,855.00

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

Page: 4
Invoice 147569
June 11, 2025

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Attorney Service	\$412.42
Federal Express	\$60.77
Court Fees	\$166.15
Lexis/Nexis- Legal Research	\$436.46
Postage	\$6.90
Reproduction Expense	\$190.60
	<hr/>
	\$1,273.30

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Banner						
04/03/2025	JDF	BANN	Review and consider response to claim of lien by Banner on Western Nut equipment; Review status of Anita Road	0.30	1,525.00	\$457.50
04/03/2025	JPN	BANN	Telephone conference with B. Bank regarding April 22, 2025 motion hearing.	0.10	1,250.00	\$125.00
04/03/2025	TMK	BANN	Review Banner Bank claims to JB Cusick receivables.	0.20	1,325.00	\$265.00
04/04/2025	JPN	BANN	Telephone conference with counsel for Banner Bank regarding Bank of America motion.	0.30	1,250.00	\$375.00
04/11/2025	JDF	BANN	Review Western Nut lien claim and documents regarding same	0.30	1,525.00	\$457.50
				1.20		\$1,680.00
Bins						
04/15/2025	JDF	BINS	Work on bins proceeds question raised by R. Kaplan; Confer with R. Kaplan re Andersen bankruptcy case issues	0.50	1,525.00	\$762.50
				0.50		\$762.50
Bank of America						
04/01/2025	JDF	BoA	Consider Bank of America motion issues raised by J. Nolan and respond to him re same; Email to Downey Brand re BofA motion	1.10	1,525.00	\$1,677.50
04/01/2025	JPN	BoA	Telephone conference with litigation team regarding Bank of America motion.	0.60	1,250.00	\$750.00
04/01/2025	JPN	BoA	Draft response to TSB (.30); Forward to G. Greenwood for input (.20).	0.50	1,250.00	\$625.00
04/02/2025	JPN	BoA	Receive correspondence from U.S. Horticulture Farmland; Draft response thereto.	0.40	1,250.00	\$500.00
04/02/2025	JPN	BoA	Review request of TSB with litigation group.	0.30	1,250.00	\$375.00
04/02/2025	JPN	BoA	Finalize response to TSB.	0.20	1,250.00	\$250.00
04/02/2025	JPN	BoA	Draft summary of accounts made by Bank of America motion; Forward to litigation team; Review legal authority cited therein.	0.80	1,250.00	\$1,000.00
04/02/2025	JPN	BoA	Finalize letter to G & N Creekside.	0.20	1,250.00	\$250.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/02/2025	JPN	BoA	Draft Declaration of Receiver in support of response to Bank of America.	0.30	1,250.00	\$375.00
04/02/2025	TMK	BoA	Review J. Nolan summary analysis of Bank of America motion for bankruptcy.	0.20	1,325.00	\$265.00
04/03/2025	JPN	BoA	Telephone conference with M. Bateman regarding grower litigation.	0.40	1,250.00	\$500.00
04/03/2025	JPN	BoA	Review Grower supplemental Declaration in District Court case regarding consolidation of litigation; Telephone conference with J. Fiero regarding same.	0.40	1,250.00	\$500.00
04/04/2025	JDF	BoA	Work on response to Bank of America motion	0.20	1,525.00	\$305.00
04/04/2025	JPN	BoA	Email exchange with litigation team regarding various events referenced in Bank of America motion.	0.40	1,250.00	\$500.00
04/04/2025	JPN	BoA	Draft statement of facts regarding response to Bank of America.	1.50	1,250.00	\$1,875.00
04/04/2025	JPN	BoA	Telephone conference with additional growers regarding Bank of America motion.	0.40	1,250.00	\$500.00
04/04/2025	JPN	BoA	Exchange correspondence with TSB.	0.30	1,250.00	\$375.00
04/04/2025	JPN	BoA	Review CRC and local rules regarding response to Bank of America; Forward emails regarding same.	0.30	1,250.00	\$375.00
04/04/2025	TMK	BoA	Confer with Stapleton regarding Bank of America motion for bankruptcy.	0.20	1,325.00	\$265.00
04/06/2025	JDF	BoA	Review IFS settlement agreement and offer revisions to same	0.30	1,525.00	\$457.50
04/07/2025	JDF	BoA	Confer with client regarding IFS agreement final version	0.20	1,525.00	\$305.00
04/07/2025	JPN	BoA	Meet with G. Greenwood regarding grower's motion to intervene; Review complaint and moving papers.	1.00	1,250.00	\$1,250.00
04/07/2025	JPN	BoA	Draft points and authorities in response to Bank of America motion.	3.00	1,250.00	\$3,750.00
04/07/2025	JPN	BoA	Telephone conference with TSB regarding grower perspective regarding motion.	0.40	1,250.00	\$500.00
04/07/2025	JPN	BoA	Draft Declaration of J. Nolan in support of response.	0.80	1,250.00	\$1,000.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/08/2025	JDF	BoA	Work on revisions to Receiver's response to BofA motion to augment receivership powers; Emails with J. Nolan; TC with J. Nolan; Exchange multiple emails with growers' counsel regarding case approach and claims procedures	2.50	1,525.00	\$3,812.50
04/08/2025	JDF	BoA	Confer with client regarding escrow funds and other inventory proceeds; TC with B. Landoll re accounts and proceeds	0.80	1,525.00	\$1,220.00
04/08/2025	JPN	BoA	Draft Declaration of D. Stapleton in support of response to Bank of America motion; Revise.	1.00	1,250.00	\$1,250.00
04/08/2025	JPN	BoA	Compile documents in support of motion and declarations.	0.60	1,250.00	\$750.00
04/08/2025	JPN	BoA	Telephone call with Kristina at Bank of America regarding motion and Receiver's response.	0.60	1,250.00	\$750.00
04/08/2025	JPN	BoA	Forward Declaration to client with comments.	0.30	1,250.00	\$375.00
04/08/2025	JPN	BoA	Revise Declaration of J. Nolan in support of response.	0.50	1,250.00	\$625.00
04/08/2025	JPN	BoA	Meet with client and litigation team regarding response to Bank of America motion and update on Receiver liquidation/winddown; Telephone conference regarding same.	0.60	1,250.00	\$750.00
04/08/2025	JPN	BoA	Further revise points and authorities in response to Bank of America motion; Meet with litigation team regarding conclusion.	2.40	1,250.00	\$3,000.00
04/08/2025	JPN	BoA	Review GSFC opposition to Bank of America motion.	0.20	1,250.00	\$250.00
04/08/2025	TMK	BoA	Confer with J. Nolan and J. Fiero regarding response to Bank of America motion for bankruptcy and review same.	0.50	1,325.00	\$662.50
04/09/2025	JDF	BoA	Work on response to growers' counsel; work on responsive pleading package, including Stapleton Declaration in opposition to BofA motion; Review oppositions filed by other parties in interest	1.70	1,525.00	\$2,592.50
04/09/2025	JPN	BoA	Review revisions proposed by Receiver re: BoA motion for bankruptcy; Circulate redline to litigation group.	0.50	1,250.00	\$625.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/09/2025	JPN	BoA	Forward to client for final approval and comments.	0.40	1,250.00	\$500.00
04/09/2025	JPN	BoA	Review revisions proposed by Receiver and litigation team; Incorporate.	0.50	1,250.00	\$625.00
04/09/2025	JPN	BoA	Revise response of Receiver to Bank of America motion; Cite check legal authorities and table of contents; Final revisions.	2.30	1,250.00	\$2,875.00
04/09/2025	JPN	BoA	Finalize and file Receiver's response and all papers.	0.50	1,250.00	\$625.00
04/09/2025	JPN	BoA	Exchange multiple emails with Receiver regarding true-up facts.	0.40	1,250.00	\$500.00
04/09/2025	JPN	BoA	Review grower opposition to Bank of America motion.	0.30	1,250.00	\$375.00
04/10/2025	JDF	BoA	Review old emails and identify communications about Bank of America and account deposits	0.40	1,525.00	\$610.00
04/10/2025	JPN	BoA	Respond regarding Jem Farms.	0.10	1,250.00	\$125.00
04/10/2025	JPN	BoA	Receive emails regarding Bank of America; Meet with litigation team regarding meeting with Bank of America.	0.30	1,250.00	\$375.00
04/10/2025	TMK	BoA	Confer with J. Fiero regarding demand to Bank of America for funding escrow.	0.20	1,325.00	\$265.00
04/11/2025	JPN	BoA	Respond to S. Levitt; Meet with litigation team regarding same.	0.20	1,250.00	\$250.00
04/11/2025	JPN	BoA	Review opposition to Banner Bank and TSB to Bank of America motion.	0.50	1,250.00	\$625.00
04/11/2025	JPN	BoA	Review opposition of Growers to Bank of America motion.	0.40	1,250.00	\$500.00
04/11/2025	JPN	BoA	Summarize issues in opposition to litigation team; Telephone conference with litigation team regarding same.	0.50	1,250.00	\$625.00
04/11/2025	JPN	BoA	Review emails regarding Grower funds.	0.10	1,250.00	\$125.00
04/11/2025	TMK	BoA	Confer with BoA regarding unauthorized sweeping of estate funds.	0.30	1,325.00	\$397.50
04/14/2025	JPN	BoA	Forward documents to JEM Farms regarding liquidation of debt.	0.30	1,250.00	\$375.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/14/2025	JPN	BoA	Draft emails to Receiver regarding JEM Farms.	0.20	1,250.00	\$250.00
04/14/2025	JPN	BoA	Review issues of amended summons and grower complaint filed in Tehama Superior Court; Review service issues.	1.00	1,250.00	\$1,250.00
04/14/2025	JPN	BoA	Respond to and reconcile debt with Jem Farms.	0.40	1,250.00	\$500.00
04/15/2025	JPN	BoA	Telephone conference with A. Cummings regarding Grower action.	0.40	1,250.00	\$500.00
04/15/2025	JPN	BoA	Telephone conference with A. Cummings regarding Reply brief.	0.20	1,250.00	\$250.00
04/15/2025	JPN	BoA	Telephone conference with Downy Brand regarding Second Amended Complaint.	0.40	1,250.00	\$500.00
04/15/2025	JPN	BoA	Draft stipulation and order to extend response deadline to Second Amended Complaint (0.50); Draft proposed order (0.20).	0.70	1,250.00	\$875.00
04/15/2025	JPN	BoA	Receive numerous emails regarding recusal order.	0.20	1,250.00	\$250.00
04/15/2025	JPN	BoA	Review Demurrer and supporting papers to Grower Second Amended Complaint.	0.40	1,250.00	\$500.00
04/15/2025	JPN	BoA	Draft approach regarding scheduling order in grower litigation.	0.40	1,250.00	\$500.00
04/16/2025	JPN	BoA	Review proposed revisions to stipulation; Revise and re-circulate regarding second amended complaint.	0.30	1,250.00	\$375.00
04/16/2025	JPN	BoA	Draft proposed order; Circulate copies to counsel and file regarding second amended complaint.	0.30	1,250.00	\$375.00
04/17/2025	JPN	BoA	Telephone conference with counsel for Bank of America regarding April 22, 2024 hearing and filing of bankruptcy.	0.40	1,250.00	\$500.00
04/17/2025	JPN	BoA	Meet with Receiver regarding grower files and process to liquidate and estimate 2023 crop debt; Draft emails to Receiver regarding missing files.	0.50	1,250.00	\$625.00
04/18/2025	JPN	BoA	Email exchange with counsel for Bank of America regarding April 22, 2025 hearing.	0.30	1,250.00	\$375.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/18/2025	TMK	BoA	Confer with Bank of America and Stapleton regarding escrow funding.	0.20	1,325.00	\$265.00
04/21/2025	JDF	BoA	Prepare for call with Bank of America's counsel	0.70	1,525.00	\$1,067.50
04/21/2025	JPN	BoA	Second telephone conference with Bank of America regarding continuance.	0.40	1,250.00	\$500.00
04/21/2025	JPN	BoA	Email exchange with Bank of America regarding April 22, 2025 hearing.	0.30	1,250.00	\$375.00
04/22/2025	JPN	BoA	Review CCP 415; Forward comments to litigation team post- BoA hearing and open items.	0.40	1,250.00	\$500.00
04/22/2025	TMK	BoA	Participate in case hearing.	0.60	1,325.00	\$795.00
04/23/2025	JPN	BoA	Review CCP §415 and CRC 3403.	0.40	1,250.00	\$500.00
04/23/2025	JPN	BoA	Receive documents from TSB Ag.; Exchange emails with J. Fiero.	0.40	1,250.00	\$500.00
04/23/2025	TMK	BoA	Confer with J. Fiero regarding correspondence to Bank of America regarding claims process.	0.20	1,325.00	\$265.00
04/23/2025	TMK	BoA	Confer with J. Fiero and J. Nolan regarding request to Bank of America for return of escrow funds.	0.20	1,325.00	\$265.00
04/23/2025	TMK	BoA	Confer with BoA regarding sweeps of escrow account.	0.20	1,325.00	\$265.00
04/24/2025	JPN	BoA	Telephone conference with J. Fiero regarding meeting with Bank of America, GSFC and claimants regarding motion.	0.20	1,250.00	\$250.00
04/25/2025	JDF	BoA	Review receivership order sand trace authority to for proceeds disposition after collection; Prepare analysis and report for client	1.50	1,525.00	\$2,287.50
04/25/2025	JPN	BoA	Review Sutherland Co. documents regarding claim.	0.30	1,250.00	\$375.00
04/25/2025	TMK	BoA	Call with Banc of America regarding claims process.	0.70	1,325.00	\$927.50
04/28/2025	JPN	BoA	Respond to Pride Valley Farms.	0.20	1,250.00	\$250.00
04/28/2025	TMK	BoA	Confer with J. Fiero and Stapleton regarding Bank of America's sweep of funds and demand for return.	0.30	1,325.00	\$397.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/29/2025	JPN	BoA	Review TSB order to transfer Sacramento lawsuit.	0.20	1,250.00	\$250.00
04/29/2025	JPN	BoA	Email exchange with Pride Valley Farms.	0.20	1,250.00	\$250.00
				48.00		\$62,870.00

Claims Administration and Objections

04/01/2025	JPN	CO	Meet with Receiver representative regarding USDA fee and response.	0.20	1,250.00	\$250.00
04/03/2025	JPN	CO	Email exchange with USDA regarding claim.	0.20	1,250.00	\$250.00
04/03/2025	JPN	CO	Review and attach grower contracts to CDFFA.	0.20	1,250.00	\$250.00
04/04/2025	JDF	CO	Prepare for and participate in legal synch call with Stapleton; Work with J. Nolan re grower responses on claims issues	1.00	1,525.00	\$1,525.00
04/04/2025	JPN	CO	Coordinate call with various counsel for growers; Telephone conference with J. Dreyer regarding litigation and motion.	0.60	1,250.00	\$750.00
04/04/2025	JPN	CO	Meet with N. Brown regarding CDFFA complaints and update of litigation tracking matrix.	0.40	1,250.00	\$500.00
04/04/2025	JPN	CO	Receipt CDFFA complaint; Forward.	0.10	1,250.00	\$125.00
04/04/2025	JPN	CO	Draft summary of conversations with Growers and demands.	0.20	1,250.00	\$250.00
04/07/2025	JPN	CO	Receipt CDFFA complaint.	0.10	1,250.00	\$125.00
04/07/2025	JPN	CO	Receive response from USDA email support for fee claim.	0.10	1,250.00	\$125.00
04/08/2025	JPN	CO	Exchange correspondence M. Kuzmich regarding claims motion.	0.30	1,250.00	\$375.00
04/08/2025	JPN	CO	Respond to USDA.	0.10	1,250.00	\$125.00
04/09/2025	JPN	CO	Telephone conference with numerous growers regarding 2023 crop dispute.	0.40	1,250.00	\$500.00
04/10/2025	JPN	CO	Draft email to litigation team regarding claims procedure motion.	0.20	1,250.00	\$250.00
04/11/2025	JPN	CO	Receive the CDFFA complaint for grower K. Delu.	0.20	1,250.00	\$250.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/14/2025	JPN	CO	Telephone conference with litigation team regarding invitation to all parties regarding claims procedures and select issues.	0.50	1,250.00	\$625.00
04/15/2025	JPN	CO	Meet with litigation group regarding update to Bank of American and GSFC.	0.30	1,250.00	\$375.00
04/16/2025	JPN	CO	Meet with G. Greenwood regarding second amended complaint and claims procedures motion.	0.30	1,250.00	\$375.00
04/16/2025	JPN	CO	Meet with Receiver regarding new CDFA complaint' Review tracking matrix and grower payables.	0.40	1,250.00	\$500.00
04/17/2025	GSG	CO	Call with J. Nolan re grower contracts and claims and motion status.	0.30	1,325.00	\$397.50
04/17/2025	JDF	CO	Review emails from CDFA and forward same to J. Nolan	0.30	1,525.00	\$457.50
04/17/2025	JDF	CO	Review and comment upon response to USDA; Weekly call with Stapleton re status	0.80	1,525.00	\$1,220.00
04/17/2025	JPN	CO	Meet with J. Fiero regarding CDFA complaints.	0.20	1,250.00	\$250.00
04/17/2025	JPN	CO	Update litigation tracking matrix regarding CDFA debt.	0.20	1,250.00	\$250.00
04/17/2025	JPN	CO	Revise response to USDA; Forward to Receiver.	0.30	1,250.00	\$375.00
04/21/2025	JPN	CO	Telephone conference with S. Levitt and Kristina Azlin regarding April 22, 2025 hearing and outcomes.	1.00	1,250.00	\$1,250.00
04/21/2025	JPN	CO	Meet with J. Fiero regarding claims procedure motion post-call.	0.30	1,250.00	\$375.00
04/21/2025	JPN	CO	Email exchange with litigation team regarding growers call.	0.30	1,250.00	\$375.00
04/22/2025	GSG	CO	Call with J. Nolan re litigation status and claims procedures.	0.30	1,325.00	\$397.50
04/22/2025	JDF	CO	Prepare claims procedure outline and confer with PSZJ re same	1.50	1,525.00	\$2,287.50
04/22/2025	JPN	CO	Draft summary of court hearing to Receiver; Forward open items for filing of claims procedures and motion.	0.50	1,250.00	\$625.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/22/2025	JPN	CO	Meet with Receiver's team regarding claims, database and compiling claimants; Exchange comments regarding same.	0.60	1,250.00	\$750.00
04/22/2025	JPN	CO	Receive and categorize new CDFA complaints.	0.20	1,250.00	\$250.00
04/22/2025	TMK	CO	Confer with J. Nolan and J. Fiero regarding claims motion and notice.	0.30	1,325.00	\$397.50
04/23/2025	JPN	CO	Legal research stay of litigation regarding claims motion.	1.20	1,250.00	\$1,500.00
04/23/2025	JPN	CO	Draft comments to claims outline to circulate to parties.	0.20	1,250.00	\$250.00
04/24/2025	JDF	CO	Work on claims procedure issues	0.40	1,525.00	\$610.00
04/24/2025	JPN	CO	Draft notice of publication for submission of periodicals.	0.50	1,250.00	\$625.00
04/24/2025	JPN	CO	Legal research content in notice of publication.	0.50	1,250.00	\$625.00
04/24/2025	JPN	CO	Telephone conference with Linda Belmonte and M. Flahive regarding omnibus claims motion.	0.60	1,250.00	\$750.00
04/24/2025	JPN	CO	Legal research California law regarding service and standard for substitute service by publication; Compile case law in California and 9th Circuit.	1.00	1,250.00	\$1,250.00
04/24/2025	JPN	CO	Draft section of claims procedures motion; Forward redline to litigation team with comment.	1.50	1,250.00	\$1,875.00
04/24/2025	JPN	CO	Draft emails to local periodicals in Northern California.	0.40	1,250.00	\$500.00
04/24/2025	JPN	CO	Email exchange with USDA.	0.30	1,250.00	\$375.00
04/25/2025	GSG	CO	Emails to J. Nolan re claims procedure.	0.20	1,325.00	\$265.00
04/25/2025	JDF	CO	Prepare for and participate in claims procedure outline call with Bank of America; Emails with client re cash disposition analysis	1.10	1,525.00	\$1,677.50
04/25/2025	JPN	CO	Revise and update omnibus claim motion; Forward to J. Fiero.	1.10	1,250.00	\$1,375.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/25/2025	JPN	CO	Email exchange with various adversary entities regarding notice of publication; Meet with litigation team regarding same.	0.30	1,250.00	\$375.00
04/25/2025	JPN	CO	Revise and finalize updated notice of publication as exhibit to motion for claims procedure.	0.40	1,250.00	\$500.00
04/25/2025	JPN	CO	Email exchange regarding exhibits to claims procedure motion.	0.30	1,250.00	\$375.00
04/25/2025	JPN	CO	Review Exhibit regarding claims form.	0.30	1,250.00	\$375.00
04/25/2025	JPN	CO	Conference call with litigation team and Bank of America regarding claims procedure motion.	0.60	1,250.00	\$750.00
04/27/2025	JDF	CO	Discuss claims process with J. Nolan and T. Kapur; Work on revisions to same	0.40	1,525.00	\$610.00
04/27/2025	TMK	CO	Confer with J. Nolan and J. Fiero regarding claims process.	0.20	1,325.00	\$265.00
04/28/2025	JPN	CO	Review CMS of Plaintiff, Stainless Aesthetics.	0.10	1,250.00	\$125.00
04/28/2025	JPN	CO	Meet with Receiver regarding list of grower's without contact information; Review list of open matters.	0.40	1,250.00	\$500.00
04/28/2025	JPN	CO	Telephone conference with Walnut Grower's Board; Draft correspondence regarding missing grower information.	0.40	1,250.00	\$500.00
04/28/2025	JPN	CO	Exchange correspondence regarding USDA.	0.20	1,250.00	\$250.00
04/29/2025	JDF	CO	Revise and finalize email to counsel for BofA claims procedures	0.80	1,525.00	\$1,220.00
04/29/2025	JPN	CO	Revise claims procedures motion.	0.50	1,250.00	\$625.00
04/29/2025	JPN	CO	Draft email to T. Kapur and J. Fiero.	0.20	1,250.00	\$250.00
04/29/2025	JPN	CO	Receive emails regarding Bank of America input to claims motion.	0.20	1,250.00	\$250.00
04/30/2025	JDF	CO	Revise claims procedures and forward same to G. Oates; Email to producers' counsel re claims procedure outline; TC with J. Nolan re claims and pending litigation items	0.90	1,525.00	\$1,372.50
04/30/2025	JPN	CO	Draft emails to growers regarding meet and confer on C/M motion.	0.30	1,250.00	\$375.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/30/2025	JPN	CO	Meet with litigation team regarding claims procedure motion.	0.30	1,250.00	\$375.00
04/30/2025	JPN	CO	Revise CDFA chart and forward to Bank of America.	0.40	1,250.00	\$500.00
04/30/2025	JPN	CO	Telephone conference with growers regarding claims procedure motion.	0.40	1,250.00	\$500.00
04/30/2025	JPN	CO	Receive response of CDFA regarding service list.	0.20	1,250.00	\$250.00
				29.70		\$39,202.50

General

04/01/2025	JDF	GEN	Review notice of default sent to A&G Orchards	0.20	1,525.00	\$305.00
04/02/2025	JPN	GEN	Respond to Specialty Crops division.	0.30	1,250.00	\$375.00
04/02/2025	JPN	GEN	Review Receiver's reports regarding inclusion of select acts.	0.80	1,250.00	\$1,000.00
04/02/2025	JPN	GEN	Review Receiver's report; Summarize pertinent time frames.	0.50	1,250.00	\$625.00
04/02/2025	JPN	GEN	Review Receiver's ex-parte application for stay of litigation; Review responses in opposition.	0.50	1,250.00	\$625.00
04/03/2025	GSG	GEN	Call with J. Nolan re litigation status and receiver reports.	0.10	1,325.00	\$132.50
04/03/2025	JPN	GEN	Telephone conference with M. Kuzmich regarding status of grower litigation.	0.60	1,250.00	\$750.00
04/03/2025	JPN	GEN	Meet with A. Caine and G. Greenwood regarding authority to stay litigation; Telephone conference with G. Greenwood regarding motion to stay litigation.	0.40	1,250.00	\$500.00
04/03/2025	JPN	GEN	Respond to Reynolds, Tilbury regarding Receiver's reports.	0.20	1,250.00	\$250.00
04/03/2025	JPN	GEN	Update litigation tracking matrix.	0.30	1,250.00	\$375.00
04/03/2025	JPN	GEN	Review documents regarding transfer litigation to Tehama Superior Court.	0.30	1,250.00	\$375.00
04/04/2025	TMK	GEN	Participate in case status call with Stapleton.	0.50	1,325.00	\$662.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/06/2025	JPN	GEN	Legal research governing partial estates, statutory authority to file bankruptcy, California case law authorizing Receiver authority to file bankruptcy and Federal authority interpreting authority to file petitions.	2.00	1,250.00	\$2,500.00
04/06/2025	JPN	GEN	Email exchange with litigation team regarding legal findings.	0.30	1,250.00	\$375.00
04/06/2025	JPN	GEN	Draft multiple emails regarding outcome of grower litigation to intervene in Receivership estate.	0.50	1,250.00	\$625.00
04/07/2025	GSG	GEN	Call with J. Nolan re pending litigation and motions anticipating bankruptcy.	0.30	1,325.00	\$397.50
04/07/2025	JPN	GEN	Draft summary of legal approach to litigation team.	0.40	1,250.00	\$500.00
04/07/2025	JPN	GEN	Legal research standard of review of trial court orders regarding Receivership estate.	0.70	1,250.00	\$875.00
04/08/2025	JPN	GEN	Telephone conference regarding collateral held by Receiver.	0.30	1,250.00	\$375.00
04/10/2025	JDF	GEN	Attention to service lists; attend weekly call with Stapleton	0.60	1,525.00	\$915.00
04/10/2025	JPN	GEN	Circulate papers to client with comment.	0.20	1,250.00	\$250.00
04/10/2025	JPN	GEN	Update litigation track matrix.	0.20	1,250.00	\$250.00
04/10/2025	TMK	GEN	Participate in case status call with Stapleton.	0.40	1,325.00	\$530.00
04/14/2025	JDF	GEN	Review and consider notice of recusal; Confer with team and client re same	0.30	1,525.00	\$457.50
04/14/2025	JPN	GEN	Review and finalize Answer to Stainless Aesthetics.	0.30	1,250.00	\$375.00
04/14/2025	JPN	GEN	Receive notice of recusal; Receive emails regarding same.	0.20	1,250.00	\$250.00
04/14/2025	JPN	GEN	Update litigation tracking matrix.	0.20	1,250.00	\$250.00
04/14/2025	JPN	GEN	Telephone conference with J. Dreher regarding service of second amended complaint.	0.30	1,250.00	\$375.00
04/14/2025	TMK	GEN	Review notice of judge's recusal and confer with Stapleton and J. Fiero.	0.20	1,325.00	\$265.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/15/2025	JDF	GEN	Work on recusal issues; TC with court clerk; Report to team and Clementino sale parties	0.30	1,525.00	\$457.50
04/15/2025	JPN	GEN	Exchange email with litigation team regarding April 22, 2025 hearing.	0.40	1,250.00	\$500.00
04/16/2025	JPN	GEN	Draft emails regarding coordination of April 22, 2025 hearing.	0.20	1,250.00	\$250.00
04/17/2025	TMK	GEN	Confer with J. Fiero and J. Nolan to prepare for hearing.	0.20	1,325.00	\$265.00
04/17/2025	TMK	GEN	Participate in status call with Stapleton.	0.50	1,325.00	\$662.50
04/21/2025	JPN	GEN	Draft summary regarding issues.	0.20	1,250.00	\$250.00
04/21/2025	JPN	GEN	Compile documents and oral argument for April 22, 2025 court hearing.	0.50	1,250.00	\$625.00
04/22/2025	JPN	GEN	Court appearance, Tehama Superior Court.	0.60	1,250.00	\$750.00
04/22/2025	JPN	GEN	Preparation for Court appearance and review of briefs and legal authorities.	0.50	1,250.00	\$625.00
04/23/2025	JPN	GEN	Receive and review BB discovery.	0.10	1,250.00	\$125.00
04/23/2025	JPN	GEN	Email exchange and meet with Receivership team regarding Debtor's records and missing information.	0.30	1,250.00	\$375.00
04/23/2025	TMK	GEN	Confer with J. Nolan and Stapleton regarding diligence requests to Enders.	0.20	1,325.00	\$265.00
04/23/2025	TMK	GEN	Participate in case status and strategy call with Stapleton.	0.50	1,325.00	\$662.50
04/24/2025	JPN	GEN	Draft follow-up regarding assignment of tasks and service due diligence issues.	0.40	1,250.00	\$500.00
04/25/2025	JPN	GEN	Review docket/filings on issue of complex design action; Meet with O. Adler regarding court clerk; Exchange correspondence with G. Greenwood.	0.40	1,250.00	\$500.00
04/28/2025	JPN	GEN	Receive emails from Cana Pine Creek grower.	0.30	1,250.00	\$375.00
04/28/2025	JPN	GEN	Exchange correspondence regarding service list.	0.20	1,250.00	\$250.00
04/29/2025	JDF	GEN	Confer with client regarding renewal of D&O insurance	0.40	1,525.00	\$610.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/29/2025	TMK	GEN	Confer with Stapleton regarding D&O insurance.	0.10	1,325.00	\$132.50
04/30/2025	JPN	GEN	Update litigation tracking matrix regarding new complaints.	0.20	1,250.00	\$250.00
04/30/2025	JPN	GEN	Review stipulation to transfer venue.	0.10	1,250.00	\$125.00
				18.70		\$24,095.00

GSFC

04/01/2025	JDF	GSFC	Prepare for and participate in call with G. Oates	0.60	1,525.00	\$915.00
04/01/2025	JPN	GSFC	Telephone conference with Gloria O. regarding Bank of America motion.	0.50	1,250.00	\$625.00
04/01/2025	JPN	GSFC	Review email from GSFC regarding status of real property sales.	0.20	1,250.00	\$250.00
04/01/2025	TMK	GSFC	Prepare for and participate on call with J. Nolan and G. Oates.	0.60	1,325.00	\$795.00
04/02/2025	JDF	GSFC	Attention to Clementino sale and execution of final version of purchase and sale agreement; Work on First Foundation Bank issue	0.60	1,525.00	\$915.00
04/03/2025	JDF	GSFC	Work on Clementino transaction; Confer with C. Garnica re same	0.30	1,525.00	\$457.50
04/08/2025	JPN	GSFC	Draft emails to GSFC.	0.20	1,250.00	\$250.00
04/11/2025	JDF	GSFC	Attention to Clementino sale status and need for court order	0.40	1,525.00	\$610.00
04/14/2025	JDF	GSFC	Work on Clementino approval motion details	0.80	1,525.00	\$1,220.00
04/15/2025	JDF	GSFC	Follow emails regarding service of second amended complaint	0.30	1,525.00	\$457.50
04/15/2025	JPN	GSFC	Draft update to GSFC regarding Grower Second Amended Complaint.	0.40	1,250.00	\$500.00
04/16/2025	JDF	GSFC	Respond to email about the Andersens' bankruptcies and effects upon the receivership; Follow up with G. Oates re Banner Bank's claim of a senior lien on equipment	0.30	1,525.00	\$457.50
04/17/2025	JDF	GSFC	Work on Clementino sale and marketing history	0.70	1,525.00	\$1,067.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/18/2025	JDF	GSFC	Work on Clementino sale motion and forward client declaration in support of same to Stapleton team; Prepare and deliver notice of ex parte hearing ; TC with T. Mehr, counsel to Clementino; TC with G. Oates re motion	2.80	1,525.00	\$4,270.00
04/19/2025	JDF	GSFC	Attention to Clementino sale motion	1.60	1,525.00	\$2,440.00
04/20/2025	JDF	GSFC	Work on revisions to Clementino sale motion	1.20	1,525.00	\$1,830.00
04/21/2025	JDF	GSFC	Attend to finalization, filing and service of Clementino sale motion	0.70	1,525.00	\$1,067.50
04/22/2025	JDF	GSFC	Prepare for and participate in hearing on Clementino sale motion; Attention to delivery of certified copy of order	1.40	1,525.00	\$2,135.00
04/23/2025	JDF	GSFC	Prepare Clementino bill of sale and forward same to all concerned with transaction; Work on closing sale after hearing; Work on Finch follow up documentation; Review Banner Bank discovery to GSFC	1.10	1,525.00	\$1,677.50
04/24/2025	JDF	GSFC	Follow up with court regarding certified copies of motion to approve Clementino sale	0.20	1,525.00	\$305.00
				<u>14.90</u>		<u>\$22,245.00</u>

TOTAL SERVICES FOR THIS MATTER:

\$150,855.00

Expenses

04/02/2025	RE	SCAN/COPY (41 @0.10 PER PG)	4.10
04/02/2025	LN	81001.00001 Lexis Charges for 04-02-25	127.30
04/06/2025	RE	SCAN/COPY (65 @0.10 PER PG)	6.50
04/06/2025	RE	SCAN/COPY (17 @0.10 PER PG)	1.70
04/06/2025	RE	SCAN/COPY (14 @0.10 PER PG)	1.40
04/06/2025	LN	BOFA Lexis Charges for 04-06-25	36.37
04/07/2025	RE	SCAN/COPY (6 @0.10 PER PG)	0.60
04/07/2025	RE	SCAN/COPY (12 @0.10 PER PG)	1.20
04/07/2025	RE	SCAN/COPY (14 @0.10 PER PG)	1.40
04/07/2025	RE	SCAN/COPY (14 @0.10 PER PG)	1.40
04/07/2025	RE	SCAN/COPY (12 @0.10 PER PG)	1.20
04/07/2025	RE	SCAN/COPY (12 @0.10 PER PG)	1.20
04/07/2025	RE	SCAN/COPY (41 @0.10 PER PG)	4.10
04/07/2025	RE	SCAN/COPY (6 @0.10 PER PG)	0.60
04/07/2025	RE	SCAN/COPY (14 @0.10 PER PG)	1.40
04/07/2025	RE	SCAN/COPY (12 @0.10 PER PG)	1.20
04/07/2025	RE	SCAN/COPY (22 @0.10 PER PG)	2.20
04/07/2025	RE	SCAN/COPY (20 @0.10 PER PG)	2.00
04/07/2025	LN	BOFA Lexis Charges for 04-07-25	181.86
04/08/2025	RE	SCAN/COPY (2 @0.10 PER PG)	0.20
04/08/2025	RE	SCAN/COPY (11 @0.10 PER PG)	1.10
04/08/2025	RE	SCAN/COPY (21 @0.10 PER PG)	2.10
04/08/2025	RE	SCAN/COPY (12 @0.10 PER PG)	1.20
04/08/2025	LN	81001.00001 Lexis Charges for 04-08-25	18.19
04/09/2025	RE	SCAN/COPY (21 @0.10 PER PG)	2.10
04/09/2025	RE	SCAN/COPY (21 @0.10 PER PG)	2.10
04/09/2025	RE	SCAN/COPY (13 @0.10 PER PG)	1.30
04/10/2025	FF	One Legal, Superior Court of CA Tehama County, Filing Fee, JPN	33.19

04/14/2025	PO	Postage	6.21
04/14/2025	RE	SCAN/COPY (45 @0.10 PER PG)	4.50
04/15/2025	FF	One Legal, Superior Court of CA Tehama County, Filing Fee, JPN	22.76
04/15/2025	RE	SCAN/COPY (26 @0.10 PER PG)	2.60
04/15/2025	RE	SCAN/COPY (12 @0.10 PER PG)	1.20
04/16/2025	RE	SCAN/COPY (2 @0.10 PER PG)	0.20
04/16/2025	RE	SCAN/COPY (5 @0.10 PER PG)	0.50
04/16/2025	RE	SCAN/COPY (2 @0.10 PER PG)	0.20
04/17/2025	FF	One Legal, Superior Court of CA Tehama County, Filing Fee, JPN	22.76
04/21/2025	FF	One Legal, Filing Fee, HP	87.44
04/21/2025	RE	SCAN/COPY (7 @0.10 PER PG)	0.70
04/21/2025	RE	SCAN/COPY (69 @0.10 PER PG)	6.90
04/21/2025	RE	SCAN/COPY (8 @0.10 PER PG)	0.80
04/21/2025	RE	SCAN/COPY (2 @0.10 PER PG)	0.20
04/21/2025	RE	SCAN/COPY (8 @0.10 PER PG)	0.80
04/21/2025	RE	SCAN/COPY (5 @0.10 PER PG)	0.50
04/22/2025	RE	SCAN/COPY (14 @0.10 PER PG)	1.40
04/23/2025	PO	Postage	0.69
04/23/2025	RE	SCAN/COPY (214 @0.10 PER PG)	21.40
04/23/2025	RE	SCAN/COPY (16 @0.10 PER PG)	1.60
04/23/2025	RE	SCAN/COPY (216 @0.10 PER PG)	21.60
04/23/2025	RE	SCAN/COPY (15 @0.10 PER PG)	1.50
04/23/2025	RE	SCAN/COPY (16 @0.10 PER PG)	1.60
04/23/2025	RE	SCAN/COPY (216 @0.10 PER PG)	21.60
04/23/2025	RE	SCAN/COPY (8 @0.10 PER PG)	0.80
04/23/2025	RE	SCAN/COPY (8 @0.10 PER PG)	0.80
04/23/2025	RE	SCAN/COPY (8 @0.10 PER PG)	0.80
04/23/2025	RE	SCAN/COPY (9 @0.10 PER PG)	0.90

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

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Invoice 147569
June 11, 2025

04/23/2025	FE	81001.00001 FedEx Charges for 04-23-25	37.47
04/24/2025	LN	81001.00001 Lexis Charges for 04-24-25	72.74
04/28/2025	RE	(112 @0.20 PER PG)	22.40
04/28/2025	RE	(18 @0.20 PER PG)	3.60
04/28/2025	RE	(28 @0.20 PER PG)	5.60
04/28/2025	RE	(118 @0.20 PER PG)	23.60
04/30/2025	AS	Specialized Legal Services, Inv. P219078	412.42
04/30/2025	FE	81001.00001 FedEx Charges for 04-30-25	23.30

Total Expenses for this Matter

\$1,273.30

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

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A/R STATEMENT

Outstanding Balance from prior invoices as of 04/30/2025

(May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fee Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
Total Amount Due on Current and Prior Invoices:				\$152,128.30



PACHULSKI
STANG
ZIEHL &
JONES

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

May 31, 2025
Invoice 147637
Client 81001.00001

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

RE: Andersen & Sons Shelling Receivership

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2025

FEES	\$178,585.00
EXPENSES	\$796.94
TOTAL CURRENT CHARGES	\$179,381.94
BALANCE FORWARD	\$85,246.60
LAST PAYMENT	-\$85,246.60
TOTAL BALANCE DUE	\$179,381.94

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

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Invoice 147637
May 31, 2025

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	1,525.00	27.30	\$41,632.50
TMK	Kapur, Teddy M.	Partner	1,325.00	27.70	\$36,702.50
JPN	Nolan, Jeffrey P.	Counsel	1,250.00	79.30	\$99,125.00
YPD	Derac, Yves P.	Paralegal	625.00	1.80	\$1,125.00
			<hr/>		<hr/>
			136.10		\$178,585.00

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BANN	Banner	4.70	\$7,127.50
BoA	Bank of America	18.60	\$24,195.00
CO	Claims Administration and Objections	65.60	\$85,897.50
GEN	General	32.70	\$41,382.50
GSFC	GSFC	13.90	\$19,187.50
JBC	JB Cusick	0.60	\$795.00
		<hr/> 136.10	<hr/> \$178,585.00

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

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Invoice 147637
May 31, 2025

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Attorney Service	\$300.00
Lexis/Nexis- Legal Research	\$452.94
Reproduction Expense	\$44.00
	<hr/>
	\$796.94

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Banner						
05/08/2025	JDF	BANN	Follow up on Anita sale transaction	0.10	1,525.00	\$152.50
05/09/2025	JDF	BANN	Review information from R. Kaplan re chapter 7 hearing; Confer with client re lien priority issues; Work on JB Cusick issues	0.70	1,525.00	\$1,067.50
05/09/2025	TMK	BANN	Confer with Stapleton and J. Fiero regarding Anita Road sale.	0.10	1,325.00	\$132.50
05/12/2025	JDF	BANN	Review order granting relief from stay and correspondence with R. Kaplan re same	0.30	1,525.00	\$457.50
05/14/2025	TMK	BANN	Review Banner Bank inquiries and confer with Stapleton.	0.10	1,325.00	\$132.50
05/21/2025	JDF	BANN	Work on sale and motion timing issues in light of specific language of court's order	0.40	1,525.00	\$610.00
05/22/2025	JDF	BANN	Follow up on JB Cusick insurance question posed by R. Kaplan	0.20	1,525.00	\$305.00
05/23/2025	JDF	BANN	Email to R. Kaplan re JB Cusick assets	0.10	1,525.00	\$152.50
05/26/2025	JDF	BANN	Begin work on motion to approve sale of Anita Road property	1.30	1,525.00	\$1,982.50
05/29/2025	JDF	BANN	Work on Anita Road sale motion	1.10	1,525.00	\$1,677.50
05/30/2025	JDF	BANN	Prepare notice of ex parte hearing and attend to service of same	0.30	1,525.00	\$457.50
				<u>4.70</u>		<u>\$7,127.50</u>

Bank of America

05/01/2025	JPN	BoA	Meet and confer with grower's regarding extension to complaint; Draft email regarding extension.	0.40	1,250.00	\$500.00
05/01/2025	JPN	BoA	Meet with Receiver regarding service list and growers.	0.40	1,250.00	\$500.00
05/02/2025	JPN	BoA	Email exchange with growers regarding outline.	0.20	1,250.00	\$250.00
05/02/2025	JPN	BoA	Receive correspondence from Plaintiff, Cana Prime Creek.	0.20	1,250.00	\$250.00
05/05/2025	JDF	BoA	Work on response to Bank of America	0.30	1,525.00	\$457.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/05/2025	JPN	BoA	Exchange correspondence regarding Cana Pine Creek and complaint.	0.20	1,250.00	\$250.00
05/05/2025	JPN	BoA	Respond regarding Cana Pine Creek.	0.20	1,250.00	\$250.00
05/06/2025	JDF	BoA	Review prior correspondence to Bank of America re handling of accounts; Prepare draft correspondence to Bank regarding account balances; Confer with client re account balance issues; Zoom with team re Bank of America account issues	2.80	1,525.00	\$4,270.00
05/06/2025	JPN	BoA	Revise draft letter to Bank of America.	0.30	1,250.00	\$375.00
05/06/2025	JPN	BoA	Review ASSI delivery receipts regarding sums realized; Meet with Receiver regarding same.	0.50	1,250.00	\$625.00
05/06/2025	JPN	BoA	Review and update CDFA tracking matrix; Update litigation tracking matrix; Report to litigation team.	0.40	1,250.00	\$500.00
05/06/2025	JPN	BoA	Meet with litigation team regarding Bank of America escrow and grower dispute.	0.40	1,250.00	\$500.00
05/06/2025	JPN	BoA	Review Flack Family Farm claims.	0.20	1,250.00	\$250.00
05/06/2025	TMK	BoA	Review demand letter to BofA and confer with J. Fiero.	0.20	1,325.00	\$265.00
05/07/2025	JDF	BoA	Confer with J. Nolan re Cana Farms	0.20	1,525.00	\$305.00
05/07/2025	JPN	BoA	Exchange correspondence with Plaintiff, Cana Farms.	0.20	1,250.00	\$250.00
05/07/2025	JPN	BoA	Meet with litigation team regarding response to Cana Farms.	0.20	1,250.00	\$250.00
05/07/2025	JPN	BoA	Meet with Receiver and representatives regarding 2023 grower proceeds.	0.30	1,250.00	\$375.00
05/07/2025	JPN	BoA	Telephone conference with Department of Food and Agriculture regarding complaints, motion to set procedures and missing growers.	0.30	1,250.00	\$375.00
05/07/2025	JPN	BoA	Email exchange with legal department at Department of Food and Agriculture.	0.20	1,250.00	\$250.00
05/07/2025	JPN	BoA	Review final version of Bank of America letter.	0.20	1,250.00	\$250.00
05/08/2025	JPN	BoA	Receive emails from Receiver regarding recollection of amounts owed to growers; Interpret of ASSI records.	0.50	1,250.00	\$625.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/08/2025	JPN	BoA	Review calculations on grower installation payments.	0.30	1,250.00	\$375.00
05/12/2025	JPN	BoA	Respond to growers.	0.20	1,250.00	\$250.00
05/12/2025	JPN	BoA	Review emails from Bank of America.	0.20	1,250.00	\$250.00
05/14/2025	JPN	BoA	Review form and proposed judgments filed by TSB.	0.30	1,250.00	\$375.00
05/14/2025	JPN	BoA	Draft update to itigation team regarding transfer of venue requests.	0.30	1,250.00	\$375.00
05/14/2025	JPN	BoA	Receive and respond to CDFA.	0.30	1,250.00	\$375.00
05/15/2025	JPN	BoA	Receive email from TSB regarding status.	0.10	1,250.00	\$125.00
05/16/2025	JPN	BoA	Draft and exchange emails with counsel for TSB.	0.40	1,250.00	\$500.00
05/16/2025	TMK	BoA	Review correspondence from BoA regarding escrow account.	0.30	1,325.00	\$397.50
05/19/2025	JPN	BoA	Forward emails regarding background facts necessary to define grower sales for 2022; and 2023.	0.40	1,250.00	\$500.00
05/19/2025	JPN	BoA	Meet with G. Greenwood regarding TSB call for May 20, 2025 and background facts (0.30); Review TSB cross-complaint. (0.20).	0.50	1,250.00	\$625.00
05/19/2025	JPN	BoA	Receive correspondence regarding filing in Receivership action.	0.10	1,250.00	\$125.00
05/20/2025	JPN	BoA	Review crop reports regarding 2023; Exchange comments regarding same.	0.40	1,250.00	\$500.00
05/21/2025	JPN	BoA	Review email from Bank of America regarding grower lien arguments; Meet with Receiver's team regarding same.	0.40	1,250.00	\$500.00
05/21/2025	JPN	BoA	Draft email to G. Greenwood regarding issue of negotiations with TSB and update.	0.30	1,250.00	\$375.00
05/21/2025	JPN	BoA	Draft update to Receiver regarding TSB claims.	0.30	1,250.00	\$375.00
05/22/2025	JPN	BoA	Review Bank of America stipulation and respond to counsel.	0.20	1,250.00	\$250.00
05/22/2025	JPN	BoA	Exchange comments with growers regarding outline.	0.30	1,250.00	\$375.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/22/2025	JPN	BoA	Review Debtor's books and records regarding 2022 debts, back-up for TSB dispute.	0.50	1,250.00	\$625.00
05/22/2025	JPN	BoA	Review supplemental documents of TSB regarding 2022 crop.	0.30	1,250.00	\$375.00
05/22/2025	JPN	BoA	Telephone conference with M. Flahive regarding TSB.	0.20	1,250.00	\$250.00
05/22/2025	JPN	BoA	Review emails regarding continuance of Bank of America motion; Calendar.	0.20	1,250.00	\$250.00
05/27/2025	JPN	BoA	Receive correspondence from Ferrari Farms; Forward to Receiver with comment,	0.30	1,250.00	\$375.00
05/27/2025	JPN	BoA	Review ASSI records regarding Ferrari Farms.	0.40	1,250.00	\$500.00
05/28/2025	JPN	BoA	Review procedural provisions for mechanism to join growers to the 000274 litigation.	0.70	1,250.00	\$875.00
05/28/2025	JPN	BoA	Meet with litigation team regarding response to growers.	0.30	1,250.00	\$375.00
05/28/2025	JPN	BoA	Meet with T. Kapur regarding responses to growers.	0.10	1,250.00	\$125.00
05/28/2025	JPN	BoA	Review USHF proposed order; Draft email to J. Fiero.	0.20	1,250.00	\$250.00
05/28/2025	JPN	BoA	Receive emails regarding Bank of America and intervention; Review calendar regarding same.	0.20	1,250.00	\$250.00
05/29/2025	JPN	BoA	Legal research CCP section 386(b)&(f) as mechanism to add growers to litigation post-bar date.	0.90	1,250.00	\$1,125.00
05/29/2025	JPN	BoA	Draft follow-up to Plaintiff, Equator.	0.20	1,250.00	\$250.00
				18.60		\$24,195.00

Claims Administration and Objections

05/02/2025	JDF	CO	Emails with creditors re outline of proposed claims procedures	0.20	1,525.00	\$305.00
05/05/2025	JDF	CO	Work on claims procedures and confer with growers' counsel re same	0.40	1,525.00	\$610.00
05/05/2025	JPN	CO	Exchange correspondence with growers.	0.30	1,250.00	\$375.00
05/05/2025	JPN	CO	Receive grower's input on claims procedure motion; Forward comments to litigation team.	0.50	1,250.00	\$625.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/05/2025	TMK	CO	Review grower creditors comments to proposed claim procedures.	0.10	1,325.00	\$132.50
05/06/2025	JPN	CO	Review draft motion for claims procedures and intervention; Review litigation team revisions.	0.50	1,250.00	\$625.00
05/06/2025	JPN	CO	Telephone conference with Matt Flahive regarding review of Debtor's records regarding supporting declarations.	0.30	1,250.00	\$375.00
05/06/2025	JPN	CO	Meet with grower's regarding claims procedure motion.	0.40	1,250.00	\$500.00
05/06/2025	TMK	CO	Review Boutin Jones comments to claim procedures.	0.20	1,325.00	\$265.00
05/06/2025	TMK	CO	Review BoA inquiries regarding claim procedures.	0.10	1,325.00	\$132.50
05/06/2025	TMK	CO	Confer with Stapleton and J. Nolan regarding grower claims.	0.20	1,325.00	\$265.00
05/07/2025	JDF	CO	Work on revisions to claims procedures and forward same to Bank of America for further review and comment	0.70	1,525.00	\$1,067.50
05/07/2025	JPN	CO	Draft response to CDFA regarding PAI Ranches.	0.40	1,250.00	\$500.00
05/07/2025	JPN	CO	Review CDFA complaint email PAI Bulldog and response to CDFA complaint.	0.50	1,250.00	\$625.00
05/07/2025	JPN	CO	Review debtor records (0.20) and draft letter to respond to CDFA complaint versus Asellus-Placer (0.40).	0.60	1,250.00	\$750.00
05/07/2025	TMK	CO	Confer with J. Fiero and BoA regarding claims procedures.	0.10	1,325.00	\$132.50
05/08/2025	JPN	CO	Email exchange with litigation team regarding claims process.	0.40	1,250.00	\$500.00
05/08/2025	TMK	CO	Confer with J. Nolan and J. Fiero regarding claim procedures.	0.20	1,325.00	\$265.00
05/09/2025	JDF	CO	Prepare for and participate in Bank of America call re claims procedure issues; Email to Bank of America re framing of legal issues	1.40	1,525.00	\$2,135.00
05/09/2025	JPN	CO	Preparation for conference call with Bank of America regarding claims procedure motion.	0.50	1,250.00	\$625.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/09/2025	JPN	CO	Telephone conference with Bank of America litigation team regarding claims procedure motion.	1.00	1,250.00	\$1,250.00
05/09/2025	TMK	CO	Prepare for and participate in call with BoA regarding claim procedures.	0.50	1,325.00	\$662.50
05/09/2025	TMK	CO	Follow up emails with BoA regarding claim procedures.	0.10	1,325.00	\$132.50
05/12/2025	JPN	CO	Review numerous emails regarding claims motion.	0.40	1,250.00	\$500.00
05/12/2025	JPN	CO	Revise sections of claims motion procedures brief.	1.30	1,250.00	\$1,625.00
05/12/2025	TMK	CO	Review BOA comments to the claims procedures.	0.10	1,325.00	\$132.50
05/13/2025	JPN	CO	Meet with Receiver regarding claims agent, process and website.	0.30	1,250.00	\$375.00
05/13/2025	JPN	CO	Discuss and review demands from various factions regarding revisions to claims procedure motion.	0.50	1,250.00	\$625.00
05/13/2025	JPN	CO	Draft Declaration of M. Flahive regarding claims motion.	0.50	1,250.00	\$625.00
05/13/2025	JPN	CO	Draft notice of motion regarding claims procedure motion.	0.40	1,250.00	\$500.00
05/13/2025	JPN	CO	Revise and add sections to claims procedure motion and bifurcation; Run table of contents and table of authorities; Cite check authorities; Proofread.	2.30	1,250.00	\$2,875.00
05/13/2025	JPN	CO	Circulate draft claims procedure motion to litigation team.	0.30	1,250.00	\$375.00
05/13/2025	TMK	CO	Review BOA comments to the claims procedures.	0.30	1,325.00	\$397.50
05/14/2025	JDF	CO	Review edits to claims procedures and offer comments to same; TC with J. Nolan and T. Kapur re same; Revise motion to approve claims procedures	1.80	1,525.00	\$2,745.00
05/14/2025	JPN	CO	Meet with T. Kapur regarding open issues with claim procedures motion.	0.30	1,250.00	\$375.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/14/2025	JPN	CO	Revise claim procedures motion regarding accepted changes of various constituents.	1.00	1,250.00	\$1,250.00
05/14/2025	JPN	CO	Meet with litigation group regarding dispute between claimants regarding reconciliation of claims in motion.	0.50	1,250.00	\$625.00
05/14/2025	JPN	CO	Forward Belmonte Declaration to witness with comments.	0.30	1,250.00	\$375.00
05/14/2025	TMK	CO	Confer with J. Nolan and J. Fiero regarding claims procedures; follow up with Stapleton.	0.50	1,325.00	\$662.50
05/15/2025	JDF	CO	Follow up team call re claims procedures	0.40	1,525.00	\$610.00
05/15/2025	JPN	CO	Revise claims procedures motion and bifurcation of grower dispute; Re-run tables and revise authorities regarding additional legal support.	1.90	1,250.00	\$2,375.00
05/15/2025	JPN	CO	Legal research additional legal authorities to support managing and bifurcating claims within brief.	1.50	1,250.00	\$1,875.00
05/15/2025	JPN	CO	Draft email to Receiver regarding grower service list.	0.20	1,250.00	\$250.00
05/15/2025	JPN	CO	Conference call with litigation group regarding incorporating additional comments and issues of claimants.	0.40	1,250.00	\$500.00
05/15/2025	JPN	CO	Review Bank of America outline comments to motion.	0.40	1,250.00	\$500.00
05/15/2025	JPN	CO	Draft proposed order to grant and establish claims and procedures process.	1.50	1,250.00	\$1,875.00
05/15/2025	JPN	CO	Review email from Bank of America regarding motion for claims procedure.	0.10	1,250.00	\$125.00
05/15/2025	TMK	CO	Confer with Stapleton, BOA and J. Nolan regarding claim procedures.	0.20	1,325.00	\$265.00
05/16/2025	JDF	CO	Work on claims motion revisions	0.60	1,525.00	\$915.00
05/16/2025	JPN	CO	Revise motion for claims procedure.	2.00	1,250.00	\$2,500.00
05/16/2025	JPN	CO	Revise supporting declarations and compile exhibits.	1.50	1,250.00	\$1,875.00
05/16/2025	JPN	CO	Forward draft motion for claims procedure to client for approval with all supporting documents.	0.50	1,250.00	\$625.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/16/2025	TMK	CO	Review and revise claim procedures motion and confer with J. Nolan and J. Fiero.	1.50	1,325.00	\$1,987.50
05/16/2025	TMK	CO	Confer with Stapleton regarding costs for claims procedures.	0.20	1,325.00	\$265.00
05/19/2025	JPN	CO	Draft emails to litigation team regarding revisions to claims procedures motion.	0.40	1,250.00	\$500.00
05/19/2025	JPN	CO	Revise claims procedures motion to document litigation section of brief; Receive revisions.	0.50	1,250.00	\$625.00
05/19/2025	JPN	CO	Review Stretto update for claims procedures motion.	0.30	1,250.00	\$375.00
05/19/2025	JPN	CO	Exchange correspondence with Receiver regarding status of claims procedures motion.	0.40	1,250.00	\$500.00
05/19/2025	TMK	CO	Confer with J. Nolan and Stapleton regarding claim procedures motion.	0.30	1,325.00	\$397.50
05/20/2025	JDF	CO	Confer with GSFC counsel re claims procedures; Revise motion; Team call with PSZJ re revisions to claims procedures	1.80	1,525.00	\$2,745.00
05/20/2025	JPN	CO	Telephone conference with J. Kinsey regarding TSB claim and reconciliation.	0.40	1,250.00	\$500.00
05/20/2025	JPN	CO	Revise claims procedures motion to include additional issues regarding grower dispute.	1.30	1,250.00	\$1,625.00
05/20/2025	JPN	CO	Revise Bemoove Declaration.	0.20	1,250.00	\$250.00
05/20/2025	JPN	CO	Revise Declaration of J. Nolan.	0.30	1,250.00	\$375.00
05/20/2025	JPN	CO	Receipt clients revision to claims procedure motion.	0.50	1,250.00	\$625.00
05/20/2025	JPN	CO	Revise claims procedures motion; Incorporate Report 4 and T. Kapur comments.	0.50	1,250.00	\$625.00
05/20/2025	JPN	CO	Meet with Bank of America counsel regarding claims procedure motion.	0.40	1,250.00	\$500.00
05/20/2025	JPN	CO	Draft emails and forward draft claims procedure motion to Grower's counsel and financial institutions for review and comment.	0.60	1,250.00	\$750.00
05/20/2025	TMK	CO	Prepare for and participate on call with G. Oates regarding claim procedure motion.	0.30	1,325.00	\$397.50
05/20/2025	TMK	CO	Confer with Stapleton regarding third party admin fees.	0.10	1,325.00	\$132.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/20/2025	TMK	CO	Confer with J. Nolan regarding claims bar date.	0.20	1,325.00	\$265.00
05/20/2025	TMK	CO	Review and revise claims publication notice and confer with J. Nolan.	0.70	1,325.00	\$927.50
05/20/2025	TMK	CO	Confer with Stapleton and BoA regarding costs of claim procedures.	0.30	1,325.00	\$397.50
05/20/2025	TMK	CO	Prepare estimate of costs of claims procedures and confer with Stapleton.	0.20	1,325.00	\$265.00
05/20/2025	TMK	CO	Confer with J. Nolan and BoA regarding claims administrator.	0.10	1,325.00	\$132.50
05/20/2025	TMK	CO	Participate in call with J. Fiero and J. Nolan regarding claim procedures motion.	0.60	1,325.00	\$795.00
05/21/2025	JDF	CO	Zoom with Bank of America counsel re claims procedures	1.00	1,525.00	\$1,525.00
05/21/2025	JPN	CO	Conference call Bank of America lawyers and litigation team regarding claims procedures motion.	1.00	1,250.00	\$1,250.00
05/21/2025	JPN	CO	Telephone conference with K. Azlin and team regarding procedural issues with claims procedures motion.	0.60	1,250.00	\$750.00
05/21/2025	JPN	CO	Review procedures motion and filing issues raised by growers and Bank of America; Draft update.	0.40	1,250.00	\$500.00
05/21/2025	JPN	CO	Review edits to proposed order regarding claims procedure motion.	0.20	1,250.00	\$250.00
05/21/2025	TMK	CO	Review and revise claim notice cover letter and confer with J. Nolan.	0.70	1,325.00	\$927.50
05/21/2025	TMK	CO	Confer with J. Nolan regarding claim procedures.	0.30	1,325.00	\$397.50
05/21/2025	TMK	CO	Review and revise order on claim procedure motion.	0.50	1,325.00	\$662.50
05/21/2025	TMK	CO	Prepare for and participate on call with BoA regarding claim procedures motion.	1.10	1,325.00	\$1,457.50
05/22/2025	JDF	CO	Review comments from Bank of America	0.20	1,525.00	\$305.00
05/22/2025	JPN	CO	Review initial comments of Bank of America to claims procedure motion and exhibits.	0.60	1,250.00	\$750.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/22/2025	JPN	CO	Review revisions to claim form and notice; Receive comments from GSFC.	0.50	1,250.00	\$625.00
05/22/2025	TMK	CO	Review and revise proof of claim form and confer with J. Nolan.	0.50	1,325.00	\$662.50
05/22/2025	TMK	CO	Review inquiry from BoA regarding claims and follow up with Stapleton.	0.20	1,325.00	\$265.00
05/22/2025	TMK	CO	Review and revise motion and notice for claim procedures motion.	1.20	1,325.00	\$1,590.00
05/22/2025	TMK	CO	Confer with G. Oates regarding claim procedures.	0.50	1,325.00	\$662.50
05/22/2025	TMK	CO	Confer with Stapleton regarding claim procedures.	0.20	1,325.00	\$265.00
05/22/2025	TMK	CO	Confer with BOA and growers regarding hearing on claims motion.	0.10	1,325.00	\$132.50
05/27/2025	JPN	CO	Meet and confer with Grower's counsel and GSFC regarding claims procedure motion.	0.50	1,250.00	\$625.00
05/27/2025	TMK	CO	Confer with BoA regarding claim procedure.	0.30	1,325.00	\$397.50
05/27/2025	TMK	CO	Coordinate call with G. Oates.	0.10	1,325.00	\$132.50
05/28/2025	JPN	CO	Revise supporting exhibits to claims procedures motion and forward to Grower's counsel with comment.	1.20	1,250.00	\$1,500.00
05/28/2025	TMK	CO	Prepare for and participate on call with G. Oates and J. Fiero regarding claim procedures.	0.50	1,325.00	\$662.50
05/28/2025	TMK	CO	Confer with J. Nolan and J. Fiero regarding claim procedures.	0.40	1,325.00	\$530.00
05/29/2025	JDF	CO	Confer with PSZJ team re claims procedures	0.40	1,525.00	\$610.00
05/29/2025	JPN	CO	Telephone conference with D. Burger regarding Stretto.	0.20	1,250.00	\$250.00
05/29/2025	JPN	CO	Telephone conference with T. Kapur and J. Fiero regarding WIP and claims motion.	0.50	1,250.00	\$625.00
05/29/2025	JPN	CO	Draft revised claims procedure motion to litigation team with comment.	0.30	1,250.00	\$375.00
05/29/2025	JPN	CO	Draft email to litigation team regarding procedural issue adding claimants.	0.40	1,250.00	\$500.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/29/2025	JPN	CO	Review Bank of America revisions to claims motion and insert as applicable.	0.50	1,250.00	\$625.00
05/29/2025	JPN	CO	Revise claims procedure motion.	2.00	1,250.00	\$2,500.00
05/29/2025	JPN	CO	Draft email to Receiver regarding retention of Stretto.	0.20	1,250.00	\$250.00
05/29/2025	TMK	CO	Confer with BoA regarding claim procedures.	0.10	1,325.00	\$132.50
05/30/2025	JDF	CO	Work with J. Nolan and T. Kapur re claims procedures; Review and revise motion	1.40	1,525.00	\$2,135.00
05/30/2025	JPN	CO	Circulate revised claims procedure motion to interested parties with comment.	0.60	1,250.00	\$750.00
05/30/2025	JPN	CO	Review proposed changes to motion; Circulate within litigation team; Further revise claims procedures motion; Update with new hearing date and deadlines; Revise Declarations.	2.10	1,250.00	\$2,625.00
05/30/2025	TMK	CO	Confer with J. Nolan and J. Fiero regarding claims motion and review revised drafts of moving papers.	0.40	1,325.00	\$530.00
				65.60		\$85,897.50
General						
05/01/2025	JDF	GEN	Emails with client; Status call with Stapleton team	0.50	1,525.00	\$762.50
05/01/2025	JPN	GEN	Exchange correspondence regarding status of Lopez litigation.	0.20	1,250.00	\$250.00
05/01/2025	JPN	GEN	Telephone conference with Walnut Board regarding missing growers.	0.20	1,250.00	\$250.00
05/01/2025	TMK	GEN	Prepare for and participate in case status call with Stapleton.	0.50	1,325.00	\$662.50
05/05/2025	JDF	GEN	Focus on creditor seeking to initiate litigation against receivership and confer with J. Nolan re same; Work on receiver's report language	0.70	1,525.00	\$1,067.50
05/05/2025	JPN	GEN	Meet with M. Flahive regarding service and notice of public.	0.40	1,250.00	\$500.00
05/05/2025	JPN	GEN	Update regarding Sandoval matter; Update tracking matrix.	0.30	1,250.00	\$375.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/05/2025	JPN	GEN	Forward pleadings regarding real property lawsuits; Exchange with Receiver.	0.20	1,250.00	\$250.00
05/05/2025	TMK	GEN	Review receiver report and confer with J. Fiero.	0.20	1,325.00	\$265.00
05/06/2025	JPN	GEN	Telephone conference with Receiver regarding service of complaints.	0.20	1,250.00	\$250.00
05/06/2025	JPN	GEN	Meet with litigation team regarding issue of nuts held pending outcome of dispute.	0.40	1,250.00	\$500.00
05/06/2025	JPN	GEN	Meet with Receiver regarding interpretation of grower/ASSI contracts and pricing.	0.40	1,250.00	\$500.00
05/07/2025	JDF	GEN	Follow up on potential litigant claiming entitlement to foreclose on producer's lien	0.20	1,525.00	\$305.00
05/07/2025	JPN	GEN	Receive court filings regarding Stainless Aesthetics.	0.10	1,250.00	\$125.00
05/08/2025	JDF	GEN	Work on assignment of accounts receivable to secured lenders for collection; Confer with J. Nolan re pending items; Participate in team call with Stapleton	1.00	1,525.00	\$1,525.00
05/08/2025	JPN	GEN	Telephone conference with Christina regarding Lopez claim.	0.20	1,250.00	\$250.00
05/08/2025	JPN	GEN	Meet with J. Fiero regarding issue of schedules.	0.30	1,250.00	\$375.00
05/08/2025	JPN	GEN	Meeting with litigation team regarding May 9, 2025 hearing.	0.20	1,250.00	\$250.00
05/08/2025	TMK	GEN	Prepare for and participate in call with Stapleton.	0.40	1,325.00	\$530.00
05/08/2025	TMK	GEN	Confer with Stapleton regarding receiver's report.	0.10	1,325.00	\$132.50
05/12/2025	JDF	GEN	Further attention to lien priority issue	0.30	1,525.00	\$457.50
05/12/2025	JPN	GEN	Legal research California law regarding binding non- participants and receivership estates.	1.20	1,250.00	\$1,500.00
05/12/2025	JPN	GEN	Review and calendar motion of Jesse Real Estate.	0.30	1,250.00	\$375.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/13/2025	JDF	GEN	Consider Stretto request for terms of employment; Prepare assignment of Cornerstone account receivable and follow up on same with counsel for Cornerstone; follow up with Cornerstone on pasteurizer transaction	1.20	1,525.00	\$1,830.00
05/13/2025	JPN	GEN	Calendar motions to intervene.	0.10	1,250.00	\$125.00
05/13/2025	JPN	GEN	Review stipulation to transfer venue regarding TSB.	0.20	1,250.00	\$250.00
05/14/2025	JPN	GEN	Review CDFA complaints and litigation pending regarding representative sample of involved counties.	0.40	1,250.00	\$500.00
05/14/2025	JPN	GEN	Draft list of impacted counties regarding due process; Forward to Receiver with comment.	0.40	1,250.00	\$500.00
05/14/2025	JPN	GEN	Revise Declaration of Belmonte; Circulate to team.	0.40	1,250.00	\$500.00
05/14/2025	JPN	GEN	Forward updated exhibits in support of motion to litigation team.	0.30	1,250.00	\$375.00
05/14/2025	JPN	GEN	Reject requests/update motion regarding consensus of bifurcation.	0.70	1,250.00	\$875.00
05/14/2025	JPN	GEN	Receive amended pleadings regarding motion to intervene.	0.30	1,250.00	\$375.00
05/14/2025	JPN	GEN	Address summons forwarded from client.	0.20	1,250.00	\$250.00
05/15/2025	JPN	GEN	Review grower outline to motion.	0.20	1,250.00	\$250.00
05/16/2025	JDF	GEN	Prepare for and participate in status call with Stapleton	0.70	1,525.00	\$1,067.50
05/16/2025	JPN	GEN	Revise proposed order to approve motion and forms.	0.50	1,250.00	\$625.00
05/16/2025	JPN	GEN	Draft Declaration of M. Flahive in support of motion.	0.50	1,250.00	\$625.00
05/16/2025	JPN	GEN	Forward outline of new argument regarding bifurcation.	0.60	1,250.00	\$750.00
05/16/2025	JPN	GEN	Revise Declaration of L. Belmonte; Forward to witness with comment.	0.50	1,250.00	\$625.00
05/16/2025	TMK	GEN	Participate in case status call with Stapleton and J. Fiero.	0.70	1,325.00	\$927.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/16/2025	TMK	GEN	Review inquiries from Cornerstone and confer with Stapleton.	0.20	1,325.00	\$265.00
05/16/2025	TMK	GEN	Confer with J. Fiero regarding revisions to receiver's report.	0.10	1,325.00	\$132.50
05/17/2025	TMK	GEN	Confer with Stapleton regarding revisions to receiver report.	0.20	1,325.00	\$265.00
05/19/2025	JPN	GEN	Revise Declaration of M. Flahive; Forward to witness with comment.	0.50	1,250.00	\$625.00
05/19/2025	JPN	GEN	Meet with L. Belmonte regarding service and notice of public action.	0.30	1,250.00	\$375.00
05/19/2025	JPN	GEN	Revise litigation tracking chart.	0.40	1,250.00	\$500.00
05/19/2025	JPN	GEN	Review changes to Flahive Declaration; Revise.	0.30	1,250.00	\$375.00
05/19/2025	TMK	GEN	Review and revise receivership report and confer with B. Landoll.	1.40	1,325.00	\$1,855.00
05/19/2025	TMK	GEN	Follow up emails with Stapleton regarding receivership report.	0.20	1,325.00	\$265.00
05/19/2025	TMK	GEN	Review litigation summary.	0.10	1,325.00	\$132.50
05/20/2025	JPN	GEN	Research service issues in Yolo county.	0.20	1,250.00	\$250.00
05/20/2025	JPN	GEN	Draft emails to Siskiyou Daily News; Forward Public Notice; Respond.	0.30	1,250.00	\$375.00
05/20/2025	JPN	GEN	Revise the Notice of Publication regarding Siskiyou.	0.30	1,250.00	\$375.00
05/20/2025	JPN	GEN	Review issues regarding government notice in motion.	0.40	1,250.00	\$500.00
05/20/2025	JPN	GEN	Meet and confer with Receiver regarding Stretto duties.	0.40	1,250.00	\$500.00
05/20/2025	JPN	GEN	Review Receiver's Report No. 4.	0.30	1,250.00	\$375.00
05/20/2025	JPN	GEN	Review Order regarding District Court, Eastern District of California regarding litigation dismissal.	0.30	1,250.00	\$375.00
05/21/2025	JPN	GEN	Review nut proceeds log.	0.40	1,250.00	\$500.00
05/21/2025	JPN	GEN	Legal research CCP § 389 and California Rules regarding joinder of parties who have interest in property.	1.50	1,250.00	\$1,875.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/21/2025	JPN	GEN	Respond to Garnett regarding publication.	0.20	1,250.00	\$250.00
05/21/2025	JPN	GEN	Email exchange with growers regarding comments.	0.10	1,250.00	\$125.00
05/21/2025	JPN	GEN	Receive Lis Pendens.	0.10	1,250.00	\$125.00
05/22/2025	JPN	GEN	Review lawsuit filed by by Plaintiff, Equator.	0.20	1,250.00	\$250.00
05/22/2025	JPN	GEN	Draft correspondence to Plaintiff, Equator.	0.40	1,250.00	\$500.00
05/22/2025	JPN	GEN	Review emails regarding Holt lawsuit; Respond to litigation group.	0.40	1,250.00	\$500.00
05/22/2025	JPN	GEN	Meet with Receiver regarding Plaintiff, Holt.	0.30	1,250.00	\$375.00
05/23/2025	JPN	GEN	Email exchange regarding new lawsuit; Review litigation tracking matrix.	0.40	1,250.00	\$500.00
05/23/2025	JPN	GEN	Review CDFA complaint.	0.30	1,250.00	\$375.00
05/29/2025	JPN	GEN	Receive emails regarding litigation tracking chart.	0.40	1,250.00	\$500.00
05/29/2025	JPN	GEN	Update litigation tracking chart.	0.60	1,250.00	\$750.00
05/29/2025	JPN	GEN	Exchange correspondence with D. Burger regarding recent lawsuits.	0.30	1,250.00	\$375.00
05/29/2025	TMK	GEN	Confer with Stapleton regarding case status and strategies; follow up emails regarding same.	0.80	1,325.00	\$1,060.00
05/29/2025	YPD	GEN	Review of emails and attachments from J. Nolan re litigations; and respond to email same.	0.40	625.00	\$250.00
05/29/2025	YPD	GEN	Review of J. Nolan litigation chart and compare with Receiver chart; revision to chart to include missing actions (1.0); and email response to J. Nolan on same and missing actions (.2).	1.20	625.00	\$750.00
05/29/2025	YPD	GEN	Review of J. Nolan email re litigation charts; review same and respond to email thereto.	0.20	625.00	\$125.00
05/30/2025	JPN	GEN	Legal research consolidation case law per CCP section 1048 and pertinent authorities.	1.00	1,250.00	\$1,250.00
05/30/2025	JPN	GEN	Telephone conference with G. Greenwood regarding 2023 crop.	0.30	1,250.00	\$375.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/30/2025	JPN	GEN	Revise litigation tracking chart; Forward to Bank of America and GSFC with comment.	0.40	1,250.00	\$500.00
05/30/2025	JPN	GEN	Respond to U.S. Horticulture regarding draft order.	0.20	1,250.00	\$250.00
05/30/2025	JPN	GEN	Review draft complaint of Plaintiff, Cana Pine Growers.	0.30	1,250.00	\$375.00
				32.70		\$41,382.50

GSFC

05/01/2025	JDF	GSFC	Review and comment upon email from G. Oates re Clementino closing status	0.20	1,525.00	\$305.00
05/01/2025	TMK	GSFC	Review status of Clementino sale.	0.10	1,325.00	\$132.50
05/05/2025	JDF	GSFC	Follow upon Clementino sale issues with C. Garnica and T. Mehr	0.20	1,525.00	\$305.00
05/06/2025	JDF	GSFC	Review First Foundation secured creditor claim	0.20	1,525.00	\$305.00
05/06/2025	TMK	GSFC	Review status of Clementino sale.	0.10	1,325.00	\$132.50
05/06/2025	TMK	GSFC	Review emails with First Foundation Bank regarding liens.	0.20	1,325.00	\$265.00
05/07/2025	JDF	GSFC	Work on Patterson lien claim issue	0.20	1,525.00	\$305.00
05/07/2025	JPN	GSFC	Address issue of Paterson real property and termination of power; Draft notice to Receiver.	0.40	1,250.00	\$500.00
05/07/2025	JPN	GSFC	Review Debtor B&R regarding PAI Riverbend.	0.30	1,250.00	\$375.00
05/07/2025	TMK	GSFC	Review emails regarding power issues to Patterson remaining tasks.	0.10	1,325.00	\$132.50
05/08/2025	JDF	GSFC	Follow up on Clementino closing	0.20	1,525.00	\$305.00
05/08/2025	JPN	GSFC	Review 2nd notice of pendency.	0.10	1,250.00	\$125.00
05/08/2025	JPN	GSFC	Respond to Receiver regarding Patterson matter.	0.20	1,250.00	\$250.00
05/08/2025	TMK	GSFC	Confer with Stapleton regarding First Foundation settlement.	0.10	1,325.00	\$132.50
05/13/2025	TMK	GSFC	Confer with Stapleton and J. Fiero regarding settlement with First Foundation.	0.20	1,325.00	\$265.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/13/2025	TMK	GSFC	Review emails with First Foundation regarding release.	0.20	1,325.00	\$265.00
05/14/2025	JDF	GSFC	Work with T. Kapur on form of document for sale of pasteurizer; Work with counsel for First Foundation	0.90	1,525.00	\$1,372.50
05/14/2025	TMK	GSFC	Draft First Foundation release agreement and confer with Stapleton and J. Fiero.	1.40	1,325.00	\$1,855.00
05/14/2025	TMK	GSFC	Confer with First Foundation Bank regarding lien release and settlement.	0.20	1,325.00	\$265.00
05/14/2025	TMK	GSFC	Confer with GSFC regarding First Foundation settlement.	0.10	1,325.00	\$132.50
05/15/2025	TMK	GSFC	Confer with First Foundation Bank regarding lien release and settlement and revise same.	0.30	1,325.00	\$397.50
05/15/2025	TMK	GSFC	Confer with Stapleton to coordinate execution of First Foundation settlement.	0.20	1,325.00	\$265.00
05/16/2025	TMK	GSFC	Review Clementino closing .	0.10	1,325.00	\$132.50
05/19/2025	TMK	GSFC	Coordinate call with G. Oates.	0.10	1,325.00	\$132.50
05/19/2025	TMK	GSFC	Confer with First Foundation Bank regarding settlement.	0.20	1,325.00	\$265.00
05/20/2025	TMK	GSFC	Coordinate execution and payment with First Foundation Bank.	0.20	1,325.00	\$265.00
05/21/2025	JDF	GSFC	Confer with GSFC re pasteurizer transaction	0.10	1,525.00	\$152.50
05/24/2025	JDF	GSFC	Prepare pasteurizer transaction documents and forward same to Cornerstone's counsel for review and comment	1.40	1,525.00	\$2,135.00
05/27/2025	TMK	GSFC	Review emails regarding Holt litigation and confer with J. Nolan.	0.10	1,325.00	\$132.50
05/28/2025	JDF	GSFC	Work on claims issues with G. Oates and PSZJ team	0.90	1,525.00	\$1,372.50
05/28/2025	JPN	GSFC	Review Holt package served on ASSI.	0.30	1,250.00	\$375.00
05/28/2025	JPN	GSFC	Review Lewec papers.	0.10	1,250.00	\$125.00
05/28/2025	JPN	GSFC	Forward email to G. Oates regarding defense of Holt litigation and Lewec.	0.30	1,250.00	\$375.00
05/28/2025	JPN	GSFC	Review service issues with USHF papers and May 28, 2025 hearing.	0.30	1,250.00	\$375.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/29/2025	JDF	GSFC	Work on Patterson demands and confer with client re same	0.30	1,525.00	\$457.50
05/30/2025	TMK	GSFC	Review and revise Ohm sale agreement and management agreement and confer with Stapleton regarding same.	3.40	1,325.00	\$4,505.00
				<u>13.90</u>		<u>\$19,187.50</u>
JB Cusick						
05/07/2025	TMK	JBC	Confer with Stapleton regarding Diamond Foods receivable.	0.10	1,325.00	\$132.50
05/08/2025	TMK	JBC	Confer with Stapleton and J. Fiero regarding Diamond Foods receivable.	0.10	1,325.00	\$132.50
05/09/2025	TMK	JBC	Confer with Stapleton and J. Fiero regarding receivables.	0.20	1,325.00	\$265.00
05/12/2025	TMK	JBC	Confer with Cornerstone Bank, Stapleton and J. Fiero regarding receivables.	0.20	1,325.00	\$265.00
				<u>0.60</u>		<u>\$795.00</u>
TOTAL SERVICES FOR THIS MATTER:						\$178,585.00

Expenses

05/02/2025	AS	Specialized Legal Services, Inv. P218962	300.00
05/07/2025	RE	SCAN/COPY (25 @0.10 PER PG)	2.50
05/07/2025	RE	SCAN/COPY (25 @0.10 PER PG)	2.50
05/07/2025	RE	SCAN/COPY (16 @0.10 PER PG)	1.60
05/12/2025	LN	81001.00001 Lexis Charges for 05-12-25	184.53
05/13/2025	LN	81001.00001 Lexis Charges for 05-13-25	117.43
05/14/2025	RE	SCAN/COPY (26 @0.10 PER PG)	2.60
05/14/2025	RE	SCAN/COPY (17 @0.10 PER PG)	1.70
05/14/2025	RE	SCAN/COPY (121 @0.10 PER PG)	12.10
05/14/2025	LN	81001.00001 Lexis Charges for 05-14-25	50.33
05/15/2025	LN	81001.00001 Lexis Charges for 05-15-25	67.10
05/16/2025	RE	SCAN/COPY (56 @0.10 PER PG)	5.60
05/16/2025	RE	SCAN/COPY (5 @0.10 PER PG)	0.50
05/16/2025	RE	SCAN/COPY (31 @0.10 PER PG)	3.10
05/16/2025	RE	SCAN/COPY (17 @0.10 PER PG)	1.70
05/16/2025	RE	SCAN/COPY (29 @0.10 PER PG)	2.90
05/16/2025	RE	SCAN/COPY (31 @0.10 PER PG)	3.10
05/20/2025	RE	SCAN/COPY (11 @0.10 PER PG)	1.10
05/29/2025	RE	SCAN/COPY (30 @0.10 PER PG)	3.00
05/30/2025	LN	81001.00001 Lexis Charges for 05-30-25	33.55

Total Expenses for this Matter

\$796.94

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

Page: 24
Invoice 147637
May 31, 2025

A/R STATEMENT

Outstanding Balance from prior invoices as of 05/31/2025

(May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fee Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
Total Amount Due on Current and Prior Invoices:				\$179,381.94

EXHIBIT “B”

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

May 31, 2025

Andersen & Sons Shelling

Invoice Number: 8808
 Invoice Period: 05-01-2025 - 05-31-2025

Time Details

<u>Date</u>	<u>Timekeeper</u>	<u>Activity</u>	<u>Hours</u>	<u>Amount</u>
<u>A/R and Inventory (BofA)</u>				
05-12-2025	BL	A/R and Inventory (BofA) Draft A/R settlement agreement w/ Base Culture. Emails w/ Atty. Kapur re: same.	0.60	312.00
05-23-2025	BL	A/R and Inventory (BofA) Emails w/ A. Casto re: agreement and A/R payment. Update agreement date.	0.30	156.00
05-27-2025	BL	A/R and Inventory (BofA) Emails w/ A. Casto re: A/R collections and payment.	0.20	104.00
			1.10	572.00
<u>Accounting</u>				
05-01-2025	SB	Accounting Process A/P. Process cash receipt.	0.40	94.00
05-01-2025	AN	Accounting Review and confirm approval to pay vendor for services provided to Anita property. T/C to provider and confirm service date re: same. Process payment.	0.50	170.00
05-02-2025	SB	Accounting Confer w/ YL and AR re: returned wire. Confer w/ AN re: same and instructions. Process CNB bank statements.	0.60	141.00
05-02-2025	SB	Accounting Confer w/ YL re: wire returned. Confer w/ AN re: ATT invoice. Confer w/ AN and BL re: Cornerstone.	0.40	94.00
05-02-2025	AN	Accounting Review and process bill payments. Update same in accounting. T/C to Water District re: Vina Ranch and update team re: same.	3.50	1,190.00
05-02-2025	YL	Accounting Review email from CNB re: ABA routing number. Confer w/ SB re: same.	0.30	102.00

Date	Timekeeper	Activity	Hours	Amount
<u>Accounting</u>				
05-02-2025	MA	Accounting Confer w/ SB re: wire and coordination with project manager.	0.10	26.50
05-05-2025	SB	Accounting Process check run.	0.30	70.50
05-05-2025	AN	Accounting Review and complete form authorizing payment re: employee benefits provider. Review cash on hand and bank activity. Review bank activity in banking app, update cash and expenses in Shelling accounting.	3.90	1,326.00
05-05-2025	MA	Accounting Review ACH.	0.20	53.00
05-06-2025	AN	Accounting Update cash and expenses in Ranch accounting.	3.20	1,088.00
05-06-2025	YL	Accounting F/u w/ team re: stale wire. Review various emails re: same. Review wire.	0.50	170.00
05-06-2025	SB	Accounting Confer w/ AN and BL re: Smarter Solutions open invoice.	0.10	23.50
05-06-2025	SB	Accounting Initiate wire. Process cash receipt. Confer w/ MA and YL re: A/P.	0.60	141.00
05-07-2025	AN	Accounting Review bank activity in banking app, update cash and expenses in Ranch accounting.	3.60	1,224.00
05-08-2025	AN	Accounting Review bank activity in banking app. T/C w/ M. Slatter from (HYG) Wells Fargo re: request approval to pick up battery chargers for leased forklifts. Research, review and respond to email from R. Bughoa re: approving same.	0.60	204.00
05-08-2025	SB	Accounting Confer w/ BL and AN re: invoices.	0.20	47.00
05-09-2025	SB	Accounting Confer w/ YL re: IRS.	0.20	47.00
05-12-2025	BL	Accounting Review bank account activity for Feb and March. Review AN's file.	0.70	364.00
05-12-2025	AN	Accounting Classify expenses in cash activity spreadsheet. Review, research and respond to email from lender, confirm and approve return of leased equipment. T/C w/ vendor for sorting equipment, research prior communications and follow up with operations manager re: same. Review, research and respond to email from fumigation service provider re: status of payment.	2.00	680.00
05-13-2025	SB	Accounting Process cash receipt.	0.30	70.50
05-14-2025	AN	Accounting	3.70	1,258.00

Date	Timekeeper	Activity	Hours	Amount
<u>Accounting</u>				
		Review billing for expenses in preparation of funding request.		
05-14-2025	SB	Accounting Confer w/ AN and BL re: incoming mail and scan.	0.10	23.50
05-14-2025	SB	Accounting Process US Bank statement.	0.10	23.50
05-15-2025	SB	Accounting Confer w/ AN re: A/P request and cash receipt. Process invoices.	0.80	188.00
05-15-2025	AN	Accounting Review and confirm multiple invoices and credit card receipts, update funding request re: same. T/C w/ PG&E re: access denied updating system with 2-factor authentication.	3.50	1,190.00
05-15-2025	CG	Accounting Review payment request and coordinate same w/ accounting.	0.20	68.00
05-16-2025	SB	Accounting Confer w/ YL and AR re: A/P request.	0.30	70.50
05-16-2025	SB	Accounting Process wire.	0.30	70.50
05-16-2025	YL	Accounting Review invoices and confer w/ SB re: same. T/C w/ SB re: online banking access.	0.40	136.00
05-16-2025	AN	Accounting Review and respond to N. Oliva payment request re: engine repair. Prepare wire request form, confirm approval.	0.50	170.00
05-16-2025	MA	Accounting Review retainer balance. Confer w/ A/P re: invoice for payment.	0.20	53.00
05-19-2025	YL	Accounting Confer w/ SB re: legal fee payments. Review and approve wires. Confer w/ DS re: same.	0.50	170.00
05-19-2025	SB	Accounting Confer w/ YL re: same day wire.	0.20	47.00
05-19-2025	SB	Accounting Process cash receipt. Confer w/ JD, BL, and AN re: request approval. Confer w/ AN re: cash receipt.	0.60	141.00
05-19-2025	AN	Accounting Review cash on hand and activity. Update ACH authorizations and confirm approvals re: same. T/C w/ vendor and research status of payment for services provided.	0.70	238.00
05-19-2025	MA	Accounting Review wire.	0.20	53.00
05-20-2025	YL	Accounting Download, review and archive wire confirmation.	0.20	68.00

Date	Timekeeper	Activity	Hours	Amount
<u>Accounting</u>				
05-20-2025	SB	Accounting Confer w/ YL re: request for confirmation of payment and archive.	0.20	47.00
05-20-2025	AN	Accounting Review cash on hand in banking app. Review payments processed for employee benefits. Process approved payments in cash app. Multiple T/Cs and emails to N. Oliva re: R&M parts purchase. T/C to vendor re: same.	2.60	884.00
05-20-2025	SB	Accounting Confer w/ BL, AN and JD re: approval. Confer w/ AN re: cash receipt. Process cash receipt.	0.80	188.00
05-21-2025	SB	Accounting Process A/P. Confer w/ MA re: wire. Confer w/ AN re: cash receipt. Process invoices. Process cash receipt. Confer w/ AN, JD and BL re: approval.	1.40	329.00
05-21-2025	YL	Accounting Review wire.	0.20	68.00
05-21-2025	MA	Accounting Review wire. Confer w/ SB re: same.	0.20	53.00
05-22-2025	MA	Accounting Review wire.	0.20	53.00
05-22-2025	SB	Accounting Process A/P.	0.40	94.00
05-23-2025	BL	Accounting Review and approve payments in bank account. Confer w/ AN re: same.	0.30	156.00
05-23-2025	YL	Accounting Review wire transfer.	0.20	68.00
05-27-2025	SB	Accounting Confer w/ AN and BL re: cash receipt. Process cash receipts.	0.50	117.50
05-28-2025	AN	Accounting Review, reconcile and update expenses and payments in accounting. Review cash on hand and activity in banking app.	2.50	850.00
05-29-2025	BL	Accounting Review invoices and bank account ACH. Approve ACH online.	0.20	104.00
05-29-2025	SB	Accounting Confer w/ AN re: check numbers. Process A/R. Process IRS, property tax and bank documents.	1.20	282.00
05-29-2025	AN	Accounting Review cash on hand and initiate payments in banking for multiple accounts.	0.80	272.00
			46.40	14,859.50
<u>Case Management</u>				
05-01-2025	DB	Case Management	0.20	58.00

Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
		Process incoming mail.		
05-01-2025	BL	Case Management Confer w/ AN re: Patterson payment. Review related invoices. Update receivership report.	0.80	416.00
05-01-2025	DB	Case Management Finalize census report.	0.30	87.00
05-02-2025	DB	Case Management Process incoming mail.	0.20	58.00
05-02-2025	JD	Case Management Review and respond to emails.	0.20	110.00
05-05-2025	DB	Case Management Process incoming mail. Process MASA ACH payment authorization forms.	0.50	145.00
05-05-2025	BL	Case Management Draft summary table for escrow account reconciliation for Atty. Fiero. Emails w/ Atty. Fiero re: same. Confer w/ AN re: QuickBooks work.	1.20	624.00
05-05-2025	CG	Case Management Confer w/ DB re: status of report.	0.10	34.00
05-06-2025	DB	Case Management Process incoming mail.	0.30	87.00
05-06-2025	BL	Case Management Review draft compliance letter and confirm dollar amounts.	0.40	208.00
05-06-2025	JD	Case Management T/C w/ BL re: status of report, funding request and other.	0.20	110.00
05-07-2025	JD	Case Management Follow-ups w/ BL and AN re: financials for Receiver's Report and timing for filing same. Review other details re: same.	0.40	220.00
05-08-2025	BL	Case Management F/U w/ AN re: report and accounting. T/C w/ Atty. Fiero re: legal items and claims process. F/U on A/R collections for JBC.	1.90	988.00
05-08-2025	BL	Case Management Draft receivership report no. 4. Confer w/ MF and AN re: same.	1.30	676.00
05-08-2025	CG	Case Management Review report, compare to property list and confer w/ BL re: same.	0.30	102.00
05-08-2025	JD	Case Management Review status of report and financial statements.	0.20	110.00
05-09-2025	BL	Case Management Draft receivership report with cash reconciliation.	2.40	1,248.00

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Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
05-09-2025	DB	Case Management Process incoming mail.	0.10	29.00
05-12-2025	DB	Case Management Process incoming mail.	0.50	145.00
05-12-2025	BL	Case Management Draft cash reconciliation for report.	1.40	728.00
05-13-2025	CG	Case Management Process price reduction.	0.10	34.00
05-13-2025	BL	Case Management Emails w/ Attys Fiero and Kapur re: A/R assignment and funding requests.	0.30	156.00
05-14-2025	DB	Case Management Process escrow documents for Clementine. Send Stretto services agreement and estimate to counsel w/ summary of same.	0.60	174.00
05-14-2025	BL	Case Management Emails w/ Atty. Kapur re: reporting and claims process. T/C w/ AN re: funding request.	0.60	312.00
05-15-2025	BL	Case Management T/C w/ AN re: funding request. T/C w/ Atty. Kapur re: legal update. Update funding request and email to GSFC. T/C w/ JD re: open items.	0.90	468.00
05-15-2025	DB	Case Management Process incoming litigation, update litigation summary and send to counsel.	0.20	58.00
05-16-2025	DB	Case Management Process NCPI bill of sale. Process 401K rollover.	0.40	116.00
05-17-2025	BL	Case Management Complete cash reconciliation and finalize receivership report. Emails w/ Attys Fiero and Kapur re: same.	1.00	520.00
05-18-2025	CG	Case Management Confer w/ BL and JD re: report and updates to same. Process edits and provide updated report to team. Prepare exhibit for report and provide same to BL.	0.60	204.00
05-19-2025	DB	Case Management Process incoming mail. Process wire instructions. Prepare receiver's certificate and notarize same. Coordinate FedEx shipment of same to GSFC.	1.30	377.00
05-19-2025	BL	Case Management Confer w/ CG re: invoices and accounting. Review related invoices. T/C w/ Atty. Kapur re: receivership report and outstanding items. T/C w/ JD re: update on cash reconciliation and other priorities.	2.80	1,456.00
05-19-2025	BL	Case Management Update receivership report no. 4.	1.30	676.00
05-19-2025	CG	Case Management	0.70	238.00

Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
		Review edits to monthly accounting. Process same and provide finalized reports to team. Confer w/ team re: payments and confirmations for same.		
05-19-2025	JD	Case Management Review and respond to emails.	0.20	110.00
05-20-2025	DB	Case Management Review incoming mail for Andersen.	0.90	261.00
05-20-2025	DB	Case Management Finalize report no. 4 and combine w/ exhibits. File w/ court and serve on all parties. Process court file stamped copy of report and invoice for filing fees.	1.50	435.00
05-21-2025	BL	Case Management Emails w/ K. Bird re: data room and related files.	0.20	104.00
05-21-2025	MF	Case Management Review notices and lawsuit summons received.	0.30	156.00
05-22-2025	DB	Case Management Process incoming mail.	0.20	58.00
05-22-2025	JD	Case Management Legal call re: various matters. Review inquiries re: insurance.	0.50	275.00
05-22-2025	BL	Case Management Respond to email from J. Nolan re: growers litigation. Emails w/ Ecolab re: check payment. Review and approve payments online.	1.00	520.00
05-23-2025	BL	Case Management Confer w/ CG re: invoices. Emails w/ Atty. Nolan and R. Bughao re: served papers. T/C w/ R. Bughao re: same.	0.60	312.00
05-23-2025	DB	Case Management Process Addendum for Anita Rd. property. Prepare letter to M. Andersen w/ completed title to 1980 GMC.	0.50	145.00
05-23-2025	DB	Case Management Confer w/ BL re: title document.	0.20	58.00
05-27-2025	DB	Case Management Process incoming mail.	0.50	145.00
05-27-2025	BL	Case Management Respond to Atty. Oates email re: collections. Confer w/ JD re: priority items.	0.40	208.00
05-27-2025	MF	Case Management Review details re: potential creditor and confer w/ staff re: same.	0.30	156.00
05-28-2025	DB	Case Management Process Base Culture settlement agreement. Process Cornerstone Community Bank Release Agreement.	0.40	116.00
05-29-2025	MF	Case Management Review final presentation.	0.10	52.00

Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
05-29-2025	DB	Case Management Review email from Atty. Nolan. T/C w/ same. Send current litigation summary to same. Process incoming mail and update service list.	0.40	116.00
			31.90	14,199.00
<u>Claims</u>				
05-01-2025	JD	Claims T/C w/ BL and counsel re: various pending legal matters, claims process and other. Follow-ups to same.	0.50	275.00
05-06-2025	MF	Claims Confer w/ Atty. Nolan re: claims verification. Review information and coordinate call w/ staff re: same.	1.10	572.00
05-07-2025	MF	Claims Review additional information from staff re: supporting files for claims verification.	0.40	208.00
05-08-2025	MF	Claims Conf. call w/ Andersen staff re: accounting support for claims calculations and input figures for same. Draft response to Atty. Nolan re: review of same.	1.60	832.00
05-09-2025	JD	Claims Review status of claims, attend conf. call re: same. Review draft procedures. Follow-up w/ team.	0.50	275.00
05-09-2025	MF	Claims Attend conf. call w/ secured creditor's counsel re: claims process.	0.60	312.00
05-12-2025	MF	Claims T/C w/ grower counsel re: outstanding claim and status of case.	0.20	104.00
05-13-2025	JD	Claims Review emails re: claims process. T/C w/ BL re: status of accounting and Receiver's Report and insurance. Follow-up w/ MF re: insurance.	0.60	330.00
05-13-2025	DB	Claims Send email to Stretto re: email for claims motion. Review response. Process incoming mail. Process Assignment of Accounts Receivable and Indemnity Agreement.	0.60	174.00
05-13-2025	MF	Claims Draft response to counsel re: claims procedure motion and information needed for same.	0.40	208.00
05-14-2025	MF	Claims Review inquiry and draft response to counsel re: claims procedures.	0.40	208.00
05-16-2025	BL	Claims Conf. call w/ Attys Fiero and Kapur re: claims process, real estate and other. Prep for legal call. F/U post-call.	0.80	416.00
05-16-2025	JD	Claims Attend legal call re: various matters including claims process, funding requests, reporting and other.	0.50	275.00
05-19-2025	BL	Claims T/C w/ J. Nolan re: claims procedure. Schedule meeting w/ PSZJ. Update receivership report re: claims process.	0.60	312.00

Date	Timekeeper	Activity	Hours	Amount
<u>Claims</u>				
05-19-2025	MF	Claims Review and provide redlines re: claims declaration.	0.30	156.00
05-20-2025	BL	Claims Conf. call w/ Attys Nolan, Kapur and Fiero re: claims motion. F/U post-call w/ JD re: edits. Review third party claims agent fees and services.	1.40	728.00
05-20-2025	MF	Claims Conf. call w/ JD, BL and counsel re: claims process and motions being prepared.	0.70	364.00
05-20-2025	MF	Claims Review updated claims declaration and confer w/ Linda B. and counsel re: same.	0.40	208.00
05-20-2025	BL	Claims Review and provide edits for claims motions and declarations prepared by J. Nolan.	2.60	1,352.00
05-20-2025	JD	Claims Review claims motion. Prepare for and attend conf. call w/ BL, MF and counsel re: review of claims process. Provide comments re: same.	0.90	495.00
05-21-2025	JD	Claims T/C w/ Atty. Fiero re: claims process and motion re: same.	0.20	110.00
05-23-2025	CG	Claims Confer w/ BL and counsel re: reports and provide details for same.	0.30	102.00
05-29-2025	BL	Claims Conf. call w/ Attys Fiero and Kapur re: claims process and real estate. Post-call confer w/ JD re: same.	0.60	312.00
05-29-2025	JD	Claims T/C w/ BL and counsel re: various open topics, claims process, bankruptcy discussions, and other. Update w/ DS re: all open items and status of assets / bankruptcy possibility.	0.60	330.00
05-30-2025	DB	Claims Review and respond to email from Atty. Nolan re: claims website. Send email to Stretto w/ additional questions.	0.30	87.00
			17.10	8,745.00
<u>JB Cusick</u>				
05-09-2025	BL	JB Cusick Review and update A/R aging. Emails w/ Atty's Fiero and Kapur re: priority on JBC A/R.	0.40	208.00
05-16-2025	BL	JB Cusick Obtain assignment agreement. Emails w/ M. Moseley re: same.	0.20	104.00
			0.60	312.00
<u>Land, Facilities & Equipment (GSFC)</u>				
05-01-2025	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale and auction of building.	0.30	165.00
05-01-2025	JD	Land, Facilities & Equipment (GSFC) T/C w/ S. Mudd re: R.E. listings and termination of contract. T/C w/ R. Faris re: same and path forward for	0.50	275.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities & Equipment (GSFC)</u>				
		facility, harvest, etc. Follow-ups re: ranch irrigation district details. Respond to emails.		
05-01-2025	BL	Land, Facilities & Equipment (GSFC) Email to A. Bryning re: purchase of scrap metal. F/U on sale of Clementino w/ CG.	0.40	208.00
05-01-2025	CG	Land, Facilities & Equipment (GSFC) Exchanges w/ counsel re: title deliverables. T/C w/ escrow re: buyer updates and closing status. Confer w/ broker re: status of closing. Review exchanges re: termination of listing agreement. F/U w/ JD re: same. Coordinate signature and provide executed termination to broker.	0.80	272.00
05-02-2025	BL	Land, Facilities & Equipment (GSFC) Emails w/ M. Mead re: equipment purchase. Update master schedule for equipment. Email GSFC for approval. Draft bill of sale and equipment exhibit A. Confer w/ R. Bughao and AN re: pink slips.	1.40	728.00
05-02-2025	JD	Land, Facilities & Equipment (GSFC) Review follow-ups to 4145 Rowles Road escrow. Review and confer w/ parties re: listing agreement for all other properties.	0.30	165.00
05-02-2025	DK	Land, Facilities & Equipment (GSFC) Review and coordinate auction requirements.	0.30	165.00
05-05-2025	CG	Land, Facilities & Equipment (GSFC) F/U w/ escrow re: pending buyer's deliverables. F/U w/ insurance broker re: quote.	0.30	102.00
05-05-2025	BL	Land, Facilities & Equipment (GSFC) Emails w/ R. Bughao re: equipment. Email w/ A. Bryning re: scrap metal purchase.	0.30	156.00
05-05-2025	JD	Land, Facilities & Equipment (GSFC) Review emails re: ranch equipment lienholders and MASA forms.	0.40	220.00
05-06-2025	CG	Land, Facilities & Equipment (GSFC) Confer w/ escrow re: Deed and updated closing statement. F/U w/ counsel re: same. Review and approve updated closing statement for circulation. Confer w/ JD re: closing updates.	0.70	238.00
05-06-2025	JD	Land, Facilities & Equipment (GSFC) Review status of ranch matters and pending requests from N. Oliva. Email from Atty. Oates. Respond to same. Confer w/ Atty. Fiero re: status of Clementino sale. Follow-ups w/ CG re: same. T/C w/ T. Stratton re: status of sales and leasing efforts.	0.60	330.00
05-07-2025	DB	Land, Facilities & Equipment (GSFC) Process Real Estate Withholding Statement and Seller's Certification of Non-Foreign Status. Notarize Quitclaim Deed.	0.50	145.00
05-07-2025	CG	Land, Facilities & Equipment (GSFC) Review correspondence re: closing updates. Prepare final documents, coordinate signatures for same and provide for closing. Review deed, coordinate signature and mailing of same.	0.80	272.00
05-07-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ N. Oliva re: pump motor. Emails w/ P. Huffine re: same.	0.30	156.00
05-07-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ Atty. McDonagh re: building 10 electrical work. Emails w/ R. Bughao re: same.	0.60	312.00

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Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities & Equipment (GSFC)</u>				
05-07-2025	JD	Land, Facilities & Equipment (GSFC) Follow-up re: facility power. Review and respond re: inquiries from. Follow-up re: pasteurizer. Leave VM for First Foundation Bank.	0.40	220.00
05-08-2025	JD	Land, Facilities & Equipment (GSFC) Follow-up w/ Atty. Albrecht re: conveyor component for pasteurized and lien re: same.	0.20	110.00
05-08-2025	BL	Land, Facilities & Equipment (GSFC) Draft bill of sale for equipment scrap purchase. Conf. call w/ P. Huffine, Atty. Oates and J. Nunes re: update on case. F/U post-call on related items.	1.20	624.00
05-08-2025	CG	Land, Facilities & Equipment (GSFC) Exchanges w/ escrow re: final closing details for buyers lender to proceed. Update to BL re: same.	0.30	102.00
05-08-2025	JD	Land, Facilities & Equipment (GSFC) Prepare for and attend update call w/ GSFC. Discuss ranch matters farming properties, closing for Clementino, equipment and other. Summarize notes re: same.	0.80	440.00
05-08-2025	DK	Land, Facilities & Equipment (GSFC) Review of sale requirements.	0.30	165.00
05-09-2025	DK	Land, Facilities & Equipment (GSFC) Review of sale requirements.	0.20	110.00
05-09-2025	BL	Land, Facilities & Equipment (GSFC) F/U on Mead equipment purchase. Confer w/ AN re: same.	0.60	312.00
05-09-2025	JD	Land, Facilities & Equipment (GSFC) Review status of closings and T/C w/ S. Mudd re: same. Confer w/ CG re: same.	0.20	110.00
05-09-2025	CG	Land, Facilities & Equipment (GSFC) Follow up w/ T. Motta re: 1026 Sheridan auction.	0.30	102.00
05-12-2025	CG	Land, Facilities & Equipment (GSFC) Updates from escrow re: buyer status.	0.20	68.00
05-12-2025	MF	Land, Facilities & Equipment (GSFC) Confer w/ broker re: pending insurance renewal and notify JD re: potential premium costs.	0.60	312.00
05-12-2025	JD	Land, Facilities & Equipment (GSFC) Coordinate for plant tour. Confer w/ R. Bughao re: same. Review status of R.E. closings. Review update re: listing for 50% ownership in Chico commercial property.	0.40	220.00
05-13-2025	JD	Land, Facilities & Equipment (GSFC) Follow-up re: purchase of in-feed conveyor and pasteurizer. Updates re: facility and fumigation and access for facility tour.	0.30	165.00
05-13-2025	CG	Land, Facilities & Equipment (GSFC) Confer w/ Atty. Fiero re: order. Confer w/ escrow re: closing package and buyer updates.	0.40	136.00
05-13-2025	DK	Land, Facilities & Equipment (GSFC) Review of sales.	0.30	165.00

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Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities & Equipment (GSFC)</u>				
05-13-2025	BL	Land, Facilities & Equipment (GSFC) Review emails re: equipment sale and insurance for facility. Confer w/ JD re: same.	0.40	208.00
05-13-2025	MF	Land, Facilities & Equipment (GSFC) Confer w/ JD and follow-up w/ broker re: insurance coverage options.	0.40	208.00
05-14-2025	CG	Land, Facilities & Equipment (GSFC) Review closing package for Clementino. Confer w/ Atty. Fiero re: same. Prepare package for signature.	0.60	204.00
05-15-2025	BL	Land, Facilities & Equipment (GSFC) Emails w/ interested party re: real estate. Connect party w/ CG.	0.20	104.00
05-15-2025	JD	Land, Facilities & Equipment (GSFC) Follow-ups w/ R. Bughao re: facility maintenance. T/C w/ N. Oliva re: ranch matters and farming.	0.50	275.00
05-15-2025	CG	Land, Facilities & Equipment (GSFC) Review correspondence re: property listings and f/u w/ JD re: same.	0.20	68.00
05-16-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ N. Oliva re: equipment and real estate. F/U on items from call w/ N. Oliva. Emails w/ P. Huffine re: funding request. Update funding request. Confer w/ CG re: real estate available. Email w/ Omni Foods re: call next week.	1.80	936.00
05-16-2025	CG	Land, Facilities & Equipment (GSFC) Review closing of Clementino closing. Confirm same and provide update to team.	0.30	102.00
05-16-2025	JD	Land, Facilities & Equipment (GSFC) Follow-ups re: lien payoffs for pasteurizer and farm equipment. Updates re: ranch matters and real estate w/ team.	0.30	165.00
05-17-2025	MF	Land, Facilities & Equipment (GSFC) Prepare summary of estimated insurance renewal cost and draft email detailing same.	0.40	208.00
05-17-2025	JD	Land, Facilities & Equipment (GSFC) Review and respond to emails. Follow-ups re: Clementino closing and ranch matters w/ ranch manager.	0.30	165.00
05-18-2025	CG	Land, Facilities & Equipment (GSFC) F/U w/ JD re: properties.	0.10	34.00
05-19-2025	MF	Land, Facilities & Equipment (GSFC) Prepare update to lender re: insurance renewal costs.	0.30	156.00
05-19-2025	CG	Land, Facilities & Equipment (GSFC) Compile list of remaining properties to provide to broker. Confer w/ JD re: same.	0.30	102.00
05-20-2025	BL	Land, Facilities & Equipment (GSFC) Confer w/ JD re: key project items. Emails w/ R. Faris re: sales process. Emails w/ M. Mead and R. Bughao re: equipment sale and wire.	0.60	312.00
05-20-2025	CG	Land, Facilities & Equipment (GSFC) F/U w/ broker re: sold properties.	0.20	68.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities & Equipment (GSFC)</u>				
05-20-2025	JD	Land, Facilities & Equipment (GSFC) Review and approve payment for pump motor. Review final executed version of agreement re: First Foundation lien resolution. Emails re: same. Updates re: Cornerstone lien.	0.40	220.00
05-21-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ A. Sharma re: real estate interest. Confer w/ CG re: same.	0.60	312.00
05-21-2025	CG	Land, Facilities & Equipment (GSFC) Review tax notice and confer w/ BL and MF re: associated property.	0.30	102.00
05-21-2025	JD	Land, Facilities & Equipment (GSFC) Review and reply re: pasteurizer loan and Clementino sale proceeds. T/C w/ Atty. Fiero re: pasteurizer.	0.20	110.00
05-27-2025	BL	Land, Facilities & Equipment (GSFC) Emails w/ R. Bughao re: buyer's interest in equipment and depreciation schedule. Review related files. Emails w/ Atty. Duvernay re: client's interest in purchasing equipment. F/U w/ accounting on check for scrap metal. Confirm w/ buyer and N. Oliva for pick-up.	1.40	728.00
05-27-2025	CG	Land, Facilities & Equipment (GSFC) Confer w/ BL re: properties held in Andersen Trust and provide recap of same.	0.30	102.00
05-27-2025	BL	Land, Facilities & Equipment (GSFC) Update real estate schedule for prospective bulk buyer. Confer w/ CG re: same. Email prospective buyer.	0.50	260.00
05-27-2025	JD	Land, Facilities & Equipment (GSFC) Review and respond to emails re: misc. excess in-shell bagging equipment. Updates w/ team re: budget and funding. Follow-up re: pasteurized pay-offs. Follow-ups re: farming Kelly Ln, Vadney, etc. Email to counsel re: same.	0.70	385.00
05-28-2025	JD	Land, Facilities & Equipment (GSFC) Review and respond to email from R. Faris re: farming Kelly Lane. T/Cs to N. Oliva re: same and follow-ups re: permits, Vadney Lane and Beck.	0.50	275.00
05-28-2025	CG	Land, Facilities & Equipment (GSFC) Confer w/ JD and counsel re: BK and DNS properties and provide list for same.	0.30	102.00
05-28-2025	BL	Land, Facilities & Equipment (GSFC) Emails w/ prospective buyer of equipment. Review email from R. Bughao re: questions. Emails to complete sale of pasteurizer.	0.80	416.00
05-29-2025	JD	Land, Facilities & Equipment (GSFC) Review progress on sale of various assets. Review plan for Kelly Ln, Beck and Vadney. Review PSA for Ohm and farm management agreement for same.	0.70	385.00
05-30-2025	CG	Land, Facilities & Equipment (GSFC) Review Ohm PSA and provide comparison of previous offers. Review terminated listing agreement, outline detail and confer w/ JD and counsel re: same. Review comments/questions from counsel re: PSA and provide responses.	1.60	544.00
05-30-2025	CG	Land, Facilities & Equipment (GSFC) Exchanges w/ counsel and JD re: BofA lien. Various T/Cs w/ broker re: new offer for Ohm. Provide offer to team and discuss next steps.	0.90	306.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities & Equipment (GSFC)</u>				
05-30-2025	JD	Land, Facilities & Equipment (GSFC)	1.80	990.00
		AM T/C w/ P. Huffine re: Ohms sale, Pat & Mike BKs, pasteurizer settlements, ranch operations and harvest / huller plan, legal matters, Building 10 electrical, insurance and other. Follow-ups w/ team re: various detail on Ohms offer and PSA, insurance and other. Various T/Cs w/ N. Oliva re: ranch operations, irrigation, farming, etc. Updates via email w/ counsel re: Ohms PSA. Review and respond to emails.		
			33.10	15,822.00
		Total	130.20	54,509.50

Time Summary

Timekeeper	Hours	Amount
Audrey Nefkens	31.60	10,744.00
Betsy Landoll	38.50	20,020.00
Cathy Garnica	11.20	3,808.00
David Kieffer	1.40	770.00
Deborah Burger	10.60	3,074.00
Jake Diiorio	15.00	8,250.00
Mary Ann Arcenal	1.10	291.50
Matthew Flahive	8.50	4,420.00
Sierra Boyer	10.00	2,350.00
Yenni Liang	2.30	782.00
	Total	54,509.50

Activity	Hours	Amount
A/R and Inventory (BofA)	1.10	572.00
Accounting	46.40	14,859.50
Case Management	31.90	14,199.00
Claims	17.10	8,745.00
JB Cusick	0.60	312.00
Land, Facilities & Equipment (GSFC)	33.10	15,822.00
	Total Fees	54,509.50

Expense Summary

Expense	Amount
Copies	25.80
Court Filing Fee	23.63
Notary	30.00
Postage & Correspondence	80.28
	Total Expenses
	159.71

Total for this Invoice 54,669.21



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

May 31, 2025

Andersen & Sons Shelling

Invoice Number: 8807
 Invoice Period: 05-01-2025 - 05-31-2025

Time Details

Date	Timekeeper	Activity	Hours	Amount
<u>Anita-Hopson Ranch (Banner)</u>				
05-07-2025	JD	Anita-Hopson Ranch (Banner) Update re: Mike Andersen BK and status of relief for closing Anita sale.	0.20	110.00
05-09-2025	CG	Anita-Hopson Ranch (Banner) Review updates re: Anita. Confer w/ team re: same. F/U w/ escrow and title re: review of file to prep for next steps.	0.40	136.00
05-12-2025	CG	Anita-Hopson Ranch (Banner) F/U w/ escrow re: review of file in preparation of closing.	0.20	68.00
05-16-2025	CG	Anita-Hopson Ranch (Banner) Review correspondence re: buyer status. F/U w/ BL re: status of transaction. Confer w/ escrow re: updates.	0.30	102.00
05-16-2025	JD	Anita-Hopson Ranch (Banner) Follow-up re: Anita closing timeline. T/C to N. Oliva re: farming /irrigating same.	0.20	110.00
05-21-2025	CG	Anita-Hopson Ranch (Banner) T/C w/ escrow re: status of Anita sale. Confer w/ counsel re: status of sale motion.	0.40	136.00
05-21-2025	JD	Anita-Hopson Ranch (Banner) T/C w/ Atty. Fiero re: Anita closing and timing.	0.20	110.00
05-22-2025	CG	Anita-Hopson Ranch (Banner) Review various correspondence re: closing prep. Exchanges re: same. Confer w/ bank re: same.	0.70	238.00
05-22-2025	JD	Anita-Hopson Ranch (Banner) Follow-ups re: Anita closing and timing.	0.30	165.00
05-23-2025	CG	Anita-Hopson Ranch (Banner) Review PSA addendum and provide same to JD to approve. Coordinate signature and provide same to escrow. Confer w/ escrow re: sale motion. F/U w/ counsel and team re: same.	0.60	204.00

Date	Timekeeper	Activity	Hours	Amount
<u>Anita-Hopson Ranch (Banner)</u>				
05-27-2025	CG	Anita-Hopson Ranch (Banner) Review sales order and provide same to title for review. Confer w/ title re: same. Correspond w/ junior lender and escrow re: closing requirements.	0.60	204.00
05-29-2025	CG	Anita-Hopson Ranch (Banner) Exchanges w/ escrow re: buyer assignment. T/C w/ junior lender re: release. F/U w/ escrow re: same. Review response from title and escrow re: sales order. F/U w/ counsel re: same.	0.90	306.00
05-30-2025	CG	Anita-Hopson Ranch (Banner) Exchanges w/ GSFC re: closing updates.	0.40	136.00
			5.40	2,025.00
			Total	5.40 2,025.00

Time Summary

Timekeeper	Hours	Amount
Cathy Garnica	4.50	1,530.00
Jake Diiorio	0.90	495.00
	Total	2,025.00
Activity	Hours	Amount
Anita-Hopson Ranch (Banner)	5.40	2,025.00
	Total Fees	2,025.00

Total for this Invoice 2,025.00

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

June 30, 2025

Andersen & Sons Shelling

Invoice Number: 8838
Invoice Period: 06-01-2025 - 06-30-2025

Time Details

<u>Date</u>	<u>Timekeeper</u>	<u>Activity</u>	<u>Hours</u>	<u>Amount</u>
<u>A/R and Inventory (BofA)</u>				
06-13-2025	BL	A/R and Inventory (BofA) Respond to Atty. Levitt's email re: receivership report.	0.20	104.00
			0.20	104.00
<u>Case Management</u>				
06-03-2025	CG	Case Management Confer w/ BL re: payments and coordinate same w/ accounting.	0.10	34.00
06-03-2025	SB	Case Management Confer w/ AN re: cash receipt. Process cash receipt. Process bank statements.	0.50	117.50
06-03-2025	AN	Case Management Review, research, reconcile and organize invoices for expenses pending funding and payment.	3.70	1,258.00
06-03-2025	MF	Case Management Review pending invoices, confer w/ BL re: accounting needs, and set meeting w/ team to discuss same.	1.10	572.00
06-03-2025	YL	Case Management Confer w/ MF re: A/P transition and meeting.	0.30	102.00
06-03-2025	BL	Case Management Confer w/ MF re: accounting set-up and staffing. Review bank accounts.	0.60	312.00
06-04-2025	MF	Case Management Conf. call w/ accounting team re: processes in place and pending reporting needs.	0.90	468.00
06-04-2025	DB	Case Management Process 401K rollover form. Process incoming pleading in Patterson litigation and send to counsel.	0.50	145.00
06-04-2025	BL	Case Management Review and approve ACH requests in bank account. Emails w/ AN re: same. Conf. call w/ YL, MF and AN re:	0.80	416.00

Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
		accounting transfer.		
06-04-2025	YL	Case Management Meeting w/ team re: transition of book and A/P process to accounting. Setup QBO accounts.	1.00	340.00
06-04-2025	YL	Case Management Confer w/ MF re: A/P transition. MS Teams meeting w/ team re: same.	1.00	340.00
06-04-2025	AN	Case Management Review wire instructions and process multiple wire transfers for payroll. Review invoices for expenses and process payments and update funding requests for same.	2.30	782.00
06-05-2025	AN	Case Management Review multiple incoming invoices and finalize funding request re: expenses.	2.30	782.00
06-05-2025	BL	Case Management Reconcile cash and review invoices provided by CG.	0.60	312.00
06-05-2025	DS	Case Management Review issues and timing. Confer w/ BL.	0.20	116.00
06-06-2025	SB	Case Management Process A/P.	0.10	23.50
06-06-2025	DB	Case Management Process NDA and incoming mail.	0.40	116.00
06-06-2025	SB	Case Management Process cash receipts.	0.40	94.00
06-06-2025	MF	Case Management Update w/ YL re: accounting transition.	0.30	156.00
06-06-2025	YL	Case Management Review QBO transactions. Confer w/ AN re: paid and unpaid invoices and other bookkeeping documents.	1.20	408.00
06-07-2025	AN	Case Management Review, research and respond to email from armed guard service provider re: status of payment.	0.50	170.00
06-09-2025	DB	Case Management Process incoming mail and pleadings.	0.40	116.00
06-09-2025	SB	Case Management Process cash receipt. Process invoices.	0.50	117.50
06-09-2025	CG	Case Management Confer w/ BL re: reports and provide recap of same.	0.10	34.00
06-09-2025	AN	Case Management Review expenses and processed payments re: same.	0.90	306.00

0.40 94.00

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Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
06-10-2025	SB	Case Management Confer w/ AN and BL re: invoice. Process cash receipt.		
06-10-2025	SB	Case Management Process A/P and review Smarter Solutions invoice.	0.10	23.50
06-10-2025	DB	Case Management T/Cs w/ creditors re: status. Process letter from Dept. of Industrial Relations re: WARN notification. Process incoming mail.	1.20	348.00
06-11-2025	BL	Case Management Emails w/ P. Huffine re: Kelly Lane property. Review budget prepared by N. Oliva. Coordinate call w/ J. Howard re: same.	0.20	104.00
06-13-2025	BL	Case Management Work w/ BH to get wire forms signed. Emails w/ P. Huffine re: funding request. T/C w/ GSFC to confirm funding amounts. Confer w/ DS re: project status and key next steps. Update reconciliation. Emails w/ Attys. Kapur and Fiero re: same.	1.00	520.00
06-13-2025	DB	Case Management Process and forward wire request.	0.20	58.00
06-13-2025	DB	Case Management Process and forward 401K rollover.	0.20	58.00
06-13-2025	CG	Case Management Review wire forms and confer w/ BH re: same. Coordinate signatures for same.	0.20	68.00
06-13-2025	DS	Case Management Update w/ BL. Review emails.	0.20	116.00
06-16-2025	JD	Case Management Review emails re: fuel tank sale to Finch, flood insurance and other. Confer w/ BL re: same.	0.40	220.00
06-16-2025	DB	Case Management Process and forward declaration. Confer w/ MF re: mail. Process and forward outstanding invoice to MF.	0.70	203.00
06-16-2025	MF	Case Management Review creditor notices and administrative expense invoices received. Forward pertinent notices to AN or BL.	0.80	416.00
06-16-2025	BL	Case Management Submit declaration for signature. Emails w/ BH re: same. Emails w/ MF re: insurance policies.	0.50	260.00
06-17-2025	BL	Case Management Draft open items list and agenda for call w/ GSFC. Confer w/ JD re: key open items and status of sales and accounting.	2.10	1,092.00
06-17-2025	SB	Case Management Confer w/ AN re: invoice.	0.10	23.50
06-18-2025	BL	Case Management Conf. call w/ JD and DS re: case status and next steps. Update open items list. Conf. call w/ Attys. Fiero Kapur	1.40	728.00

Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
		and JD re: real estate sales, requests from lenders and other priorities. F/U post-call w/ cash rec.		
06-18-2025	BL	Case Management Review invoices and approvals submitted by AN. Process payments in bank account.	0.30	156.00
06-18-2025	DS	Case Management Review next steps and issues w/ BL and JD.	0.10	58.00
06-18-2025	JD	Case Management Meet w/ DS and BL re: all open items and case direction / deliverables / planning. Additional follow-ups re: reporting, insurance and litigation.	0.90	495.00
06-18-2025	AN	Case Management Review cash on hand in banking app. Confer w/ BL re: property tax payments. Research and review email threads and files re: tax bills. Review multiple emails from N. Oliva re: payment requests for multiple suppliers. Initiate payments re: same. Review wire instructions from payroll company and initiate wire re: same. Research, review, calculate and initiate payments to independent contractors. Review multiple vendor emails re: A/P. Process payments and update funding spreadsheet re: same.	3.30	1,122.00
06-19-2025	JD	Case Management Review responses re: CDFa litigation and follow-up. Review binding of insurance, confer w/ MF re: same. Follow-ups re: same.	0.50	275.00
06-19-2025	BL	Case Management Review and respond to emails from Atty. Kapur re: legal items.	0.20	104.00
06-19-2025	YL	Case Management Review wire.	0.20	68.00
06-19-2025	CG	Case Management Confer w/ SB re: wiring instructions.	0.10	34.00
06-19-2025	SB	Case Management Process A/P. Confer w/ AN, BL and CG re: wire instructions. Process cash receipt. Process A/R. Create new vendor.	1.60	376.00
06-19-2025	AN	Case Management Review cash on hand in banking app.	0.20	68.00
06-20-2025	BL	Case Management T/C w/ Atty. Kapur. Review invoices and provided comments. Confer w/ DB re: DocuSign for flood insurance.	0.50	260.00
06-20-2025	JD	Case Management Review inquiries / diligence requests from grower attorney groups. Follow-ups w/ MF re: same. Respond to counsel.	0.50	275.00
06-20-2025	AN	Case Management Review, organize and prioritize attention and scheduling for critical tasks. T/C w/ Avrit Insurance re: process payment policy renewal. Review and process payments re: electrical repair work for multiple ranch locations. Review cash on hand in banking app.	1.30	442.00
06-20-2025	DS	Case Management T/C w/ counsel from Walnut board.	0.20	116.00

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Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
06-22-2025	JD	Case Management Review and respond to emails re: Producers' Request for Information from Receiver.	0.30	165.00
06-23-2025	DB	Case Management Process incoming mail.	0.20	58.00
06-23-2025	SB	Case Management Confer w/ CG re: wire instructions.	0.20	47.00
06-23-2025	JD	Case Management Confer w/ BL re: counsel involvement on litigation matters. Follow-up re: on-site matters.	0.30	165.00
06-23-2025	AN	Case Management Health benefits review w/ M. Updegraff from Interwest. Review documents and update team re: same.	0.90	306.00
06-23-2025	AN	Case Management T/C w/ PG&E re: online account updates, gain access to service accounts and process service account re: same.	1.10	374.00
06-24-2025	DB	Case Management Process incoming mail.	0.20	58.00
06-24-2025	JD	Case Management Attend conf. call w/ team re: responses for growers counsel. Follow-ups w/ team re: same.	0.30	165.00
06-25-2025	AN	Case Management Review ACH exceptions and cash on hand in banking app. Review and approve invoices and supporting documents for expenses. Reconcile, confirm payment receipts for outstanding payables.	3.60	1,224.00
06-25-2025	DB	Case Management Process incoming mail. Update service list.	1.30	377.00
06-25-2025	AN	Case Management Review and respond to email from benefits broker re: filing amended plan. Review forklift inventory and confer w/ team re: status.	0.60	204.00
06-25-2025	AN	Case Management Process online payments for multiple accounts. Update funding request re: same. Gain access to multiple websites and defending A/P emails.	3.70	1,258.00
06-25-2025	JD	Case Management Review and respond to emails from InterWest broker. Follow-up re: Form 5500 signatures.	0.20	110.00
06-26-2025	AN	Case Management Update cash and expenses in accounting. Process checks to print for Shelling.	3.20	1,088.00
06-26-2025	DB	Case Management Process and forward golden state letter.	0.20	58.00
06-26-2025	AN	Case Management Review activity in banking app. Review corresponding invoice support for expenses.	3.40	1,156.00

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

Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>				
06-26-2025	SB	Case Management Process A/P. Process paper statement.	0.70	164.50
06-26-2025	DB	Case Management Begin draft of receiver's report no. 5. Process incoming mail.	0.70	203.00
06-26-2025	YL	Case Management Review wire.	0.20	68.00
06-26-2025	BL	Case Management Draft funding request and email to GSFC. Confer w/ AN re: same. Confer w/ MF re: insurance coverage.	1.00	520.00
06-26-2025	CG	Case Management Review edits to monthly accounting. Process same and provide finalized reports to team.	0.50	170.00
06-27-2025	DB	Case Management Process Golden State wire transfers. Process Omega Walnut bill of sale and partial tax exemption.	0.70	203.00
06-27-2025	SB	Case Management Process A/R.	0.20	47.00
06-27-2025	YL	Case Management Confer w/ AR re: blank checks.	0.10	34.00
06-27-2025	AN	Case Management Review and respond to multiple letters re: refunds for cancelled service contracts.	0.50	170.00
06-27-2025	AN	Case Management Review activity in banking app. Review corresponding invoice support for expenses. Update cash and expenses in accounting. Process checks to print for Ranch.	4.40	1,496.00
06-30-2025	DB	Case Management Proces incoming mail.	0.30	87.00
06-30-2025	JD	Case Management Confer w/ BL re: all open items.	0.40	220.00
06-30-2025	SB	Case Management Confer w/ BL and AN re: cash receipts. Process cash receipts.	0.70	164.50
06-30-2025	YL	Case Management Review email re: transition.	0.10	34.00
06-30-2025	BL	Case Management Confer w/ MF re: accounting set-up and insurance. F/U w/ YL and AN re: accounting set-up.	0.60	312.00
06-30-2025	AN	Case Management Review and respond to JD re: repairs and upgrades for Spanfellner property. T/C w/ tax collector re: process payment by phone re: property tax for HQ. Review and respond to email from SB re: deposit account for incoming checks. Review utility service billing, compare and calculate estimated cost for budgeting.	2.40	816.00

Date	Timekeeper	Activity	Hours	Amount
<u>Case Management</u>			73.50	27,340.50
<u>Claims</u>				
06-02-2025	MF	Claims Confer w/ Atty. Nolan re: grower claim details and confer w/ staff re: accounting records.	1.20	624.00
06-02-2025	DB	Claims Process incoming mail. Process Stretto Services Agreement and forward. Review emails from Stretto re: same. Send claims website address along w/ claims inquiries email address to counsel. Process NDA. Accept initial meeting request sent by Stretto.	1.40	406.00
06-03-2025	DB	Claims T/C w/ Stretto re: claims procedure. Send f/u email to MF, BL and JD to summarize same. Process incoming mail. Review email from Stretto w/ inquiry telephone numbers. Send to counsel.	0.80	232.00
06-03-2025	MF	Claims Confer w/ ASSI staff re: TSB details and events surrounding same. T/C w/ Atty. Nolan re: claims accounting, TSB claim, and timing of when debts were incurred.	1.60	832.00
06-03-2025	MF	Claims Review information received and query staff re: grower accounting files for claims evaluation.	1.60	832.00
06-04-2025	BL	Claims Review written statements for claims from Atty. Nolan. Emails w/ Atty. Nolan re: same. Review emails from MF re: claims process and files requested.	1.00	520.00
06-04-2025	DB	Claims Send mailing lists to Stretto for claims notice.	0.20	58.00
06-05-2025	DB	Claims Review email from counsel re: email for submitting claims. Send request to Stretto. Review response and send new email address to counsel. Process incoming mail.	0.60	174.00
06-06-2025	MF	Claims Review declaration, confer w/ counsel re: draft figures, and execute same.	0.70	364.00
06-09-2025	JD	Claims Review update re: claims process, details re: disputed grower liens and filing motion re: same. Respond to emails.	0.30	165.00
06-09-2025	MF	Claims Confer w/ DB re: claims update to counsel.	0.20	104.00
06-10-2025	DB	Claims Process and forward new address re: potential creditors. Confer w/ MF re: same.	0.50	145.00
06-10-2025	MF	Claims Confer w/ DB and Atty. Nolan re: creditor notices and TSB amount due.	0.60	312.00
06-10-2025	DB	Claims T/C w/ Atty. Nolan and MF re: service list for claims motion. Calendar claims motion hearing. Process incoming pleadings. Update creditor mailing list.	0.90	261.00
06-11-2025	MF	Claims	0.60	312.00

Date	Timekeeper	Activity	Hours	Amount
<u>Claims</u>				
		Review TSB claim details and confirm observations from ASSI's books.		
06-13-2025	JD	Claims Review status of creditor inquiries and grower claims. Review details re: claims motion and forms / process for same.	0.60	330.00
06-17-2025	JD	Claims Review status of claims motion. Review emails.	0.30	165.00
06-18-2025	DB	Claims Review and respond to email from Stretto re: timing of claims motion. Process incoming mail.	0.30	87.00
06-18-2025	MF	Claims Confer w/ counsel re: claimants register and service list.	0.50	260.00
06-20-2025	BL	Claims Confer and emails w/ MF re: diligence request list.	0.20	104.00
06-20-2025	MF	Claims Prepare response to grower claim metrics and compile supporting files re: same.	1.20	624.00
06-21-2025	BL	Claims Reconcile Sheller sales. Update responses with Sheller crop specific proceeds. Review responses drafted by MF.	1.60	832.00
06-23-2025	BL	Claims Draft sales of 2023 crop summary. Review information provided by L. Belmonte. Emails w/ Atty. Kapur re: response to growers. Schedule call w/ attys. Confer w/ MF re: analysis and COGS calculation.	2.40	1,248.00
06-24-2025	BL	Claims Confer w/ MF re: growers response. Conf. call w/ Attys. Kapur and Fiero re: same.	0.60	312.00
06-24-2025	MF	Claims Compile information re: 2023 crop sales and confer w/ counsel re: same for response to creditors.	0.90	468.00
06-25-2025	MF	Claims Review updates re: 2023 crop revenue accounting and confer w/ interested party re: same.	1.10	572.00
06-26-2025	MF	Claims Review 2023 crop revenue details w/ BL and confer w/ Linda B. re: same.	0.80	416.00
06-26-2025	BL	Claims Review crop sale calculation file. Confer w/ MF re: same. Schedule time w/ L. Belmonte to review.	0.80	416.00
06-27-2025	MF	Claims Compile additional data and confer w/ Linda B. and BL re: 2023 crop sales revenue accounting.	1.20	624.00
06-27-2025	BL	Claims Conf. call w/ L. Belmonte and MF re: 2023 crop proceeds and related files. Update draft calculation for 2023 proceeds. Confer w/ MF re: same. Emails w/ R. Bughao re: confirming timing. Draft response related to total proceeds.	1.80	936.00

Date	Timekeeper	Activity	Hours	Amount
<u>Claims</u>				
06-29-2025	BL	Claims Draft response to Atty. Kapur re: growers request.	0.30	156.00
			26.80	12,891.00
<u>Land, Facilities & Equipment (GSFC)</u>				
06-02-2025	MF	Land, Facilities & Equipment (GSFC) Review policy quotes from insurance broker and draft summary of costs for lender.	0.90	468.00
06-02-2025	DK	Land, Facilities & Equipment (GSFC) Review and coordinate transaction.	0.40	220.00
06-03-2025	CG	Land, Facilities & Equipment (GSFC) Confer w/ broker re: offer and f/u w/ re: same. Meeting w/ BL and counsel re: review same. T/C w/ broker re: escrow and title for Sheridan property. Review PSA for Sheridan and confer w/ team re: same. Confer w/ DM re: property tenancy and details of co-owner. F/U w/ broker re: same.	1.30	442.00
06-03-2025	BL	Land, Facilities & Equipment (GSFC) Conf. call w/ Attys. Kapur and Fiero re: real estate properties for sale. Review sales agreement for Ohm sale. Email to P. Huffine and Atty. Oates re: building 10 permits. Confer w/ R. Bughao re: same. Emails w/ P. Huffine re: equipment sale.	2.60	1,352.00
06-03-2025	MF	Land, Facilities & Equipment (GSFC) Update insurance cost summary w/ lower cost quote and circulate to secured lender.	0.40	208.00
06-03-2025	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale and contract requirements and confer w/ agent re: same.	0.40	220.00
06-03-2025	JD	Land, Facilities & Equipment (GSFC) Review questions re: GSFC diligence and emails re: same. Review status of ranch matters, follow-ups w/ N. Oliva.	0.30	165.00
06-04-2025	BL	Land, Facilities & Equipment (GSFC) Emails w/ GSFC re: building 10 permits. T/C w/ R. Bughao re: same. Emails w/ P. Huffine re: equipment sale. Review real estate sale from CG. Emails w/ prospective bulk buyer re: same. T/C w/ Tehama County rep re: permits. Conf. call w/ Atty. Fiero, Atty. Oates and J. Patterson re: electrical permits.	1.70	884.00
06-04-2025	CG	Land, Facilities & Equipment (GSFC) Prepare PSA for Sheridan. F/U w/ broker re: marketing efforts and Receiver's addendum. Confer w/ DK re: same. Various exchanges re: Ohm PSA. Review updated PSA and confer w/ DK re: same.	1.40	476.00
06-05-2025	DS	Land, Facilities & Equipment (GSFC) Review issues and timing. Confer w/ BL.	0.20	116.00
06-05-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ R. Bughao re: building 10 permit. Review emails and messages re: same. T/C w/ P. Huffine re: equipment sales and other priority items.	0.70	364.00
06-05-2025	DK	Land, Facilities & Equipment (GSFC) Review and coordinate transaction.	0.30	165.00
06-05-2025	CG	Land, Facilities & Equipment (GSFC) Confer w/ counsel re: title reports and coordinate call.	0.20	68.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities & Equipment (GSFC)</u>				
06-05-2025	MF	Land, Facilities & Equipment (GSFC) Draft correspondence to GSFC re: D&O insurance coverage.	0.30	156.00
06-06-2025	JD	Land, Facilities & Equipment (GSFC) Review status of electrical at Bldg 10. Emails re: same.	0.30	165.00
06-06-2025	CG	Land, Facilities & Equipment (GSFC) Various exchanges w/ counsel and DK re: edits to PSA. T/C w/ broker re: Ohm offer and status of same. T/C and vm to Sheridan broker re: status.	0.70	238.00
06-06-2025	DK	Land, Facilities & Equipment (GSFC) Review and coordinate transactions and confer w/ counsel re: same.	0.60	330.00
06-06-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ Atty. Kapur re: real estate sale. Emails w/ DK and CG re: same. Review emails from Atty. Oates re: building 10.	0.30	156.00
06-06-2025	MF	Land, Facilities & Equipment (GSFC) Draft response to GSFC re: pending insurance coverage renewals.	0.40	208.00
06-09-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ N. Oliva re: farming update and ranch budget. Emails w/ N. Oliva re: same. Review budget created. Email w/ P. Huffine re: equipment sale to Finch. F/U w/ C. Avrit re: flood insurance. Emails w/ K. Bird re: data room and asset list. Review asset list.	1.90	988.00
06-09-2025	CG	Land, Facilities & Equipment (GSFC) T/C w/ escrow re: sale of Sheridan.	0.30	102.00
06-09-2025	DK	Land, Facilities & Equipment (GSFC) Review of contract and confer w/ counsel re: transaction. Coordinate transaction requirements.	0.70	385.00
06-10-2025	CG	Land, Facilities & Equipment (GSFC) Review correspondence re: Ohm PSA. F/U w/ Atty Oates re: same. Provide same to escrow and title. Respond to questions from escrow re: Sheridan property.	0.80	272.00
06-10-2025	BL	Land, Facilities & Equipment (GSFC) Review and edit funding request and related invoices provided by AN. Emails w/ GSFC re: same.	0.70	364.00
06-10-2025	JD	Land, Facilities & Equipment (GSFC) Follow-ups re: Ohm sale. T/C w/ counsel re: same. Review and respond to emails re: contract and other re: same. T/C W/ BL re: all of same and other activity on-site. Review and respond to emails re: Building 6.	0.70	385.00
06-10-2025	DK	Land, Facilities & Equipment (GSFC) Review and coordinate sale.	0.20	110.00
06-10-2025	BL	Land, Facilities & Equipment (GSFC) Emails w/ Atty. Oates re: Ohm sale. Confer w/ JD re: same. Review agreement sent by Atty. Oates. Respond to questions from Atty. Fiero. Emails w/ R. Bughao re: same.	0.90	468.00
06-10-2025	JD	Land, Facilities & Equipment (GSFC) Review updates re: Ohm sale. Review timing and plan for motion.	0.30	165.00
06-10-2025	AN	Land, Facilities & Equipment (GSFC) Thank you for trusting Stapleton Group, we appreciate your business.	0.20	68.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities & Equipment (GSFC)</u>				
		Process Ohm farm management agreement and purchase and sale agreement.		
06-11-2025	DK	Land, Facilities & Equipment (GSFC) Review and coordinate transaction.	0.30	165.00
06-11-2025	CG	Land, Facilities & Equipment (GSFC) Confer and f/u's w/ underwriter re: Sheridan sale motion process.	0.40	136.00
06-12-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ P. Huffine re: scrap metal sale and other. F/U post-call w/ photos and emails w/ R. Bughao and N. Oliva. Review funding request and resend to GSFC. Conf. call w/ P. Huffine, J. Howard and N. Oliva re: Kelly Lane and Beck properties.	1.90	988.00
06-13-2025	DS	Land, Facilities & Equipment (GSFC) Update w/ BL. Review emails.	0.20	116.00
06-13-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ R. Bughao and JD re: equipment and building 10 permits. Emails w/ N. Olvia and MAB re: ranch budget. Emails w/ S. Marchant and P. Huffine re: bankruptcy properties.	1.60	832.00
06-13-2025	CG	Land, Facilities & Equipment (GSFC) T/C w/ broker re: presenting offer. Draft memo for Ohm sale motion and provide same to counsel.	1.10	374.00
06-16-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ MAB re: ranch budget. Emails w/ R. Faris re: Beck equipment sale.	0.50	260.00
06-16-2025	CG	Land, Facilities & Equipment (GSFC) Confer w/ Atty. Oates re: Ohm escrow. Confer w/ escrow re: status. Review declaration for sale motion. T/C w/ sales agent for Sheridan re: change of escrow/title, real property, PSA addendum and counter.	0.70	238.00
06-16-2025	MF	Land, Facilities & Equipment (GSFC) Confer w/ lender re: pending insurance renewal.	0.30	156.00
06-17-2025	DK	Land, Facilities & Equipment (GSFC) Review and coordinate transaction.	0.40	220.00
06-17-2025	MF	Land, Facilities & Equipment (GSFC) Confer w/ BL re: pending insurance renewal.	0.30	156.00
06-17-2025	BL	Land, Facilities & Equipment (GSFC) Review asset listings and data room provided by K. Bird. Draft ranch budget. T/C w/ K. Bird re: availability of asset information. T/C w/ R. Bughao re: missing items. T/C w/ JD and N. Oliva re: harvest and ranch plans. F/U w/ Atty. Fiero re: pasteurizer sale. F/U w/ S. Marchant re: plan for M. Andersen orchards.	3.10	1,612.00
06-17-2025	CG	Land, Facilities & Equipment (GSFC) T/C w/ escrow re: buyer assignment and f/u w/ broker re: same. Confer w/ title re: motion for Ohm. T/C w/ agent for Sheridan re: amendment re: change of escrow and title. F/U's re: same.	0.40	136.00
06-17-2025	JD	Land, Facilities & Equipment (GSFC) T/C from N. Oliva re: ranch matters. Follow-ups re: same, equipment at Becks, equipment at Vina, property insurance and other. Confer w/ BL re: agenda for updates w/ GSFC. Updates re: ranch budget.	0.90	495.00
06-18-2025	CG	Land, Facilities & Equipment (GSFC)	1.20	408.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities & Equipment (GSFC)</u>				
		Review PSA assignment for Ohm and confer w/ agent re: same. Confer w/ escrow re: NHD reports. Confer w/ BL and AN re: property taxes. Review Spanfelner offer and provide recap and comparisons of same to DK and JD. Coordinate signature for Sheridan PSA and provide same to agent for countersignature.		
06-18-2025	BL	Land, Facilities & Equipment (GSFC) Complete bill of sale and invoice for Finch equipment sale. Emails w/ AT re: property taxes. Confer w/ JD and AT re: property taxes. T/Cs w/ R. Bughao re: building 10 permits and report filed. Confer w/ MF re: property insurance. Confer w/ AN re: flood insurance and F/U w/ broker.	2.30	1,196.00
06-18-2025	AT	Land, Facilities & Equipment (GSFC) Update property tax schedule for multiple counties.	3.70	758.50
06-18-2025	MF	Land, Facilities & Equipment (GSFC) T/C w/ P. Huffine at GSFC re: pending insurance renewal.	0.40	208.00
06-18-2025	MF	Land, Facilities & Equipment (GSFC) Confer w/ insurance broker re: renewal questions and draft update to lender re: same. Receive approval and instruct broker to bind coverage.	1.80	936.00
06-18-2025	DK	Land, Facilities & Equipment (GSFC) Review and coordinate transaction.	0.30	165.00
06-18-2025	DS	Land, Facilities & Equipment (GSFC) Review next steps and issues w/ BL and JD.	0.20	116.00
06-18-2025	JD	Land, Facilities & Equipment (GSFC) Review and approve ranch A/P. Confer w/ team re: same. Conferw / BL re: all items for GSFC update call, budget, equipment, facility, Bldg 10, etc.	0.70	385.00
06-18-2025	DB	Land, Facilities & Equipment (GSFC) Process counter offer for 1026 Sheridan Ave. in Chico.	0.20	58.00
06-19-2025	JD	Land, Facilities & Equipment (GSFC) Review equipment at Becks. Review Ohms closing.	0.40	220.00
06-19-2025	CG	Land, Facilities & Equipment (GSFC) Confer w/ title re: proof of service and order. Confer w/ agent re: addendum for Sheridan and provide executed copy of same.	0.30	102.00
06-19-2025	MF	Land, Facilities & Equipment (GSFC) Process insurance renewal forms.	0.30	156.00
06-19-2025	DB	Land, Facilities & Equipment (GSFC) Process check run. Process letter from Pioneer Engineering & Construction re: obtaining Bldg. 10 electrical permit.	0.30	87.00
06-19-2025	BL	Land, Facilities & Equipment (GSFC) F/U on sale of equipment and electrician contract. T/C w/ R. Bughao and JD re: Beck equipment. Review emails re: same.	0.80	416.00
06-20-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ insurance broker re: flood insurance. Emails w/ DS re: same. Update open items list and agenda for GSFC call. Conf. call w/ P. Huffine and R. Faris re: ranch update and other priority open items.	2.00	1,040.00

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

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities & Equipment (GSFC)</u>				
06-20-2025	CG	Land, Facilities & Equipment (GSFC) Provide update to BL re: Ohm sale. Provide proof of service to title. Confer w/ JD re: status of estimated closing statement for Ohm. F/U w/ JD re: review of offer.	0.30	102.00
06-20-2025	MF	Land, Facilities & Equipment (GSFC) Execute insurance renewal files and present financing option to GSFC.	1.10	572.00
06-20-2025	JD	Land, Facilities & Equipment (GSFC) Prepare for and attend update call w/ BL, R. Faris and P. Huffine re: facilities, equipment, harvest, sale of R.E., insurance, staffing, CDFA and other legal items. Follow-ups to same.	1.20	660.00
06-20-2025	JD	Land, Facilities & Equipment (GSFC) T/Cs w/ N. Oliva re: ranch matters, Ohm and other properties and equipment. Follow-ups w/ R. Bughao re: sale of equipment and follow-ups re: same.	0.70	385.00
06-23-2025	AT	Land, Facilities & Equipment (GSFC) Update current property tax schedule. Confer w/ BL re: same.	2.00	410.00
06-23-2025	BL	Land, Facilities & Equipment (GSFC) Draft bill of sale for equipment. T/Cs w/ buyer re: purchase agreement. Confer w/ JD re: open items. Emails w/ R. Bughao re: equipment for sale. Emails w/ H. Rocha re: flood insurance. Confer w/ AN re: electricity bills.	1.30	676.00
06-23-2025	JD	Land, Facilities & Equipment (GSFC) Follow-ups to GSFC call items and T/C w/ BL re: same. Follow-ups re: sale of equipment at Becks property. Follow-up re: Ohm sale.	0.80	440.00
06-23-2025	CG	Land, Facilities & Equipment (GSFC) Confer w/ counsel re: addendum. Review executed PSA and addendum for 1026 Sheridan, confer w/ agent re: same and open escrow.	0.40	136.00
06-24-2025	AN	Land, Facilities & Equipment (GSFC) Property search re: insurance coverage. Review property tax billing spreadsheet. Confirm amounts. Funding Request	3.80	1,292.00
06-24-2025	CG	Land, Facilities & Equipment (GSFC) T/C w/ JD re: review of offer. Confer w/ escrow re: NHD for Sheridan.	0.30	102.00
06-24-2025	JD	Land, Facilities & Equipment (GSFC) Review status of excess equipment, ranch matters, real estate sales and offers for Spahfelhner, etc. Confer w/ CG re: same.	0.40	220.00
06-24-2025	MF	Land, Facilities & Equipment (GSFC) Review schedule of assets included in insurance coverages. Confer w/ R. Bughao re: rolling stock and review properties included w/ same.	1.80	936.00
06-25-2025	MF	Land, Facilities & Equipment (GSFC) Review insurance update and notification required to debtor's counsel.	0.50	260.00
06-26-2025	AN	Land, Facilities & Equipment (GSFC) T/C w/ tenant for Connecticut property re: non-op water heater.	0.50	170.00
06-26-2025	JD	Land, Facilities & Equipment (GSFC)	0.30	165.00

Date	Timekeeper	Activity	Hours	Amount
<u>Land, Facilities & Equipment (GSFC)</u>				
		Confer w/ BL re: funding request. Follow-ups re: equipment assets.		
06-26-2025	MF	Land, Facilities & Equipment (GSFC) Present insurance renewal payment plan to lender.	0.30	156.00
06-26-2025	BL	Land, Facilities & Equipment (GSFC) T/C w/ N. Oliva re: ranch budget and harvest operations. Review budget file provided by N. Olvia.	0.80	416.00
06-27-2025	MF	Land, Facilities & Equipment (GSFC) Process insurance financing agreement. Provide notice to debtor's counsel re: removal of personal property from business policy.	0.70	364.00
06-27-2025	BL	Land, Facilities & Equipment (GSFC) Draft ranch budget for 2H-2025. Review related funding requests, invoices, notes from T/Cs w/ N.Oliva and prior budgets. Emails w/ N. Oliva re: same. Confer w/ JD and AN re: same.	3.10	1,612.00
06-28-2025	JD	Land, Facilities & Equipment (GSFC) T/C w/ CG re: status of Ohm sale. Follow-ups to same.	0.30	165.00
06-30-2025	BL	Land, Facilities & Equipment (GSFC) Draft and update ranch budget. T/C w/ AN re: utilities, insurance and confirm property taxes paid. Confer w/ JD re: status on priority items. T/C w/ N. Oliva re: ranch budget for walnuts and prunes.	1.80	936.00
06-30-2025	MF	Land, Facilities & Equipment (GSFC) Finalize premium finance agreement and process payment re: insurance coverage. Confer w/ BL re: annual insurance cost for Ranch.	0.80	416.00
06-30-2025	JD	Land, Facilities & Equipment (GSFC) Review ranch budget and updates to same. Follow-up w/ team re: same.	0.40	220.00
			70.70	32,654.50
		Total	171.20	72,990.00

Time Summary

Timekeeper	Hours	Amount
Aidan Trusso	5.70	1,168.50
Audrey Nefkens	42.80	14,552.00
Betsy Landoll	46.70	24,284.00
Cathy Garnica	10.80	3,672.00
David Kieffer	3.60	1,980.00
David Stapleton	1.30	754.00
Deborah Burger	12.40	3,596.00
Jake Diiorio	12.70	6,985.00
Matthew Flahive	25.60	13,312.00
Sierra Boyer	5.50	1,292.50
Yenni Liang	4.10	1,394.00
Total		72,990.00
Activity	Hours	Amount
A/R and Inventory (BofA)	0.20	104.00
Case Management	73.50	27,340.50
Claims	26.80	12,891.00
Land, Facilities & Equipment (GSFC)	70.70	32,654.50

Activity	Hours	Amount
	Total Fees	72,990.00

Expense Summary

Expense	Amount
Copies	16.80
Notary	30.00
Postage & Correspondence	18.54
Total Expenses	65.34
Total for this Invoice	73,055.34



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

June 30, 2025

Andersen & Sons Shelling

Invoice Number: 8835
 Invoice Period: 06-01-2025 - 06-30-2025

Time Details

Date	Timekeeper	Activity	Hours	Amount
<u>Anita-Hopson Ranch (Banner)</u>				
06-02-2025	DB	Anita-Hopson Ranch (Banner) Process declaration of DS in support of Anita sale motion.	0.20	58.00
06-03-2025	CG	Anita-Hopson Ranch (Banner) Confer w/ escrow re: estimated closing statement and status of junior lender. Confer w/ BL re: pending deliverables to bank. Meeting w/ BL and counsel re: review of closing. Review amendments and coordinate signatures for same. Confer w/ DK re: same. Forward executed copies to escrow. Confer w/ BL re: bank contact.	1.20	408.00
06-04-2025	CG	Anita-Hopson Ranch (Banner) Confer w/ BL re: payoff. Email to bank re: same. F/U w/ escrow re: status of junior lender signoff. Draft memo to bank re: status and updates. F/U w/ bank re: same. Coordinate payoff statement w/ escrow and updates to closing statement. Update to BL. T/C w/ broker re: demand and provide same for buyer and seller's brokers to escrow. Confer w/ escrow re: Grant Deed. Coordinate signature for same. Confer w/ broker re: review of file.	1.10	374.00
06-09-2025	CG	Anita-Hopson Ranch (Banner) Confer w/ BL re: recap of Banner properties and details re: same. F/U re: same. Confer w/ escrow re: status of certified order, lender funding and response from junior lender.	0.60	204.00
06-09-2025	BL	Anita-Hopson Ranch (Banner) T/C w/ DS re: Anita sale. Review emails and confer w/ CG re: same.	0.60	312.00
06-10-2025	BL	Anita-Hopson Ranch (Banner) Confer w/ CG re: Anita sale. Review emails re: same. Update draft analysis. T/C w/ DS re: sale and open items.	0.60	312.00
06-10-2025	CG	Anita-Hopson Ranch (Banner) Confer and T/C w/ BL re: status of closing. F/U w/ escrow re: same. T/C w/ broker re: buyer and closing updates. F/U w/ DS re: bank updates.	0.30	102.00
06-11-2025	BL	Anita-Hopson Ranch (Banner) Conf. call w/ S. Barkley re: receivership update. F/U post-call w/ JD and update analysis. Emails w/ Atty. Fiero and CG re: sale.	0.70	364.00

Date	Timekeeper	Activity	Hours	Amount
<u>Anita-Hopson Ranch (Banner)</u>				
06-11-2025	DS	Anita-Hopson Ranch (Banner) Review Banner Bank issues.	0.30	174.00
06-12-2025	BL	Anita-Hopson Ranch (Banner) Review settlement statement provided by CG. Confer w/ CG re: same.	0.40	208.00
06-13-2025	BL	Anita-Hopson Ranch (Banner) Review final settlement statement. Confer w/ CG re: same.	0.20	104.00
06-13-2025	CG	Anita-Hopson Ranch (Banner) Confer w/ BL re: amended closing statement and provide same to bank. T/C w/ escrow re: closing update. Finalize closing package, coordinate signatures and provide same. Confer w/ all re: tax withholding. Confer w/ escrow re: buyer's vesting change. T/C w/ broker re: updates.	0.50	170.00
06-17-2025	CG	Anita-Hopson Ranch (Banner) T/C w/ escrow re: buyer updates. Confer w/ BL re: same. F/U w/ Banner re: payoff statement.	0.20	68.00
06-19-2025	CG	Anita-Hopson Ranch (Banner) F/U w/ escrow re: status of buyers loan docs. Confer w/ title re: underwriting change due to buyers lender. Confer w/ JD re: details of counter. Confer w/ title and escrow re: signature line and amended deed and closing statement. Review buyers request re: grade sheets. F/U w/ JD re: same.	0.70	238.00
06-19-2025	JD	Anita-Hopson Ranch (Banner) Review maintenance / cultural matters at Anita prior to close.	0.20	110.00
06-19-2025	AN	Anita-Hopson Ranch (Banner) Review email from and T/C w/ real estate agent re: clean up proposal for Anita property. Request and review pictures of current conditions. Confer w/ team re: same. Review response from N. Oliva re: labor availability re: same. T/C w/ S. Mudd re: tenant estoppel certificates, update CG re: same.	0.90	306.00
06-20-2025	AN	Anita-Hopson Ranch (Banner) T/C w/ and email to S. Mudd re: billing details and final approval to proceed with cleanup for Anita.	0.40	136.00
06-20-2025	CG	Anita-Hopson Ranch (Banner) T/C w/ broker re: crop reports. F/U w/ JD re: same. F/U w/ SB re: wire instructions. Provide update to bank.	0.50	170.00
06-23-2025	CG	Anita-Hopson Ranch (Banner) T/C w/ buyer's agent re: buyer updates. F/U w/ escrow and provide update to bank.	0.30	102.00
06-24-2025	CG	Anita-Hopson Ranch (Banner) Various T/Cs w/ buyer, buyer's lender, buyer's agent, escrow and title re: closing and pending requirements for same. Debrief w/ JD. Confer w/ title re: order.	0.80	272.00
06-26-2025	CG	Anita-Hopson Ranch (Banner) Various exchanges and T/Cs w/ escrow, buyer's lender and agent re: closing coordination. Update to JD re: same. Various f/u's w/ all re: updates.	0.60	204.00
06-27-2025	DB	Anita-Hopson Ranch (Banner) Process escrow closing documents for Anita and notarize same.	0.30	87.00
06-30-2025	AN	Anita-Hopson Ranch (Banner) Review and respond to email from CG re: status of occupancy and tenant contact for Anita property.	0.20	68.00

Date	Timekeeper	Activity	Hours	Amount
<u>Anita-Hopson Ranch (Banner)</u>				
06-30-2025	CG	Anita-Hopson Ranch (Banner)	1.30	442.00
		Confer w/ AN re: tenants. Various emails, call and texts re: closing and finalizing same. Update w/ JD re: same.		
			13.10	4,993.00
		Total	13.10	4,993.00

Time Summary

Timekeeper	Hours	Amount
Audrey Nefkens	1.50	510.00
Betsy Landoll	2.50	1,300.00
Cathy Garnica	8.10	2,754.00
David Stapleton	0.30	174.00
Deborah Burger	0.50	145.00
Jake Diiorio	0.20	110.00
Total		4,993.00
Activity	Hours	Amount
Anita-Hopson Ranch (Banner)	13.10	4,993.00
Total Fees		4,993.00

Total for this Invoice 4,993.00

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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 July 29, 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. 5

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 July 29, 2025, at Solana Beach, California.


Deborah L. Burger

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FAMILY TRUST DATED MAY 3, 2017,
FRANKLIN KAY ANDERSEN, individually
and as Trustee of the FRANKLIN K.
ANDERSEN TRUST DATED SEPTEMBER
22, 2016 and the FRANKLIN K.
ANDERSEN IRREVOCABLE TRUST A,
DATED JULY 24, 2019

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