UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA FORT MYERS DIVISION

CASE NO.: 2:09-CV-229-FTM-29SPC

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

VS.

FOUNDING PARTNERS CAPITAL MANAGEMENT, and WILLIAM L. GUNLICKS,

Defendants,

FOUNDING PARTERS STABLE-VALUE FUND, LP, FOUNDING PARTNERS STABLE-VALUE FUND II, LP, FOUNDING PARTNERS GLOBAL FUND, LTD., and FOUNDING PARTNERS HYBRID-VALUE FUND, LP,

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RECEIVER'S FIRST INTERIM APPLICATION FOR ALLOWANCE AND PAYMENT OF FEES AND EXPENSES INCURRED BY THE

RECEIVER, RETAINED COUNSEL AND OTHER PROFESSIONALS

Receiver Daniel S. Newman, not individually, but solely in his capacity as receiver ("Receiver") for Founding Partners Capital Management Company; Founding Partners Stable-Value Fund, L.P.; Founding Partners Global Fund, Ltd.; and Founding Partners Hybrid-Value Fund, L.P. ("Entities"), files his First Application for Allowance and Payment of Expenses Incurred by the Receiver and his Retained Counsel, and requests that this Court enter an Order authorizing him to make payments for certain professional services and expenses incurred during the period of May 20, 2009, through

August 31, 2009 ("Application Period"). This application is submitted with the approval of the United States Securities and Exchange Commission ("SEC").

The Receiver respectfully requests that the Court authorize the Receiver to pay: (a) Broad and Cassel, as Receiver's primary counsel, for reasonable attorneys' fees and costs; (b) Berkowitz Dick Pollack & Brant, as receiver's accountants, for reasonable fees and costs; and (c) Attride-Stirling & Woloniecki, the Receiver's Bermuda counsel, for reasonable fees and costs.

For purposes of this First Fee Affidavit, because recovery efforts are still in the early stages, both Broad and Cassel and Berkowitz, Dick Pollack & Brant have agreed, at the request of the U.S. Securities and Exchange Commission ("SEC") and pursuant to discussions with the SEC, to request payment of only seventy (70%) percent of the fees accrued through August 31, 2009, as opposed to the full amount of invoiced fees.¹

I. RETENTION OF RECEIVER, DISCLOSURE OF COMPENSATION, AND REQUESTED AWARD

A. The SEC's Motion

On April 20, 2009, the SEC filed its Complaint (D.E. 1) and Emergency Motion to Appoint a Receiver (D.E. 3), which was granted by this Court on the same date. (D.E. 9) In the Complaint, the SEC seeks to permanently enjoin Founding Partners and its owner and principal William L. Gunlicks from violating antifraud provisions of the federal securities laws and a December 2007 Commission cease and desist order against them. (D.E. at 1) The Commission also seeks to protect and preserve approximately \$550 million of investor assets at risk. (*Id.*) On May 13, 2009, the SEC filed a Motion to Appoint a Replacement Receiver (D.E. 71), based on

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The remaining thirty (30%) percent would be payable upon further Application. In addition, separate and apart, both firms agreed to write-off certain invoiced fees at the request of the Receiver.

his submissions regarding his qualifications and his proposed compensation schedule and course of action (D.E. 71 at Exb. 1).

B. The Court Appoints Daniel Newman, Esq., as Replacement Receiver

On May 20, 2009, the Court entered its Order Appointing Replacement Receiver and appointed Daniel Newman, Esq., as Receiver for the Receivership (D.E. 73, the "Receivership Order"). The Order placed the Receiver in charge of the Entities. (*Id.* at 2-3). Pursuant to the Receivership Order, the Receiver was granted "full and exclusive power, duty, and authority to: administer and manage the business affairs, funds, assets, choses in action and any other property of Founding Partners and the Founding Partners Relief Defendants; marshal and safeguard all of the assets of Founding Partners and the Founding Partners Relief Defendants; and take whatever actions are necessary for the protection of investors." (D.E. at 1-2) The Receivership Order required the Receiver to, among other things:

- take immediate possession of and administer the assets of the Entities;
- investigate the manner in which the affairs of the Entities were conducted;
- institute such actions and legal proceedings, for the benefit and on behalf of Entities and their investors and other creditors as the Receiver deems necessary;
- employ professionals as the Receiver deems necessary to take possession of the assets and business;
- engage persons in the Receiver's discretion to assist the Receiver in carrying out the Receiver's duties and responsibilities;
- defend, compromise or settle legal actions in which the Entities or the Receiver is a party;
- assume control of all of the Entities' financial accounts, as necessary;

• make payments and disbursements from the funds and assets taken into control as necessary in discharging the Receiver's duties; and

have access to and review all mail of the Entities.

(D.E. 73 at 3-6).

II. REQUEST FOR FEES AND EXPENSES

The Receiver and his counsel have worked diligently to marshal and preserve all assets of

the Entities, investigate their business operations, and investigate any claims the Entities may

have.

The Receiver's efforts after the Receivership Order, including the gathering of evidence

and marshaling of assets, as well as hearing testimony and ongoing efforts are set forth in detail

in the Receiver's First Report, filed concurrently herewith.

The Receiver respectfully requests an award for all legal and professional fees and the

reimbursement of certain expenses incurred on behalf of the Receiver for services rendered

during the Application Period. These amounts total \$963,456.52 in the aggregate ("Total

Award"). The Total Award is comprised of: (a) \$529,801.35 in legal fees and costs for Broad

and Cassel; (b) \$310,635.29 in professional fees and costs for Berkowitz Dick Pollack & Brant;

and (c) \$123,019.88 in legal fees and costs to Attride-Stirling & Woloniecki.

Significantly, the Receiver and those working with him worked at deeply discounted

rates in performing their functions. Moreover, the Receiver further reduced the final total cost

through writing off various fees incurred for work performed.

Further, as noted above, the Receiver at this time seeks Court permission to pay less than

the Total Award at this time. Specifically, the Receiver seeks permission to pay: (a) \$374,503.80

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(down from \$529,801.35) to Broad and Cassel, reflecting seventy (70%) percent of the fees

invoiced by Broad and Cassel and all of the costs invoiced by Broad & Cassel; (b) \$217,853.31

(down from \$310,635.29), reflecting seventy (70%) percent of the fees invoiced by Berkowitz

Dick Pollack & Brant and all of the costs invoiced by Berkowitz Dick Pollack & Brant, and (c)

\$123,019.88 reflecting all the fees and costs invoiced by Attride-Sterling & Woloniecki. In total

therefore, although the Total Award sought is \$963,456.52, the total requested payments at this

time is \$715,376.99. The Receiver is asking for payment of the reduced amount at this time, at

the request and pursuant to discussions with the SEC, because recovery efforts are still in the

early stages.

This request is the Receiver's first application to the Court for compensation and

reimbursement of expenses for services rendered on behalf of the Receiver. No understanding

exists between the Receiver and any other person for the sharing of compensation sought by this

Receiver, except among the partners and associates of the employees of the firms retained by the

Receiver.

As demonstrative of the efforts performed on behalf of the Receiver, the Receiver has

attached several exhibits to its Application consisting of:

Exhibit 1:

Summary of Professional and Paraprofessional Time;

Exhibit 2:

Monthly Individual Summaries and Breakdown of Requested

Reimbursements of Expenses and Disbursements for Broad

and Cassel, Berkowitz Dick Pollack & Brant; and

Attride-Stirling & Woloniecki; and

Exhibit 3:

Individualized and Detailed Descriptions of the Services

Rendered, Expenses, and Disbursements for Broad and

Cassel and Berkowitz Dick Pollack & Brant.

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Exhibit 1 contains an aggregate summary of all hours accumulated by all counsel and paralegals who have been involved and provided services for the Receiver during the course of the Application Period segregated by each firm performing services. The total amount represents the amount of time expended by each attorney, paralegal, and professional multiplied by the applicable Court-approved hourly rate. Exhibit 2 reflects monthly individual summaries of the actual and necessary out-of-pocket expenses and disbursements incurred by each of the attorneys, paralegals, and professionals, who have been involved and provided services for the Receiver during the course of the Application Period. The expenses and disbursements summarized in Exhibit 2 are those which the attorneys would typically invoice to their clients. Finally, Exhibit 3 contains an individualized and detailed description of the daily services rendered and the hours expended by the various attorneys, paralegals, and professionals employed on behalf of the Receiver in this case. Exhibit 3 also contains a detailed schedule which lists the expenses and disbursements for which the Receiver solely seeks funds for reimbursement. Exhibit 3 is based on, among other information, the contemporaneous daily time records maintained by the Receiver's attorneys, paralegals, and professionals, who rendered services in this case. These time records have also been reviewed and approved by the Receiver, and, based on the complexity of the case, the Receiver respectfully submits that the requested compensation is reasonable.

III. MEMORANDUM OF LAW

Under governing law, following a determination that services were rendered and costs expended in furtherance of the Receivership, the Court may award compensation for those fees and costs. When determining an award of attorneys' fees incurred during a receivership, the

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Court should give consideration to the factors for compensation that the Eleventh Circuit articulated in *In re Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988): (1) the time and labor required; (2) the novelty and difficulty of the question involved; (3) the skill requisite to perform the legal service properly; (4) the likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer; (5) the fee customarily charged in the locality for similar legal services; (6) whether the fee is fixed or contingent; (7) the time limitations imposed by the client or by the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the lawyer or lawyers performing the services; (10) the "undesirability" of the case; (11) the nature and length of the professional relationship with the client; and (12) any awards in similar cases. *See also Securities and Exchange Commission v. Elliot*, 953 F. 2d 1560, 1577 (11th Cir. 1992). The Receiver respectfully suggests that his request for fees for payment of his attorneys and other professionals meets the criteria for this interim compensation.

In this case, the Court's Receivership Order requires the Receiver to "administer such assets as is required in order to comply with the directions contained in this Order, and to hold all other assets pending further order of this Court." (D.E. 73 at 3). The Receivership Order allows the Receiver to appoint "one or more special agents, employ legal counsel, actuaries, accountants, clerks, consultants and assistants as the Receiver deems necessary and to fix and pay their reasonable compensation and reasonable expenses, as well as all reasonable expenses of taking possession of the assets and business...." (D.E. 73 at 4-5). The Court further authorized payment of these professionals from the funds held by the Receivership. (D.E. 73 at

6). Pursuant to this provision, the Court authorized the retention of counsel for the Receiver. *See*, *e.g.*, D.E. 78.

The Receiver's attorneys, paralegals, and accountants have incurred reasonable fees and costs consistent the Court's Orders, and payment is appropriate and warranted in consideration of the 11th Circuit multi-factor test, as follows: The Receiver and the Receiver's attorneys and accountants have expended a considerable amount of time and effort in order to perform the extensive work necessary to perform the tasks set forth in this Court's Receivership Order. (Factor 1). There were difficulties determining the interrelationship of the Defendants' related entities and the extent of their participation in the fraudulent conduct, due to the breadth of the fraud and the lack of complete records maintained by the Defendants, as well as the specific factual circumstances and legal issues involved in the of the Entities' operations under the Credit and Security Agreements Factors 2 and 3). The Receiver and his counsel and accountants have engaged in extensive factfinding and legal analysis in light of the complex issues raised by the Receivership and interested parties, limiting their ability to perform other, significant work due to the demands of this case on their time (Factor 4). Moreover, the law firm and accounting firm retained by the Receiver agreed to work for significantly reduced rates to maximize the amount of funds ultimately to be distributed to investors (Factor 5).² Accordingly, they have taken a substantial financial risk, and failure to recover their fees would place a tremendous burden on their practices (Factor 6).

Moreover, managing the receivership and the attendant litigation presented numerous, complex issues, and the Receiver and his retained counsel have spent a great deal of time and effort

Attride-Stirling & Woloniecki was retained by Court Order approving their fees.

BROAD and **CASSEL**

trying to obtain information about the five entities that make up the Receivership Entities and their relationship with others (Factors 2, 3, 7). Among other things, there was emergency injunction practice, followed by expedited discovery, involving a great deal of information and sophisticated legal issues relating to the Sun Litigation, in time-limited fashion (*Id.*). The files of the Receivership Entities were disorganized and the Receiver inherited a great deal of electronic data to sort through. (*Id.*). The Receiver's tasks were made more challenging and complicated because Mr. Gunlicks still has refused to cooperate with the Receiver. (*Id.*)

The foregoing se challenges, the significant responsibilities of the Receiver, the complex factual and legal issues and the amount of money at stake, all necessitated the retention of the experienced, skilled, and reputable professionals at issue. (Factors 2, 3, 8, 9). The results obtained have been significant. (Factor 8). The Receiver and his retained counsel gathered a great deal of information about the Defendants' financial assets and liabilities, assisted in marshalling assets, obtained expedited discovery in the Sun litigation, and also made great strides toward determinations necessary to ensure a proper claims process (Factor 8).

In view of these circumstances, this request for fees and expenses, which are the result of discounted and reduced rates, and as to which the Receiver seeks current payment of only 70% of the fees of the primary law firm and accounting firm, is appropriate and warranted (Factor 12). As noted, the SEC approves of this request.

WHEREFORE, the Receiver, Daniel S. Newman, respectfully requests that this Court enter an Order authorizing the payment of: (1) \$374,503.80 in fees and costs to Broad and Cassel; (2) \$217,853.31 in fees and costs to Berkowitz Dick Pollack & Brant; (3) \$123,019.88 in fees and

BROAD and **CASSEL**

expenses to Attride-Sterling & Woloniecki and authorizing the Receiver to distribute from the Receivership Estate funds to its retained counsel and professionals. A proposed Order is attached.

Date: November 13, 2009

Respectfully Submitted,

BROAD AND CASSEL

One Biscayne Tower, 21st Floor 2 S. Biscayne Boulevard Miami, FL 33131 Telephone: (305) 373-9400

Facsimile: (305) 3/3-9400 Facsimile: (305) 995-9443

By: s/Jonathan Etra

Jonathan Etra, Esq. Florida Bar No. 0686905 Counsel for Receiver

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel who are not authorized to receive electronically Notices of Electronic Filing.

s/Jonathan Etra	
Jonathan Etra, Esq.	

SERVICE LIST

U.S. Securities and Exchange Commission v. Founding Partners Capital Management, Inc., et al Case No. 2:09-CV-229-FTM-29SPC United States District Court, Middle District of Florida

C. Ian Anderson, Esq.

andersonci@sec.gov

U.S. Securities and Exchange Commission

801 Brickell Avenue, Suite 1800

Miami, FL 33131 Tel: (305) 982-6317

Fax: (305) 536-4154 Attorney for Plaintiff

U.S. Securities and Exchange Commission

Via CM/ECF

Paul A. Calli, Esq.

pcalli@carltonfields.com

Marissel Descalzo, Esq.

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Carlton Fields, P.A. 100 S.E. 2nd Street,

Suite 4000

Miami, FL 33131

Tel: (305) 530-4065

Fax: (305) 530-0055

Attorneys for Defendant William L. Gunlicks

Via CM/ECF

4849-2363-6996.2 43125/0001 11/13/2009

EXHIBIT 1

SUMMARY OF INVOICES FOR SERVICES PROVIDED TO THE RECEIVERSHIP¹

¹ The detailed invoices supporting all services by the Receiver and his professionals are attached as Exhibit 3 hereto. Those invoices have been redacted in certain places to avoid disclosure of attorney-client and work-product privileged materials, investor names and other information deemed confidential as to third-parties for litigation purposes.

The following is an aggregate tabular summary of fees and expenses for the Receiver and the Receiver's counsel, Broad and Cassel, who presently handles the receivership day-to-day matters under the Receiver's supervision for the months of May 2009 through August 31, 2009:

Attorney	Number Of Hours	Bill Amount
Daniel S. Newman, P.A.	307.40	\$96,831.00
Jonathan Etra	280.40	88,326.00
Susan Barnes de Resendiz	519.70	163,705.50
Michael Magidson	383.40	74,763.00
Scott Flint	201.20	50,300.00
Jeffrey Geldens	11.30	2,825.00
Lester Perling	17.20	5,418.00
Andrew Mullens	47.10	7,065.00
<u>Paralegal</u>		
Brenda Fradera	48.90	7,335.00
Gisela Fasco	21.00	3,150.00
Junelle Rodriguez	22.10	3,315.00
Patricia Anzalone	28.60	4,290.00
Robert House	42.90	6,435.00
Margaret Weaver	26.00	3,900.00
Subtotal Fees Of Receiver And Receiver's Counsel:		\$517,658.50
Total Expenses Of Receiver And Receiver's Counsel		\$ 12,142.85

Total Fees and Expenses
For Receiver And Receiver's Counsel:

\$ <u>529,801.35</u>

The following is an aggregate tabular summary of fees and expenses for the Receiver's forensic accountants, Berkowitz Dick Pollack & Brant for the months of June 2009 through August 31, 2009:

Accountant	Number Of Hours	Bill Amount
David Siegel	385.8	\$115,740.00
Martin Prisloo	153.7	38,425.00
Scott Bouchner	3.15	945.00
Joel Glick	7.7	1,925.00
Sharon Foote	15.5	3,022.50
Adam Lang	264.45	66,112.50
Dan Hughes	122.55	36,765.00
Jorge Lopez	4.0	600.00
Anya Stasenko	54.7	8,205.00
Gary Rosenthal	49.7	14,910.00
Richard Pollack	24.0	7,440.00
Whitney Schiffer	21.4	6,420.00
Danielle Goldstein	9.0	1,350.00
Rachel Merritt	126.9	19,035.00
Joao Gomes	25.0	3,750.00
Erin Auble	61.1	5,804.50
Dany Lowe	1.0	95.00
Melissa Fleitas	1.5	292.50
Julie Kaufman	33.75	3,206.25
Dustin Grizzle	17.2	2,580.00
Art Dichter	2.0	600.00
Andreea Cioara	18.5	5,550.00
Benjamin Myers	8.3	996.00
Joseph Malca	2.0	190.00
Subtotal Fees Of Receiver's Forensic Accountants: Less Reduction		\$ 343,959.25 (\$34,686.00)
Total Fees of Receiver's Forensic Accountants:	·	\$ <u>309,273.25</u>
Total Expenses Of Receiver's Forensic Accountants:	1 · · ·	\$ 1,362.0 4

Total Fees and Expenses
For Receiver's Forensic Accountants:

\$ 310,635.29

EXHIBIT 2



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9400
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

October 9, 2009

\$409,701.57

Invoice No.: 771832

STATEMENT OF ACCOUNT

Matter Name: SEC v. Founding Partners Capital

Managemnt Co., et al.

TOTAL BALANCE DUE (Previous and current balance)

Client/Matter No: 43125.0001

Previous Balance Payments Received		\$0.00
-		
Subtotal of Previous Balance		\$0.00
Professional Charges (detail attached) Expenses (detail attached) Subtotal of Current Charges	\$398,200.00 11,501.57	\$409,701.57



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2 South Biscayne Boulevard
Miami, Florida 33131
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Facsimile: 305.373.9443
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www.broadandcassel.com

Daniel S. Newman, Receiver

October 9, 2009 Invoice No.: 771936

STATEMENT OF ACCOUNT

Matter Name: Sun Capital Litigation

Client/Matter No: 43125.0002

Previous Balance Payments Received Subtotal of Previous Balance		\$0.00
Professional Charges (detail attached) Expenses (detail attached)	\$100,347.00 639.34	
Subtotal of Current Charges		\$100,986.34
TOTAL BALANCE DUE (Previous and cu	irrent balance)	\$100,986.34



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Daniel S. Newman, Receiver

October 9, 2009 Invoice No.: 771935

STATEMENT OF ACCOUNT

Matter Name: Texas Litigation Client/Matter No: 43125.0003

Previous Balance Payments Received		\$0.00
Subtotal of Previous Balance		\$0.00
Professional Charges (detail attached) Expenses (detail attached)	\$1,008.00 1.94	
Subtotal of Current Charges		\$1,009.94
TOTAL BALANCE DUE (Previous and cu	rrent balance)	\$1,009.94



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Daniel S. Newman, Receiver

October 9, 2009 Invoice No.: 771937

STATEMENT OF ACCOUNT

Matter Name: Bermuda Litigation Client/Matter No: 43125.0004

Previous Balance Payments Received Subtotal of Previous Balance		\$0.00
Professional Charges (detail attached) Expenses (detail attached) Subtotal of Current Charges	\$18,103.50 0.00	\$18,103.50
TOTAL BALANCE DUE (Previous and c	urrent balance)	\$18,103.50



200 South Biscayne Boulevard Sixth Floor Miami, Florida 33131-5310 Telephone: 305-379-7000 Toll Free: 800-999-1CPA (1272) Fax: 305-379-8200

Daniel Newman, Receiver c/o Broad and Cassel 2 S. Biscayne Blvd, 21st Floor Miami, Florida 33131 515 East Las Olas Boulevard Fifteenth Floor Fort Lauderdale, Florida 33301-2281 Telephone: 954-712-7000 Toll Free: 800-999-1 CPA (1272) Fax: 954-712-7070

unow.bdpb.com

Invoice: 23634-063009 Date: 07/16/2009

Client ID: 23634

Invoice due upon receipt.	Amount enclosed \$
Founding Partners Receivership	
For professional service rendered through	June 30, 2009 as follows:
Asset analysis and recovery	\$34,095.00
Forensic accounting	23,512.50
Out-of-pocket expenses	<u>273.75</u>
· ·	

 New Charges
 \$57,881.25

 Plus Prior Balance
 0.00

 New Balance
 \$57,881.25



Please direct mail to Miami office: 200 South Biscayne Boulevard Sixth Floor Miami, Florida 33131-5310 Telephone: 305-379-7000 Toll Free: 800-999-1 CPA (1272) Fax: 305-379-8200 515 East Las Olas Boulevard Fifteenth Floor Fort Lauderdale, Florida 33301-2281 Telephone: 954-712-7000 Toll Free: 800-999-1CPA (1272) Fax: 954-712-7070

www.bdpb.com

Daniel S. Newman, as Receiver Broad and Cassel

Invoice: 93827 Date: 08/28/2009

2 S. Biscayne Blvd., 21st Floor Miami , FL 33131

Client ID: 23634

Invoice due upon receipt.

Amount enclosed \$

For professional service rendered as follows:

Founding Partners Receivership

In connection with all litigation services through July 31, 2009.

180,640.00

New Charges

\$180,640.00

Plus Prior Balance

57,880.00

New Balance

\$238,520.00

Interest will be charged on balances outstanding for more than 30 days at a rate of 1% per month or 12% per annum. Thank You.



200 South Biscayne Boulevard Sixth Floor Miamit, Florida 33131-5310 Telephone: 305-379-7000 Toll Free: 800-999-1 CPA (1272) Fax: 305-379-8200 515 East Las Olas Boulevard Fifteenth Floor Fort Lauderdale, Florida 33301-2281 Telephone: 954-712-7000 Toll Free: 800-999-1 CPA (1272) Fax: 954-712-7070

www.bdph.com

Daniel S. Newman, as Receiver Broad and Cassel

2 S. Biscayne Blvd., 21st Floor Miami , FL 33131

Invoice due upon receipt.

Invoice: 94174 Date: 09/16/2009

Client ID: 23634

Amount enclosed \$

For professional service rendered as follows:

Founding Partners Receivership

In connection with all litigation services through August 31, 2009.

106,800.00

New Charges

\$106,800.00

Plus Prior Balance

238,520.00

New Balance

\$345,320.00



Statement as of 30 June 2009 Statement No. 8503

Daniel Newman Receiver of Founding Partners Global Fund Ltd. Broad and Cassel 21st Floor, One Biscayne Tower 2 South Biscayne Boulevard Miami, FL 33131

Daniel Newman
Founding Partners Global Fund Ltd.

Client #: 1451-001

Rate Summary

•	Rod S. Attride-stirling	0.50	600.00	\$	300.00
•	Kwhinde A.L.George	5.70	650.00	\$	3,705.00
	Shade Victoria Subair	4.50	400.00	\$	1,800.00
•	Phil Taylor	3.40 hours at \$	150.00 /h	: \$	510.00
•	Jan W.Woloniecki	1.00 hours at \$	650.00 /hr	* \$	650.00
. `	Total hours:	15.10			6,965.00
Expenses					
	Photocopies				1.20
	Laser Printing				<i>37.</i> 20
	Courier binders and tabs				38.90
	Stamp fees				5.00
	Sub-total Expenses:				82.30
	Total Now Due:			\$	7,047.30

Invoice payable upon receipt. All balances outstanding after 30 days will attract interest at 1.5% per month. Please enclose this stub with remittance or send telegraphic transfer clearing through correspondent bank: HSBC Bank USA, 452 Fifth Avenue, New York, New York, USA 10018, Swift Code: MRMDUS33, CHIPS ABA: 0108, FED ABA: 021001088 – Beneficiary Bank: The Bank of Bermuda Limited, 6 Front Street, Hamilton, Bermuda, Swift Code: BBDABMHM – Account Name: Attride-Stirling & Woloniecki – Account No. 010 716751 501 (United States Dollars).



Statement as of 31 July 2009 Statement No. 8607

Daniel Newman Receiver of Founding Partners Global Fund Ltd. Broad and Cassel 21st Floor, One Biscayne Tower 2 South Biscayne Boulevard Miami, FL 33131

Daniel Newman

Founding Partners Global Fund Ltd.

Client#: 1451-001

Rate Summary

	Kehinde A.L.George	25.80	650.00	\$ 16,770.00
	Edward Rance	8.00	150.00	\$ 1,200.00
•	Shade Victoria Subair	34.50	400.00	\$ 13,800.00
• • •	Phil Taylor	5.70 hours at \$	150.00 /hr	\$ 855.00
. •	Jan W.Woloniecki	34.20 hours at \$	650.00 /hr	\$ 22,230.00
	Total hours:	108.20		 54,855.00
Expenses				
•	Photocopies			305.40
•	Stamp Fees			90.00
	Research Case on Line			44.73
	Telephone Calls and Faxes			37.47
	Sub-total Expenses:			477.60
	Total Now Due:			\$ 55,332.60

Invoice payable upon receipt. All balances outstanding after 30 days will attract interest at 1.5% per month. Please enclose this stub with remittance or send telegraphic transfer clearing through correspondent bank: HSBC Bank USA, 452 Fifth Avenue, New York, New York, USA 10018, Swift Code: MRMDUS33, CHIPS ABA: 0108, FED ABA: 021001088 – Beneficiary Bank: The Bank of Bermuda Limited, 6 Front Street, Hamilton, Bermuda, Swift Code: BBDABMHM – Account Name: Attride-Stirling & Woloniecki – Account No. 010 716751 501 (United States Dollars).



Statement as of 31 August 2009 Statement No. 8933 Daniel Newman Receiver of Founding Partners Global Fund Ltd. Broad and Cassel 21st Floor, One Biscayne Tower 2 South Biscayne Boulevard Miami, FL 33131

Daniel Newman Founding Partners Global Fund Ltd.

Client#: 1451-001

Rate Summary

	Kehinde A.L.George	15.00	650.00	\$	9,750.00
	Edward Rance	5.50	150.00	\$	825.00
	Shade Victoria Subair	1.10	400.00	\$	440.00
	Susie Wakefield	<i>7.</i> 20	-	\$	_
	Susie Wakefield	26.90	500.00	\$	13,450.00
	Phil Ta y lor	1.10 hours at \$	150.00 /hr	\$	165.00
	Jan W.Woloniecki	53.70 hours at \$	650.00 /hr	\$	34,905.00
	Kamal Worrell	0.40 hours at \$	150.00 /hr	\$	60.00
	Total hours:	110.90		M	59,595.00
Expenses					
	Photocopies				712.10
	Courier binders and tabs				202.36
,	Research Case on Line				40.86
	Telephone Calls and Faxes		•		89.66
	Sub-total Expenses:				1,044.98
	Total Now Due:			\$	60,639.98

Invoice payable upon receipt. All balances outstanding after 30 days will attract interest at 1.5% per month. Please enclose this stub with remittance or send telegraphic transfer clearing through correspondent bank: HSBC Bank USA, 452 Fifth Avenue, New York, New York, USA 10018, Swift Code: MRMDUS33, CHIPS ABA: 0108, FED ABA: 021001088 — Beneficiary Bank: The Bank of Bermuda Limited, 6 Front Street, Hamilton, Bermuda, Swift Code: BBDABMHM — Account Name: Attride-Stirling & Woloniecki — Account No. 010 716751 501 (United States Dollars).

EXHIBIT 3

BROAD AND CASSEL

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 Page 3

ITEMIZED PROFESSIONAL CHARGES						
05/12/2009	DSN	FOUR-Revise proposed letter to Bob Levenson regarding potential appointment of receivership (No Charge).	0.50	\$0.00		
05/12/2009	DSN	FOUR-Telephone conference with Bob Levenson regarding potentially serving as receiver; review docket sheet and selected pleadings in Founding Partners action; telephone conferences with Bob Levenson regarding submission for appointment and other issues concerning status of case. (No Charge)	2.00	\$0.00		
05/12/2009	J-E	ONE-Reviewed pleadings and conferred with Mr. Newman. (No Charge)	1.00	\$0.00		
05/12/2009	P-A	FOUR-Obtain and review docket sheet, obtain copies of key pleadings. (No Charge)	0.80	\$0.00		
05/13/2009	DSN	FOUR-Telephone conferences with Ian Anderson regarding revised letter (No Charge); make revisions to proposed letter regarding receivership matter (No Charge).	0.50	\$0.00		
05/13/2009	J-E	ONE-Assisted with letter to SEC. (No Charge)	0.30	\$0.00		
05/14/2009	DSN	ONE- Review various pleadings relating to potential receivership in Founding Partners matter. (No Charge)	2.00	\$0.00		
05/15/2009	DSN	ONE-Review and analyze additional pleadings regarding Founding Partners; review and analyze Order Appointing Receiver. (No Charge)	2.00	\$0.00		
05/15/2009	J-E	ONE-Conferences with Mr. Newman on latest order and other issues. (No Charge)	0.40	\$0.00		
05/17/2009	J-E	ONE-Reviewed asset freeze motion and exhibits. (No Charge)	1.00	\$0.00		
05/18/2009	DSN	ONE-Review materials in connection with receivership (No Charge); review correspondence from Ian Anderson regarding notices of default (No Charge).	1.50	\$0.00		
05/18/2009	J-E	FOUR-Conferred with Mr. Newman on Sun Capital issues; reviewed notices of default from prior receiver. (No Charge)	0.30	\$0.00		
05/18/2009	P-A	FOUR-Organize additional pleadings and articles. (No Charge)	0.30	\$0.00		
05/20/2009	DSN	ONE-Continue to review applicable pleadings in matter (1.5); telephone conference with former Receiver Leyza Blanco regarding matter (1.0);	3.70	\$1,165.50		

Re: Daniel S. Newman, Receiver

SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 telephone conference with Bob Levenson and Ian Anderson regarding Receivership Order (.2); review and analyze Order Appointing Replacement Receiver (.2); Review various emails from Leyza Blanco (.8). 5.50 \$1,732.50 DSN ONE-Meet with Jonathan Etra and SEC attorneys 05/21/2009 regarding Founding Partners litigation and status of various outstanding litigation issues (1.1); review correspondence from Leyza Blanco regarding status of receivership issues including, but not limited to, various bank accounts, contact with outside counsel and other pertinent issues to receivership (.4); meet with Jonathan Etra and Leyza Blanco regarding receivership matters (4.0).FOUR-Draft Motion for Appointment of legal 0.70 \$105.00 05/21/2009 P-A counsel. 2.40 \$756.00 ONE-Telephone conference with Rick Addison 05/22/2009 DSN regarding investor claims against Founding Partners and setting up meeting during the week of May 24th (.2); draft correspondence to Rick Adisson regarding follow-up on meeting (.1); review correspondence from Rick Adisson regarding potential meeting; draft additional correspondence regarding meeting (.1); revise Motion for Appointment of Counsel (.3); review correspondence from Jennifer Ceide regarding index to list of contacts provided by former Receiver (.1); telephone conference with Jonathan Etra and Sarah Gold regarding meeting between Receiver and counsel for Sun entities (.4); review items to be performed in connection with Founding Partners matter (.1); review correspondence between Jonathan Etra and counsel regarding Tolling Agreement pertaining to Ernest & Young (.1); review and analyze documents pertaining to Founding Partners matter (.5); review correspondence from Jonathan Etra to Jessica Crutcher regarding conversation (.1); review correspondence from Trish Anzalone regarding obtaining certified copies of Order for Receivership (.1); draft correspondence to Trish Anzalone regarding same (.1); telephone conference with proposed accounting experts and draft correspondence to proposed accounting experts regarding providing information on qualifications (.2); telephone conference with

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Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001					
		Lester Perling regarding meeting with Sun Capital attorneys (.2); telephone conference with Roy Kobert regarding meeting with Sun Capital attorneys (.2).			
05/22/2009	J-E	ONE-Call with counsel to Sun entities and arranged for in person meeting. Conferences with health care and bankruptcy law specialists. Conference with Mayer Brown attorney regarding Texas litigation. Attempted to reach counsel for funds in Texas litigation. Call with Receiver re same and re additional issues. Work on motion to retain Broad and Cassel. Isolated materials for review.	2.00	\$630.00	
05/22/2009	LP	ONE-Telephone conference with Attorney Newman and Attorney Etra regarding case background.	0.40	\$126.00	
05/22/2009	P-A	ONE-Discussion as to updates required to existing website (.2); Telephone with court clerk, prepare check request, arrange for numerous certified copies to be obtained from federal court of Order Replacing Receiver (.5).	0.70	\$105.00	
05/23/2009	DSN	ONE-Draft correspondence to Leyza Blanco regarding establishing receivership bank accounts (.1); review memoranda created by Leyza Blanco regarding status of various receivership items (.3); review documents pertaining to SEC action against receivership, specifically back up documents for action (1.0); review correspondence from potential expert regarding qualifications (.3); draft correspondence to Craig Eller regarding availability for meeting on Wednesday with Sun entities (.1).	1.80	\$567.00	
05/24/2009	DSN	ONE-Review correspondence from Leyza Blanco regarding establishment of receivership bank accounts (.1); review correspondence from investor in Stable Asset regarding status of receivership (.1).	0.20	\$63.00	
05/26/2009	DSN RI	ONE-Review correspondence from REDACTED EDACTED investor in Global Fund (.1); draft correspondence to REDACTED investor in Global Fund (.2); review file correspondence from REDACTED investor in Global Fund (.1); review correspondence to Ms. Salmon at Bermuda Bank regarding telephone conference (.1); review correspondence from Ms. Salmon regarding same (.1); telephone conference with REDACTED regarding factual issues and	5.60	\$1,764.00	

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Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001

05/26/2009

05/26/2009

05/26/2009

05/27/2009

REDA	correspondence from REDACTED regarding investment in Global Fund (.1); office conference with Lester Perling regarding factual issues pertinent to meeting with Sun Entities representatives (.2); review correspondence from Sarah Gold regarding meeting with Sun Entities representatives (.1); draft correspondence to Sarah Gold regarding meeting with Sun Entities representatives (.1); review correspondence to Sarah Gold regarding meeting with Sun Entities representatives (.1); review correspondence from Leyza Blanco regarding Jim Fox, counsel for Naples landlord (.1); review correspondence from Jim Fox (.1); review and analyze pleadings and exhibits in action to become familiarized with all factual and legal issues (3.5); review correspondence from Jonathan Etra to Mary Beth Summers regarding Tolling Agreements (.1); review correspondence from Paul Calli, counsel		
·	for William Gunlicks (.1); review correspondence from investor REDACTED of Chariot Stable Asset Fund (.1); review correspondence from Leyza Blanco regarding transition to new receiver (.1); review correspondence from Deloitte regarding submission regarding proposal for accounting services (.1).		
Ј-Е	ONE-Worked on tolling agreement issues. Worked on report from prior Receiver. Worked on preparation for meeting with Proskauer.	1.00	\$315.00
LP	ONE-Review Ernst and Young memorandum regarding Sun Healthcare.	0.50	\$157.50
P-A	FOUR-Research Middle District requirements and arrange for numerous certified copies of Order Appointing Replacement Receiver.	0.60	\$90.00
DSN	ONE-Review correspondence from Lester Perling regarding meeting with Sun Capital representatives (.1); review correspondence from Morrison Brown regarding submission to provide accounting services (.1); review correspondence from Tony Argiz regarding Morrison Brown submission (.1); review correspondence from Paul Calli (.2); telephone conference with Paul Calli regarding potential meeting with receiver (.2); review correspondence from REDACTED following up on conversation with investor and potential meeting with REDACTED (.1); review correspondence from Rick Adisson confirming meeting (.1); review correspondence	7.90	\$2,488.50

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Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001

> from Jennifer Ceide regarding JP Morgan Chase invoice (.1); review correspondence from Leyza Blanco regarding David Teets (.1); office conference with Lester Perling, Jonathan Etra and Craig Eller regarding meeting with Sun Capital entities and items to be discussed during meeting (.3); meet with Sun Capital representatives and counsel to discuss factual issues, history of dealings between entities and other issues, attendees included Vincent Paparo, Sarah Gold, Larry Heller, Larry Ledler and Philip (5.0); review correspondence from Phil Von Kahle regarding Founding Partners and moving of FF and boxes to new location (.1); review correspondence from Deloitte regarding proposal to assist court-appointed receiver and correspondence regarding Deloitte's potential retention (.5); review correspondence from Jim Fox regarding outstanding invoice pertaining to Naples office space (.1); review correspondence from Kaniecki regarding QUIST invoice for alleged services provided to Founding Partners (.1); draft correspondence to Morrison Brown firm regarding proposed submission to provide services (.2); review correspondence from Mary Beth Summers regarding communication from Mayer Brown and E&Y Tolling Agreement (.2); draft correspondence to Phil Von Kahle regarding documents and FF&E (.1); review correspondence from Mary Beth Summers to E&Y regarding Tolling Agreement and proposed Tolling Agreement (.1); review correspondence from REDACTED investor in Global Fund regarding Robert Haggar (.1).

05/27/2009 J-E

ONE- Meetings with Proskauer and principals of Sun Entities, along with Receiver, Mr Perling, and Mr. Eller (6.0). Review of materials prior to meeting, and analysis and follow up internal discussion (1.0). Worked on tolling agreements with Ernst and Young and Mayer Brown (.3). Call with counsel for investors (.2). Memo to Mr. Eller on security/bankruptcy issues (.3)

05/27/2009 LP

ONE-Telephone conference with Mr. Newman; Review various pleadings for case background; Conference with Sun Healthcare counsel and representatives in Miami; Conference with Attorneys Newman, Etra and Eller (8.0) (no charge for 1 hour of travel).

\$2,457.00

\$2,520.00

7.80

8.00

Page 8 Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 \$45.00 0.30 05/27/2009 P-A FOUR-Receipt of package from Middle District clerk; Written and telephonic communication regarding missing certified order. 8.40 \$2,646.00 ONE-Meet with Jonathan Etra, Ian Anderson and 05/28/2009 DSN

Bob Levenson regarding factual issues pertaining to Founding Partners (1.0); review correspondence regarding information to be provided in connection with attorney submission (.1); telephone conference regarding information to be provided with CPA submission (.3); telephone conference with Tony Argiz regarding submission to be provided by CPA firm (.2); telephone conference with Ron Finkelstein at Morrison Brown regarding submission to be made in connection with proposal to provide accounting services (.4); conference with Jeff Geldens regarding research regarding receivership orders (.1); meet with Jonathan Etra and Rick Adisson, counsel to various investor plaintiffs in Texas litigation (1.2); review and analyze complaint filed in Texas litigation (.3); review correspondence from Founding Partners employee REDACTED (.1); draft correspondence to Founding Partners' employee

REDACTED 1 (.1); telephone conference with counsel for EDACTED regarding various issues (.3); review correspondence from Mara Beth Summers regarding Tolling Agreement negotiations with Mayer Brown and response thereto (.4); review correspondence from Andrew Bernstein regarding submission of CPA plan (.1); review additional correspondence from Richard Pollack regarding CPA submission (.1); review submission by Navigant concerning expert services (.3); review correspondence to Ms. Burley and Ms. Salmon regarding Founding Partners and funds in Bermuda (.1); office conference with Brenda Fradera regarding contact with HSBC Bermuda (.1); draft correspondence to Richard Bendix regarding continuance of providing services to Receiver (.1); review correspondence from Richard Bendix regarding same (.1); review correspondence from Paul Calli regarding Mr. Gunlicks (.1); draft correspondence to Paul Calli regarding Mr. Gunlicks (.1); review correspondence from Ian Anderson to Paul Calli (.1); review additional correspondence from Ian Anderson pertaining to funds located at Bermuda

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 Page 9

Bank (.1); review correspondence from Vincent Paparo at Proskauer Rose regarding May 27th meeting (.2); review correspondence and revise correspondence from Jonathan Etra to Vincent Paparo regarding May 27th meeting (.1); review follow-up email communication from Vincent Paparo regarding May 27th meeting (.1); review correspondence from Jonathan Etra to Vincent Paparo following up on additional email communication (.1); review correspondence from Ian Anderson to Jonathan Etra regarding Mayer Brown (.1); review correspondence from Leyza Blanco, former receiver, regarding turn over to sucessor receiver (.1); review documents pertaining to Founding Partners matter (1.5); review correspondence from Leyza Blanco regarding Robert H. (.1); draft correspondence to Ms. Salmon at Bermuda Bank regarding necessity for conversation prior to close of business on May 29th (.1); draft correspondence to A.H. responding to investor inquiry regarding Founding Partners (.1). FOUR-draft correspondence to Phil Von Kahle regarding review of various computer files (.2);

05/28/2009 J-E

ONE-Reviewed Koslow affidavit (.3). Meetings with Receiver and SEC (1.5). Meeting with counsel to investors in Texas Litigation (.7). Correspondence with counsel to Sun Entities (.5). Worked on proposed accounting/consulting firms and communications with candidate firms (.4). Worked on tolling agreements (.4). Work on plan for first report to court (.2).

ONE-Review correspondence from

05/29/2009 DSN

regarding potential meeting (.1); draft correspondence to REDACTED regarding potential meeting (.1); review correspondence from Ron at Ernest & Young (.1); draft correspondence to Jonathan Etra regarding communication with Ron at Ernest & Young (.1); draft correspondence to Phil Von Kahle regarding moving and storage of FF&E offices and other issues (.1); review correspondence from Phil Von Kahle regarding moving and storage of FF&E offices and other issues (.1); telephone conference with Phil Von Kahle regarding strategy for moving and storage of FF&E and computer access issues (.4); review lease agreement for Naples office (.3); review correspondence from

\$1,260.00

\$819.00

4.00

2.60

REDACTED

BOCA RATON . Ft. Lauderdale . Miami . Orlando . Tallahassee . Tampa . West Palm Beach

SEC v.	Foundin mnt Co.,	an, Receiver g Partners Capital et al.		rage 10
		REDACTED (.1); draft correspondence to REDACTED (.1); telephone conference with Leyza Blanco regarding various organizational and status issues (.3); review submissions from Kaufman Rosen regarding potential provision of services (.4); review submission from Morrison Brown regarding potential provision of services (.4).		
05/29/2009 05/30/2009	J-E DSN	ONE- worked on tolling agreements. ONE-Review pleadings; review correspondence from REDACTED; fund; draft correspondence to REDACTED mind; research REDACTED REDACTED	0.40 2.00	\$126.00 \$630.00
05/30/2009	J-E	ONE-Reviewed motions to dismiss and responses.	0.30	\$94.50
05/31/2009	DSN	ONE-Meet with Jonathan Etra and discuss strategy and proposals provided by various forensic accountants (1.1); review correspondence from and draft correspondence to Leyza Blanco regarding status of various issues (.3); review and analyze documents retrieved from Founding Partners offices (1.5).	2.90	\$913.50
05/31/2009	J-E	ONE- Work on Founding Partners and Sun issues, work on bank account issues, work on tolling agreement issues, work on selection of accounting firms, work on document collection and review in Naples and Chicago, review of additional documents in Miami, work on identification of second FOUNDING PARTNERS accounting firm.	2.00	\$630.00
06/01/2009	B-F	ONE-Prepare and file Notices of Filing Order Appointing Replacement Receiver in Eastern, Northern and Southern Districts of California and Northern District of Illinois.	2.00	\$300.00
06/01/2009	DSN	ONE-Review documents in Naples office of Founding Partners (7.6); meet with David Teets regarding Founding Partners (.5); draft correspondence to Jonathan Etra regarding former employee of Founding Partners (.1); review correspondence from Jonathan Etra regarding conversation with counsel for former employee (.1).	8.30	\$2,614.50
06/01/2009	J-E	ONE- E-mail correspondence and calls with counsel to Sun Capital and conferred with Receiver (1.0). Worked on review of bank	2.80	\$882.00

	mnt Co.,	g Partners Capital et al.		J
		accounts (.3). Work on pre-filing workout issues involving Sun Trust (.8). Correspondence with SEC concerning identities of those already interviewed (.2). Correspondence with counsel to Founding Partners 'controller and conferences with Receiver (.3). Work on plan for inspection of Chicago offices (.2)		
06/01/2009	MDM	ONE-Travel to and from Naples (No Charge) (5.6) to assist receiver in reviewing documents contained in Founding Partners offices (8.9).	8.90	\$1,735.50
06/01/2009	P-A	ONE-Meeting regarding new receivership website and inquiry as to what to include.	0.20	\$30.00
06/01/2009	SJF	ONE- Return to Tampa (No Charge)	2.80	\$0.00
06/01/2009	SJF	ONE-Review documents at Founding Partners	8.80	\$2,200.00
06/01/2009	SJF	ONE-Travel to Naples to review documents at Founding Partners (No Charge)	2.80	\$0.00
06/02/2009	B-F	THREE-Prepare notices of change of address for Founding Partners Entities in Naples, Florida.	0.50	\$75.00
06/02/2009	Ј-Е	ONE-Worked on Bermuda account and other bank accounts, including research on HSBC (.8)	0.80	\$252.00
06/02/2009	MDM	ONE-Review affidavit of Howard Koslow	0.50	\$97.50
06/02/2009	P-A	THREE-Review communications regarding bank accounts to be opened (.2); Meet with Gladys Gabriel at Mellon Bank (.2); Prepare memo to Receiver and counsel regarding separate accounts needed to be opened, communications regarding same (.2).	0.60	\$90.00
06/03/2009	B-F	ONE-Conference with Daniel Newman and Robert House regarding tasks to be performed.	0.20	\$30.00
06/03/2009	DSN	ONE- Draft correspondence to Leyza Blanco responding to email concerning call received by her office re investors (.1); draft correspondence to Leyza Blanco re Founding employees(.1); conference with counsel re filing motion to retain Berkowitz firm for accounting services (.2); review correspondence from counsel for William Gunlicks and between Receiver's counsel and new counsel for Bill Gunlicks (.1); telephone conference with Ian Anderson of the SEC (.1); Review correspondence from counsel for former employee (.2); draft correspondence to counsel for former employee (.2); conference with counsel re various issues concerning Founding Partners employees (.3); meet with Robert House re varous tasks to be performed including serving	6.50	\$2,047.50

		of subpoenaes (.2); telephone conference with former employee A.M. (.4); conference with counsel regarding tasks to be performed at Naples office of Founding Partners (.2); review correspondence from regarding potential meeting regarding investment in Founding Partners (.1); draft correspondence to REDACTED regarding potential meeting concerning past investment in Founding Partners (.1); telephone conference with REDACTED(.3); conference with counsel regarding various tasks to be performed and Sun Capital agreements (.3); review correspondence pertaining to former accounting firm (.3); FOUR-conference with forensic accountants re status of receivership and actions to be taken. (1.4); telephone conference with Pat Gannon regarding potential forensic accounting services (.5); telephone conference with Richard Pollack and others regarding providing potential accounting services and meet with Richard Pollack regarding same (.8);FIVE-telephone conference with investor R.B. regarding status of Founding Partners (.3); telephone conference with investor B.H. (.3).		
06/03/2009	J-E	ONE-Interviews with potential accounting firms (.8). Work on Gunlicks conference call (.2). Analysis of status of bank accounts (.3). Call with investor (.2). Work on Sun Capital issues. (.5) Work on additional source of assets (.2) Worked on tolling agreements (.1). Review of relevant contracts (.5)	2.80	\$882.00
06/03/2009	MDM	FOUR-Review William Gunlicks's Motion to Dismiss	0.50	\$97.50
06/03/2009	P-A	THREE-Meet with Receiver and counsel, discuss payments needed to be made quickly (.2); Assist with review of various tax documents, searching for tax identification numbers of the receivership entities to open bank accounts (.9); Numerous communications with staff regarding same (.3).	1.40	\$210.00
06/03/2009	RH	THREE- Review and catalog mail; conferences with D. Newman and B. Fradera regarding document organization; (.8) telephone conference with investor C.M. (3.5)	4.30	\$645.00
06/04/2009	DSN	ONE-Review and organize documents; Review correspondence from Trish Anazalone regarding establishment of bank accounts for receivership (.1); draft correspondence to Trish Anazalone	0.30	\$94.50

	Founding	g Partners Capital		Page 13
		receivership (.1); review correspondence from Leyza Blanco regarding investor S.S. (.1).		
06/04/2009	J-E	ONE-Worked on bank account freeze and transfer (.3). Attempts to reach counsel for Gunlicks son (.2). Work on employment/insurance issues (.3). Worked on filings of receivership orders in other jurisdictions (.2). Meeting with Receiver and accountants (1.2). Call with counsel to Sun entities on access to Sun entities' information and report to Receiver on same (.2). FOUR- Prepared and finalized motion to employ accountants and consultants and proposed order (.4)	2.80	\$882.00
06/04/2009	MDM	ONE-Travel to and from Naples (6.0) (No Charge); Review documents in Founding Partners offices. (6.2).	6.20	\$1,209.00
06/04/2009	MDM	THREE-Research regarding REDACTED	2.10	\$409.50
		REDACTED		
06/04/2009	P-A	THREE-Telephone conference with and prepare correspondence to Gladys Gabriel at Mellon Bank requesting money market accounts be opened for various receivership entities (.4); Additional correspondence to Ms. Gabriel transmitting Order Appointing Daniel Newman as Receiver (.2).	0.60	\$90.00
06/04/2009	RH	THREE- Review and catalog mail; research regarding bank and securities accounts; conference with D. Newman regarding status of former employees, computer system, and physical files.	4.90	\$735.00
06/04/2009	SJF	ONE-Return to Tampa (NO CHARGE)	2.80	\$0.00
06/04/2009	SJF	ONE-Travel to Naples to review documents at Founding Partners (No Charge)	2.80	\$0.00
06/04/2009	SJF	ONE-Review documents at Founding Partners	6.00	\$1,500.00
06/05/2009	B-F	ONE-Prepare and file Notices of Filing Order Appointing Replacement Receiver in miscellaneous cases in Western District of Louisiana, Central District of California, Northern, Eastern and Western Districts of Texas.	2.50	\$375.00
06/05/2009	DSN	ONE-Draft correspondence to Richard Pollack regarding E&Y reports (.1); draft correspondence to Brenda Fradera and Robert House regarding continued preparation of various document files (.1); draft correspondence to Richard Pollack containing additional financial related	2.30	\$724.50

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		from Craig Eller regarding employment related issues (.1); draft correspondence to Steve Parish		
		regarding assistance with employment related		
		issues (.1); telephone conference with Steve		
		Parish and Scott Flint regarding employment		
		related issues (.4); telephone conference with		
•		Rick Bendix at Dyckma Gossett (.1); draft		
		correspondence to Robert House regarding		
		insurance related documents (.1);ONE- review		
		correspondence from Steve Parish regarding		
		employment related issues (.2); Review		
		correspondence from Phil Von Kahle (.1);		
		telephone conference with Phil Von Kahle		
		regarding computers and document related issues		
		(.3); review correspondence from Rene Friedman		
		(.1); THREE- telephone conference with Rene		
		Friedman, counsel for (.3); review REDACTED		
		correspondence from Robert House regarding		
		insurance related issues (.2).		* *
06/05/2009	J-E	ONE - Attempted calls with counsel to Mr. Gunlicks' son. (.1)	0.10	\$31.50
06/05/2009	MDM	ONE - Research regarding effect of receivership	2.40	\$468.00
		on employees of Founding Partners; Conferences		
		with Attorney Flint regarding same		
06/05/2009	P-A	THREE - Telephone conferences from and	0.60	\$90.00
		prepare memo to Receiver regarding REDACTED		
		(.1); Telephone conferences with Gladys Gabriel		
		from Mellon (.2); Pick up signature cards and		
		other bank opening documents, prepare memo to		
		Receiver (.3).		
06/05/2009	RH	THREE - Review and catalog mail; research	4.60	\$690.00
		regarding bank and securities accounts; review		
		mail for insurance information.		
06/05/2009	SJF	THREE - Telephone conference with Receiver	0.50	\$125.00
		and employment counsel		
06/05/2009	SJF	THREE - Research issues related to receiver's	1.50	\$375.00
00,00,		effect on employment status		
06/06/2009	DSN	ONE - Review correspondence from Founding	0.30	\$94.50
00/00/2009	2011	Partners investor B.P. (.1); review		
		correspondence from Richard Bendix regarding		
		insurance related issues (.1); draft correspondence		
		to Rick Bendix regarding same (.1).		
06/08/2009	B-F	ONE - Prepare and file Notice of Filing Order	0.30	\$45.00
50.00,200		Appointing Replacement Receiver in Florida		
		Southern District Court.		

documentation (.1);FIVE- review correspondence

SEC v. Founding Partners Capital

Managemnt Co., et al. 43125.0001 3.60 \$1,134.00 06/08/2009 DSN ONE - Review correspondence from Jim Fox regarding keys (.1); draft correspondence to Jim Fox regarding same (.1); draft correspondence to Phil Von Kahle (.1); telephone conference with Phil Von Kahle regarding moving and other expenses (.3); telephone conference with counsel for William Gunlick regarding potential agreement with SEC regarding asset freeze (.3); telephone conference with Ian Anderson and Bob Levenson regarding asset freeze over William Gunlick's assets (.3); telephone conference with Ian Anderson, Jonathan Etra and counsel for William Gunlick regarding asset freeze and terms thereof (.4); FIVE - review correspondence from regarding meeting (.1); draft REDACTED investor S.H. correspondence to investor S.H. · regarding meeting (.1); ONE - meet with forensic accountants regarding review of documents in Naples office, strategy and steps to be performed (1.0); draft correspondence to investor (.1); FIVE - draft correspondence to Robert House regarding insurance issues (.1); telephone conference with Robert House regarding insurance issues (.2); ONE - review correspondence from Jonathan Etra to investor (.1); conference with Jonathan Etra regarding strategy and subpoenas as well as conference with Brenda Fradera regarding subpoenas (.3). ONE - Met with accountants on various issues 2.10 \$661.50 06/08/2009 J-E (1.0). Call with counsel to Gunlicks, call with SEC re same, and conference call with Gunlicks counsel and SEC (.6). Correspondence with counsel to Sun (.1). Work on bank account issues (.2). Correspondence with counsel to REDACTED (.2)0.90 \$283.50 06/09/2009 DSN ONE - Review correspondence from counsel for Phil Fues (.1); review documents from Naples office including Blue Cross and Blue Shield, Swiss Fund and HSBC documents (.2); review correspondence and telephone conference with Naples landlord (.1); review correspondence from investor C.M. (.1); review correspondence from employee D.T. (.1); review correspondence from TriNet (.1); review correspondence from counsel for William Gunlicks regarding cooperation (.1); review correspondence from Robert House regarding insurance policies (.1).

Re: Daniel S SEC v. I Manager 43125.00	Founding nnt Co.,	g Partners Capital		Page 16
06/09/2009	J-E	ONE - Conferences with Mr. Newman on Sun issues (.3). Correspondence with counsel to Sun (.2). Worked on Gunlicks issues (.3). Work on legal research on potential claim (.2) Worked on tolling agreements (.2).	1.20	\$378.00
06/09/2009	MDM	THREE - Research regarding (REDACTED Conferences regarding same; Prepare research summary; Review emails sent by former employee	2.90	\$565.50
06/09/2009	RH	THREE - Review and catalog mail; prepare creditor files; telephone conference with BlueCross BlueShield of Illinois; letter to BlueCross Blue Shield of Illinois regarding coverage status and request for documents.	3.20	\$480.00
06/09/2009	SJF	THREE - Research REDACTED	0.50	\$125.00
06/10/2009	B-F	ONE - Telephone conference with investor A.G. regarding status of receivership.	0.20	\$30.00
06/10/2009	DSN	ONE - Telephone conference with Rene Friedman regarding employee termination issues (.3); telephone conference with investor A.G. regarding investment in Founding Partners (.1); conference with Roy Kobert regarding strategy for counsel (.3); telephone conference with potential counsel regarding issues and factual nature of action (.8); review correspondence from forensic accountant David Siegel regarding documents obtained from Naples office (.2); review correspondence from Jonathan Etra regarding conversations with counsel for Sun (.1); review correspondence from counsel for Sun (.1); review draft freeze letter prepared by Jennifer Jimenez Perez (.2); review correspondence from Robert House regarding schedule of assets (.2); draft correspondence to Scott Flint (.1); review correspondence from Scott Flint regarding termination issues (.1); draft correspondence to Robert House regarding insurance status of Founding Partners (.1); draft correspondence to Phil Von Kahle regarding activation of computers (.1); draft correspondence to Trish Anzalone regarding establishment of receivership bank accounts and status thereof (.1).	2.80	\$882.00
06/10/2009	J-E	ONE - Work on Gunlicks issues, including calls with SEC and with Gunlicks counsel (.8).	2.40	\$756.00

	Founding mnt Co.,	g Partners Capital		Page 17
		Conferences with attorneys (1.0). FIVE - Work on employee/health insurance issues (.4). ONE - Work on bank accounts and insurance policy (.2).		
06/10/2009	MDM	FIVE - Review emails received from former employee; Conference with Attorney Flint regarding employee benefits issues	0.20	\$39.00
06/10/2009	RH	THREE - Review and catalog mail; prepare creditor files; review list of accounts prepared by accountant David Siegel; email correspondence with D. Newman and J. Etra regarding asset accounts.	3.20	\$480.00
06/10/2009	SJF	THREE - Telephone conference with Dana Young at Tri-Net relating to COBRA notices	0.40	\$100.00
06/10/2009	SJF	THREE - E-mail to Dana Young attaching SEC order and requesting certain COBRA information	0.20	\$50.00
06/11/2009	B-F	THREE - Prepare and fax asset freeze letters to various financial institutions.	2.50	\$375.00
06/11/2009	J-E	ONE - Negotiations with Sun over Sun's voluntary provision of information (.5). Consulted with accountants (.2). Call with investor. (.2) Work on bank accounts (.3).	1.20	\$378.00
06/11/2009	P-A	THREE - Obtain signatures and other information on Mellon Bank documents (.2); Partially complete W-9 forms (.2); Meet with Yvonne Douglas from the bank (.3); Prepare memo to Receiver, counsel and others regarding missing information needed to complete opening of accounts (.1); Attempts to locate tax information (.5).	1.30	\$195.00
06/12/2009	B-F	THREE - Conference with Ignacio Gutierrez regarding setting up computers retrieved from Founding Partners Naples office.	0.20	\$30.00
06/12/2009	DSN	ONE - Draft correspondence to Phil Von Kahle regarding servers and attaching same (.1); review correspondence from Phil Von Kahle regarding same (.1); review correspondence from Richard Pollack regarding proposed meeting with Sun representatives in NY (.1); office conference with Receiver's counsel regarding same (.1); review correspondence from PWC liquidator appointed by Cayman Islands Court (.2); review correspondence from Phil Fues (.1); review correspondence from Scott Flint regarding insurance related issues (.1); review correspondence from Robert House regarding insurance related issues (.1); draft correspondence	1.10	\$346.50

	Founding nnt Co., (g Partners Capital et al. to Receiver's counsel regarding various insurance		Page 18
		related and employment related issues including correspondence relating to TriNet regarding COBRA issue (.2).		
06/12/2009	J-E	ONE - Call with accountants (.2). Work on insurance issues (.2). Work on bank account issues. (.2) Work on Gunlicks issues (.1). Correspondence and call with Cayman receiver and call with Receiver (.4).	1.10	\$346.50
06/12/2009	MDM	TWO - Conference with Attorney Newman regarding Chicago office lease (.2); Review documents relating to Chicago office lease (.2); Call Mr. Von Kahle regarding Chicago office lease (.1); Correspond with Mr. Von Kahle and Mr. Lattas regarding same (.3); Analysis of REDACTED	3.40	\$663.00
06/12/2009	P-A	THREE - Various communications with Receiver, counsel and Mellon Bank representatives regarding information needed to complete opening of various money market accounts (.7); Review communication from Jennifer Jimenez regarding Wachovia account, prepare response (.2); Meet with Receiver regarding foregoing (.1).	1.00	\$150.00
06/12/2009	RH	THREE - Review and catalog mail; telephone conference with BlueCross BlueShield of Illinois; telephone conference with S. Flint regarding insurance status.	2.80	\$420.00
06/12/2009	SJF	THREE - Telephone conference with Tri-Net on employee insurance coverage	0.30	\$75.00
06/13/2009	MDM	TWO - Call Chicago office building manager (.1); Correspond with Attorney Newman regarding same (.1)	0.20	\$39.00
06/14/2009	DSN	ONE - Review correspondence from Leyza Blanco regarding communication from Ken Welt (.1); draft correspondence to Ian Stokoe regarding Cayman Islands liquidator (.1); draft correspondence to Receiver's counsel regarding various issues to be addressed in coming week including insurance and termination issues (.1); draft correspondence to Richard Pollack pertaining to conference prior to meeting with Sun entities (.1); review correspondence relating to communication to landlord in Chicago office (.1); draft correspondence to Scott Flint regarding	0.70	\$220.50

	Founding mnt Co.,	g Partners Capital		Page 19
06/14/2009	MDM	insurance and termination related issues (.2). FIVE - Review emails regarding employment and health insurance status of FP employees and related strategy (.2); Correspond with Attorney Newman regarding same (.1); Review and analysis of REDACTED and prepare summary of same (7.0)	7.30	\$1,423.50
06/15/2009	AHM	ONE - Researched receivership issues.	2.20	\$330.00
06/15/2009	AHM	ONE - Conducted research regarding REDACTED	1.90	\$285.00
06/15/2009	B-F	ONE - Conference with Receiver's counsel regarding tasks to be performed (.5); telephone conference with Peggy at Mellon Bank regarding accounts to be opened (.2); draft letter to SunTrust Bank regarding transfer of funds (.2); draft letter to Harris, N.A. regarding transfer of funds (.2); continue preparing and sending out asset freeze letters to various financial institutions regarding Founding Partner accounts (3.5)	4.60	\$690.00
06/15/2009	DSN	ONE - Conference with Receiver's counsel regarding various tasks to be performed in connection with receivership action (.1); prepare for meeting with investors from REDACTED by reviewing various documents pertaining to these investors (.3); telephone conference with counsel for plaintiffs in Texas litigation regarding request for status (.2); FIVE - meet with representatives from REDACTED and discuss various factual issues (2.2); ONE - telephone conference with Richard Pollack regarding meeting with Vincent Paparo, counsel to Sun Capital to be held in NY (.2); office conference with Receiver's counsel regarding various issues to be researched in connection with appointment of liquidator (.3); telephone conference with Jonathan Etra and Ian Anderson regarding appointment of liquidator and Bill Gunlicks and request for release of funds (.3); telephone conference with Rick Rein regarding counsel in Bermuda and draft correspondence to Rick Rein regarding same (.3); review correspondence from former employee regarding termination of employment and subsequent correspondence from former employee's counsel (.2); draft correspondence to counsel for former employee	6.10	\$1,921.50

06/15/2009

06/15/2009

06/15/2009

06/15/2009

J-E

MDM

RH

SJF

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regarding termination issue (.1); draft correspondence to counsel regarding termination and insurance related issues as well as status of asset location (.4); draft multiple correspondence to Rick Rein regarding issues to obtaining Bermuda counsel (.2); review correspondence from Marisel Descalzo to Ian Anderson regarding William Gunlicks (.1); review correspondence from Mara Beth Summers regarding Tolling Agreement and discuss strategy with Jonathan Etra regarding same (.3); review draft subpoenas for depositions of various individuals relating to Founding Partners and revise same (.4); review correspondence from Scott Flint regarding Subpoena to Blue Cross Blue Shield (.1); draft correspondence to Scott Flint regarding same (.1); telephone conference with Matthew Thompson regarding preparation of various documents in connection with potential Bill Gunlicks agreement (.3).		
ONE - In person meeting with investors (1.5). Phone call with counsel to other investors (.4). Work on legal research issues (5). Work on obtaining foreign counsel (.2). Work on bank accounts (.3). Work on Gunlicks issues (.5). Work on employee issues (.4). Work on subpoenaing of additional witnesses (.3). Conferences with Receiver and SEC on foregoing (.5)	4.60	\$1,449.00
TWO - Call with Mr. Lattas regarding reaching Chicago office building manager (.1); Call with Mr. Gilbert, property manager for opera house, which shares space with Chicago office, regarding same (.1); Review and analysis of REDACTED and prepare summary of same (1.5); THREE - Review correspondence regarding Blue Cross and termination of health insurance and conference with Attorney Flint regarding same (.1); TWO - Discuss subpoenas to REDACTE and Will Gunlicks with Attorney Flint and draft schedule listing all documents to be produced (2.0); Correspond with attorneys regarding same (.1)	3.90	\$760.50
ONE - Review and catalog mail; prepare creditor files; research regarding assets.	3.40	\$510.00
	0.00	ቀላለለ ለለ

0.80

\$200.00

ONE - Research witness fee under Illinois law

	Founding mnt Co.,	g Partners Capital		Page 21
06/15/2009	SJF	ONE - Draft subpoena for Blue Cross records relating to Founding Partners	0.60	\$150.00
06/15/2009	SJF	ONE - Discussions with Blue Cross legal department regarding subpoena for documents	0.50	\$125.00
06/16/2009	АНМ	ONE - Conducted research and began composition of memorandum on	2.50	\$375.00
		REDACTED		
06/16/2009	B-F	THREE - Telephone conference with regarding Founding Partner accounts (.2); telephone conference with Gina Regan at SunTrust Bank regarding transfer of funds into Mellon account (.1); ONE - continuing preparing and sending out asset freeze letters to additional financial institutions (1.5); telephone conference with Cecilia Gondor at Thomas J. Herzfeld Advisors, Inc. regarding freeze letter and Founding accounts (.1).	1.90	\$285.00
06/16/2009	DSN	ONE - Review correspondence from Marissel Descalzo relating to Bill Gunlicks (.1); review correspondence from Michael Madgison regarding revising subpoenas for various documents and deposition testimony (.2); review Response to Motion to Dismiss (.3); telephone conference with counsel for former employee (.2); telephone conference with counsel for Sun Entities, Sun principal and Receiver's accountant regarding documents to be voluntarily produced by Sun and other related issues (.7); telephone conference with Receiver's accountant regarding various issues pertaining to document review (.2); review and analyze proposed list of documents to be requested from Sun Entities (.3); telephone conference with Matthew Thompson regarding documents to be produced in connection with potential agreement with William Gunlicks (.2); review additional correspondence from Marissel Descalzo regarding William Gunlicks (.2); telephone conference with Marissel Descalzo regarding William Gunlicks (.2); review correspondence from Scott Flint regarding Blue Cross and Blue Shield (.1); office conference with Jonathan Etra regarding various Founding Partner assets (.2); review and analyze related Case Order and Track Notice entered by Court (.1); review correspondence from Thomas J. Hertzfeld	5.90	\$1,858.50

06/16/2009

06/16/2009

06/16/2009

06/16/2009

06/17/2009

	Advisors Inc. regarding Founding Partners (.1); review correspondence from investor R.C. (.1); draft correspondence to investor R.C. (.1); review correspondence regarding John Hancock (.1); office conference with staff regarding Chicago mail and securing of same (.1); review correspondence from accountant David Siegel regarding tax I.D. numbers relating to Founding Partners Entities (.1); review correspondence relating to Peter Aldridge (.1); telephone call to Peter Aldridge's office (.1); revise correspondence to SunTrust Bank and review correspondence to SunTrust Bank regarding transferring of funds (.1); review correspondence from Jonathan Etra to HSBC Bermuda Bank (.1); telephone conference with Lou Gross, property manager, regarding Founding Partners and potential re-renting of space (.2); review correspondence from broker regarding re-letting of Founding Partners Chicago office space (.1); telephone conference with Keith Goodman at Knight Capital regarding Founding Partners (.3); review correspondence to Knight Capital regarding Founding Partners (.1); review document relating to Schultz Investment Advisors sent by William Gunlicks (.1); review correspondence from Ian Stoeke regarding phone conference to be set for June 17 (.1). FIVE-review		
J-E	correspondence from Bill Butrym of ABL Capital (.1). ONE - Work on HSBC Bank of Bermuda (1.0). Call with Chicago lawyer representing investor group (.4). Call with Gunlicks' attorney on effect of Cayman liquidator on negotiations with Gunlicks (.3). Conference with counsel on case management report (.1)	1.80	\$567.00
MDM	ONE - Revise scope of documents to be produced by and Will Gunlicks (.4); Conference with Attorney Flint regarding same (.2); Research REDACTED (.2)	0.80	\$156.00
P-A	THREE - Review correspondence from Mellon regarding 3 newly opened accounts (.2); Examine correspondence to and information received from accountant David Siegel (.3); Meet with Yvonne Douglas from Mellon Bank (.4).	0.90	\$135.00
SJF	ONE - Review potential defaults under the Sun credit agreements	1.50	\$375.00
AHM	ONE - Composed Memorandum concerning	3.60	\$540.00

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issues relating to conflict between foreign cliquidators and domestic receivers (1.1). Attended conference call to discuss "joint liquidator" issues with representatives from the Cayman Islands (1.0 NO CHARGE). Conducted researched on joint liquidatorships and attempted to find Cayman Island cases relating to joint liquidatorships (2.5).

06/17/2009 B-F

THREE-Telephone conference with Gina Regan at SunTrust regarding accounts and wire transfers (.2); telephone conference with Yvonne Douglas at Mellon Bank regarding transfer of funds from Harris, N.A. into Mellon accounts (.1); draft correspondence to Yvonne Douglas at Mellon Bank regarding funds expected to be transferred into Mellon accounts (.1); prepare change of address forms for 5150 Tamiami Trial, Naples address and 20 N. Wacker Dr., Chicago address (1.0); Telephone conference with Beth at Harris Bank regarding Founding Partners accounts and funds to be transferred (.2); ONE-draft correspondence to Keith Goodman at Knight Capital regarding status of funds (.1); review correspondence from Keith Goodman at Knight Capital regarding status of funds to be transferred to Mellon (.1) review correspondence from Leslie Gatto, Clerk of Middle District, regarding admission for Jonathan Etra and Daniel Newman in Middle District (.1) (NO CHARGE); draft correspondence to Leslie Gatto regarding getting earlier date for admission (.1);

06/17/2009 DSN

ONE - Meet with Mara Beth Sommers regarding various Tolling Agreements and revisions to be made to same (1.1); conference with receiver's counsel regarding various tasks to be performed and telephone conference with Ian Stokoe, liquidator appointed by Grand Cayman court (1.0); review correspondence from Rick Rein regarding retention of counsel in Bermuda (.1); draft correspondence to Rick Rein regarding retention of counsel in Bermuda (.2); telephone conference with counsel in Grand Cayman (.2); review correspondence from counsel in Grand Cayman (.2); review summary of various critical documents pertaining to Founding Partners (2.5); telephone conference with counsel for former employee Phil Fues (.3); telephone conference with Rick Bendix of Dyckma Gossett regarding

1.90 \$285.00

8.40 \$2,646.00

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Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001

> performance of various services (.2); telephone conference with Ian Anderson of SEC regarding Bill Gunlicks and liquidator appointed by Grand Cayman court (.2); telephone conference with Jonathan Etra, Ian Anderson, and counsel for Bill Gunlicks regarding potential modification of Freeze Order (.4); conference with receiver's counsel regarding former employees and subpoenas to be prepared regarding depositions of various former employees (.5); revise subpoenas relating to former employees and to banks holding assets of Founding Partners (.4); review correspondence from Ian Stokoe regarding Orders Appointing Liquidator (.4); conference with counsel regarding various research issues to be performed (.2); review various due diligence material relating to potential counsel in Bermuda (.5).

06/17/2009 J-E

ONE - Internal conference on issues surrounding Cayman liquidator. (.5) Conference call with Cayman liquidator and arranged for in person meeting. (.3). Conference with SEC on numerous issues (.3). Conferences with counsel to Gunlicks on negotiations over asset freeze (.4). Letter to North Shore bank on assert freeze issue and conference with counsel to North Shore Bank (.4). E-mail to HSBC Bank of Bermuda (.2). Meeting concerning tolling agreements, review of drafts, and conference with one of the entities from whom tolling agreement is sought (.5). Reviewed Judge's order on Receiver's comments on asset freeze issue and corresponded with Receiver re same (.2) Worked on informal document request to Sun entities and forwarded same (.2). Review and analysis of non-disclosure assertions regarding specified Sun materials (.3).

06/17/2009 MDM

ONE - Revise scope of documents to produced pursuant to subpoena by Judy Aller and Will Gunlicks (2.2); Call Mr. Delaney, counsel for Will Gunlicks, regarding accepting service of process of subpoena (.1); Call with Mr. Menchel regarding whether he will accept service for REDACTED (.1); CalREDACTED egarding deposition date (.1); Draft schedule to subpoena to HSBC listing documents to be produced (1.6); Conference regarding audit rights of FP under REDACTED Agreement with Sun Capital, Inc., and proposed NDA with Sun (.6)

3.30 \$1,039.50

4.70 \$916.50

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				
06/17/2009	P-A	THREE - Various dealings throughout the day with Mellon Bank regarding completing opening up of new accounts (.8); Numerous telephonic and written communications with Elizabeth Parker regarding new website, discussion as to home page, contact information and other key items to be included (1.0).	1.80	\$270.00
06/17/2009	RH	ONE - Review and catalog mail; research regarding assets comprising Hybrid Value fund.	1.50	\$225.00
06/17/2009	SJF	THREE - Draft letter to Blue Cross moving date for deposition and requesting information as soon as possible	0.30	\$75.00
06/17/2009	SJF	THREE - Telephone conference with Genapha Campbell of Blue Cross	0.20	\$50.00
06/18/2009	AHM	ONE - Attended conference call meeting re: outstanding Founding Partners' matters.	0.60	\$90.00
06/18/2009 ·	AHM	ONE - Created and compiled research folder for J. Etra in preparation for tomorrow night's meeting with Cayman liquidators.	0.50	\$75.00
06/18/2009	B-F	ONE - Conference with Receiver's counsel regarding status and tasks to be performed (.8); telephone call to Beth at Harris Bank regarding status of wires (.1); draft email correspondence to Yvonne Douglas at Mellon Bank regarding status of wire transfers (.1); telephone conference with Yvonne Douglas regarding transfer of funds from Harris Bank (.1).	1.10	\$165.00
06/18/2009	DSN	ONE - Telephone conference with counsel in the Cayman Islands regarding potential representation (.5); draft correspondence from counsel in the Cayman Islands regarding potential representation (.2); multiple email correspondence between Daniel Newman and Rick Rein of Dyckma Gossett regarding Bermuda counsel (.3); telephone conference with Rick Rein regarding potential retention of Bermuda counsel (.2); telephone conference with Ian Anderson regarding Bill Gunlicks (.4); telephone conference with Ian Anderson regarding potential retention of Bermuda counsel (.3); telephone conference with representative of entity inquiring as to desire to sell receivables (.2); FIVE - review and analyze correspondence from relating to issues as a follow up to meeting on June 15th (.1); ONE - meet with receiver's counsel and those assisting receiver regarding various tasks to be performed	5.00	\$1,575.00

		including, following up on freeze letters, subpoenas, research and website establishment (.8); FIVE - telephone conference with several investors relating to status of Founding Partners and Order Appointing Receiver and tasks to be performed by Receiver (.6); revise communication to investor (.4); ONE - revise opening summary relating to receivership to be placed on website (.2); revise schedule to subpoena to be served on bank containing Founding Partners' funds (.4); office conferences with Jonathan Etra regarding strategy for proceeding on various issues (.4); review correspondence from Mara Beth Sommers regarding Tolling Agreement (.2); review and make revisions to proposed Tolling Agreement (.3); review correspondence from Keith Goodman of Knight Capital (.2); review and analyze various documents relating to Founding Partners (.2).		
06/18/2009	J-E	ONE - Call with investor (.1). Work on Cayman and Bermuda issues and legal research re same (1.5). Work on receivables issues (.3). Conferences with Receiver and SEC (.3)	2.20	\$693.00
06/18/2009	MDM	ONE - Conferences with Receiver and Attorney Etra regarding scope of subpoena to HSBC (.3); Revise same (1.7); Status meeting with Receiver (1.0); Draft overview of case and letter to investors for receivership website (1.1); Calls with Attorney Flint regarding documents in Chicago offices of FP (.2); Review documents from Chicago office (.4)	4.70	\$916.50
06/18/2009	P-A	THREE - Various communications, both telephonically and written, with Elizabeth Parker and counsel regarding website issues, documents to be up-loaded to website (.9); Assist with introductory language on home page (.2); Examine correspondence regarding monies wired into bank accounts, funds to be transferred (.2); Review documents to be covered by HSBC subpoena (.1)	1.40	\$210.00
06/18/2009	RH	ONE - Attend telephone conference with D. Newman and team regarding status of projects; research regarding law firm Attride-Stirling & Woloniecki in Bermuda; prepare creditor files.	2.50	\$375.00
06/18/2009	SJF	ONE - Travel to Chicago office of Founding Partners (NO CHARGE).	3.00	\$0.00

	Founding	g Partners Capital		Page 27
06/18/2009	SJF	ONE - Review documents in Chicago office	9.10	\$2,275.00
06/19/2009	AHM	FOUR - Conducted research on issues relating to REDACTED	1.30	\$195.00
06/19/2009	B-F	ONE - Draft freeze letter to Realty Capital Partners (.1); conference with David Siegel and Martin Prisloo, forensic accountants, regarding computers retrieved from Founding Partners Naples office (.2); FIVE - telephone conference with investor M.L. regarding status of receivership and website (.1); review email correspondence from investor A.G. (.1)	0.50	\$75.00
06/19/2009	DSN	ONE - Telephone conference with potential counsel in Cayman Islands (.4); telephone conference with potential counsel in Bermuda regarding retention (.4); review correspondence from Michael Magidson regarding schedule for HSBC Subpoena and conference with Michael Magidson regarding same (.3); review correspondence from counsel for Naples landlord (.1); draft correspondence to Naples landlord (.1); draft correspondence from Jonathan Etra regarding Joint Conference Order and telephone conference with Jonathan Etra regarding same and terms to be included (.3); draft correspondence to Robert House regarding Wells Fargo Bank (.1); review correspondence from Robert House regarding Wells Fargo Bank (.1); review correspondence from Ross McDonough, potential Cayman Island counsel (.3); telephone conference with Peter Aldrich regarding Founding Partners Naples office (.2); review correspondence from Brenda Fradera regarding Peter Aldrich and Naples office (.2); office conference with Jonathan Etra and Jeff Deutch regarding analysis of real estate related property (.3); telephone conference with Jonathan Etra, counsel for Gunlicks and SEC counsel (.3); review correspondence from Brenda Fradera to investor regarding status of receivership (.1); meet with forensic accountants regarding Founding Partners computers (.9); telephone conference with Rick Rein regarding retaining Bermuda counsel (.2); review various correspondence from Rick Rein regarding obtaining Bermuda counsel (.1); review correspondence from Rick Rein regarding obtaining Bermuda counsel (.1); review correspondence from Rick Rein regarding	8.90	\$2,803.50

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Managemnt Co., et al. 43125.0001 correspondence in similar action to present case (.2); prepare for meeting with Cayman Island liquidator (.5); telephone conference with insurance agent for Founding Partners regarding status of various insurance instruments and review communications from insurance agent (.8); telephone conference with Ian Anderson and office of international affairs relating to Bermuda action (.5); review and analyze various correspondence from Ian Anderson relating to Founding Partners investors (.3); review correspondence from Ian Anderson relating to Bermuda Supreme Court docket (.1); FIVE review correspondence from investor R.C. (.1); draft correspondence to investor R.C. (.1); ONE meet with liquidator from Cayman action, Ian Stocke and his counsel Simon Dickson (1.9). ONE-Prepare for and attend case management 3.70 \$1,165.50 J-E 06/19/2009 conference with counsel for other parties (1.5). Work on Gunlicks' issues and real estate preservation issues (.8). Meeting with accountants concerning numerous issues (.5). Follow up on freeze letter to Texas entity through Hartline (.3). Work on insurance policy issue (.1). Work on HSBC issues (.3) FOUR-Call with counsel to investors (.2). 5.30 \$1,033.50 ONE - Prepare subpoena to HSBC and notice of 06/19/2009 **MDM** issuing subpoena to take deposition pursuant to Fed.R.Civ.P. 30(b)(6) (1.5); Correspond with Attorney Etra and Receiver regarding same (.4); Review documents obtained from FP Chicago office (1.8); Correspond with Attorney Etra and Receiver regarding various task list items (.2); Prepare Motion to Terminate Leases (.2); Continue review of documents obtained from FP Chicago office and prepare correspondence to Receiver and Attorney Etra regarding review of documents found in Chicago office (1.2) 0.80 \$120.00 06/19/2009 THREE - Review status of website, confirm P-A loading of documents, accessing of same (.5); Arrange for program to be installed regarding future uploads (.3). 1.10 \$165.00 ONE - Telephone conference with Harry Carr of RH 06/19/2009 Wells Fargo regarding frozen accounts; research REDACTED regarding. ; prepare creditor files. 3.00 \$0.00 ONE - Return to Tampa from Chicago Founding 06/19/2009 SJF

	Founding mnt Co.,	g Partners Capital		Page 29
06/19/2009	SJF	Partner office (NO CHARGE). ONE - Review documents in Chicago Founding	8.10	\$2,025.00
06/20/2009	DSN	Partners office ONE - Review correspondence from Jonathan Etra to counsel for William Gunlicks regarding privileged related issues (.1); draft correspondence to Scott Flint regarding communication between Jonathan Etra and counsel for William Gunlicks (.1); review correspondence from Jonathan Etra regarding various tasks to be performed (.1); draft correspondence to Scott Flint and Michael Magidson regarding legal issues pertaining to REDACTED (.1); telephone conference with Scott Flint regarding review of documents in Chicago office (.3); review correspondence from Michael Magidson regarding issue pertaining to William Gunlicks (.1); draft correspondence to Brenda Fradera and Robert House regarding tasks to be performed (.1); draft correspondence to Scott Flint regarding employee to be contacted (.1); review correspondence from counsel regarding Bermuda action (.1); draft correspondence to SEC counsel regarding meeting with liquidator (.1); review correspondence from Scott Flint regarding insurance related issue (.1); draft correspondence to Jonathan Etra regarding action in light of email from Scott Flint regarding employee related issue (.1); draft correspondence to counsel in Cayman Islands regarding proceeding with retention (.1); draft correspondence to Mara Beth Sommers (.3); draft correspondence to CPA regarding Class B shareholder asserting claim in Bermuda and	2.00	\$630.00
06/20/2009	J-E	actions to be taken (.2). ONE - Revised, finalized, and sent e-mail to Gunlicks' counsel on privilege issue (.5). Reviewed pacer for corporate disclosure filings and e-mail correspondence with prior Receiver (.3). Review report from Chicago office inspection and follow up on certain assets (.3). Correspondence with accountants on computer access (.1).	1.20	\$378.00
06/20/2009	MDM	ONE - Correspond with Receiver and attorneys regarding freeze letters and subpoenas	0.10	\$19.50
06/20/2009	SJF	ONE - Telephone discussion with receiver on Chicago documents	0.20	\$50.00

	Founding mnt Co.,	g Partners Capital		Page 30
06/20/2009	SJF	THREE - Telephone conference with REDACTED former employee of Founding	0.30	\$75.00
06/21/2009	DSN	FIVE - Review correspondence from investor D.P. regarding status of receivership (.2); ONE - draft correspondence to investor D.P. regarding status of receivership (.3); review correspondence from Jonathan Etra to David Siegel (.1); review response from David Siegel to Jonathan Etra regarding review of computers (.1).	0.70	\$220.50
06/22/2009	AHM	ONE - Conducted research and began drafting of brief memorandum concerning t REDACTED	1.70	\$255.00
06/22/2009	B-F	ONE - Prepare and send out asset freeze letter to M&I Wealth Management (.1); conference with Trish Anzalone regarding Founding website (.1); telephone conference with Leslie Gatto, Clerk of Middle District, regarding attorney admission (.1); conference with Susan Barnes de Resendiz regarding documents to be review (.1).	0.40	\$60.00
06/22/2009	DSN	ONE - Office conference with Susan Barnes de Resendiz relating to factual issues and strategy in connection with representation of Receiver (.9); review correspondence from attorney in Bermuda regarding potential representation (.1); review correspondence from counsel for Sun Capital regarding access to documentation (.1); telephone conference with counsel in Cayman Islands regarding retention and for purposes of due diligence (.4); review proposed retainer letter for counsel to be retained in Cayman Islands (.2); telephone conference with Dyckma Gossett regarding potential Bermuda counsel (.2); FIVE - review correspondence from investor R.C. (.1); draft correspondence to investor R.C. (.1); draft correspondence from investor S.S.R. (.1); draft correspondence to investor S.S.R. (.1); ONE - review correspondence from SEC counsel regarding contacting counsel for REDACTED (.2); conference with Receiver's counsel regarding analysis and legal issue pertaining to REDACTED (.4); telephone conference with SEC counsel regarding meeting with Cayman Islands liquidator (.3); review correspondence from Leyza Blanco regarding Figari & Davenport (.1); review correspondence from attorney in Bermuda (.1);	5.70	\$1,795.50

06/22/2009

06/22/2009

06/22/2009

06/22/2009

J-E

MDM

RH

SBR

draft correspondence to attorney in Bermuda inquiring regarding representation (.1); office conference with Michael Magidson regarding Motion to Reject Leases (.3); draft correspondence to Chicago landlord regarding security deposit (.2); draft correspondence to Naples landlord regarding security deposit (.2); telephone conference with Chicago landlord regarding security deposit (.3); FIVE - review correspondence from investor G.V. (.1); draft correspondence to investor G.V. (.2); ONE - review correspondence from Michael Magidson regarding Founding Partners Capital Management provision contained in REDACTED Agreement and By-Laws and related correspondence with Jonathan Etra pertaining to additional steps to be taken (.4); draft correspondence to accountants regarding issue of domestic fund and global fund (.1); draft correspondence to Phil Von Kahle regarding access to computer images (.1); review correspondence from Phil Von Kahle regarding same (.1); revise correspondence and send correspondence to Mara Beth Sommers regarding services to be performed (.2).		
ONE - Worked on Aller issues (.4). Worked on case management report (.2). Worked on certificate of ownership (1.0). Worked on Gunlicks real estate issues (.2). Worked on offshore cousnel issues (.3). Conferences on security and workout issues (1.0).	3.10	\$976.50
FOUR - Revisions to HSBC subpoena and related documents (.4); Research regarding REDACTED preparation of memo regarding same (2.8); Conference with Receiver regarding same (.2); Conferences with Attorney de Resendiz regarding Sun agreements (.4); Conference with Receiver and Attorney Etra regarding REDACTED (.2); Review same and FPCMC bylaws (.3); Research regarding effect of same (1.6); Review draft Certificate of Interested Persons and revise same (.4); Continue to draft Motion to Terminate Leases (.4)	6.70	\$1,306.50
THREE - Review and catalog mail.	0.70	\$105.00
ONE - Office Conference with Daniel Newman	6.90	\$2,173.50

		regarding factual issues and strategy for Receiver (1.1); Office Conference with Jonathan Etra regarding status of litigation and possible future litigation with various entities (.5); Correspondence with Dan Newman, Chris Redmond, and Sheryl Seigel regarding retention of counsel in Bermuda (.5); review Sun Capital client factoring agreement and client list (1); Office conference with Mike Magidson regarding Founding Partners Credit and Security Agreement (.4); Review Credit and Security Agreement between Stable-Value Fund, memos regarding terms of Credit and Security Agreement, Sun Capital defaults of the REDACTED Agreement, amendments to the REDACTED Agreement, correspondence between Founding Partners and Sun Capital regarding regarding Sun Capital's deviation from the terms of the REDACTED Agreement (4.1); Correspondence with Roy Kobert, Dan Newman and Lisa Vander Weide regarding UCC filings related to REDACTED Agreements between Sun Capital and Sun Capital Healthcare (.2).		#200.00
06/22/2009	SJF	FIVE - Review documents received from Blue Cross and Blue shield	1.20	\$300.00
06/22/2009	SJF	FOUR - Research REDACTED	1.50	\$375.00
06/23/2009	B-F	THREE - Revise Certificate of Interested Persons and Corporate Disclosure Statement (1.5); telephone conference with representative at M&I Wealth Management regarding freeze letter (.1); telephone conference with Eugene Perez regarding transfer of Founding Partners phone lines (.1); telephone conference with Karen Shea at Naples Executive Suites regarding phone system at Founding Partners Naples office (.1); draft email correspondence to Eugene Perez regarding transferring of phone lines (.1); review email correspondence from Eugene Perez regarding transferring phone lines (.1); meet with Martin Prisloo regarding computer images (.2).	2.20	\$330.00
06/23/2009	DSN	ONE - Revise HSBC Subpoena (.2); review correspondence from investor (.1); draft correspondence to REDACTED (.1); FIVE - review follow up correspondence from	6.50	\$2,047.50

SEC v. Manage	Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001			Page 33
		REDACTED (.1); ONE - telephone conference regarding potential representation in Bermuda (.8); draft correspondence to potential counsel (.1); conference with Receiver's counsel and review of various documents (5.1).		
06/23/2009	MDM	ONE-Draft Motion to Terminate Leases (1.8); Finalize HSBC subpoena and conferences regarding same (2.0); Revise Certificate of Interested Persons and Corporate Disclosure and conferences regarding same (1.7); File same (.1); Conferences with Attorney de Resendiz regarding Sun agreements and strategy regarding collateral (1.2)	6.80	\$1,326.00
06/23/2009	P-A	FOUR - Assist with finalization and filing of Notice of Issuance of and Subpoena Duces Tecum for Deposition to HSBC representative (.9)	0.90	\$135.00
06/23/2009	SBR	ONE-Office conference with Mike Magidson regarding Sun agreements, need for further information, and strategy for collateral recovery (1.2); review SEC complaint against Founding Partners et al. (1.0 NO CHARGE); preparation of chart of Founding Partners and Sun Capital entities with corporation information, name changes, lending arrangements, payment of fees among Founding Partners and related entities and between Founding Partners and related entities and Sun Capital entities (2.5); review Sun Capital lending practices, types of loans, and entities receiving proceeds of Stable-Value loans; review news articles and memos regarding Sun Capital Healthcare factoring receivables of bankrupt companies and providing debtor in possession financing to bankruptcy healthcare companies (.80); review UCC filing reports regarding Founding Partners and related entities, William Gunlicks, and Sun Capital and Sun Capital Healthcare (.6); review incorporation information and reports regarding Founding Partners and related entities and Sun Capital and related entities (.7).	5.80	\$1,827.00
06/23/2009	SJF	ONE - Review and categorize documents received from Chicago office	3.00	\$750.00
06/24/2009	AHM	FOUR - Collated research and began composition of a memorandum detailing REDACTED	2.30	\$0.00
		(NO CHARGE).		

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				
06/24/2009	DSN	ONE - Telephone conference with Jonathan Etra and Ian Anderson regarding various issues (.4); telephone conference with Jonathan Etra and Marissel Descalzo, counsel for William Gunlicks, regarding Mr. Gunlicks' cooperation (.3); review correspondence from David Siegel regarding results of initial review of computer images (.2); review communication from Michael Magidson and Susan Barnes de Resendiz regarding various factual issues (.1)FOUR- telephone conference with counsel for landlord for Chicago space regarding moving out and lease situation and draft correspondence to counsel for landlord (.4);	1.40	\$441.00
06/24/2009	J-E	ONE - Conferences with SEC and Receiver on numerous issues (.6). Call with Mr. Gunlicks' counsel. (.2). Call with REDACTED(.2). Conference with accountants (.2). Correspondence with counsel to Sun Entities on provision of information (.2). Correspondence with investor group on upcoming meeting (.2)	1.60	\$504.00
06/24/2009	MDM	ONE - Research regarding REDACTED (.3); Research regarding REDACTED (1.9); Conference with Attorney Flint regarding employment issues and other task list items (.2)	2.40	\$468.00
06/24/2009	RH	THREE - Prepare log of William Gunlicks' personal mail (1.3); ONE - research regarding	2.30	\$345.00
		REDACTED		
06/24/2009	SBR	(1.0). FOUR - Review pleadings, exhibits, and responses (5.8 NO CHARGE); Correspondence from Mike Magidson re corporate standing of Sun Capital and sun Capital Healthcare (.1); Correspondence with Make Magidson re dates of incorporation of Founding Partners entities and relationship to incorporation of Sun Capital entities (.2); correspondence from Mike Magidson re Founding Partners Investor Offering Memoranda (.1); correspondence with Robert House re dockets for National Century Financial Enterprises and Med Diversified and Sun Capital Healthcare's role in those bankruptcies (.5); Review Stable Value Offering Memorandum (1.2); correspondence with Linda Hayman	2.20	\$693.00

	Founding mnt Co.,	g Partners Capital		Page 35
		regarding New York counsel to Sun Capital (.1).		
06/24/2009	SJF	FIVE - Research	1.50	\$375.00
		REDACTED		
06/24/2009	SJF	ONE - Review agreements and REDACTED agreements	1.50	\$375.00
06/25/2009	АНМ	FOUR - Attended status meeting concerning outstanding receivership issues and impending document review (NO CHARGE).	1.20	\$0.00
06/25/2009	B-F	FIVE - Review email from investor K.W. regarding tax issues (.1); ONE - conference with Receiver's counsel regarding status and tasks to be performed (1.0); THREE - telephone conference with Gina Regan at SunTrust regarding status of funds transfer (.1); draft email correspondence to Yvonne Douglas at Mellon regarding wire transfer (.1); review email correspondence from Yvonne Douglas at Mellon regarding wire transfer (.1); FIVE - draft letter to investor W.M. regarding Founding Partners (.1); ONE - draft email correspondence to Leyza Blanco regarding safe deposit boxes (.1).	1.60	\$240.00
06/25/2009	DSN RED	ONE - Review correspondence from Receiver's counsel regarding Subpoena served on bank (.1); meet with Receiver's counsel regarding strategy for proceeding (1.7 NO CHARGE); telephone conference with counsel in Bermuda regarding retention and steps to be taken in Bermuda (.5); FIVE - draft correspondence to investor REDACTED (.1); review correspondence from principal of (.1); review correspondence from principal of MACTED (.1); ONE - review correspondence from Michael Magidson regarding Form UCC's relating to William Gunlicks' assets (.1); review draft letter to Bank of Bermuda regarding additional information (.2); review correspondence from Bank of Bermuda regarding retention of counsel (.1); review correspondence regarding safe deposit boxes (.1); review correspondence from counsel for Naples landlord (.1); telephone conference with Receiver's counsel regarding Texas litigation and other issues relating to Gunlick's representations concerning real estate holdings (.4); review draft response to investor email (.1); review correspondence regarding HSBC deposition (.1); review email correspondence relating to Bermuda investor and response to same (.1); review email	2.70	\$850.50

SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 relating to William Gunlick's Reply to Motion to Amend Asset Freeze (.2); review correspondence to counsel for Gunlicks regarding request for information in support of Gunlick's representations and motion to modify asset freeze (.2); review correspondence from counsel relating to inquiry by bank relating to Founding Partners (.1); review and analyze correspondence from David Siegel relating to disportion of shared receivables and other information in connection with preparation of Receiver's initial report (.1). 4.70 \$1,480.50 ONE - Team meeting and conferences with 06/25/2009 J-E Receiver on various issues (.6). Conference with real estate team on valuation of Mr. Gunlicks' properties and other issues relating thereto (.5). Work on substitution of counsel issue on Texas litigation (.3). Call with SEC and CIMA on Cayman liquidator issues (.5). Call with Bermuda investor (.2). Work on HSBC deposition (.2). Work on motions for offshore counsel (.2). Conference with accountants (.2). Reviewed Mr. Gunlicks' renewed motion for partial lift of asset freeze, the SEC's response, Mr. Gunlicks' reply and supporting documentation and analysis of same, in view of court order for Receiver to provide position (1.0). Detailed e-mail to Mr. Gunlicks' counsel on outstanding issues and concerns with respect to the properties at issue in Mr. Gunlicks' Motion (.5). Worked on gathering documentation needed for the Receiver's submission on Mr. Gunlicks' motion (.5). 1.70 \$255.00 FOUR - Review documents, organize and prepare 06/25/2009 MAW binders of same relating Sun Capital Healthcare, Sun Capital, Inc., Founding Partners Capital Management Company's corporate records, and miscellaneous documents relating to Found Partners entities 7.40 \$1,443.00 ONE - Correspond with Receiver and Attorney **MDM** 06/25/2009 Etra regarding HSBC subpoena (.2); Conference with Attorney Flint regarding response to Gunlicks' motion to modify asset freeze (.1); Review and analyze credit and security agreements with Sun entities and confer with Attorney de Resendiz regarding same (2.1); Case law research regarding? REDACTED

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(1.8); Status conference with Receiver

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(1.2); Compose email to counsel for Will Gunlicks regarding service of subpoena (.1); Conference with Attorney de Resendiz regarding Motions to Terminate Leases and revise same (.7); Review draft Motions to Employ Counsel in Cayman Islands and Bermuda and provide comments (.2); Review and analyze defendant Gunlicks' reply to response to motion to modify asset freeze and correspondence from Attorney Etra regarding same (.5); Review and analyze letter from attorneys representing North Shore Bank (.1); Review correspondence to HSBC Bank of Bermuda and conduct research.

REDACTED

in preparation for deposition of HSBC corporate representative (.4)

06/25/2009 RH

FOUR-Attend telephone conference with D. Newman and other attorneys regarding status of projects; prepare log of William Gunlicks' personal mail.

ONE - Review dockets of National Century

06/25/2009 SBR

Financial Enterprises and Med Diversified regarding Sun Capital Healthcare lending to bankruptcy companies (1.0); office conference with Jonathan Etra and other attorneys regarding work to be done on the Founding Partners case and issues to explore as well as case strategy (1.4); telephone call with Jonathan Etra to David Siegel regarding accounting firm activities in Founding Partners case (.1); review and revise draft motions to terminate leases and exhibits (.2); telephone conference with Mike Magidson regarding comparison of various credit and security documents and draft motion to terminate leases (.2); correspondence with Jonathan Etra regarding Annandale case against Founding Partners (.2); review Annandale complaint (.2); correspondence with Josephine Garrett regarding appearance in Dallas County state court and Annandale case (.1); telephone call to Mike Magidson regarding revisions to draft motions to terminate leases (.1); correspondence with Sheryl Siegel and Dan Newman regarding retention of counsel in Bermuda (.2); review Founding Partners web site; correspondence with Dan Newman regarding draft motions to terminate leases (.2); review affidavit and attachments filed by SEC (2.6 NO CHARGE); correspondence with \$420.00

2.80

6.00

\$1,890.00

SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 Mike Magidson regarding comparison of Sun Capital and Sun Capital Healthcare REDACTED agreements (.1); further revisions to draft motions to terminate leases (.6); continue review document files and indexes (1.4). 0.40 \$100.00 ONE - Draft motion to employ Cayman Islands 06/25/2009 SJF counsel 0.30 \$75.00 06/25/2009 SJF FIVE - Telephone conference with Dave Teets on insurance benefits \$75.00 0.30 SJF ONE - Draft motion to employ Bermuda counsel 06/25/2009 \$50.00 0.20 06/25/2009 SJF THREE - Telephone conference with REDACTED REDACTED employee of Founding Partners 0.20 \$50.00 06/25/2009 SJF THREE - Telephone conference with Dorothy Beard at Blue Cross on insurance issues 0.20 \$50.00 06/25/2009 SJF THREE - Draft letter to Texas Workforce Commission 1.50 \$225.00 06/26/2009 ONE - Conducted research for memorandum AHM REDACTEDInitiated document review of e-mail files per D. Newman. 5.00 \$1,575.00 ONE - Review correspondence from Ian 06/26/2009 DSN Anderson regarding meeting with Sun (.1); review correspondence from Ian Anderson regarding potential expert relating to health care issues (.1); review correspondence from Ian Anderson regarding Founding Partners Global Fund Inc. (.1); draft correspondence to Brenda Fradera regarding investor in Bermuda Fund (.1); review correspondence from Brenda Fradera regarding Bank of Bermuda information (.1); review correspondence from Michael Magidson REDACTED regarding relating to results Gunlicks' properties (.2); review correspondence from Jonathan Etra to Marissel Descalzo regarding information relating to Motion for Relief From Stay (.1); review correspondence from Marissel Descalzo in response to email (.1); review correspondence from Michael Magidson relating to Subpoena regarding William Gunlicks bank accounts and outstanding loans (.1); review correspondence from Leyza Blanco (.1); draft correspondence to Phil Von Kahle regarding Chicago office and various estimates (.1); review Motion filed by Sun Capital (.3); office conference with Receiver's counsel in light of filing by Sun Capital (1.5); conference with Susan

J-E

MAW

MDM

06/26/2009

06/26/2009

06/26/2009

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Barnes de Resendiz regarding schedule for subpoenas to be served (.3) (NO CHARGE); draft correspondence to landlords regarding June rent payments (.1); draft and revise responses to investors regarding status of investments and request for redemptions (.1); ONE - review correspondence from Scott Flint regarding deposition of HSBC Bank (.1); review correspondence from Scott Flint regarding Judy Aller and William Gunlicks (.1); telephone conference with REDACTED regarding Notice of Service of Subpoena for Deposition (.2); review correspondence from David Siegel, accountant, regarding information requested from accounting firm (.2); review correspondence from Michael Magidson regarding discovery request in litigation (.1); draft correspondence to Michael Magidson responding to same (.1); review correspondence regarding National Advisors Holdings (.2); review correspondence from Figari & Davenport (.3); telephone conference with Keith Verges at Figari & Davenport regarding Texas action (.3). Various conferences with counsel (.9) (NO CHARGE)- FIVE - review correspondence from investor K.W. (.1); revise response to investor K.W. (.1); 2.30 \$724.50 ONE - Conference with HSBC counsel concerning deposition and documents (.2). Meeting with accountants (.2). Preliminary review of Sun's filing on lifting of stay (.2). Conferences with Receiver and fellow counsel on issues and strategy relating to Sun (1.0). Work on letter to Sun counsel (.3). Work on Receiver's submission on Gunlicks' motion for lift of asset freeze (.4). \$465.00 ONE - Review documents, organize and prepare 3.10 binders of same relating Sun Capital Healthcare, Sun Capital, Inc., Founding Partners Capital Management Company's corporate records, and miscellaneous documents relating to Found Partners entities; Prepare table of contents for each entities binder 11.10 \$2,164.50 ONE - Review and analyze Gunlicks' Renewed Motion to Modify Asset Freeze, SEC's Response

and Gunlicks' Reply and exhibits attached thereto (.8); Research values for Gunlicks' properties (.7); Conference with Attorney Flint regarding same

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(.2); Research

REDACTED

1 in preparation for deposition of HSBC corporate representative (.6); Call with attorneys for North Shore Community Bank (.2); Correspond with Attorney Etra regarding same and prepare subpoena to North Shore (1.4); Review correspondence with Bank of Bermuda in preparation for HSBC deposition (.1); Review and analyze Sun's Motion to Modify Order Appointing Receiver (.6); Review scope of and Will Gunlicks subpoenas documents for (.1); Call with Receiver and attorneys regarding subpoenas to and complaint against Sun, Promise and Success (.3); Conferences with Attorney de Resendiz regarding scope of documents to be produced under subpoenas (1.2); Draft same (3.7); Call with Ms. Rollins, counsel for HSBC, regarding continuation of HSBC deposition (.1); Correspond with Attorney Etra regarding same (.1); Conference with Attorney Flint regarding service of subpoena to Judy Aller (.2); Conferences with Attorney de Resendiz and Attorney Flint regarding complaint against Sun entities (.8)

REDACTED

06/26/2009 P-A

FOUR - Telephone conference with process server (.1); Prepare memo to counsel regarding service information on HSBC (.1); Update deposition information regarding location (.1).

0.30

\$45.00

06/26/2009 SBR

ONE - Correspondence from Jonathan Etra regarding Gemino inquiry regarding financing healthcare receivable and review correspondence and documents (.3); office conference with David Siegel and Daniel Hughes to discuss tasks and priorities of Receiver's accountants (2.5); office conference with Dan Newman and Jonathan Etra regarding subpoena duces tecum, Sun Capital's motion to permit filing of litigation, and complaint against Sun Capital entities on loan defaults (.5); telephone conference with Mike Magidson re document request for subpoena and preparation of complaint (.5); telephone call to Mike Magidson re basic structure for complaint on loan defaults (.2); telephone call to Mike Magidson and Scott Flint to review and revise lists of documents for subpoena duces tecum (.6); telephone call to Mike Magidson re accounting

7.70 \$2,425.50

firm document request list (.1); telephone call from Mike Magidson regarding definitions for

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				
		subpoena duces tecum and defined terms for complaint on loan default (.1); telephone call with Mike Magidson to review additions and revisions to document request for subpoena duces tecum (.5)'; telephone call from Mike Magidson re draft subpoena and complaint (.1); review and revise draft subpoena and complaint (2.3).		
06/26/2009	SJF	FOUR - Research REDACTED	1.50	\$375.00
06/26/2009	SJF	ONE - Research REDACTED	2.70	\$675.00
06/27/2009	DSN	ONE - Review correspondence from Jonathan Etra regarding proposed letter to counsel for Sun Capital (.2); revise proposed letter to counsel for Sun Capital (.2); office conference with Jonathan Etra regarding proposed letter to counsel for Sun Capital (.1); review correspondence from accountants regarding proposed letter to Sun Capital (.1); review correspondence from accountants regarding communications with Sun Capital (.1); draft correspondence to accountants regarding information concerning William Gunlicks' assets and position of funds (.1); review and analyze briefs relating to William Gunlick's Motion to Modify Freeze Order and exhibits thereto in connection with Receiver's court-ordered response and stragetize with Jonathan Etra regarding various issues relating to same (1.7).	2.50	\$787.50
06/27/2009	J-E	ONE - Work on letter to Proskauer (2.0). Work on Receiver's submission on Gunlicks' motion for partial list of asset freeze (4.0).	6.00	\$1,890.00
06/27/2009	MDM	ONE - Review and analyze documents relating to REDACTED Agreements with Sun entities, including amendments and purported amendments (2.4); Draft complaint against Sun Capital Inc. and Sun Capital Healthcare Inc. (1.1); Calls with Attorney Flint regarding structure of complaint, potential causes of action and proper jurisdiction and venue (.3); Legal research regarding REDACTED and prepare preliminary analysis of same (1.2)	5.00	\$975.00
06/27/2009	SBR	ONE - Correspondence with J. Etra, D. Newman, S. Flint, and D. Siegel re letter to V. Paparo and	2.30	\$724.50

SEC v. Founding Partners Capital

Managemnt Co., et al. 43125.0001 review draft letter(.5); Correspondence with M. Magidson regarding amendments to REDACTED agreements and review same (.3); Review lock box schedule of deposit for Sun Capital (.2); Correspondence with D. Newman and D. Siegel regarding Gunlicks' motion for relief from asset freeze and review same (.5); Correspondence with D. Newman et al. regarding prior receiver's notices of default (.1); Correspondence from and to M. Magidson regarding Draft complaint against Sun Entities and review same (.3); Correspondence to J. Etra et al. regarding lock box systems and operations (.4).ONE - Continue to review loan documents and 2.30 \$575.00 06/27/2009 SJF incorporate provisions into complaint 6.50 \$1,625.00 SJF ONE - Continue to work on complaint against 06/27/2009 Sun entities 5.20 \$1,638.00 06/28/2009 J-E ONE - Reviewed relevant filings and affidavits, continued drafting Receiver's's submission on Gunlicks' motion for relief from asset freeze, revised and distributed same (4.7). Work on Work on certificates/security interests (5). 5.50 \$1,072.50 FOUR - Continue to draft Sun complaint (3.9); 06/28/2009 **MDM** Legal research regarding REDACTED : (.6); Review and analyze SEC testimony of Howard Koslow (1.0) 2.30 \$724.50 06/28/2009 SBR ONE - Correspondence with M. Magidson regrading information requests to Sun Capital entities and review same (.8); Correspondence with J. Etra et al. regarding Receiver's response to Gunlicks' motion to unfreeze assets and review same (.1.2); Correspondence with J. Etra et al. regarding Sun Capital Healthcare Borrowing Certificates and review same (.2); correspondence with D. Siegel requesting report on Sun Capital Healthcare lock box deposits (.1). \$875.00 ONE - Continue to work on complaint against 3.50 06/28/2009 SJF Sun entities 1.20 \$300.00 SJF ONE - Research other litigation in the country 06/28/2009 against Sun entities \$495.00 ONE - Performed document review of e-mail 3.30 06/29/2009 **AHM** correspondence per D. Newman. 2.30 \$345.00 06/29/2009 **AHM** ONE - Conducted research regarding REDACTED

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REDACTED

06/29/2009 DSN

4.90 \$1,543.50

ONE - Review and revise proposed motion to be filed by Receiver in connection with Bill Gunlick's Motion for Relief from Asset Freeze (.5); conference with Jonathan Etra regarding Receiver's Response to Motion for Relief from Asset Freeze (.3); review correspondence from counsel for Phil Fues (.1); review correspondence from Michael Magidson regarding former employee of Founding Partners (.1); conference with Andrew Mullens regarding research to be performed regarding to request to modify asset freeze (.1); review and analyze cases cited by Andrew Mullens (.8); THREE - review draft letter to be sent to Texas regarding unemployment request by former employee and provide revisions to same (.1); ONE - draft correspondence to David Siegel regarding accounting firms (.1); telephone conference with David Siegel regarding lock box, Sun Capital and other issues (.4); office conference with Jonathan Etra regarding proposed letter to be sent to counsel for Sun, review letter and provide revisions to same (.4); office conference with Jonathan Etra regarding call from counsel for Sun and revisions to be made to proposed letter (.2); ONE - draft correspondence to Michael Magidson regarding contact with bank regarding freeze letter (.1); review correspondence from counsel for Sun regarding telephone conference to take place (.1); review correspondence from David Siegel regarding former accountant to Founding Partners (.1); draft correspondence to landlord for Naples office space (.2); THREE - draft correspondence to counsel for landlord for Chicago office space (.2); ONE - review correspondence from Leyza Blanco regarding storage unit (.1); draft correspondence to Levza Blanco regarding same (.1); review revised letter to be sent to counsel for Sun regarding revised Motion (.2); draft correspondence to Leyza Blanco in response to correspondence (.1); FOUR - review correspondence from investor P.M. (.1); draft correspondence to investor P.M. (.1); review follow up correspondence from investor P.M. (.1); ONE - office conference with Andrew Mullens regarding research to be performed regarding: REDACTED **L**(.3).

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				
06/29/2009	J-E	ONE - Worked on submission by Receiver on Gunlicks's Motion For Relief From Asset Freeze. (2.0). Conferences with accountants on Sun issues (.4). Call with counsel to Sun on discovery and resolutions (.3). Conferences with Receiver on Sun issues (.4)	3.10	\$976.50
06/29/2009	MDM .	ONE - Edit Receiver's Submission Concerning Gunlicks' Motion to Modify Asset Freeze (.7); Status conference with Receiver and Attorney Etra (.3); Review edits to Sun complaint made by Attorney de Resendiz and revise same (2.1); Finalize Motions to Terminate Leases (.4); Conference with Receiver regarding same (.1); Conference with Ms. Fradera regarding M&I Wealth Management freeze letter (.1); Call Ms. Lauren at M&I regarding same (.1); Draft correspondence to Receiver and Attorney Etra regarding same (.1); Conferences with Attorney Etra and Receiver regarding edits and revisions to Receiver's Submission Concerning Gunlicks' Motion to Modify Asset Freeze (.6); Edit and revise same, compile and review exhibits in preparation for filing and file same (4.4); Conference with Receiver regarding Sun complaint and subpoenas (.1); Draft correspondence to Attorney de Resendiz regarding same (.1)	9.10	\$1,774.50
06/29/2009	P-A	FOUR - Review various communications with Receiver, counsel and others pertaining to rescheduling of HSBC's deposition (.3); Arrangements for rescheduling of deposition, possible mail in of records (.3).	0.60	\$90.00
06/29/2009	SBR	ONE - Revise draft response to Gunlicks' motion to unfreeze assets (1.5); Revise draft letter to V. Parparo (1.1); Correspondence with J. Etra regarding response to Gunlicks' motion and letter to V. Parparo (.2); Revise draft Complaint against Sun Entities (2.3); Correspondence with M. Magidson regarding draft complaint (.2).	5.30	\$1,669.50
06/29/2009	SJF	FOUR - Continue to incorporate changes into complaint from loan documents	1.50	\$375.00
06/29/2009	SJF	ONE - Research re: REDACTED	1.20	\$300.00
06/29/2009	SJF	ONE - Research REDACTED issue	0.80	\$200.00
06/29/2009	SJF	ONE - Research REDACTED	1.50	\$375.00
06/29/2009	SJF	ONE - Review UCC financing statements in favor	0.60	\$150.00

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				Page 45
		of Founding partners from Sun Capital and incorporate language from statements into complaint against Sun Entities		
06/29/2009	SJF	ONE - Telephone conference with Ed Shohat, attorney for Judy Aller	0.10	\$25.00
06/29/2009	SJF	FOUR - Finalize and mail letter to Texas unemployment commission	0.20	\$50.00
06/30/2009	AHM	ONE - Status meeting regarding Sun Capital strategy and goals of document review.	1.20	\$180.00
06/30/2009	AHM	ONE-Performed document review of e-mail correspondence per D. Newman.	4.50	\$675.00
06/30/2009	DSN	ONE - Meeting with Receiver's counsel regarding various issues including those pertaining to Sun lock box and subpoenas to be issues (1.3); telephone conference with Receiver's counsel and SunTrust regarding Founding Partners related accounts at SunTrust (1.0); review correspondence from Kehinde George regarding proposed letter to be sent to Bank of Bermuda (.2); revise proposed letter to be sent to Bank of Bermuda (.1); review follow up correspondence from Kehinde George and revised letter (.2); draft correspondence to Kehinde George regarding revised letter (.1); review correspondence received from counsel for Bank of Bermuda (.2); draft correspondence to Kehinde George regarding retainer terms (.2); review correspondence from Kehinde George regarding retainer terms (.1); conference with counsel for Receiver regarding items to be listed in various subpoenas (.4); review correspondence from counsel for William Gunlicks regarding personal mail (.1).	3.90	\$1,228.50
06/30/2009	J-E	ONE - Work on Bermuda and Cayman issues (1.0). Work on Sun issues, conferences with Receiver, counsel, and accountants (5.0).	6.00	\$1,890.00
06/30/2009	MDM	ONE - Status conference with Receiver (.6); Conference with Attorney de Resendiz regarding revisions to Sun complaint and subpoenas (1.0); Call with Mr. Siegel regarding collateral and Sun lockbox accounts (.7); Draft correspondence to Mr. Siegel regarding same (.1) Call with Mr. Stein, counsel for North Shore Bank, regarding documents to be produced in response to subpoena (.4); Draft correspondence to Receiver and Attorney Etra regarding same (.1); Review	13.30	\$2,593.50

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001

correspondence from Bermuda counsel regarding filing by Cayman liquidator and proposed response and confer with Receiver regarding same (.2); Draft schedule to subpoena for SunTrust (.3); Participate in conference call with SunTrust representatives and counsel (1.5); Strategy conference regarding REDACTED

with Receiver, Attorney Etra and Attorney de Resendiz (1.0); Review SunTrust Master Lockbox Agreements to determine Founding Partners' rights and Draft Transfer Notices to SunTrust (.5); Strategy conference with Attorney REDACTED regarding Etra and Attorney de Resendiz (1.4); Research conference with Attorney Etra regarding issues likely to be raised by Sun in response to seizure of lockboxes (.3); Review prior court filings regarding Sun's Motion for TRO and confer with Attorney Etra regarding same (.8); Revise Sun REDACTED complaint (.6); Research

REDACTED (.7); Strategy

conference regarding

REDACTED

t (2.7); Prepare notes

regarding same (.4)

06/30/2009 SBR

ONE - Conference with M. Magidson regarding document requests for Sun Entities and revised complaint against Sun Entities (.6); Conference with D. Newman, M. Magidson, and A. Mullen to discuss status of letter to V. Paparo, document requests to Sun Entities, and complaint against Sun Entities (.8); Call to D. Siegel to discuss operation of Sun lock box system and amount of Founding Partners collateral (.9); Conference with M. Magidson regarding Sun lock box system (.1); revise draft complaint (.5); Correspondence with R. Wolin regarding Annandale litigation in Dallas County (.1); Call from D. Seigel re lock box deposits (.1); Conference with M. Magidson and J. Etra regarding strategy for Sun document requests and complaint (1.4); conference call with D. Newman et al. and Sun Trust and counsel regarding lock box arrangements and Sun Entities accounts (1.5); Conference with M. Magidson : and regarding REDACTED revisions to complaint (.7); Correspondence and calls with R. Kobert regarding status for Founding Partners cash collateral and strategy re

9.60 \$3,024.00

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		Cayman Islands and Bermuda proceedings (.1); Correspondence with M. Magidson re Union Planters Bank (.1); Review Correspondence regarding Ernst & Young audit of Sun Capital Entities in 2007 (.3); Correspondence with D. Siegel re loan balances owed by Sun Capital Entities to Founding Partners Entities (.2); Review draft notices required by Tripartite Agreements (.1); Correspondence with J. Etra re Receiver's rights to cash in Sun Capital Accounts (.1).		
06/30/2009	SJF	ONE - Work on Rule 26 disclosures	1.50	\$375.00
06/30/2009	SJF	ONE - Continue to work on complaint	1.60	\$400.00
06/30/2009	SJF	ONE - Review and edit schedules to subpoenas	0.80	\$200.00
06/30/2009	SJF	ONE - Telephone conference with Ed Shohat, attorney for former CFO of Founding Partners, Judy Aller	0.20	\$50.00
07/01/2009	AHM	ONE - Conducted research related to	3.10	\$465.00
		REDACTED		
07/01/2009	DSN	ONE - Review correspondence from Michael Magidson and conference regarding various subpoenas to be prepared (.3); meet with various investor groups represented by Rick Adisson in connection with Alendale case in Dallas, Texas (2.1); review and revise motions to employ legal counsel (.5); draft correspondence to counsel for witness regarding interview (.1); review correspondence from counsel for witness regarding interview (.1); office conferences with counsel regarding strategy (2.5); review additional correspondence from counsel for witness (.1); review correspondence from accountants regarding tasks to be performed (.1); meet with accountants regarding review of Sun	8.80	\$2,772.00

same (.6); Conference with J. Etra, D. Newman, M. Magidson, and R. Kobert re status of and strategy for recovery of Founding Partners loans and collateral (2.7); correspondence with D. Siegel regarding lock box deposit information for Sun Capital Healthcare (.1); Correspondence discussing Founding Partners deposit accounts in

materials and visit to Sun facilities (.9); review

correspondence from accountants regarding Founding Partners document production as of July 1 (.1); draft correspondence to accountants

subpoena to SunTrust (.2); review

07/01/2009

07/01/2009

07/01/2009

07/01/2009

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	regarding information to be obtained from Sun (.2); review additional correspondence from accountants regarding meeting at Sun (.1); review correspondence from investor P.M. (.1); telephone conference with investor P.M. (.5); review correspondence from accountants regarding communications with Sun and meeting to be had on July 2nd (.1); review correspondence from Jonathan Etra to counsel for Sun regarding production of materials; review correspondence from Susan Barnes de Resendiz regarding items to be followed up on by accountants (.2); review correspondence from Ed Schohat regarding subpoena to Judy Aller, timing of deposition testimony and documents (.2); draft correspondence to Ed Schohat regarding same (.1); telephone conference with Ed Schohat regarding July Aller deposition and testimony dates (.3).		
LP	ONE - Review and respond to e-mail correspondence from Attorney Etra regarding lock box cash flow.	0.30	\$94.50
MDM	ONE - Revise schedules to Sun, Promise and Success subpoenas (.7); Conference with Attorney Etra regarding same (.1); Status and research conference with Attorney Flint (.2); Conference with accountants regarding collateral in lockboxes (.6); Finalize schedule to SunTrust subpoena and send to SunTrust's counsel (.6); Analyze local rules regarding deadline for response to Sun's Motion to Modify Order Appointing Replacement Receiver and confer with Attorney Etra regarding same (.6); Revise Sun complaint (2.0); Analyze Sun financial data received from Berkowitz (.2); Revise Motion to Employ Legal Counsel in Bermuda, prepare exhibits for same, confer with Receiver and Attorney Etra regarding same and file same (2.9); Prepare notes regarding task list items (.2)	8.10	\$1,579.50
RSK	ONE - Host call with prior receiver Leyza Blanco regarding open issues during transition; lock box review and default demand on sum. (No Charge)	0.60	\$0.00
RSK	ONE - Extensive conference regarding	2.80	\$0.00

REDACTED

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\$2,425.50

REDACTED

:(No

7.70

Charge).

07/01/2009 SBR

ONE - Further revisions to letter to v. Paparo (.2); conference with D. Siegel, J. Etra, D. Hughes, D. Newman, and M. Magidson to prepare for accountants' meeting with Sun (1.1); Correspondence with R. Wolin and J. Etra re Annandale litigation (.1).; Correspondent with D. Newman and J. Etra re communication with V. Paparo (.2); correspondence with J. Crutcher re Annandale case and withdrawal and substitution of counsel (.2); call from R. Kobert re first Sun receiver (.2); conference call with R. Kobert and L. Blanco re activities during first receiver's appointment (1); conference with D. Newman re complaint and seizure of lock boxes (.2); correspondence with D. Siegel et al. re topics to address at meeting with Sun (1); correspondence with D. Newman et al. regarding response to Sun Capital's motion to lift stay (.1); correspondence with J. Etra et al. re Annandale litigation (.2); review and revise complaint on loan defaults (1.2); review Sun Capital financial information for Jan.-Feb. 2009 (.2); correspondence with J. Etra re same (.1); correspondence with D. Seigel regarding status of document productions from Sun (.1); correspondence with J. Etra to V. Paparo regarding Sun's lack of document production and revise same (.2); correspondence with D. Siegel re Suntrust Lock Box credits and debit reports and review same (.2); correspondence frrom M. Magidson re lock box reports (.1); FOUR review correspondence from Belmont Strategic Investors (.1); ONE - conference with J. Etra, D. Newman, and M. Magidson re accounts' activities and written confirmation of same (.2); correspondent to M. Magidson et al. regarding REDACTED legal research on? and review same (.2); correspondence with R. Kobert re amount of lock

07/02/2009 AHM

ONE - Performed document review of Gunlicks' e-mail correspondence and continued research of

correspondence to V. Paparo (.2).

box collateral and amount of loans outstanding (.1); correspondence to D. Siegel re information learned from L. Blanco (.3); review and revise

REDACTED

0.50

\$75.00

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07/02/2009 DSN

ONE - Review correspondence from counsel for Plaintiffs in Texas litigation (.1); draft correspondence to Rick Adisson, counsel for Plaintiffs in Texas litigation (.1); review court order approving emergency motions to retain counsel in Cayman Island and Bermuda (.1); draft correspondence to counsel in Cayman Islands regarding court order (.1); draft correspondence to counsel in Bermuda regarding court order (.1); telephone conference with forensic accountants regarding documents to be obtained and reviewed (.3); review Motion for Protective Order filed by HSBC (.2); review court order directing that we file response to Motion for Protective Order (.1); office conference regarding posting various orders and filings on the Receiver's website (.1); draft correspondence to retain counsel in Bermuda regarding steps to be taken in light of court order (.1); telephone conference with counsel for landlord in Naples regarding rent payment (.2); review correspondence from counsel for Naples office regarding rent payment (.1); telephone conference with counsel for Judy Aller regarding appearance for deposition testimony and production of documents (.2); review correspondence from counsel for Sun regarding production of documents (.2); telephone conference with counsel and accountants regarding receipt of letter from counsel for Sun regarding production of documents and contents thereof (.2); review correspondence from Ross McDonough, counsel in the Cayman Islands (.1); draft correspondence to counsel for former employee (.1); review correspondence from counsel for former employee (.1); review REDACTED : Agreement (.3); review and revise proposed correspondence to be sent regarding Sun (.4); office conference with counsel regarding strategy of various tasks to be performed (.5); review correspondence from Rick Rein (.1); draft correspondence to Rick Rein (.1); telephone conference with Rick Rein (.2); office conference with accountants regarding materials and information received from Sun (.5); office conference with counsel regarding various filings to be effectuated including subpoenas for 30(b)(6) deposition testimony (.4).

5.00 \$1,575.00

07/02/2009 MDM ONE - Call with clerk of Court regarding 7.90 \$1,540.50

1.60

10.30

\$240.00

\$3,244.50

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001

> emergency nature of Motion to Employ Legal Counsel in Bermuda and Cayman (.1) Conference with Attorney Flint regarding additional documents found in Chicago office of FP (.2); Review order granting Emergency Motion to Employ Legal Counsel in Bermuda and Cayman (.1); Analyze HSBC's Motion for Protective Order (.1); Analyze REDACTED

> Agreement between Promise Healthcare, Inc. and FP Stable Value Fund, REDACTED Agreement and related documents and prepare summary of same (.8); Call with Attorney de Resendiz regarding same (.2); Correspond with Receiver and attorneys regarding same (.1); Correspond with Attorney Etra regarding response to HSBC Motion for Protective Order (.1); Confer with A. Mullens regarding same (.1); Analyze REDACTED Agreement between Stable Value and Global Fund Ltd. and prepare summary of same (1.0); Final revisions to Motions to Terminate Leases and correspond with Receiver and Attorney de Resendiz regarding same (.5); Calls with Receiver and Attorney de Resendiz regarding letter to Sun counsel (1.8); Finalize subpoenas, schedules thereto and 30(b)(6) Notices and transmit and file same (2.8)

07/02/2009 P-A

FOUR - Arrange for further settings to be made to website (.6); Upload Motion and Order regarding appointment of legal counsel in Cayman Islands and Bermuda, Cayman Island Orders for Appointment of Provisional Liquidators (.8); Prepare memo to counsel and Receiver (.2).

ONE - Review stock pledge agreement and HLP

07/02/2009 SBR

loan agreement (.6); correspondence with M. Magidson re same (.1); call from M. Magidson re same (.7); review and revise subpoenas and document requests (.5); correspondence with J. Crutcher re Annandale case and substitution of counsel (.2); review and revise motions to terminate leases and correspondence re same (1); further revisions to document requests (.5); call from D. Siegel to report on meeting with Sun (.9); review HSBC protective motion and correspondence re same (.3); review: REDACTED agreement and summary of same (.8); conference call with D. Newman and M. Magidson re strategy and letter to Sun counsel (.8); conference with D. Newman re same (.4); final review of

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subpoenas and document requests (.6); review
correspondence regarding retention of Bermuda
counsel (.1); correspondence with D. Newman
and D. Seigel re topics for accountants' meeting
with Sun (.3); reviewREDACTEDagreement and
amendments (.6); call from R. Kobert re first
receiver's actions (.2); conference with D.
Newman and finalize letter to Sun's counsel (.9);
review correspondence from Sun Capital's
counsel re Sun's production of Documents (.1);
review Annandale mediation order (.1); draft5
letter to Sun's counsel re Sun's plan to repay loans
to Founding Partners and review correspondence
from D, Newman and M. Magidson re same (.6)
ONE - Review documents relating to Founding
Partners Chicago
ONE - Draft numerous correspondence to
accountants regarding documentation to be

\$350.00 1.40

3.40

(.4).

DSN 07/03/2009

07/02/2009

SJF

accountants regarding documentation to be prepared (.3); review correspondence from Rick Adisson (.1); telephone conference with Rick Adisson regarding factual information (.2); draft correspondence to David Siegel regarding various issues (.1); draft correspondence to Ross McDonough regarding receipt of correspondence from counsel for Bank of Bermuda (.1); review and revise draft complaint (1.0); draft correspondence to counsel regarding issues and revisions to be made to various documents (.1); review various documents relating to Founding Partners' Sun relationship (.5); draft numerous correspondence to counsel regarding tasks to be performed (.6); various conferences with counsel re: strategy for Bermuda and recovery of assets

\$1,071.00

07/03/2009 **MDM** ONE-Correspond with Receiver regarding motions to terminate leases and potential objections by opposing counsel (.1); Correspond with Attorney and Receiver regarding possible lawsuit (.2); Review ? REDACTED agreement provisions and draft correspondence regarding same (.3); Review correspondence from REDACTED n, moving Receiver regarding out of Chicago office, Cayman and Bermuda proceedings, documents to be posted to web site and research issues for Sun complaint and follow up regarding same (.2); Review Receiver's comments to draft Sun complaint (.3); Revise

1.80 \$351.00

	Founding mnt Co.,	Partners Capital		Page 53
		same (.3); Review and analyze Howard Koslow's SEC testimony from March 2009 (.4)		
07/03/2009	SBR	ONE - Review Sun's motion to lift Stay and outline reply.	2.10	\$661.50
07/04/2009	MDM	ONE - Correspond with Receiver and attorneys regarding Sun subpoenas (.8); Review and analyze Federal Rule of Civil Procedure 45 regarding issuance of subpoena in distant district (.3); Review memorandum prepared by accountants regarding meeting with Sun (.4)	1.50	\$292.50
07/04/2009	SBR	ONE - Review and responde to correspondence regarding issuance and service of subpoenas on Sun (.5); review correspondence and memo from D. Siegel re meeting with L. Leder at Sun (.7).	1.20	\$378.00
07/05/2009	MDM	ONE-Review and analyze Howard Koslow's SEC testimony from March 2009 (2.5) (NO CHARGE); Review and analyze prior Receiver's Motion to Expand Receivership to include Sun and reply to Sun's response, and prior Receiver's response to Sun's Motion for TRO (.7); Revise draft Sun complaint in light of Koslow testimony (1.1)	1.80	\$351.00
07/05/2009	SBR	ONE - Review L. Blanco memo re actions of first receiver and information obtained (.8); partially review Koslow deposition by SEC (.5); correspondence with M. Magidson re Koslow deposition (.1).	1.40	\$441.00
07/06/2009	АНМ	ONE - Conducted research concerning REDACTED (NO CHARGE).	5.60	\$0.00
07/06/2009	DSN	ONE - Conference with counsel regarding various issues including subpoenas to Promise, proposed depositions with Promise, documents provided by Sun and Promise, letters to be sent to the Sun Entities (1.5); review correspondence from Marissel Descalzo, counsel for William Gunlicks, regarding Gunlicks' personal mail (.1); review memo prepared by David Siegel relating to documents produced by Sun and meeting with Sun (.3); telephone conference with accountants regarding meeting with Sun Entities and documentation provided (.3); review correspondence relating to Mr. Gunlicks' personal mail (.1); review correspondence from counsel	6.90	\$2,173.50

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001

> SunTrust regarding subpoena (.1); telephone conference with counsel in Bermuda relating to strategy (.5); draft correspondence to counsel in Bermuda regarding strategy (.1); review Notice of Issuance of Subpoena regarding M&I (.1); draft correspondence to Phil Von Kahle regarding move of Chicago office (.1); review correspondence from Phil Von Kahle regarding same (.1); review correspondence regarding former employee and access to office (.1); review correspondence from counsel relating to strategy and response to Sun Motion to Lift Stay and strategy regarding various issues (.3); review correspondence from counsel to counsel for HSBC relating to Motion for Protective Order (.1); review correspondence between counsel and counsel for HSBC regading deposition of HSBC (.1); review follow up correspondence from counsel for SunTrust regarding subpoena and conference with counsel regarding same (.2); review correspondence from Bermuda counsel regarding letter to be sent to counsel for Liquidator and HSBC (.3); draft correspondence to Bermuda counsel providing comments to proposed correspondence (.4); review correspondence from counsel regarding conversation with investor relating to dealings between investor and Founding and Sun Entities and follow up communications regarding same (.3); draft correspondence to counsel relating to factual issues pertaining to various investors' investments in Founding Partners (.2); review various correspondence from counsel relating to subpoena to SunTrust (.2); review correspondence from Mara Beth Sommers regarding Tolling Agreement and respond to correspondence from Mara Beth Sommers regarding Tolling Agreement (.2); review draft letters to be sent to Sun Entities and provide comments relating to same (.5); review correspondence from Phil Von Kahle relating to move (.1); review correspondence from counsel regarding to legal issues pertaining to agreements with Sun (.3); review correspondence relating to legal issues pertaining to Sun (.3)

07/06/2009 J-E

ONE - Reviewed reports from accountant on efforts to obtain voluntary disclosure from Sun and correspondence with Sun counsel (.7).

5.70 \$1,795.50

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Reviewed draft complaint against Sun (.5). Correspondence with counsel to HSBC regarding motion for protective order, research on same, began drafting opposition papers (2.5). Conferences with Ms. Barnes-deResendiz on issues regarding Sun and review of draft letters (1.5). Worked on subpoenas and notices of same (1.0). Call with counsel to investors and follow up on potential witness identified (.5).

07/06/2009 MDM

7.50 \$1,462.50

ONE - Finalize Sun, Promise and Success subpoenas and confer with attorneys regarding same (1.7); Correspond with Mr. Foster, SunTrust counsel, regarding subpoena (.1); Call Ms. Coley, counsel for M&I Bank regarding subpoena and documents to be produced (.3); Prepare correspondence regarding same (.2); Prepare subpoena to M&I Bank for records relating to FP or Gunlicks accounts (.1); File Notices of Issuance of Subpoena for M&I Bank, Promise and Success (.2); Confer with Attorney Etra regarding REDACTED : Agreement (.3); Confer with Attorney Flint regarding response to Sun's motion to lift litigation stay against FP (.4); Confer with Attorney de Resendiz regarding letters to Sun and Sun's counsel regarding invalid consents and waivers (1.1); Research NY Law (1.6); Prepare Notices of Issuance of Subpoena to SunTrust and North Shore Bank (.2); Conference with Attorneys Etra and de Resendiz regarding allegations in draft Sun complaint (.7); Call with Attorneys Kobert and de Resendiz regarding Sun strategy (.4); Review correspondence from Attorney de Resendiz regarding waivers and consents permitted under agreements (.2)

07/06/2009 P-A

ONE - Finalize subpoenas for documents to Promise Healthcare and Success Healthcare (.6); Finalize subpoenas for deposition to Sun Capital and Sun Capital Healthcare (.6); Meet with counsel and arrange for rush service this afternoon of all subpoenas upon direction from counsel (.6); Prepare correspondence to process server relative to same (.2); Review filing regarding Gunlick's renewed emergency motion regarding asset freeze (.2); Meet with counsel (.2); Arrange for same to be posted on website (.4); Telephone conferences with Veritext Reporting regarding upcoming depositions (.1); Assist with Notice of Issuance of Subpoenas,

3.30 \$495.00

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filing of same (.4).

RSK 07/06/2009

ONE - Various conferences regarding

1.40

\$0.00

REDACTED

(No Charge)

SBR 07/06/2009

ONE - Continue reviewing Koslow deposition

\$3,181.50 10.10

(.8); review correspondence regarding J. Aller deposition (.1); correspondence with D. Newman regarding assignment between Stable-Value and Global Fund (.1); correspondence to D. Newman et al. re response to Sun's motion to lift stay (.1); review and revise draft revocation of consents (.4); review and revise draft letter to Sun's counsel requesting a repayment proposal (.6); correspondence regarding Annandale case in Texas (.1); correspondence regarding revised complaint for judgment on loan agreements (.1); correspondence regarding response from Sun's counsel and review same (.2); correspondence with D. Siegel re document request and Sun's response (.1); review draft letter to Bermuda counsel (.1); conference with J. Etra et al. regarding status of Sun's production of documents to Receiver's accountants (.6); correspondence with D. Newman et al. regarding preparation of written request to Sun to repay loans (.3); call from M. Magidson to discuss revocation (.3); conference with J. Etra regarding revocation letter (.5); review case management order (.2); review and revise request for repayment plan per J. Etra and correspondence with J. Etra regarding same (.2); correspondence from and to J. Etra regarding discussion with J. Russell representing certain investors (.1); correspondence from and to D. Newman regarding defaults under REDACTED agreements (.1); review and revise revocation letter and correspondence with M. Magidson regarding same (.5); conference call with R. Kobert and M. Magidson re revocation of consents and waivers (.5); correspondence with R. Kobert regarding consents and waivers in loan agreements (.1); correspondence from D. Siegel re outcome of today's document production (.3); conferences with J. Etra to review terms of credit agreements and effect of revocation (1.5); conferences with D. Newman to discuss strategic and legal effect of revocation (1.2); correspondence with M. Magidson re NY law on

	Founding nnt Co.,	Partners Capital		Page 57
		revocation of consents and waivers (.2); review Sun's counsel's letter responding to Receiver's accountants' request for documents and confer with J. Etra re same (.6); correspondence with D. Siegel re same (.1); correspondence to D. Newman et al regarding Sun's motion to lift stay (.2).		
07/06/2009	SJF	ONE - Research REDACTED	2.50	\$625.00
07/06/2009	SJF	ONE - Begin draft response to motion to lift stay filed by Sun Capital	2.20	\$550.00
07/07/2009	AHM	ONE - Conducted research on REDACTED issues.	1.90	\$285.00
07/07/2009	DSN	ONE-Review correspondence regarding conference to be held between counsel for Receiver and counsel for Sun (.1); review correspondence from counsel regarding letters to be sent to Sun (.1); review correspondence from Trish Anzalone regarding service of process and draft correspondence to Trish Anzalone regarding same (.1); review correspondence between Receiver's counsel and counsel for Founding Partner Entity relating to Dallas litigation (.1); review correspondence from Ian Anderson regarding Motion to Terminate Lease (.1); review correspondence from Ross McDonough regarding petitions in Cayman Islands (.1); telephone conference with Susan Barnes de Resendiz regarding strategy and various factual issues regarding telephone conference with counsel for Sun and steps for moving forward (.5).	1.10	\$346.50
07/07/2009	J-E	ONE - Worked on discovery issues regarding Sun (.4). Conference call with Bermuda and Cayman counsel and report on same (.7). Worked on opposition to HSBC's motion for protective order (3.0).	4.10	\$1,291.50
07/07/2009	MDM	ONE - Continued review and analysis of Koslow's SEC testimony (.7); Conference with T. Anzalone regarding service of Sun subpoenas and documents to be posted to website (.1); Confer with Attorney de Resendiz regarding letters to Sun and letter to Paparo regarding repayment plan and revise same (3.1); Research for Response to HSBC's Motion for Protective Order (3.4); Confer with Attorneys de Resendiz and Etra in preparation for conference call with Sun counsel (.5); Conference call with Sun counsel, Proskauer	14.30	\$2,788.50

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Rose (.5); Prepare summary of same (.3); Confer with Attorneys de Resendiz and Etra regarding depositions of Sun corporate representative (.3); Confer with Attorney Etra regarding Memorandum in Opposition to HSBC's Motion for Protective Order and draft same and file (5.4)

07/07/2009 P-A

ONE - Telephone conferences with server in Boca Raton, Steve Navarette and others (.4); Prepare memo to counsel and Receiver regarding service effected on general counsel (.2); Prepare second memo regarding same (.2); Review Gunlick's renewed emergency motion to modify asset freeze, SEC's response, and Gunlick's reply in support of his renewed emergency motion (.5); Post all documents on website and prepare memo to counsel and Receiver (.3).

07/07/2009 SBR

ONE - Correspondence from and to Sun's counsel re conference call to discuss refusal to attend depositions (.2); correspondence with Receiver, J. Etra, and M. Magidson regarding letters (.4); correspondence with D. Siegel re July 6 meeting with Sun for production of documents (.5); calls and correspondence regarding HLP Loan and request for repayment after maturity (.2); correspondence with J. Etra re service of subpoenas (.1); correspondence with J. Crutcher regarding substitution of counsel (.2); review corporate matrices for Success and Promise (.4); call from M. Magidson re revisions to letters (.1); review final subpoenas to prepare for conference call with Sun counsel (.4); correspondence to D. Siegel requesting meeting to discuss Sun document production (.1); review correspondence from's Sun counsel regarding subpoenas (.1); conference with M. Magidson and J. Etra to prepare for conference call with Sun's counsel regarding Sun's intention to comply with Receiver's subpoenas (.5); call from D. Newman regarding subpoenas to Sun (.1); conference call with Sun's counsel and M. Magidson regarding Sun's refusal to comply with the Receiver's subpoenas (.5); call from D. Siegel re status of Sun's document production (.3); review and revise consent revocations and cover letter (.5); review and revise letter to Sun's counsel requesting repayment plan (.4); correspondence to and from Sun's counsel regarding issues raised during conference call (.2); review documents from

1.60 \$240.00

7.90 \$2,488.50

		Initial Receiver's office and email to D. Newman re same (.5); review J. Aller's counsel's correspondence regarding response to document request (.1); correspondence with D. Newman et al. and conference with M. Magidson re legal effect of consents and waivers in loan agreements (.4); conference with J. Etra and M. Magidson regarding Sun's refusal to appear in response to subpoenas (.4); call from D. Newman regarding same (.4); correspondence with D. Siegel re status of document production (.2); review D. Siegel's report re same (.6); correspondence from and to S. Aufiero regarding Sun's counsel's demand to call him immediately (.1)		
07/07/2009	SJF	ONE - Continue to work on response to motion to lift stay of litigation filed by Sun Capital	3.20	\$800.00
07/07/2009	SJF	ONE - Continue work on opposition to motion to modify receivership order	2.30	\$575.00
07/08/2009	AHM	ONE - Receipt and review and indexing of Founding Partners Capital Management mail (1.1); attended status meeting regarding upcoming issues (1.0 NO CHARGE); initiated document review of the files produced by Judy Aller per D. Newman (2.1).	3.20	\$480.00
07/08/2009	DSN	ONE - Meet with counsel and strategize regarding various issues pertaining to receivership recovery of assets and Sun's Motion to Lift Stay (1.0); draft correspondence to Bermuda and Cayman counsel regarding strategy in light of events in Bermuda (.1); telephone conference with former receiver regarding various factual issues (.2); telephone conference with counsel for SEC regarding factual issues and court filings (.3); review multiple correspondence from counsel for former employee and responses thereto (.2); review correspondence relating to motions to terminate leases (.2); review correspondence regarding Chicago office (.1); draft correspondence to landlord regarding Naples property and enclosing payment (.2); review correspondence from David Siegel regarding various issues (.1); review correspondence to David Siegel regarding various financial issues relating to Sun documents (.1); review follow up email from David Siegel regarding status of Founding Partners' loans to Sun Entities (.1); draft correspondence to Phil Von Kahle regarding moving services (.1);	3.30	\$1,039.50

Re: Daniel S. Newman, Receiver

SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 conference with Jonathan Etra regarding conference with institutional investor (.2); review correspondence from Susan Barnes de Resendiz regarding substitution in Texas action; review correspondence to be sent to counsel for Sun regarding request for standstill agreement and conference with counsel regarding same (.3); review research relating to lease termination issues (.2); review correspondence to counsel relating to draft standstill agreement (.1). 1.00 \$315.00 ONE - Work on Sun issues (.7). Calls and 07/08/2009 J-E correspondence with investor group (.3). 1.20 \$180.00 ONE - Reviewed and logged incoming mail 07/08/2009 J-R 4.90 \$955.50 ONE - Status and strategy conference with 07/08/2009 **MDM** Receiver and attorneys (1.0); Draft letter to Mr. Paparo regarding settlement discussions and confer with Attorney de Resendiz and Receiver regarding same (1.5); Calls with Ms. McLaughlin, former FP employee, and Mr. Bendix at Dykema regarding personal items at FP Chicago office issue (.3): Correspond with Ms. Descalzo, counsel for Mr. Gunlicks, regarding motion to terminate leases (.2); Confer with Attorney Etra and Receiver regarding same (.2); Correspond with accountants regarding documents produced by Sun and analyze same (.4); Confer with Attorney Etra regarding HSBC's Motion for Leave to File Reply (.1); Draft correspondence to Mr. Foster, counsel for SunTrust regarding subpoena and confer with Attorney Etra and Receiver regarding same (.4); Correspond with Ms. Coley, counsel for M&I Bank, regarding subpoena (.1); Confer with Attorney de Resendiz regarding entitlement of officers to indemnification by company and Receiver's authority to deny same (.7); Review draft Standstill Agreement received from Sun's counsel and provide comments (1.1 NO CHARGE) 1.50 \$225.00 FOUR - Prepare creditor files; prepare investor RH 07/08/2009 files. \$3,339.00 10.60 ONE - Correspondence with L. Blanco (.2); 07/08/2009 SBR correspondence with D. Siegel re original loan documents and amendment (.1); conference with M. Magidson and J. Etra to discuss letter to SunTrust (.2); Review Sun counsel's response to default letters (.1); correspondence with D. Newman re NY law on amendments to REDACTED

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001

> agreements and Art. 9 (.1); correspondence and conference with M. Magidson et al. re status of outstanding issues, default notices (.2); prepare report on status of document production for Sun counsel and correspondence with accountants (.9); correspondence with D. Siegel re timing of Sun June financial statements (.1); conference call with Sun counsel, M. Magidson et al. re settlement negotiations and correspondence with Receiver re same (.4); conference with Receiver re settlement negotiations (.2); correspondence with M. Magidson re NY law and Article 9 and review same (.4); correspondence with Receiver re documents from Texas litigation and review same (.1); correspondence with accountants requesting Sun financial statements, UCC filings, and meeting to discuss same (.1); conference with Receiver and attorneys re status of outstanding issues and strategy (1.0); correspondence with accountants regarding balance sheets for 2009 and status of cash collateral (.1); correspondence with R. Friedman and the Receiver re interview of Phil Fues and his request for indemnification (.6); conference with M. Magidson and Receiver re same (.3); call from D. Siegel re Sun financial information and document discovery (.2); correspondence with K. George re Bermuda and Cayman Islands laws (.1); correspondence with the Receiver and review of financial information from R. Addison (.2); correspondence with accountants re Sun corporate organization charts (.1); correspondence with accountants re security interests in loans made by SCI and SCHI to nonaffiliates and the affect on FP collateral (.3); review Sun letter to Gunlicks dated 1/29/09 re Sun no longer being a going concern; (.1): REDACTED research on: conference with M. Magidson re same (.8); review and revise draft letter to Sun counsel re settlement negotiations (.9); correspondence with Receiver and attorneys re letter to Sun Counsel (.3); revise draft letter, finalize, and send to Sun counsel (.6); calls from Sun counsel re standstill agreement (.4); review UCC filing binder and correspondence with accountants re same (.5); correspondence with J. Etra and F. Addison re status of Annandale case in Texas (.2); review correspondence re termination of Naples and

Page 62 Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 Chicago leases (.2); call from accountants re FP cash collateral (.2); correspondence with Sun counsel re standstill agreement and review same (.2); correspondence from Receiver and to M. Magidson re same (.1). 07/08/2009 SJF ONE - Continue work on memorandum in 4.00 \$1,000.00 opposition to motion to amend receiver order (2.5); Review New York law (1.5)REDACTED 3.30 \$0.00 07/09/2009 AHM ONE-Conducted research on REDACTED ; continued review of the document production of Judy Aller. (NO CHARGE) 07/09/2009 DSN ONE - Telephone conference with Ian Anderson 5.00 \$1,575.00 regarding Judy Aller (.2); telephone conference with Ed Schohat regarding Judy Aller (.2); office conference with Susan Barnes de Resendiz regarding Sun Capital (.2); review and analyze documents provided by David Siegel (.4); telephone conference with counsel in Bermuda regarding strategy for Bermuda action (.3); review correspondence from Bermuda counsel regarding strategy for Bermuda action (.1); office conference with Jonathan Etra regarding various tasks to be performed including responses to motions, meetings and subpoenas and filings and status of various asset recovery issues (1.9); review and analyze documentation relating to William Gunlicks' net worth (.2); review and analyze personal note provided by William Gunlicks to Sun related entities (.2); conference with counsel regarding note to Sun entities (.1); draft correspondence to counsel relating to proposed standstill agreement (.2); conference with counsel regarding research to be performed concerning receivership issue (.3); review correspondence from counsel in Cayman Islands regarding Founding Partners (.1); respond to correspondence from Cayman Islands counsel regarding Founding Partners (.1); review correspondence from prior receiver relating to Sun Capital (.2); review correspondence from counsel for SunTrust regarding subpoena production (.1); review correspondence from counsel for former employee regarding interview (.1); review follow up correspondence to counsel

	Founding	Partners Capital		Page 63
07/09/2009	J-E	for former employee regarding interview (.1); ONE - Worked on Judy Aller (.5). Analysis of Sun and strategy (.9). Call with Bermuda counsel and worked on submission on role of Reciever (5). Worked on off-shore issues (.3). Calls regarding potential witness (.2). Analysis of potential supplemental filing on Gunlicks motion to lift asset freeze (.3). Analysis of note to Gunlicks (.2).	2.90	\$913.50
07/09/2009	J-G	ONE - Research regarding REDACTED (2.9); analysis of task, including research review, and various conferences with J. Etra and D. Newman regarding scope of assignment, progress on research, and relevant argument (.3).	3.20	\$800.00
07/09/2009 07/09/2009	J-R MDM	ONE - Reviewed and logged incoming mail ONE - Revise draft Sun Standstill Agreement (.7 NO CHARGE); Review documents sent by Attorney Flint from Naples office of FP and correspond with attorneys regarding same (1.5); Research regarding REDACTED and confer with Attorney de Resendiz regarding same (.8); Call with accountants regarding status of Sun document production (.7)	3.50 3.00	\$525.00 \$585.00
07/09/2009	SBR	ONE - Correspondence with J. Etra re meeting with accountants and document production (.1); review on law on Cayman receiver and Bermuda bank accounts (.2); correspondence with accountants re status of documents productions (.2); correspondence with J. Crutcher re Annandale litigations (.3); review accountant report re status of document production (.4); correspondence with R. Friedman re: P. Fues (.2); call from Sun counsel to discuss settlement meeting (.3); call from M. Magidson re standstill agreement (.1); correspondence with Receiver and et al. re call from Sun counsel (.2); conference with Receiver re strategy for settlement discussions with Sun (.2); correspondence with accountants re Sun financials and June information (.2); correspondence with M. Magidson re HLP stock certificate collateral and memo re same (.2); call from Sun counsel re standstill agreement and settlement negotiations (.3); correspondence with Sun and information needed for meeting with Sun and information needed for meeting (.2); correspondence with	8.50	\$2,677.50

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001

Receiver et al. re call from Sun counsel and request for meeting (.3); conference with M. Magidson re officer and director indemnification and review cases re same (.4); correspondence with Fues counsel re same (.2); correspondence with accountants re status of documents production and update report re same (.6); correspondence with Receiver and review draft order for expansion of receivership from initial receiver (.2 NO CHARGE); review documents re Gunlicks's loan to Promise (.2); correspondence with accountants re certain items on document production status report and finalize report for Sun counsel (1.5); review case law re motion to lift stay (.5); conference call with counsel for

REDACTED

and and Receiver's professionals and correspondence re same (.9); review information re Gunlicks' financial status and response to Gunlicks' motion to lift stay (.3); call from Receiver to discuss strategy (.2); correspondence re Gunlicks' assets (.1); correspondence with Receiver et al. re status of document production (.1); correspondence with Receiver re Gunlicks' motion to lift stay (.1).

07/09/2009	SJF	ONE - Review and collect documents in Naples Founding Partners office.	8.70	\$2,175.00
07/09/2009	SJF	ONE - Return to Tampa from Naples Founding Partners office (NO CHARGE)	2.50	\$0.00
07/09/2009	SJF	ONE - Travel from Tampa to Founding Partners office in Naples (NO CHARGE)	2.60	\$0.00
07/10/2009	AHM	ONE - Performed review of documents produced by Judy Aller (NO CHARGE).	7.10	\$0.00
07/10/2009	DSN	ONE - Meet with accountants regarding Sun	3.90	\$1,228.50

ONE - Meet with accountants regarding Sun Capital documents and information (1.7); office conference with counsel regarding response to Motion to Lift Stay and response to Motion to Quash Subpoenas and areas to be addressed (.3); draft correspondence to accountants regarding meeting (.1); review correspondence from David Siegel regarding status of document production (.2); review correspondence from counsel relating to communication with counsel for Sun regarding standstill agreement (.1); review correspondence from counsel for Sun regarding standstill agreement (.1); draft correspondence to counsel relating to draft standstill agreement (.2); review correspondence from counsel for Sun regarding

		attempt to work out discovery issue and standstill agreement (.1); review follow up correspondence to counsel for Sun regarding standstill agreement (.1); review revisions to proposed standstill agreement (.1); review correspondence from Receiver's counsel to counsel for Sun (.1); review correspondence from Phil Von Kahle regarding Chicago office (.1); draft correspondence to Phil Von Kahle regarding same (.1); draft correspondence regarding standstill agreement to counsel (.1); review additional correspondence from counsel for Sun (.1); review correspondence to Vince Paparo regarding status of document production from counsel (.1); review correspondence pertaining to standstill agreement and respond to same (.1); review correspondence regarding counsel for Gunlicks' inquiry and respond to same (.1); review correspondence from accountants regarding meeting and other related issues (.1).		
07/10/2009	J-E	ONE - Work on meet and confer with Sun regarding outstanding subpoenas (.4). Conference with accountants on status and preliminary findings regarding Sun financial investigation (1.0). Conferences on opposition to motion to lift stay, opposition on motion to quash, and complaint (1.0)	2.40	\$756.00
07/10/2009	J-G	ONE - Review and analyze authority on receiver's powers (.5); prepare memorandum summarizing analysis (1.1).	1.60	\$400.00
07/10/2009	J-R	ONE - Reviewed incoming mail and updated mail log	3.30	\$495.00
07/10/2009	MDM	ONE - Review documents obtained from FP Naples office and confer with Attorney Flint regarding same (.8); Prepare letter to Sun counsel regarding comments to draft Standstill Agreement and confer with attorneys regarding same (1.1); Revise document production status report and prepare cover letter to Sun's counsel regarding same (2.2); Review correspondence from Mr. Paparo, Sun's counsel, regarding draft Standstill Agreement and postponement of depositions (.2); Calls with attorney for Harris Bank regarding safekeeping account in name of FP Stable-Value Fund, LP containing Promise Healthcare, Inc. stock certificates (.3); Review and analysis of Sun's Motion to Quash and conference with	6.20	\$1,209.00

Re: Daniel S SEC v. Manager 43125.00	Founding mnt Co.,	g Partners Capital		Page 66
		Attorney Flint regarding same (1.5); Calls with Gunlicks' counsel's office regarding Sun depositions (.1)		
07/10/2009	RH	ONE - Review and catalog mail; prepare list of creditors; prepare creditor files.	3.50	\$525.00
07/10/2009	SBR	ONE - Review cases re (1); conference with D. Newman and correspondence with M. Magidson re revisions to document list report (.1); review revised document production report (.1); correspondence with accountants re same (.1); review letter responding to Sun counsel re standstill agreement (.2); call and correspondence from Sun counsel re standstill agreement (.2); prepare correspondence to Sun counsel re motion to quash depositions and document production status (.8); correspondence and calls with M. Magidson re correspondence to Sun Counsel with document production updated status report and standstill agreement (1.2); review correspondence re Chicago lease (.1); review Naples office document index and call to accountants re same (1.1); meet with accountants to discuss document production (1.9); review correspondence re Promise stock certificates at Harris bank (.1); review and revise response to Sun counsel's standstill agreement (1.1); correspondence with accountants re copies of Sun loan documents received from Sun (.1); conference with J. Etra re motion to compel (.3); review draft of response to motion to lift stay and revise (.5); review correspondence and pleadings from Sun re motion to quash subpoenas (.4); correspondence with M. Magidson re (.1).	9.40	\$2,961.00
07/10/2009	SJF	ONE - Research REDACTED	2.70	\$675.00
07/10/2009	SJF	ONE - Begin drafting response in opposition to motion to quash subpoenas	2.40	\$600.00
07/11/2009	DSN	ONE - Review Sun Entities' Emergency Motion for Protective Order/Motion to Quash and analyze same (.4); draft correspondence to counsel regarding various issues to be responded to from Sun's Motion to Quash (.3); office conference with counsel regarding various tasks to be performed including Response to Motion to Lift	1.10	\$346.50

	Founding nnt Co., (Partners Capital		Page 67
		Stay, Response to Motion to Quash Subpoenas and other related issues (.4).		
07/11/2009	J-E	ONE - Work on complaint, opposition to motion to quash, and opposition to motion to lift stay.	1.00	\$315.00
07/11/2009	MDM	ONE - Correspond and confer with attorneys regarding response to Sun's Motion to Quash subpoenas	0.50	\$97.50
07/11/2009	SBR	ONE - Correspondence with D. Siegel re financial information discussed at Friday meeting (.1); correspondence and conference with D. Newman re motion to quash and review same (.4); continue research and drafting complaint, correspondence with M. Magidson, D. Siegel, and S. Flint re same, conference with J. Etra and D. Newman re same (7.4); correspondence with D. Newman et al. re Sun counsel's failure to deliver requested consents and waivers (.1); correspondence with J. Etra re history of Sun's failure to produce documents for response to motion to quash (.2); review files re requests for document production and forward to S. Flint (.8); correspondence with Sun counsel re Sunday conference call and correspondence with J. Etra re same (.2); correspondence with D. Siegel re documents in Naples office (.1); Correspondence with S. Flint setting out facts for motion to quash (.1); correspondence with D. Siegel re financial information for complaint (.1); correspondence with D. Siegel re motion to quash (.1); correspondence with Receiver and counsel re motion to quash (.1); correspondence with Receiver et al. re draft complaint (.1).	9.80	\$3,087.00
07/11/2009	SJF	ONE - Draft initial response to motion to quash subpoenas	6.80	\$1,700.00
07/11/2009	SJF	ONE - Review voluminous e-mails and other correspondence to draft history of negotiations between Receiver and Sun Capital.	1.80	\$450.00
07/12/2009	DSN	ONE - Review and analyze Motion to Lift Stay (.4); office conference with Jonathan Etra regarding Motion to Lift Stay and response to same (.2); review and analyze draft complaint (.8); conference with Jonathan Etra and Susan Barnes de Resendiz regarding telephone conference with Vince Paparo (.3); review draft response to Motion to Quash Subpoenas and analyze same (.5); review correspondence from David Siegel regarding Promise and Success	3.70	\$1,165.50

J-E

07/12/2009

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\$630.00

\$1,657.50

\$2,898.00

8.50

Hospital entities (.3); review correspondence from Scott Flint regarding legal research on various issues (.2); office conference with Michael Magidson and Susan Barnes de Resendiz regarding draft complaint and issues to be researched (.4); review correspondence from David Siegel regarding documents still remaining to be provided by Sun (.2); review correspondence from Ed Shohat regarding

REDACTED '(.1); draft correspondence to Ed Shohat regarding (.1); review follow up

REDACTED correspondence from Ed Shohat regarding (.1); draft follow up correspondence to Ed

Shohat regarding (.1).

2.00 ONE - Work on complaint, opposition to motion

to quash, and opposition to motion to lift stay (1.5). Call with Sun counsel (.4). Work on

REDACTED interview (.1)

ONE - Revise Sun complaint and correspond with **MDM** 07/12/2009

> attorneys regarding same (8.1); Conference call with Sun's counsel (.4)

SBR ONE - Correspondence with S. Flint re June 4 07/12/2009

9.20 request for documents (.1); correspondence from S. Flint and J. Etra re motion to quash (.3); calls from D. Siegel to review and revise complaint against Sun (2.7); Call with Sun counsel and J.

conference with J. Etra re same (.2);

Etra to discuss settlement versus litigation (.6); correspondence with L. Blanco re history of Sun's document production to receivership (.4); further revisions to complaint and correspondence with Receiver et al. re same (1.2); correspondence and calls from D. Siegel re motion to quash and correspondence with S. Flint re same (.3); conference with J. Etra re same (.2); review and revise response to motion to lift stay (1); correspondence with J. Etra re interview with J. Aller (.1); conference with D. Newman re filling complaint and call to M. Magidson re same (.4);

correspondence from S. Flint re pledge of Promise stock (.1); correspondence re D. Newman re complaint (.1); correspondence e from M. Magidson and review revised document list (.1); revise draft complaint (1.3);

correspondence with M. Magidson re revisions to complaint (.7); review revised response to motion

to quash (.3)

Re: Daniel S SEC v. I Manager 43125.00	Founding nnt Co.,	Partners Capital		Page 69
07/12/2009	SJF	ONE - Continue work on opposition to motion to quash subpoena	2.50	\$625.00
07/13/2009	AHM	ONE - Continued review of the documents produced by REDACTED and coordinated production of a flagged documents set for review by senior attorneys; conducted research on	5.40	\$810.00
		REDACTED		
07/13/2009	DSN	ONE- review and analyze revisions to draft complaint (1.5); various office conferences with counsel regarding additional legal research to be performed on various issues pertaining to receivership (1.5); review and revise Response to Motion to Lift Stay and conference with counsel regarding same (1.1); telephone conference with Ian Anderson and SEC regarding various issues (.3); draft correspondence to Ian Anderson regarding various issues (.1); draft correspondence to Ed Shohat regarding RI (.1); review correspondence from Ed Shohat regarding REDACTED(.1).	4.70 EDACTED	\$1,480.50
07/13/2009	J-E	ONE - Conferences on strategy (1.0). Reviewed order on motion to quash and response to same (.3). Worked on opposition to motion to lift stay and notice of filing complaint (3.1). Worked on accountant issues (.3).	4.70	\$1,480.50
07/13/2009	J-G	ONE - Additional research regarding	2.90	\$725.00
		REDACTED (2.9); prepare additions to memorandum, incorporating additional authority and refining question presented (1.5 NO CHARGE).		
07/13/2009	MAW	ONE - Prepare Civil Cover Sheet and Summonse for Defendants; Prepare Exhibits for Complaint; Telephone conference with Federal Court in Ft. Myers regarding local filing; Telephone conferences with courier regarding rush filing in Ft. Myers	s 1.20	\$180.00
07/13/2009	MDM	ONE - Revise Sun complaint and confer with attorneys regarding same (3.4); Research jurisdiction of court appointing federal receiver (1.3); Research REDACTED (1.2)	5.90	\$1,150.50
07/13/2009	P-A	ONE - Assist with upcoming depositions (.2).	0.20	\$30.00
07/13/2009	RSK	ONE - Conference regarding lockbox arrangementreplevin issues; foreclosure of	0.60	\$0.00

Re: Daniel S. Newman, Receiver

SEC v. Manager 43125.00	Founding nnt Co.,	g Partners Capital		7 282 1 0
		personalty (No Charge)		
07/13/2009	SBR	ONE - Review revised draft complaint and further revise (1.2); call from M. Magidson to review and revise complaint (.8); correspondence to D. Newman et al. re same (.2); correspondence with J. Etra re motion to quash and accountants efforts (.1); review court's order partially granting motion to quash depositions (.1); correspondence re partial granting motion (.2); correspondence with D. Siegel re DSH receivables (.1); conference with T. Rebull re foreclosing on security interest (.2); correspondence re UCC filings for complaint (.1); correspondence with R. Kobert re foreclose on personal property (.1); correspondence re stock collateral for HLP loan and foreclosure of same (.4); correspondence re replevin and foreclosure of personal property interests (.3); correspondence with J. Crutcher and conference with D. Newman re stay of Annandale litigation (.2); draft section of complaint re HLP loan and stock pledge and calls to and from M. Magidson re same (7.6); conference with Receiver re REDACTED greements (.2); correspondence with D. Siegel re updates to document production status report (.1); call from M. Magidson re complaint (.1); call from M. Magidson re complaint (.2); call from M. Magidson re complaint (.2); conference with Receiver re Sun principals' conflict of interest (.6); correspondence with Sun Counsel re document production (.2); call from R. Kobert re complaint (.2).	13.40	\$4,221.00
07/13/2009	SJF	ONE - Edit and refine allegations in complaint	1.50	\$375.00
07/13/2009	SJF	ONE - Review documents obtained from Naples office	3.60	\$900.00
07/13/2009	SJF	ONE - Draft count and allegations for foreclosure of security interests	1.50	\$375.00
07/13/2009	SJF	ONE - Review and edit complaint	1.20	\$300.00
07/13/2009	SJF	ONE - Research Florida and New York law	1.80	\$450.00
07/14/2009	AHM	ONE - Receipt and review of computer disk files produced by Judy Aller.	2.70	\$405.00
07/14/2009	DSN	ONE - Review and revise draft response to motion to lift stay; telephone conferences with counsel regarding same (1.1); telephone conferences with counsel regarding strategies and	1.90	\$598.50

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				
		Sun entities (.2); review correspondence regarding Chicago office space (.1); conference with counsel regarding service of complaint (.1); review memorandum of Jeffrey Geldens regarding receivership related issues to be used in connection with Camen counsel (.3); review order on motion to modify asset freeze regarding William Gunlicks (.1)	·	
07/14/2009	J-E	ONE Reviewed Order on Mr. Gunlicks' motion on lift of asset freeze (.2). Worked on motion for reconsideration of Magistrate ruling made without having heard from Receiver (.5). Conferences with SEC (.4). Revisions to opposition to motion to permit Sun to sue Receiver (2.0).	3.10	\$976.50
07/14/2009	MAW	ONE - Conference with courier regarding instructions on rush filing in Ft. Myers; Telephone conference with process server regarding service of Summonses on Defendants; Prepare memo to process server with instructions on service; Review filed and issued documents and prepare and send Summonses with complaints to be served on Defendants	0.70	\$105.00
07/14/2009	MDM	ONE - Finalize complaint in preparation for filing and confer with Receiver regarding same (1.7); Revise response to motion to lift stay, confer with attorneys regarding same, and file electronically (10.6); Review court order partially granting Gunlicks' asset freeze modification and confer with Attorney Etra regarding same (.2)	12.50	\$2,437.50
07/14/2009	P-A	ONE - Review correspondence from counsel and prepare response (.2); Examine communication, prepare responses to Margaret Weaver, and assist with service of Suncare Summonses (.3).	0.50	\$75.00
07/14/2009	RSK	ONE - Conference regarding REDACTED (No Charge)	0.40	\$0.00
07/14/2009	RSK	ONE - Conference regarding change of venue standards in bankruptcy (No Charge)	0.40	\$0.00
07/14/2009	SBR	ONE - Correspondence with R. Kobert and S. Flint re change of venue (.2); call to M. Magidson re complaint (.1); review and revise response to motion to lift stay, conference with J. Etra and correspondence regarding response (8); calls to and from M. Magidson re same (.2); correspondence and review of court order re Gunlicks' motion to lift stay (.2); correspondence	12.90	\$4,063.50

		re filing and serving complaint (.2); correspondence from Sun's counsel re document production (.2); correspondence with Receiver re motion to lift stay (.1); call to M. Magidson re same (.3); conference with J. Etra re revisions to motion and strategy (.3); correspondence with Receiver re call from opposing counsel (.1); correspondence with M. Magidson re same (.1); conference with J. Etra to review and revise response to motion to lift stay (2.5); conference with Receiver re complaint (.1); correspondence with M. Magidson re same (.1); correspondence with J. Etra re call to Sun Counsel (.1); correspondence with J. Magidson re		
07/14/2009	SJF	correspondence with Sun's counsel (.1). ONE - Research REDACTED (NO CHARGE)	4.00	\$0.00
07/14/2009	SJF	ONE - Research REDACTED	1.50	\$375.00
07/15/2009	DSN	ONE- telephone conference with counsel regarding meeting with accountants and SEC.	0.20	\$63.00
07/15/2009	J-E	ONE - Work on service of process (.5). Work on Gunlicks mail (.3). Conference with accountants and analysis of receivables (1.0). Work on setting up conference call with witness (.2). Work on email to Sun counsel on need for immediate and specific information (1.0). Conferences on Sun strategy. and began drafting letter to Sun (2.5).	5.50	\$1,732.50
07/15/2009	MDM	ONE- Conferences with Receiver and attorneys regarding lockbox accounts (.6); Call harris bank regarding Promise Healthcare stock certificate (.1); Review motion correspond with attorneys regarding same (.6); Strategy conference (.4); Legal research (4.1); Prepare Transfer Notices to SunTrust and transmit same (1.1); Review draft correspondence to Sun's counsel regarding Transfer Notices (.1)	7.00	\$1,365.00
07/15/2009	SBR	ONE - Correspondence with V. Paparo regarding his call to discuss document production (.1); correspondence with D. Siegel regarding response to motion to lift stay and document production (.1); review draft correspondence to Sun counsel and calls to M. Magidson to revise same (.2); correspondence with R. Kobert regarding issue (.1); correspondence with R. Kobert regarding REDACTED (.1); correspondence with D. Newman et al. regarding giving notice to SunTrust under Triparty	3.90	\$1,228.50

Re: Daniel S. Newman, Receiver

SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 Agreement (.1); call to D. Siegel regarding lock box (.1); correspondence with D. Newman, R. Kobert, J. Etra, and M. Magidson regarding preparation of the lock box notices (.1); conference with J. Etra and D. Siegel regarding accounts receivables and status of Receiver's collateral (1.7); conference call with D. Newman, J. Etra, and D. Siegel regarding financial reports and strategy (.4); conference with J. Etra and I. Anderson to discuss status of case (.7); correspondence from D. Siegel and to D. Newman et al. re receivables aging report for Sun Capital (.1); correspondence with L. Vander Weide re change of venue documents (.1). ONE - Review of case law: 3.20 \$480.00 07/16/2009 AHM REDACTED ONE - Review correspondence from Ed Foster at 2.20 \$693.00 07/16/2009 DSN SunTrust (.3); telephone conference with Ed Foster, in-house counsel for SunTrust and Receiver's Counsel regarding lock box accounts (.5); meeting with local counsel for Sun, Larry Heller, along with Receiver's Counsel and convey Receiver's continued willingness to review lending under appropriate circumstances (.5); office conference with Counsel for Receiver regarding strategy and meeting with Larry Heller (.2); review draft correspondence to be sent out to Vince Paparo (.2); telephone conference with counsel regarding same (.1); telephone conference with Vince Paparo and Larry Heller regarding weekend meeting regarding Sun (.2); telephone conference with Ian Anderson of the SEC (.2). 3.10 \$976.50 J-E ONE - Strategy for Sun Trust Bank and Sun (1.0). 07/16/2009 Remission to letter to Sun (.5). Meeting with Sun's local counsel and follow up conferences with Sun NY counsel on meeting for Sunday (.5). Work on Gunlicks mail (.1). Work on Gunlicks' request for assistance in obtaining court-ordered release of funds from North Shore Bank (.3). Work on setting up conference with investor (.3). Preparation to oppose TRO on lockbox (.2). Work on Mayer Brown tolling agreement (.2) 9.70 \$1,891.50 ONE - Review and analyze Agreements 07/16/2009 **MDM** Agreement (.7); Confer with REDACTED and ' Receiver regarding same (.3); Conference call with SunTrust counsel regarding Transfer Notices (1.0); Correspond with SunTrust's counsel

SEC v. Manager	Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				
		regarding same (.8); Draft, revise and transmit letter to Sun's counsel and confer with Attorney de Resendiz regarding same (1.8); Draft letter to SunTrust's counsel regarding other accounts and confer with Attorney de Resendiz regarding same (2.4); Call with Harris Bank counsel regarding Promise stock certificates and draft letter to Bank regarding same (.5); Review documents received from SunTrust in response to subpoena and confer with attorneys regarding same (.5); Draft legal section of response to TRO and confer with Attorney Flint regarding same (1.7)			
07/16/2009	P-A	ONE - Review Opinion and Order regarding Gunlick's renewed motion on asset freeze (.3); Post order on website and prepare memo to Receiver and counsel (.3).	0.60	\$90.00	
07/16/2009	SBR	ONE - Correspondence, calls, conferences, research with D. Newman, J. Etra, M. Magidson, E. Foster, D. Siegel, G. Lehman re seizures of lock boxes (9.5)	9.50	\$2,992.50	
07/16/2009	SJF	ONE- Research issues related to REDACTED and Prepare memorandum on REDACTED ; Review agreements and draft facts to include in opposition to temporary restraining order.	5.90	\$1,475.00	
07/17/2009	DSN	FOUR - Review correspondence from Phil Von Kahle (.1); draft correspondence to Phil Von Kahle (.1).	0.20	\$63.00	
07/17/2009	DSN	ONE - Meet with Receiver's counsel in preparation for meeting with representatives of Sun Capital (.9); review correspondence from counsel for Sun regarding Sun's lock box issue (.2); draft correspondence to counsel regarding response to counsel for Sun's letter (.3); telephone conference with counsel regarding SunTrust lock boxes (.2); review correspondence from counsel to SunTrust (.1); draft correspondence to Rick Adderson regarding communication received from Institution client (.1); telephone conference with Ian Anderson regarding recent events, Sun Capital (.2).	2.00	\$630.00	
07/17/2009	J-E	ONE - Meeting with Sun's local counsel on lockbox, Sun's threats, and the Receiver's position(.3). Conference call with Sun's local	1.60	\$504.00	

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				
		counsel and Sun's primary counsel regarding same and agreeing to meeting on Sunday (.2). Conference with accountants on latest information and analysis (.3). Telephonic interview with witness (.3). Internal strategy discussions (.3). Printed and reviewed letter from Sun counsel with threats (.2).		
07/17/2009	J-R	ONE - Reviewed and logged in incoming personal mail for Gunlicks; Reviewed and logged incoming mail for Founding Partners	3.10	\$465.00
07/17/2009	MDM	ONE - Finalize letter to Harris Bank regarding Promise stock certificates (.2); Continue drafting response in opposition to TRO and confer with Attorney Flint regarding same (3.2); Review orders received from court in Sun action and correspond with attorneys regarding same (.2); Review correspondence from Sun's counsel and correspond with attorneys regarding same (.6)	4.20	\$819.00
07/17/2009	SBR	ONE - Correspondence, calls, conferences with Receiver Team, SunTrust, and Sun Counsel re seizure of lock boxes and settlement meeting with Sun Capital.	9.70	\$3,055.50
07/17/2009	SJF	ONE - Draft opposition to motion for temporary restraining order	10.50	\$2,625.00
07/18/2009	DSN	ONE - Review correspondence from Vince Paparo (.2); draft response to correspondence from Vince Paparo (.4); draft correspondence to counsel regarding response to Vince Paparo (.2); conference and emails between and among counsel relating to the preparation for July 19, 2009 meeting with Sun (.3).	1.10	\$346.50
07/18/2009	J-E	ONE - Reviewed email from Sun's counsel with threats and comments on proposed response (.2). Comments on draft response to Sun's counsel letter of July 17th. (.2)	0.40	\$126.00
07/18/2009	MDM	ONE - Continue drafting response in opposition to TRO and correspond with Attorney Flint regarding same	1.20	\$234.00
07/18/2009	SBR	ONE - Correspondence and calls from D. Newman, D. Siegel and J. Etra re correspondence to Sun's counsel and prepare for settlement meeting.	8.80	\$2,772.00
07/18/2009	SJF	ONE - Continue to work on opposition to temporary restraining order; research	4.30	\$1,075.00
		REDACTED		

	Founding mnt Co.,	g Partners Capital		Page 76
07/19/2009	DSN	ONE - Attend meetings at offices of Sun regarding settlement negotiations and multiple conferences with counsel and negotiations during same.	8.00	\$2,520.00
07/19/2009	J-E	ONE - All day meeting with Sun principals and counsel, and pre- and post-meeting conferences with internal team.	8.00	\$2,520.00
07/19/2009	LP	ONE - Attend emergency conference in Boca Raton with receiver and counsel and Promise Health Care regarding release of funds.	8.00	\$2,520.00
07/19/2009	MDM	ONE - Finalize letter to Sun's counsel and transmit same (.3); Review and analyze REDACTED (.3)	0.60	\$117.00
07/19/2009	SBR	ONE - correspondence, calls, preparation for and settlement meeting with Sun Trust (8.0); correspondence with E. Foster, M. Magidson, and S. Flint re outcome of settlement (2.0)	10.00	\$3,150.00
07/20/2009	DSN	ONE - Meet with Jonathan Etra and Daniel Hughes, Accountant, regarding information to be obtained in connection with Bermuda action (.5); telephone conference with counsel, accountant, and Bermuda counsel regarding information to be obtained in connection with Bermuda action and affidavits and other evidence that will be necessary along with briefing scheduling and schedule for hearing (.4); review correspondence between Suntrust and Receiver's counsel and Sun relating to release of funds and draft correspondence to counsel relating to responses to Suntrust in connection with release of funds (.4); office conference with counsel regarding issue of retention of additional professional relating to Sun proposal (.2); review correspondence from Bermuda counsel regarding JPL filing and related issues (.2).	1.70	\$535.50
07/20/2009	J-E	ONE - Work on Mayer Brown tolling agreement (.5). Work on advancement of funding to Sun, pursuant to agreement (1.0). Work on obtaining mortgage in hospital real estate, pursuant to agreement (.4). Calls and correspondence with Mr. Gunlicks' counsel regarding mail (.4). Work on Sun strategy on going forward basis (.5). Work on health care advisors for Sun negotiations (.3). Work on bankruptcy law expert to support application in Bermuda (.3).	3.40	\$1,071.00

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07/20/2009	MDM	ONE - Review correspondence with SunTrust's counsel regarding implementation of agreement with Sun (.3); Call with Attorney de Resendiz regarding same (.2); Review and analyze Sun account balance information received from SunTrust and confer with Attorney de Resendiz regarding implementation of agreement with Sun and instructions to SunTrust (1.4); Conference call with SunTrust counsel and representatives regarding same (.5); Prepare instructions to SunTrust to implement agreement between Sun and Receiver and confer with Attorney de Resendiz regarding same (.8); Conference call with Sun representatives regarding implementation of agreement between Sun and Receiver (.2); Call with Ms. Raj at Harris Bank regarding transfer of Promise Healthcare stock certificates pledged to FP and compose email to Ms. Raj regarding same (.2); Confer with Attorney de Resendiz regarding consultant and terms of proposed financial restructuring of Sun entities (.3); Review email from SunTrust's counsel summarizing implementation of Sun agreement with Receiver (.1); Review correspondence from potential consultant (.1); Review organizational charts for Promise and Success entities received from Mr. Siegel (.2)	4.30	\$838.50
07/20/2009	SBR RE	ONE - Correspondence and conferences with D. Newman et al. regarding release of cash collateral and conference calls with M. Magidson and E. Foster re same (4.1); Correspondence with EDACTED re regarding retention of healthcare consultants (1.1); organize correspondence and files regarding loan and use of cash collateral (1.0); correspondence with J. Etra re mortgage on LH properties (.1).	6.30	\$1,984.50
07/20/2009	SJF	ONE - Research REDACTED	2.10	\$525.00
07/21/2009	DSN	ONE - Correspondence with Ed Shohat regarding interview of REDACTE(2); conference with counsel regarding Motion to Substitute in Texas litigation (.2); conference with Ian Anderson regarding Annandale case and draft correspondence to Ian Anderson regarding same (.3); telephone conference with Ed Foster of Suntrust (.2); conference with counsel regarding	2.60	\$819.00

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		Annandale litigation (.4); conference with counsel for Sun regarding Annandale litigation (.3); conference with Rick Addison regarding Annandale litigation (.3); conference regarding website; conference with Ed Foster and bank counsel regarding potential for setting up new accounts (.5); review correspondence from David Seigal regarding Sun Capital (.2).		
07/21/2009	J-E	ONE - Work in opposition to amended complaint and TRO filed in Texas court to seize lockboxes in possession, including calls and conferences with Texas counsel and with Texas court and calls from investors (2.5). Correspondence and call with counsel for victims/witnesses (.2). Work on Sun Trust issues (.5). Work on motion concerning discovery directed at Promise and Success (1.0 NO CHARGE). Work on REDACTED meeting (1.). Work on document review and management (.2)	4.40	\$1,386.00
,07/21/2009	MAW	ONE - Review, print and organize pleadings filed in two Annandale Texas lawsuits	0.50	\$75.00
07/21/2009	MDM	ONE - Review Promise and Success organizational charts and prepare organizational chart of real estate holdings owned by Sun principals (.8); Call with investoREDACTEP4); Memo to file regarding same (.2); Confer with Attorney de Resendiz and Attorney Etra regarding Annandale case and draft correspondence to Mr. Addison attaching relevant documents (.4); REDACTED and prepare memorandum regarding same (1.2); Draft petition in intervention in Texas action brought by FP investors against Sun and confer with Attorneys de Resendiz and Flint regarding same (3.7); Confer with Attorneys Etra and Flint regarding motion for reconsideration of order on Sun's motion to quash (.6)	7.30	\$1,423.50
07/21/2009	SBR	ONE - Conference with J. Etra and calls to Dallas Cty court re remand of Annandale v. Sun Capital case to state court, correspondence and calls with J. Crutcher and J. Garret re representation in case, and calls to S. Flint, D. Newman, R. Addison, and prepare motion with M. Magidson to intervene in case (8.2); call from REDACTED heelthcare consultant and correspondence with D. Newman and J. Eta re same (.2); calls and conferences with D. Newman, D. Siegel, E. Foster, et al. re	13.20	\$4,158.00

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		SunTrust handling of cash collateral (2.2); correspondence with Houlihan Lokey and conference with D. Newman re same (.3); correspondence with FP counsel in Annandale cases re withdrawal (2.); correspondence with S. Flint re motion for reconsideration (.1); correspondence with S. Flint re filing of notice of receiver in Annandale v. Founding Partners case (.2)		
07/21/2009	SJF	ONE-Work on drafting motion (NO CHARGE)	2.50	\$0.00
07/22/2009	J-E	ONE- Worked on petition to intervene in Texas case and conferences with Mr. Rick Addison (1.0). Conferences with counsel for investors concerning Texas TRO and Sun (.5). Team conference on pending matters and assignments (1.0). Conference with Mr. Heller (.5).	3.00	\$945.00
07/22/2009	MDM	ONE - Revisions to Petition to Intervene in Texas Sun case and correspond with attorneys regarding same and file same (3.7); Review Motion and confer with Attorney Flint regarding same (.3); Review correspondence from Receiver regarding logistics of monitoring Sun bank accounts per Agreement (.1); Review and analyze documents received from Cain Brothers and Sun (.6); Call with Attorney de Resendiz and Mr. Heller, Sun's counsel, regarding implementation of agreement between Receiver and Sun (.2); Status conference with Receiver and attorneys (1.6).	6.50	\$1,267.50
07/22/2009	SBR	ONE - Correspondence and calls with Houlihan Lokey (1.3); correspondence with D. Newman and REDACTED (.3); correspondence with D. Newman, M. Magidson, et al. re problems with SunTrust accounts, calls with M. Magidson and L. Heller re same, calls from D. Siegel re same, conference with L. Heller, D. Newman, and J. Etra re same, and calls and conferences with M. Magidson, J. Etra et al re problems with Sun Trust distributions of cash collateral to Sun (4.1); calls with M. Magidson, D. Siegel, D. Newman, et al. and revise motion to intervene in Annandale v. Sun Capital case (3.2), ; correspondence with D. Newman et al re motion for reconsideration (.2); correspondence with M. Magidson re Naples and Chicago office leases (.2); correspondence with V. Paparo re SunTrust accounts (.2)	9.50	\$2,992.50
07/22/2009	SJF	ONE-Draft notice of filing in the Annandale Texas case and file electronically	0.80	\$200.00

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07/23/2009	DSN	FIVE- Draft correspondence to investor D.P.	0.20	\$63.00
07/23/2009	J-E	ONE-Correspondence with Sun counsel regarding meeting on continued funding.	0.20	\$63.00
07/23/2009	P-A	ONE - Telephone conferences with Chuck Marasco from SunTrust regarding documents needed to start the opening of account process (.2); Prepare correspondence to Mr. Marasco and transmit Order Appointing Replacement Receiver (.3); Numerous telephone conversations with Penny O'Malley from Suntrust (.7); Various communications with Susan Barnes de Resendiz regarding appropriate name and tax i.d. number for account (.5) Receipt and review, completion, and obtaining signatures of bank account opening documents (1.3); Prepare correspondence to Ms. O'Malley regarding same (.2); Meet with Receiver regarding agreement with bank (.1).	3.30	\$495.00
07/23/2009	SBR	ONE - Correspondence and calls with D. Newman, E. Foster, M. Magidson, and V. Paparo re problems with disbursing cash collateral from SunTrust accounts to Sun Capitals (3.1); research REDACTED (.2) (NO CHARGE); Correspondence with D. Newman and K. Verges re Annandale v. Founding partners case (.3);	3.40	\$1,071.00
07/23/2009	SJF	ONE-Work on opposition to motion for temporary retraining order filed by Sun Capital	11.60	\$2,900.00
07/24/2009	DSN	ONE- Meet with (.4); review correspondence from Ed Foster (.1); draft correspondence to Ed Foster (.1); telephone conference with Ed Foster updating him regarding status of conference with Judge (.3); review correspondence from Rick Rein (.1); draft correspondence to Rick Rein (.1); telephone conference with David Siegel regarding accounting issues pertaining to Sun (.2);	1.30	\$409.50
07/24/2009	SBR	ONE- Correspondence with C. Kane re mortgage on Sun property (.3); correspondence with D. Siegel re HLP and LH loans (.2); correspondence with D. Newman, D. Siegel et al re issues to be discussed with Sun Capital re use of cash collateral, prepare memo re same, correspondence with E. Foster re same, and correspondence with Sun's counsel re same (1.7).	2.20	\$693.00
07/24/2009	SJF	ONE - Continue drafting and making final edits to memorandum in opposition to motion for temporary restraining order	4.50	\$1,125.00

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07/25/2009	MDM	ONE - Correspond with attorneys regarding strategy	0.50	\$97.50
07/26/2009	MDM	FOUR- Correspond with Attorney de Resendiz regarding Phil Fues's property.	0.10	\$19.50
07/26/2009	SBR	ONE- Correspondence with D. Newman, P. Tomaras, and R. Friedman REDACTED legal fees, Fues personal property, REDACTED (.7); organize correspondence, files, and documents in preparation for TRO hearing and correspondence with D. Newman, R. Kobert, J. Etra re same (5.5).	6.20	\$1,953.00
07/26/2009	SJF	ONE-Begin drafting motion for postponement of preliminary injunction hearing	2.50	\$625.00
07/27/2009	P-A	ONE - Review certified copies of Order appointing Receiver.	0.10	\$15.00
07/27/2009	RSK	ONE - Conference regarding new Receivership Order, impact of new Order and Temporary Restraining Order findings (NO CHARGE).	0.40	\$0.00
07/27/2009	SBR	ONE - Correspondence with M. Magidson re office lease rejections (.1); correspondence with C. Kane re mortgage and title insurance on Sun property (.2); correspondence with R. Friedman and DNewman re P. Fues personal property, malk EDACTED (.5); correspondence re filing in Annandale case (.1); correspondence, calls, research, and conferences with D. Newman, D. Siegel et al. to prepare for hearing on TRO (9.3)	10.20	\$3,213.00
07/28/2009	G-F	ONE - Compiled, organized and reviewed incoming personal mail for Gunlicks and for Founding Partners	3.40	\$510.00
07/28/2009	P-A	ONE - Commence review of Agreement, Terms and Conditions from Suntrust Bank (.6); Telephone conference with Michael Magidson (.2); Meeting with Susan de Resendiz (.1); Prepare memo to Receiver relative to same, and responses regarding bank documents, hearing preparation, hearing postponement (.2).	1.10	\$165.00
07/28/2009	SBR	ONE - Correspondence with F. Friedman and D. Newman REDACTED retrieval of personal property (.6); correspondence with D. Newman re Annandale cases (.1).	0.70	\$220.50
07/28/2009	SJF	ONE - Review financial statements from accountants and draft analysis of borrowing base deficiency	1.80	\$450.00
07/28/2009	SJF	ONE - Work on editing motion to continue	1.60	\$400.00

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07/29/2009	DSN	ONE- Review Motion for Disbursement of Funds filed by Gunlicks (.1); telephone conference with Rene Friedman REDACTED (.2); review correspondence from David Siegel regarding REDACTED (.2); continue to meet with counsel regarding various issues (.5); review correspondence from Mike Madigson regarding Chicago computers (.1); draft correspondence to Mike Madigson responding to same (.1). FOUR-review correspondence from Leyza Blanco regarding investor correspondence from investor W.C. (.1).	1.30 O	\$409.50
07/29/2009	G-F	THREE - Compile, review and organize incoming mail for Founding Partners.	0.30	\$45.00
07/29/2009	J-E	ONE- Reviewed Mr. Gunlicks' motion for an order directed at North Shore bank (.2). Correspondence with counsel for Mr. Gunlicks concerning receipt of check and conference with Receiver (.2). Call with Rick Addison (.2)	0.60	\$189.00
07/29/2009	J-R	FOUR - Telephone conference with Xact, Credence and Ikon regarding information on web- based document management systems and setting up demonstrations.	0.70	\$105.00
07/29/2009	MAW	ONE - Review, prepare documents (Gunlick's files) retrieved from Naples office	4.60	\$690.00
07/29/2009	MDM	THREE - Correspond with Mr. Lattas and Receiver regarding furniture and computers from FP Chicago office (.2); ONE - Review Gunlicks' Motion for Disbursement of Funds (.1)	0.30	\$58.50
07/29/2009	SBR	ONE - Correspondence, calls, and conferences with D. Newman, R. Friedman, and D. Siegel REDACTED regarding the Founding Partners loans to Sun Capital (2.8); correspondence and calls with D. Newman, D. Siegel, and J. Etra, and research and Gunlicks document review to amend complaint against Sun (5.8)	8.60	\$2,709.00
07/30/2009	DSN	ONE - Conference with counsel regarding Motion to Deposit Funds in Registry of Court (.1); REDACTED Founding Partners (.7); review correspondence from Rick Bendix regarding employee belongings (.1); FIVE- review draft correspondence to investor and revise same (.2)	1.10	\$346.50
07/30/2009	G-F	THREE - Compile, review and organize incoming mail for Founding Partners.	1.10	\$165.00

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				
07/30/2009	J-E	ONE - Reviewed document provided by investor and memo on same (.4). Work on E&Y tolling agreement (.2). Conferred with Receiver and correspondence with Mr. Gunlicks' counsel on depositing rent into court registry (.2). E-mail request to Mr. Gunlicks' counsel for cooperation of Mr. Gunlicks and regarding subpoena for his testimony (.2). Work on document production requests (3.0). FOUR- Calls with counsel for investors (.4)	4.40	\$1,386.00
07/30/2009	J-R	FOUR - Meeting with Xact regarding web-based document management system; Telephone conferences and correspondence with Credence and Ikon regarding web based document management systems.	2.20	\$330.00
07/30/2009	MAW	ONE - Review, prepare documents (Gunlick's files) retrieved from Naples office	0.60	\$90.00
07/30/2009	MDM	ONE - Confer with attorneys regarding task list items (.2); Confer with Attorney Flint regarding depositions of Mr. Gunlicks and Sun principals (.1); Review correspondence from Attorney Etra to Gunlicks' counsel regarding same (.1); Correspond with attorneys regarding proposed correspondence to Sun (.2)	0.60	\$117.00
07/30/2009	SBR	ONE - correspondence and calls with D. Newman, R. Bendix, and R. Friedman REDACTED (2.2); correspondence, calls, and conferences with D. Newman et al. re case strategy and management and review Gunlicks files (7.1)	9.30	\$2,929.50
07/31/2009	DSN	ONE- Revise correspondence to be sent to Sun regarding conference with agreement (.3); review correspondence from CPA regarding status of document production (.2); telephone conference with counsel regarding letter to Sun (.3); review correspondence to landlords (.2) conference with REDACTED (.2); telephone conference with Martin P regarding Founding Partners computer filing (.2). Review correspondence regarding court request for hearing on Gunlicks' Motion to Deposit (.2); conference with counsel regarding same (.3); review correspondence regarding Tolling Agreement (.1).	2.00	\$630.00
07/31/2009	G-F	THREE - Logged mail for Gunlicks and for Founding Partners; Compiled, reveiwed and organized incoming mail received on July 30,	3.00	\$450.00

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				
07/31/2009	J-E	ONE - Reviewed motions filed by Mr. Gunlicks, Prepared for and participate in teleconference hearing on the two motions (.6). Follow up on dealing with the first \$3,000 payment due on August 1st (.2). Reviewed Order on Mr. Gunlicks' motions (.1). Work on discovery requests (.5). Work on, finalize, and send letters to Sun on weekly and monthly report defaults (1.0). Work on letter on payment default (.3). Correspondence with Mayer Brown on tolling agreement (.3). Work on return of possessions of Mr. Fues (.3).	3.30	\$1,039.50
07/31/2009	J-R	FOUR - Meeting with Credence, telephone conference with Credence regarding online demonstration; Telephone conference with Driven regarding online web document management system; Correspondence with vendors Credence, Ikon, Xact, and Driven.	2.60	\$390.00
07/31/2009	MAW	ONE - Review, document management and organization of documents and files for Founding Partners Global Fund, Ltd. and additional Gunlicks file documents and retrieved from Naples office; Finalize, serve and file Receiver's Motions to terminate Leases	0.80	\$120.00
07/31/2009	MDM	ONE - Call with Judge Steele's clerk regarding telephonic hearing on Gunlicks' motions, review motions and related documents and confer with Attorney Etra in preparation for same (1.5); Attend hearing (.4); Follow up conversations with Receiver, Attorney Etra, Ms. Fradera and Ms. Descalzo regarding implementation of court order regarding disbursement of funds for Mr. Gunlicks' living expenses (1.0); Call with judge's law clerk and Ms. Descalzo regarding same (.1); Confer with Attorney de Resendiz regarding letters to Sun asking for required payments and reports under agreements and draft and revise same (2.2); Finalize motions to terminate leases, confer with Attorney de Resendiz regarding same and file same (.9)	6.10	\$1,189.50
07/31/2009	SBR	ONE - Correspondence with M. Magidson and J. Etra re hearing on Gunlicks' motion, prepare for hearing, review court order, and correspondence from B. Fradera and D. Newman re new bank account (1.4); correspondence with A. Mullen re P. Fues electronic mail, correspondence and calls	9.60	\$3,024.00

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Managemnt Co., et al. 43125.0001 to and from P. Farah re P. Fues personal property and conference with J. Etra and call to D. Newman re same (.9); correspondence with D. Siegel re document requests for subpoenas and conference with J. Etra re same (.7); correspondence with M. Magidson and D. Newman re rejection of Naples and Chicago leases, research REDACTED review and revise motions to reject leases, and correspondence with W. Dorsey and J. Fox re same (3.4); correspondence with M. Magidson, J. Etra, and D. Newman re loan defaults, prepare letters to borrowers re same, calls to and from M. Magidson re same, and conference with J. Etra to finalize and send default letters (3.2). 0.20 \$63.00 08/01/2009 J-E REDACTED (.2)08/01/2009 SBR ONE - Correspondence with J. Etra et al re 6.80 \$2,142.00 default notices on Sun Capital loan defaults, conference with J. Etra re draft default letters, revise default notice letters, and correspondence with J. Etra re same (1.6); FOUR correspondence with R. Friedman re return of Phil Fues' personal property (.1); correspondence with J. Etra et al. re documents request for subpoenas, review SCI document request, review SCHI document request, and correspondence with J. Etra regarding suggested changes to same (2); correspondence with D. Siegel re Gunlicks' emails regarding interest rate change on SCI factoring client (.3); correspondence with M. Magidson re Gunlicks' loan document binder (.1); organize July files and correspondence and prepare task list (2.70). J-E ONE-Work on letters to Sun on defaults. 1.50 \$472.50 08/02/2009 1.10 \$346.50 08/02/2009 **SBR** ONE - Correspondence with J. Etra re reporting requirements in : REDACTED agreements (.1); correspondence with M. Magidson regarding Mayer Brown book prepared for February 24, 2009, meeting containing agreements and REDACTED proposed amendments (1). \$157.50 DSN ONE - Telephone conference with Rick Addison 0.50 08/03/2009 regarding factual issues (.3); telephone conference with Jim Fox, attorneys for Naples Landlord (.2). FOUR-Logged incoming mail for Founding 0.90 \$135.00 08/03/2009 G-F Partners Capital Management.

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08/03/2009	J-R	FOUR - Correspondence and telephone conference with vendor regarding online demonstration of web-based document management system	0.40	\$60.00
08/03/2009	MAW	ONE - Prepare letter and exhibits filed to Receiver's Motion to Terminate Lease to Ms. Yoo, law clerk to Judge Steele office	0.40	\$60.00
08/03/2009	SBR	ONE - correspondence from J. Fox and to D. Newman and S. Flint re condition of Naples office space and termination of lease (.6); correspondence with B. Fradera re SSR draft subpoena (.1); review order granting defendant's extension to answer complaint (.1); correspondence with REDACTED (.1); continue reviewing and organizing July electronic files and completion of task list for August (3.7)	4.60	\$1,449.00
08/04/2009	B-F	ONE - Draft email to Daniel Newman providing investor contact information (.2); FOUR - update receivership website to include recent court filings (1.5).	1.70	\$255.00
08/04/2009	DSN	ONE-Review correspondence from Jill Frew (.1); draft correspondence to Jill Frew (.1); draft correspondence to Vincent Paparo request by Jill Frew for telephone conference (.1); review correspondence from Vincent Paparo regarding Jill Frew telephone conference (.1); telephone conference with GL regarding Sun proposal (.3); draft correspondence to Jill Frew as follow-up to telephone conference (.2); telephone conference with Martin P regarding Founding Partners computer system; review correspondence from Martin P regarding same (.4); FOUR - telephone conference and e mail correspondence with Phil VanMohl Naples, coordinating move of Naples office (.1); conference with Brenda Fradera regarding updating Receivership web site (.1).	1.50	\$472.50
08/04/2009	G-F	ONE - Logged incoming mail for Founding Partners Capital Management.	2.50	\$375.00
08/04/2009	J-E	ONE- Call with investor (.2). Work on putting materials on internet site (.2). Conference call with Cain Brothers investment bankers (.3)	0.70	\$220.50
08/04/2009	J-R	FOUR - Correspondence with Credence regarding setting up a demonstration of the web-based document management system	0.30	\$45.00
08/04/2009	SBR	ONE - correspondence from D. Newman re	0.20	\$63.00

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		response to proposal to convert Sun debt to equity (.1); correspondence with D. Newman re status of LH mortgage (.1).		
08/05/2009	B-F	FOUR - Meet with Jennifer Martin and Brian Riley of Credence Corp. regarding document management (1.2); ONE - telephone conference with Dan Newman regarding bank account for William Gunlick funds as directed by Court Order (.1); review email from Ron Brazda regarding Naples office address (.1); draft email to Ron Brazda regarding Naples office (.1).	1.50	\$225.00
08/05/2009	DSN	ONE - Telephone conference with Jim Fox, attorney for Naples offices (.2); draft subpoena to investors regarding Global Fund Investment (.7); review response from counsel regarding Tolling Agreement (.1); conference forensic accountant regarding review of Sun Financial information (.2); draft correspondence to investor (.1); review correspondence from investor (.1); review Order pertaining to William Gunlets (.1); review e mail from forensic accountant relating to e mail through Founding Partner e mail (.1); FOUR - respond to correspondence from investor J.H. (.1); review correspondence from investor J.H. (.1); ONE - draft and review correspondence regarding status of Sun Mortgage (.1); FOUR - telephone conference and e mail correspondence re: Naples, coordinating move of Naples office (.1).	2.00	\$630.00
08/05/2009	G-F	FOUR - Logged incoming mail for Founding Partners Capital Management.	0.50	\$75.00
08/05/2009	J-R	FOUR - Correspondence and telephone conferences with Credence regarding their services for web-based document management system and setting up a demonstration of program.	0.60	\$90.00
08/05/2009	SBR	ONE - Correspondence with D. Newman regarding cash collateral agreement and mortgage (.2); correspondence with B. Fradera re SSR subpoena (.1).	0.30	\$94.50
08/06/2009	B-F	ONE - Conference with Daniel Newman regarding Chicago and Naples offices and tasks to be performed (.2); review correspondence from Daniel Newman regarding Naples office (.1); review documents provided by investor M.L. (.1); draft letter to Vince Paparo transmitting copies of correspondence sent to Howard Koslow (.1);	0.60	\$90.00

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		FOUR - conference with Junelle Rodriguez regarding document management (.1).		
08/06/2009	DSN	ONE- Revise letter to SCHI regarding accrued interest (.4); telephone conference with Jim Fox, counsel for landlord, regarding proposed agreement regarding Naples offices (.3); telephone conference with Mockler & Associates regarding move of Naples office (.2); draft correspondence to Naples office manager regarding move of Naples office (.1); telephone conference with investor C.S. regarding status of action and other related issues (.2); review request by investor regarding changing designations (.1); telephone conference with accountant regarding identification of investors in Global Fund (.3); review documents provided by accountant regarding various investors in Global Fund (.3); draft correspondence regarding status of mortgage (.1).	2.00	\$630.00
08/06/2009	G-F	ONE - Reviewed, organized and logged incoming mail.	1.50	\$225.00
08/06/2009	J-E	ONE - Work on Mr. Gunlicks funds and bank account issue and correspondence with Carlton Fields (.3). Worked on letter re no interest payment, and review of contracts (1.0). Worked on subpoenas directed to investors (5). Correspondence with investor group (.2)	2.00	\$630.00
08/06/2009	SBR	ONE - correspondence from D. Siegel re Focus Management Report (.1); Correspondence and calls to D. Newman and J. Etra re motions to reject leases in Chicago and Naples (1.20); review draft subpoena to SSR, review REDACTED agreement, and correspondence with D. Siegel, B. Fradera, and J. Etra re same (.5); review revised SCI document request and correspondence to J. Etra re same (.4); correspondence with J. Etra and D. Newman re request to transfer interests in Stable-Value Fund (.2); correspondence with D. Newman and J. Etra re default notice on failure to make interest payments on SCI and SCHI loans (2.)	4.40	\$1,386.00
08/07/2009	B-F	ONE - Telephone conference with Neville Muradali regarding phone system at Founding Partners Naples office (.1); telephone call to Peter Aldridge at Naples Executive Suites, Inc. regarding phone system (.1); telephone conference with Neville Muradali regarding	0.40	\$60.00

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		(.1); review email from investor C.S. regarding documents requested (.1).		
08/07/2009	DSN	ONE - Draft correspondence to accountant regarding investor request (.1); draft correspondence to counsel regarding default letters and review correspondence from counsel regarding default letters (.3); draft and review correspondence from Brenda Fradera relating to the Naples office system (.1); review correspondence from counsel regarding status of document production of third party subpoenaed entity (.1).	0.60	\$189.00
08/07/2009	J-E	ONE - E-mail to counsel for Gunlicks on accepting service of subpoena, and worked on subpoena (.3). Call with counsel for investors (.2). Work on credit insurance issue (.2). Work on interest default and acceleration letters. (1.5). Worked on other default letters (.2). Call with SEC counsel (.2). Worked on tolling agreement for Mayer Brown and correspondence with Mayer Brown re: same. (.3).	2.90	\$913.50
08/07/2009	SBR	ONE - review correspondence re Gunlicks' deposition (.1); correspondence, calls, and drafting of letters to SCI and SCHI declaring loans in default (3.8); correspondence with L. Blanco and J. Etra re attorneys' fees (2.); correspondence with S. Flint et al. re credit insurance policies (.2)	6.10	\$1,921.50
08/07/2009	SJF	ONE - Begin drafting subpoenas to investors	0.50	\$125.00
08/08/2009	J-E	ONE - Edit, finalize interest default letters to Sun and transmittal courtesy letter to Proskauer, and arranged for distribution of same (1.0). Correspondence on additional default letters (.3).	1.30	\$409.50
08/10/2009	B-F	ONE - Telephone conference with Neville regarding documents to be delivered to Broad and Cassel (.1); telephone conference with Michael Magidson regarding addresses for subpoenas to be served (.1); compile addresses for subpoenas to be served (.2); telephone conference with Jessica Alfonso-Baez and Andrea Nathan regarding document management program (.3); review email correspondence from Jonathan Etra regarding production of Judy Aller documents to the SEC (.1); draft email correspondence to Ian Anderson at the SEC regarding production of Judy Aller documents (.1); telephone conferences	1.10	\$165.00

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		with Michael Magidson regarding Gunlicks account (.2).		
08/10/2009	DSN	ONE - Draft and review correspondence from counsel regarding establishment of William Gunlicks account (.1); correspond counsel regarding documents produced by third party (.1).	0.20	\$63.00
08/10/2009	J-E	ONE - Call with SEC on various issues (.3). Worked on investor subpoenas (.3). Call from new counsel for North Shore bank regarding foreclosure, internal e-mail regarding same, and calls with SEC and Receiver (1.0). Conference with Receiver on request by Chicago counsel to investors (.3). Reviewed letter from Vince Paparo, distributed same with comments (.2). Worked no opening of account for Mr. Gunlick's funds, per Court Order. (.2).	2.30	\$724.50
08/10/2009	MDM	ONE- Correspond with Receiver and attorneys regarding new bank account to be established (.2); Correspond with attorneys and Receiver regarding correspondence from North Shore Bank regarding foreclosure of Gunlicks' property in Chicago (.2); Analysis of case cited by North Shore Bank counsel (.3)	0.70	\$136.50
08/10/2009	SBR	ONE - correspondence from V. Paparo re weekly reports, etc., and J. Etra's suggested response (.2); correspondence with J. Etra re North Shore Bank threatened foreclosure and setoff (.3); correspondence from D. Siegel re SCI accounts receivable aging (.1)	0.60	\$189.00
08/11/2009	B-F	ONE - Telephone conference with Michael Magidson regarding subpoenas to be served (.1); review email correspondence from Margaret Weaver regarding investor contact information (.1); draft email correspondence to Margaret Weaver providing investor contact information (.1); telephone conferences with Junelle Rodriguez regarding document management (.1); draft correspondence to Ian Anderson transmitting Judy Aller documents (.1); telephone conference with investor R.B. regarding status of receivership (.2); FOUR - review email from counsel for receiver regarding employee personal belongings (.1); draft email correspondence to counsel for receiver regarding same (.1); ONE - organize and update receiver files (1.0).	1.90	\$285.00
08/11/2009	DSN	ONE - Numerous correspondence with counsel relating to requests by bank to file motion for set-	0.70	\$220.50

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		off of Founding Partners on the establishment of Gunlicks account (.2); numerous correspondence for the establishment of Gunlick's account (.1); conference with counsel relating to NorthShore Bank motion (.1); numerous conferences regarding storing materials that we received from Naples and Chicago offices (.3) (NO CHARGE); review correspondence from counsel for Naples office (.1); draft correspondence to counsel for Naples office regarding potential settlement (.1); draft correspondence to counsel regarding research on set-off issues (.1).		
08/11/2009	J-E	ONE- Worked on outline of information for Bermuda counsel (.2). Worked on response to Proskauer letter (.2). Worked on health Jill Frew matters (.3). Worked on letters of default and re credit insurance (.2). Worked on document review and legal research (.2). Worked on request by North Shore bank counsel, including call with same (.3). Worked on request by Chicago investors counsel and call with same and with SEC (.3). Worked on request by Mr. Gunlicks on property (.2). Worked on Mayer Brown tolling agreement (.2).	2.10	\$661.50
08/11/2009	J-R	FOUR - Telephone conference with Credence regarding obtaining South Florida references on the Relativity program	0.30	\$45.00
08/11/2009	MAW	ONE - Revise, finalize, serve via certified mail and facsimile Subpoenas for documents for investors,	3.20	\$480.00
		REDACTED		
		Telephone conversations with Mr. Addison regarding acceptance of service of subpoena on behalf of REDACTED; Telephone conference with Mr. Silverio's office regarding confirmation of acceptance of service of Subpoena on behalf of REDACTED Telephone conference with Mr. Mizgall regarding confirmation of acceptance of service on behalf of REDACTED		
08/11/2009	MDM	ONE- Finalize investor subpoenas and coordinate service of same (2.5); Call with Mr. Addison regarding same (.1); Calls with Receiver	2.80	\$546.00

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08/11/2009	SBR	and Attorney Etra regarding same (.2). ONE - correspondence with REDACTED (.1); correspondence with J. Frew re NDA and review same (.4); call from J. Etra re outstanding tasks and issues (.8); correspondence with B. Fradera and D. Newman re personal property of P. Fues, W. Gunlicks, and other former Founding Partners employees (.2); correspondence with D. Newman re North Shore Bank foreclosure (.2); call to W. Dorsey re rejection of Chicago office lease (.6); call to REDACTED and correspondence with D. Newman and J. Etra re same (.6); correspondence with R. Kobert re SEC enforcement actions (.1); call to D. Siegel re borrowing base calculations (.2); review Houlihan Lokey materials and correspondence with S. Clark re same (.7); correspondence with C. Kane re status of mortgage (.1); review Gunlicks' SCI and SCHI credit insurance files and discuss with J. Etra (1.5); correspondence with D. Newman re response to V. Paparo (.1); further research on lender issues (.8)	6.40	\$2,016.00
08/12/2009	B-F	ONE - Review email correspondence from Daniel Newman regarding William Gunlicks account (.1); telephone conference with Dana Glover at BankAtlantic regarding opening William Gunlicks account (.1).	0.20	\$30.00
08/12/2009	DSN	ONE - Review correspondence from counsel regarding subpoena regarding receipt of phone call from attorney representing investor in receipt of subpoena (.1); THREE - review correspondence from investor regarding forms K1 (.1); ONE - review correspondence from counsel relating to telephone conference with investor regarding various issues (.1); review correspondence to counsel for Gunlick's in response to William Gunlick's personal property (.2); review file and correspondence relating to same (.1); review correspondence relating to filing of Motion to Intervene (.1); review correspondence relating to letter received from investor and Stable Asset Fund (.1); FOUR - review correspondence relating to call from counsel for investor L.L. regarding receipt of subpoena and follow-up issues (.1); ONE - review	1.50	\$472.50

Page 93 Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 correspondence from counsel for William Gunlick's relating to William Gunlick's assets (.2); review correspondence to counsel for landlord for Chicago office space (.1); FIVE review correspondence from prior Receiver regarding fee application (.1); draft correspondence to the former Receiver regarding fee application (.1); ONE - review correspondence from counsel for Naples landlord (.1);1.90 \$598.50 ONE - Worked on and provided position on J-E 08/12/2009 North Shore motion (.4). Worked on and provided position on Chicago investors motion (.4). Worked on Mr. Gunlicks' request for property, response to same (.4). Worked on health care valuation and expert issues (.4). Call with lawyers for investors and internal follow up (.3)\$526.50 2.70 ONE - Conference with Ms. Weaver regarding **MDM** 08/12/2009 subpoenas sent to Mr. Addison and review correspondence regarding same (.3); Call with Mr. Lang regarding analysis of Global Fund (.9); Call with investor (.4); Call with Mr. Silverio, counsel for investor REDACTED regarding subpoena (.2); Call with Mr. O'Brien, counsel for investor: REDACTED regarding subpoena and correspond with Mr. O'Brien regarding same (.4); Correspond with Receiver regarding same (.2); Review correspondence from Freeborn Peters, counsel for investors (.1); Review correspondence to Mr. Gunlicks' counsel regarding request for personal property and response to same (.2). \$2,331.00 7.40 ONE - correspondence with D. Newman and W. **SBR** 08/12/2009 Dorsey re Chicago office lease (.8); correspondence with C. Kane re LH mortgage (.1); review correspondence from investor counsel rescinding their securities purchases (.1); correspondence with REDACTEDre SEC action (.1); review North Shore motion for relief from stay to set off and foreclosure on Gunlicks' residence (.3); correspondence from J. Etra re call from G. Friedman (.1); FOUR - review K. Verges motion and order to withdraw as counsel to Founding Partners in Annandale case and call to K. Verges and correspondence with J. Etra and D. Newman re same (.7); correspondence with T.

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Oxford requesting his withdrawal as counsel in the Annandale case (.2); ONE - review correspondence re REDACTED (.1); review REDACTED proposal (.3); call to D. Siegel re credit insurance documents (.1); correspondence with accountants re credit insurance and review and send files re same (.4); correspondence with accountants re contents of SCI and SCHI weekly reports (.2); review correspondence from Gunlicks' lawyer re return of personal property (.1); correspondence from D. Siegel re contents of weekly reports (.1); view materials from Cain Brothers in preparation for call with J. Frew (1.1); call from J. Frew re debt restructuring proposal (.6); FIVE correspondence with D. Newman re setoff rights (.6); ONE - review materials on commitment to lend (2)

08/13/2009 DSN

ONE - Review correspondence relating to HSB motion for protective order (.1); review correspondence from REDACTED relating to forms K1 (.1); review correspondence from counsel relating regarding Global Fund and documents relating to same (.1); FOUR - review correspondence regarding conversation with investors (.1); review correspondence on response to telephone call from investment banker (.1); FIVE - review correspondence relating to conversation with former counsel and legal issues relating to payment (.1); draft correspondence relating to conversation from former counsel regarding request for payment (.1); review follow-up email relating to research pertaining to attorney request for payment (.1); ONE - review correspondence to investor relating to Receiver's subpoenas (.1).

08/13/2009 J-E 08/13/2009 MDM

ONE-Call with Mr. Lang regarding memo for Bermuda counsel and analysis of Global Funds (.2); Correspond with Receiver regarding same (.1); Review and analyze Order denying HSBC's Motion for Protective Order (.1); Review correspondence regarding negotiations with Cain Brothers (.1); FIVE - Analyze case law regarding

ONE - Work on document request for SCI.

REDACTED

and prepare summary of same (1.3);ONE- Call with Ms. Anderson, counsel for

0.90 \$283.50

0.50

3.90

\$157.50

\$760.50

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REDACTED, regarding subpoena and correspond with Ms. Anderson regarding same (.3); Prepare task list of open items and correspond with attorneys and Receiver regarding same (.3); Conference with Mrs. Barnes de Resendiz regarding REDACTED Agreement between Stable Value and

Global Fund Ltd., REDACTED Agreement, HLP Promissory Note and LHA Promissory Note (1.0); Review and analyze investors' motion for relief from litigation stay (.3); Correspond with Mr. Etra regarding discovery requests to SCI (.2)

08/13/2009 SBR

ONE - correspondence with J. Carrion and S. Clark regarding interview of Houlihan Lokey (.2); correspondence with D. Newman re investor motion for relief from stay (.1); correspondence with D. Newman et al. re Sun Capital's motion for special appearance to file motion to dismiss in Annandale case (.1); correspondence with B. Fradera and D. Siegel regarding number of receivership bank accounts and Global fund issues (.2); correspondence with D. Newman et al. re issues discussed J. Frew (.6); correspondence with B. Fradera and D. Siegel re case management issues and filing of original correspondence and pleadings (.2); FIVE - research and preparation of memo of REDACTED

and correspondence with D. Newman et al. re same (1.3); correspondence with D. Newman and J. Frew re telephone conversation on Aug. 12 (.7); correspondence with D. Siegel re SCI and SCHI documents requests (.2); draft letter to V. Paparo responding to his Aug. 10 letter and review HLP loan agreement and stock pledge (3.6); correspondence with S. Clark and D. Newman re Houlihan interview (.2); FIVE - call to M. Magidson to discuss setoff issues and agreement (1); correspondence with M. Magidson re Texas law on setoff rights (.2); correspondence with M. Magidson re SCF loan (.2); correspondence to and calls from D. Siegel re assignment agreement (2.3); correspondence with D. Newman et al. re Global Fund investment in Stable-Value fund (1.5).

08/14/2009 B-F

FOUR - Telephone conference with Dana Glover at BankAtlantic regarding opening account for William Gunlicks' personal funds (.1); draft email to Dana Glover regarding same (.1); telephone conference with Adam Lang at forensic

12.60 \$3,969.00

0.60 \$90.00

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				Page 96
		accountant's office, regarding 2007 tax returns for Founding (.1); telephone conference with Yvonne Douglas at Mellon Bank regarding interest rate issue (.1); review email correspondence from Dana Glover at BankAtlantic regarding documents needed to open account (.1); draft email correspondence to Dana Glover providing documents requested (.1).		
08/14/2009	DSN	FOUR - Draft correspondence to Brenda Fradera regarding Naples office equipment (.1); ONE - draft correspondence to Brenda Fradera regarding Naples Lease (.1); draft correspondence to Mike Magidsen regarding legal research to be conducted (.2); ; draft correspondence to counsel for Receiver regarding communication with investment banker for Sun (.3); review summary of telephone conference with investment banker for Sun (.1); review summary of research from Receiver's counsel regarding legal issues (.1); draft correspondence to Receivers' counsel regarding summary of research (.1); FOUR - review summary from Receivers' counsel regarding conversation with investor J.A. (.2)	1.20	\$378.00
08/14/2009	MDM	FIVE - Research regarding REDACTED (.2); ONE - Draft and revise SCI RFP and Notice of Taking Deposition and confer with Mr. Etra regarding same (1.8); Review analysis of Agreement between Stable Value and Global Fund Ltd. prepared by Mrs. Barnes de Resendiz (.2); FOUR - Call with investor Mr. Anderson regarding subpoena and other matters (.3); Prepare summary of same (.1); ONE - Call with Mrs. Barnes de Resendiz regarding agreement (.2); Review draft letter to Sun counsel and provide comments (.3); Phone calls with reporter from Crane's Chicago Business (.2); Correspond with Receiver regarding same (.1); Review Mrs. Gunlicks' Motion to Intervene and Motion to Modify the Asset Freeze (.1); Correspond with attorneys regarding same (.1)	3.60	\$702.00
08/14/2009	SBR	ONE - Continue drafting response to V. Paparo's Aug. 10 letter and correspondence with M. Magidson, and D. Siegel regarding revisions to draft letter, and correspondence with D. Newman et al. re same (2.9); correspondence with M. Magidson re agreement (.1); review HLP loan documents raised in Paparo Aug. 10 letter (.8);	8.10	\$2,551.50

Re: Daniel S. Newman, Receiver

SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001 call to D. Siegel re same (.1); correspondence to D. Siegel and M. Magidson re HLP loan (.2); REDACTED calls from and to M. Magidson re agreement (.3); additional review of documents re REDACTED agreement (.6); correspondence from M. Magidson re investor call (.1); call from M. Prinslo re REDACTED agreement (.4); call from D. agreement (.3); correspondence with A. Lang re same (.2); review agreement (.5); correspondence with S. Siegel re recharacterization of equity to debt (.1); review Aller and Gunlicks (1.5)correspondence with M. Magidson re case (.1); correspondence with M. Magidson re agreement (.1); correspondence from D. Newman re Cain Brothers (.1); correspondence with B. Fradera re case management issues (.1) 2.30 \$724.50 ONE - correspondence with D. Newman 08/15/2009 SBR regarding changes to letter to V. Paparo and review same (.2); correspondence with R. Kobert REDACTED (.2); file electronic correspondence and update task list (1.9). 0.60 \$189.00 08/16/2009 SBR ONE - correspondence with D. Newman re Chicago and Naples leases and filing amended motions (.2); correspondence with R. Kobert re REDACTED s (.2); correspondence with D. Siegel re aging of accounts receivable (.1); correspondence with D. Siegel re report of weekly deposits in lock boxes (.1)3.00 \$450.00 ONE - Review email from Adam Lang regarding B-F 08/17/2009 2007 tax documents needed for Founding Entities (.1); FOUR - conference with Daniel Newman regarding providing tax documents to forensic accountants (.1); review documents retrieved from Founding Partners' Naples office in order to locate and gather 2007 tax documents requested by forensic accountants (2.5); draft email correspondence to Adam Lang transmitting tax documents to Founding Partners Capital Management (.1); draft email correspondence to Adam Lang transmitting tax documents for Founding Partners Stable Value Fund and Hybrid Value Fund (.1); ONE - review email

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correspondence from Daniel Newman regarding

Naples lease (.1).

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001				
08/17/2009	DSN	ONE-Meet with counsel regarding strategy and tasks for moving forward in relation to various issues and division of tasks to be performed (1.0); review and analyze documents relating Sun's relationship with Founding Partners (.4); Asset Recovery: Telephone conference with Jim Fox regarding settlement (.4); review correspondence from Jim Fox regarding settlement (.1); conference with counsel regarding preparation of appropriate settlement documents for resolution of landlord matter (.2); review and analyze motion by William Gunlick's wife to modify asset freeze and related documents (.5); review correspondence from prior counsel for Founding Partners regarding substitution (.1); FOUR telephone conference with REDACTED regarding forms K1 (.4).	3.10	\$976.50
08/17/2009	J-E	FOUR - Call with counsel for investors (.4). Worked on numerous other matters (1.5).	1.90	\$598.50
08/17/2009	MDM	ONE - Call with investor regarding subpoena (.3); Prepare correspondence to Receiver and attorneys regarding same (.1); Review and analyze Mrs. Gunlicks' Motion to Intervene and Draft Motion to Modify Asset Freeze Order (.2); Review and analyze correspondence between FP and E&Y relating to Global Fund (.1); Review and analyze Global Fund documents I (.3); Review correspondence from Mrs. Barnes de Resendiz and Mr. Siegel regarding Global Fund, Ltd. (.1)	1.10	\$214.50
08/17/2009	SBR	ONE - Correspondence with D. Newman and J. Etra re REDACTED (.2); correspondence with M. Magidson re retention of healthcare consultants (.1); review P. Gunlicks' motion to intervene (3.); correspondence with M. Magidson and D. Newman re amending motions to reject Chicago and Naples leases (.1); correspondence with W. Dorsey and D. Newman re Chicago lease (.2); correspondence with M. Magidson re motions to reject leases (.1); correspondence with REDACTED with Receiver (.1)correspondence with D. Newman re discussions with Cain Bros. (.1).	3.90	\$1,228.50
08/18/2009	B-F	FOUR - Meet with receiver's counsel and Xact Data regarding document management system (1.3); ONE - draft Stipulation of Settlement, Motion to Approve Settlement, and proposed	4.50	\$675.00

Re: Daniel S SEC v. Manager 43125.00	Founding nnt Co.,	g Partners Capital		Page 99
09/19/2000	DENI	order granting Motion to Approve Settlement between Receiver and Landlord for Naples property (1.6); FOUR - draft email correspondence to Dana Glover at BankAtlantic regarding status of Gunlick account opening (.1); review email correspondence from Dana Glover responding to same (.1); telephone conference with BankAtlantic regarding Gunlick account (.1); draft email to David Siegel regarding hard drive images (.1); review documents retrieved from Founding Partners Naples office in search of documents requested by forensic accountants (1.2).	3.80	\$1,197.00
08/18/2009	DSN	FOUR - Meet with a potential document management service and attorneys regarding document management issues (1.0 NO CHARGE); ONE - meet with potential consultant relating to health care consulting issues (1.3); review and analyze numerous Sun related documents (1.0); FOUR - conference with Receiver's accountant regarding forms K-1 (.3); conference with investors regarding forms K-1 and status (.2); review correspondence to accountants relating to tax returns (.1); FIVE - review correspondence from various investors regarding letters rescinding investment (.3); review and analyze Illinois statute in reference to the decision (.2); telephone conference with counsel for investor regarding decision letter (.4)	5.80	\$1,197.00
08/18/2009	J-E	ONE - Meetings with Receiver and with potential consultants (1.5). Work on follow up conference call with witness (.2). FOUR - Work on document management (.5).	2.20	\$693.00
08/18/2009	J-R	FOUR - Meeting with Xact regarding web-based document management system; Correspondence with Xact regarding pricing	1.30	\$195.00
08/18/2009	MDM	ONE - Review correspondence from Mr. Siegel regarding Global Fund, Ltd. (.1); Confer with Mr. Etra regarding amended Sun complaint (.1); Review petition filed in Annandale case in Texas, including investor affidavits (1.3); FIVE - Analyze REDACTED	1.70	\$331.50
		and prepare summary for Receiver regarding same (.2)		
08/18/2009	SBR	FOUR - Asset Analysis and Recovery: Conference with D. Newman, J. Etra, and Xact	4.70	\$1,480.50

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		document management system (1.5); ONE - conference with D. Newman, J. Etra,		
		REDACTED		
		(3.2)		
08/19/2009	B-F	FOUR - Telephone conference with Ivonne at Mellon Bank regarding increase of interest rate on accounts (.1); telephone conference with Karen Shea at Naples Executive Suites regarding phones (.1); telephone conference with Ezekial of Xact Data and Martin Prisloo, forensic accountant, regarding document management (.5)	0.70	\$105.00
08/19/2009	DSN	ONE - Conference with counsel regarding documents retrieval from Founding Partners office and review of same and review of various documents and summaries of same relating to documents retrieved from Founding Partners office (1.5); FOUR - telephone conference with accountant for investor regarding receipt of requests for various Founding Partners' documents and review facsimile from investor (.4); correspond with accountant regarding status of forms K-1 (.1); review correspondence from investor regarding various questions and respond to investor question regarding same (.2); research issue relating to REDACTED (.3); Administrative: review correspondence relating to status of Sun mortgage (.1); continue work on opening of the bank account regarding William Gunlicks (.1); review correspondence from counsel for William Gunlicks (.1); telephone conference with accountant regarding various financial issues including forms K-1, investor request for access to documentation and preparation materials in connection with upcoming depositions (.2).	3.00	\$945.00
08/19/2009	J-E	ONE - Worked on document review (.4). Worked on issues regarding Mr. Gunlicks (.3). FOUR - Call from investor's counsel and follow up on same (.2).	0.90	\$283.50
08/19/2009	MDM	ONE - Document review of documents relating to REDACTED t Agreements, proposed restructuring and recapitalization of Sun and related entities, LHA loan and related documents, Global Fund loan participations (5.3); Prepare summary of same for Receiver and attorneys (.7); Conferences with Mrs. Barnes de Resendiz and	7.10	\$1,384.50

	Founding mnt Co., o	Partners Capital		Page 101
08/19/2009	SBR	Mr. Siegel regarding same (1.1). FOUR - Correspondence with D. Newman and D. Siegel re investor requests for tax returns and call from D. Siegel re same (.4); ONE - call from M. Kennelly regarding fee structure for restructuring consultation (.1); correspondence from J. Etra and to D. Siegel re Gunlicks property (.2); review Mayer-Brown tax opinions re Global Fund and related documents (1.3)	2.00	\$630.00
08/20/2009	DSN	ONE - Review motion filed by Intervenor's (.3); review and analyze various documents retrieved from Founding Partners office and discuss implications of same with counsel (.8); draft letter to potential expert for retention of services (.1); FOUR - telephone conference with Receiver's accountants regarding forms K1 and disclosures to be provided (.3); finalize paperwork to establish bank account regarding Bill Gunlicks (.1); office conference with Receiver's counsel regarding correspondence from counsel for William Gunlicks (.1); draft correspondence for counsel for William Gunlicks Jr. (.2); review correspondence from counsel for William Gunlicks Jr and respond to same (.1); draft correspondence to storage company regarding various issues and review response regarding same (.2); review various correspondence from investors pertaining to tax and other issues (.3); review filing by investor D.P. (.1).	2.60	\$819.00
08/20/2009	J-E	ONE- ONE - Work on various matters concerning Mr. Gunlicks (.3). FOUR - Call with investor (.2).	0.50	\$157.50
08/20/2009	MDM	ONE - Review documents from FP offices relating to Sun Capital Funding deal, Gunlicks' restructuring negotiations with Sun, communications with investors, and Texas litigation (3.9); Prepare summaries of same for Receiver and attorneys (.8); FOUR - Correspond with Mr. Etra regarding bank account for Gunlicks' living expenses (.1)	4.80	\$936.00
08/20/2009	RH	FOUR - Review letter from William Gunlicks' attorney regarding personal mail and prepare response.	0.60	\$90.00
08/20/2009	SBR	FOUR - Correspondence with D. Siegel regarding Gunlicks personal property (.2); ONE - correspondence with M. Magidson regarding Hybrid-Value and investor call (.1);	1.00	\$315.00

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		correspondence with D. Newman re Gunlicks personal property (.1); review Houlihan materials and correspondence with D. Newman (.3); review correspondence from investor and to D. Siegel re same (.2); correspondence with S. Clark at Houlihan Lokey re retention of healthcare consultants (.1)		
08/21/2009	DSN	ONE - Interview with potential expert firm (1.0); FOUR - Review correspondence from Phil Von Kahle regarding contents of Founding Partners offices (.1); multiple telephone conferences with accountants regarding treatment of forms K-1 (.4). ONE - Review correspondence relating to production by third party subject to subpoena and outline of discussion (.2).	1.70	\$535.50
08/21/2009	MAW	FOUR - Review, document management and organization of documents received by Subpoenaed Investor, REDACTED	0.70	\$105.00
08/21/2009	MDM_R	ONE - Call with investor EDACTED regarding subpoena (.3); Correspond with regarding same (.1); Review documents produced by REDACTED in response to subpoena (.2); FOUR - Compile investor contact info (.1); Correspond with attorneys regarding bank account for Gunlicks' living expenses (.1); Call with Mr. Gentry re: REDACTED (.5); Call with Mr. O'Brien, counsel for regarding response to subpoena (.1); Correspond with Receiver and attorneys regarding same (.1)	1.50	\$292.50
08/21/2009	SBR	FOUR - Correspondence with D. Newman re investor tax issues (.1); ONE - research on healthcare consultants, conference call with Houlihan Lokey, call to D. Newman re same, and correspondence with S. Clark (2.4); correspondence with J. Etra re Hybrid-Value redemption requests (.1); correspondence with J. Etra re Northshore motion (.1); correspondence with J. Etra re letter to Mayer-Brown re tolling agreement (.2)	2.90	\$913.50
08/22/2009	J-E	ONE - Worked on Mayer Brown tolling agreement. (.5). Arranged for scheduling of expiration of tolling agreements (.2). Worked on third-party subpoenas (.5). Worked on position on pending motions and timing of responses (.6). Follow up on request for witness interview. (.2). Follow up on Hybrid Fund investments (.2).	2.20	\$693.00

	Founding	Partners Capital		Page 103
08/22/2009	MDM	FOUR - Correspond with attorneys and Receiver regarding task list items	0.30	\$58.50
08/22/2009	SBR	ONE - Review and file electronic correspondence (1.20); correspondence with J. Etra re claims against Mayer-Brown (.2)	1.40	\$441.00
08/23/2009	DSN	FOUR - Draft disclosure to investors related to forms K1 (.4); draft correspondence to accountants regarding draft disclosure (.1);	0.50	\$157.50
08/23/2009	MDM	FOUR - Correspond with attorneys and Receiver regarding task list items	0.30	\$58.50
08/24/2009	B-F	FOUR - Review email correspondence from Daniel Newman regarding investor update regarding Forms K-1 (.1); update investor website to include recent update regarding status of Forms K-1 (.1); revise letter to Howard Koslow regarding Founding Partners Stable Value Fund (.1).	0.30	\$45.00
08/24/2009		ONE - Review correspondence from investor ACTED (.4); review correspondence relating to objections and responses to subpoena by investor CTED (.2); FIVE - review correspondence from Susan Barnes deResendiz regarding correspondence from Chicago counsel for landlord (.2); ONE - review correspondence from Michael Magisden (.1); review correspondence from counsel for William Gunlicks (.1); review correspondence to counsel for William Gunlicks (.1).	1.10	\$346.50
08/24/2009	G-F	FOUR - Compile and review incoming mail for Mr. Gunlicks and Founding Partners Capital Management; Log-in incoming mail.	0.80	\$120.00
08/24/2009	J-E	ONE - Reviewed correspondence with Carlton Fields regarding Mr. Gunlicks' claimed possessions and drafted response to latest correspondence.	1.00	\$315.00
08/24/2009	MAW	ONE - Review, document management and organization of documents received by Subpoenaed Investors, REDACTED	2.80	\$420.00
08/24/2009	MDM	ONE - Review investor subpoena responses (.7); - Correspond with attorneys regarding Gunlicks' motion for extension of time to answer North Shore motion to foreclose (.1); FOUR - Correspond with attorneys regarding disbursement of Mr. Gunlicks' living expenses	1.30	\$253.50

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		(.2); FIVE - Review calculation of amounts due under Chicago office lease prepared by Chicago landlord's counsel and correspond with Mrs. de Resendiz regarding same (.3)		
08/24/2009	SBR	FIVE - Review correspondence from W. Dorsey and correspondence to M. Magidson re same (.3); FOUR - correspondence with J. Etra regarding turnover of Gunlicks' personal property (.2)	0.50	\$157.50
08/25/2009	B-F	FOUR - Review correspondence from Marissel Descalzo transmitting check for Gunlicks' personal funds account (.1); review email correspondence from Dana Glover at BankAtlantic regarding Gunlicks' account (.1); draft email correspondence to Dana Glover at BankAtlantic regarding Gunlicks' account (.1)	0.30	\$45.00
08/25/2009	DSN	ONE - Telephone conference with Ian Anderson of SEC regarding various issues and responses to outstanding items (.2);	0.20	\$63.00
08/25/2009	G-F	FOUR - Compile and review incoming mail for Mr. Gunlicks and Founding Partners Capital Management; Log-in incoming mail.	1.10	\$165.00
08/25/2009	J-E	ONE-Worked on document review (1.0). FOUR - Revised and finalized letter to Carlton Fields on property claimed by Mr. Gunlicks (.8). Correspondence with SEC on property claimed by Mr. Gunlicks (.2).	2.00	\$630.00
08/25/2009	MAW	ONE-Review, document management and organization of documents received by Subpoenaed Investors, REDACTED REDACTED and additional documents received from REDACTED; Prepare index of investors subpoenaed and status of responses thereto.	2.60	\$390.00
08/25/2009	MDM	FOUR-Correspond with attorneys regarding disbursement of funds for Gunlicks' living expenses (.2); Review letter to Gunlicks' counsel regarding personal property (.1)	0.30	\$58.50
08/25/2009	SBR	ONE - Calls from A. Dunayer re Houlihan Lokey fees to represent Receiver (.5); FOUR - review and revise letter re Gunlicks' personal property (.2); FIVE - correspondence with W. Dorsey et al. regarding revised spreadsheet for claims arising from rejection of Chicago lease (.2); ONE - correspondence with M. Hughes and report to D. Newman re various healthcare consultants (.3); call from REDACTED re meeting with	1.40	\$441.00

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08/26/2009	B-F	Gunlicks (.2) FOUR - Telephone conference with Phil Von Kahle regarding items retrieved from Founding Partners Chicago office (.1); telephone call to local U.S. Post Office in Chicago regarding mail for Founding Partners Chicago office (.1).	0.20	\$30.00
08/26/2009	DSN	ONE - Review correspondence from counsel relating to subpoena served on third party (NO CHARGE); correspondence to counsel regarding response to investor employee (NO CHARGE); FOUR - Case Administration: Office conference with counsel relating to document production and retention issues for multiple purposes (1.3); telephone conference with counsel for William Gunlicks regarding various issues (.3); receipt and review of correspondence from counsel for William Gunlick's (.1); draft correspondence relating to Chicago office (.1); telephone conference with accountant for investor regarding various documents (.2); review and analyze confidentiality agreement to be provide to vendor regarding document services (.5); telephone conference with counsel for the SEC regarding prior Receiver fee application (.1); conferences with attorneys and paralegals regarding various administrative issues pertaining to case management work load and other related issues (1.0 NO CHARGE);	2.60	\$819.00
08/26/2009	G-F	FOUR - Compile and review incoming mail for Mr. Gunlicks and Founding Partners Capital Management; Log-in incoming mail.	1.70	\$255.00
08/26/2009	J-E	FOUR - Document review and analysis and work on web-based document management system (2.5). ONE - Conference call with witness (.5). Work on hybrid value issues (.2). Work on expert issue (.3).	3.50	\$1,102.50
08/26/2009	J-R	FOUR - Telephone conference with vendor regarding web-based document management system.(.4)	0.40	\$60.00
08/26/2009	MDM	ONE - Document review (6.2); Conference with attorneys and Receiver regarding same (1.3)	7.50	\$1,462.50
08/26/2009	SBR	ONE - Correspondence with D. Newman et al. regarding Court's denial to extend receivership to Founding Partners and review same (.2); FIVE - correspondence with M. Magidson and D. Newman re Chicago lease (.2); ONE -	0.60	\$189.00

Re: Daniel S SEC v. I Manager 43125.00	Founding nnt Co., e	Partners Capital		Page 106
		correspondence with D. Newman and M. Kennelly re retention of Huron as healthcare consultants (.2)		
08/27/2009	DSN	FOUR - Draft correspondence to Phil Von Kahle regarding personal items (.1); review correspondence from Phil Von Kahle (.1); draft correspondence to Rick Addison regarding potential mediator (.1); draft correspondence to counsel regarding various issues (.3); meet with accountants regarding tax related issues and telephone conference with potential tax counsel (1.3);	1.90	\$598.50
08/27/2009	G-F	FOUR - Compile and review incoming mail for Mr. Gunlicks and Founding Partners Capital Management; Log-in incoming mail.	2.50	\$375.00
08/27/2009	J-E	ONE - Worked on responses to pending motions in SEC action (.5). Worked on funding of Mr. Gunlicks per Order (.4). Document review and analysis (1.0). FOUR - Call with investor group (.3). ONE - Work on expert issue (.2).	2.40	\$756.00
08/27/2009	J-R	FOUR - Correspondence with Xact regarding signing Broad and Cassel's Confidentiality Agreement; Conference with J. Etra and M. Magdison regarding training for web-based document management system; Conference with Xact regarding picking up first batch of documents to be uploaded into web system.	1.00	\$150.00
08/27/2009	MDM	FOUR - Correspond with attorneys regarding disbursement of funds for Gunlicks' living expenses (.5); ONE - Confer with Mr. Flint regarding responses to motions by North Shore, Mrs. Gunlicks and investors (.3);	0.80	\$156.00
08/27/2009	SBR	ONE - conference with D. Newman re same (.6); correspondence with S. Flint re Gunlicks personal bank statements (.1)	0.70	\$220.50
08/27/2009	SJF	ONE - Research REDACTED	1.50	\$375.00
08/27/2009	SJF	ONE - Begin drafting response to Pamela Gunlicks' motion to modify asset freeze	1.50	\$375.00
08/27/2009	SJF	ONE - Telephone conference with accountant Seigel on tracing source of funds into bank accounts	0.20	\$50.00
08/28/2009	B-F	FOUR - Review email correspondence from investor E.G. regarding request for tax information (.1); review email correspondence	6.30	\$945.00

ATTORNEYS AT LAW

Re: Daniel S. Newman, Receiver SEC v. Founding Partners Capital Managemnt Co., et al. 43125.0001

		from Conrad Stroebe CPA regarding request for tax information for investor E.G. (.1); draft confidentiality agreement between investor E.G., Conrad Stroebe CPA and Receiver in connection with tax information requested (1.0); telephone conference with Jesse Francis regarding document management program and setting up training session for receiver's counsel (.1); revise confidentiality agreement per Daniel Newman's comments (.1); draft email correspondence to Conrad Stroebe CPA and investor E.G. transmitting confidentiality agreement (.1); review email correspondence from Conrad Stroebe CPA in response to same (.1); review email correspondence from Michael Magidson regarding Gunlicks' personal funds account and disbursement to be made (.1); draft response to		
		Michael Magidson regarding same (.1); meet with Martin Prisloo regarding computer images and chain of custody (.2); meet with Ezekiel Alicea at Xact Data regarding transfer of computer images (.2); FOUR - search PACER for documents requested by receiver action (.3); ONE - draft and send freeze letters to various entities (3.5); FOUR - revise letter to investors regarding status of tax returns and post to receivership website (.3).		
08/28/2009	DSN	FOUR - Draft tax return disclosure document to investors (.6); draft correspondence to accounting professionals regarding same (.1); review revisions from accounting professionals (.2); revise tax disclosure documents (.2); telephone conference with Conrad Stroebe regarding obtaining tax information (.2); review research literature regarding blank return (.2).	1.50	\$472.50
08/28/2009	G-F	FOUR - Compile and review incoming mail for Mr. Gunlicks and Founding Partners Capital Management; Log-in incoming mail.	1.40	\$210.00
08/28/2009	J-E	ONE - Conferences with SEC regarding responses to pending motions and work on same (.5). FOUR - Work on notice to investors on Forms K-1 (.5). ONE - Document review (1.0).	2.00	\$630.00
08/28/2009	P-A	FOUR - Communications with Betsy Parker and paralegal regarding website issues.	0.10	\$15.00
08/28/2009	SBR	ONE - Call from A. Dunayer regarding Houlihan Lokey assistance to Receiver and correspondence with D. Newman regarding same.	0.30	\$94.50

	Founding	Partners Capital		Page 108
08/28/2009	SJF	ONE - Research REDACTED (2.3); Draft memorandum regarding (1.2); Research (1.8)	5.30	\$1,325.00
08/29/2009	DSN	ONE -Review and analyze draft response to Pamela Gunlick's Motion to Intervene and correspond with Receiver's counsel regarding research relating to same (.5)	0.50	\$157.50
08/29/2009	SBR	ONE - Correspondence with A. Dunayer re Cain Bros. (.2)	0.20	\$63.00
08/30/2009	DSN	ONE - Draft correspondence regarding research to be performed (.1).	0.10	\$31.50
08/30/2009	MDM	ONE - Review draft response to Mrs. Gunlicks' motions and correspondence from attorneys regarding same	0.30	\$58.50
08/30/2009	SJF	ONE - Research legal issues involving (REDACTED (1.5); Work on response to investor motion to modify stay of litigation (1.2)	2.70	\$675.00
08/31/2009	B-F	FOUR - Review email from receiver's counsel regarding Gunlicks' check (.1); draft letter to Marissel Descalzo transmitting Gunlicks' check for living expenses (.1); review email correspondence from Conrad Stroebe CPA regarding scope of documents requested and changes to confidentiality agreement (.1); conference with Daniel Newman regarding revisions to confidentiality agreement (.1); revise confidentiality agreement per Daniel Newman's comments (.1); draft email correspondence to Conrad Stroebe CPA and investor E.G. transmitting revised confidentiality agreement for execution (.1); FIVE - telephone conference with Marlene Downer at Executive Development Corp. regarding final invoice for Naples office (.1); review email correspondence from Marlene Downer regarding same (.1); draft letter to Marlene Downer at Executive Development Corp. transmitting check for final invoice (.1); FOUR - conference with Ezekiel Alicea and Jesse Francis of Xact Data and Daniel Newman regarding images to be uploaded and scope of work to be performed (.4); ONE - draft freeze letters to additional entities (.5); draft Subpoenas Duces Tecum to Howard Koslow, Lawrence Leder and Peter Baranoff (1.2).	3.00	\$450.00

SEC Mana		nn, Receiver g Partners Cap et al.	oital					Page 109
08/31/200	9 DSN	FOUR - Telepregarding Schoorresponden regarding distorresponden Investments (Anderson reg Motion and Motion an	nutes K-1 (.3) ce to counsel ribution (.1); ce from MK1); telephonarding respondotion by No ing to responde to counsel respondence confirms of the confirmation of the confirms of the confirmation of	o; review for Bill (ONE - re A Realty (conference to Mrs rthShore (ases (.4); condence ference with form form the telepholument for	Gunlicks Eview Dipportunity Ice with Ian S. Gunlicks' (.4); review Iraft regarding ce from form th associates her Founding one investor		2.10	\$661.50
08/31/200	9 J-E	waivers and of deposition of Certificate of third-party do (1.0). Worke	ONE - Review of documents on purported waivers and consents and organize files for deposition of SCHI. (1.0). ONE - Arranged for Certificate of Non-Appearance (.2). Worked on third-party document requests and subpoenas (1.0). Worked on responses to motions in SEC and receivership actions (1.0).					\$1,008.00
08/31/200)9 J-R	FOUR - Mee regarding upl					0.80	\$120.00
08/31/200	09 MDM	regarding uploading of electronic data ONE - Review Gunlicks' financial declarations with regard to ownership of various properties in order to respond to Mrs. Gunlicks' motions to intervene and modify the asset freeze (.1); FOUR - Correspond with attorneys and paralegal regarding Gunlicks' living expenses disbursement (.3); ONE - Review draft response to investors' motion to intervene and provide comments (.1); Correspond with Receiver regarding responses to investor subpoenas (.1);					\$117.00	
08/31/200	9 SJF	ONE - Work intervene and			r motion to		1.60	\$400.00
		TOTAL PRO	OFESSIO	NAL CI	HARGES		=	\$398,200.00
		TI	MEKEEI	PER SU	JMMAR	Y		
LP DSN	Lester Perling		17.20 247.90	hrs @	\$315.00 \$315.00	per hour		\$5,418.00 \$78,088.50

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J-E	Jonathan Etra	185.60	hrs @	\$315.00	per hour	\$58,464.00
SBR	Susan Barnes de Resendiz	364.80	hrs @	\$315.00	per hour	\$114,912.00
MDM	Michael Magidson	295.50	hrs @	\$195.00	per hour	\$57,622.50
J-G	Jeffery Geldens	7.70	hrs @	\$250.00	per hour	\$1,925.00
SJF	Scott J. Flint	188.30	hrs @	\$250.00	per hour	\$47,075.00
AHM	Andrew H. Mullens	47.10	hrs @	\$150.00	per hour	\$7,065.00
P-A	Patricia Anzalone	27.10	hrs @	\$150.00	per hour	\$4,065.00
G-F	Gisela Fasco	20.70	hrs @	\$150.00	per hour	\$3,105.00
MAW	Margaret Weaver	22.90	hrs @	\$150.00	per hour	\$3,435.00
B-F	Brenda Fradera	48.90	hrs @	\$150.00	per hour	\$7,335.00
J-R	Junelle Rodriguez	21.70	hrs @	\$150.00	per hour	\$3,255.00
RH	Robert House	42.90	hrs @	\$150.00	per hour	\$6,435.00

TIMEKEEPER TOTAL......\$398,200.00

ITEMIZED EXPENSES		
05/15/2009	Messenger Service - From SEC to B&C- Inv. # 30381- VENDOR: Arrow Express Messenger Service	\$6.00
05/22/2009	Certified Copies - 10 copies of Receiver order- VENDOR:Clerk, U.S. District Court	\$140.00
05/22/2009	Reversal from Void Check Number: 53173 Bank ID: M004 Voucher ID: 413285 Vendor: Clerk, U.S. District Court	-\$140.00
05/26/2009	FedEx Tracking # 796637266903 Trish Anzalone Broad and Cassel 2 S BISCAYNE BLVD FL 21 MIAMI FL 33131	\$22.32
05/26/2009	Filing Fees - Certificate of Good Standing-VENDOR:U.S. Courts	\$15.00
05/26/2009	Filing Fees -Certificate of Good Standing-VENDOR:U.S. Courts	\$15.00
05/26/2009	Photocopies (Outside Services) - VENDOR: United States District Court	\$140.00
05/27/2009	FedEx Tracking # 797629501052 Trish Anzalone Broad and Cassel 2 S BISCAYNE BLVD FL 21 MIAMI FL 33131	\$12.25
05/27/2009	Travel	\$1.65
05/29/2009	FedEx Tracking # 797638559887 U.S. District Court Eastern District of California 501 treet - 4th Floor	\$11.09
05/29/2009	FedEx Tracking # 797638540010 U.S. District Court Southern District of Californi Office of the Clerk SAN DIEGO CA 92101	\$11.09
05/29/2009	FedEx Tracking # 797638549809 U.S. District Court Northern District of Californi Clerk of the Court SAN FRANCISCO CA 94102	\$11.09
06/01/2009	Travel - Exxon/Gas	\$25.05
06/01/2009	Other Costs - Lunch meeting/South Street	\$54.54
06/01/2009	Other Costs - BB Locksmith/Keys	\$149.46
06/04/2009	FedEx Tracking # 797654594988 Clerk of the Court U.S District Court Everett McKinley Dirksen CHICAGO IL 60604	\$10.51
06/04/2009	FedEx Tracking # 796667206977 Attn: Room G-19, Civil Intake U.S. District Court Central District of California LOS ANGELES CA 90012	\$11.92
06/04/2009	FedEx Tracking # 797654568318 Clerk of the Court United States Courthouse 300 FANNIN ST STE 1167	\$10.38

Re: Daniel S. Newmar SEC v. Founding Managemnt Co., e 43125.0001	Page 112	
	SHREVEPORT LA 71101	
06/04/2009	Other Costs, Copies, Invoice no.120698 - VENDOR: Speed Print One, Inc.	\$138.78
06/05/2009	In House Messenger	\$6.00
06/08/2009	FedEx Tracking # 796672749424 ATTN: CLERK OF THE COURT U.S. DISTRICT COURT EASTERN DISTRICT OF TEXAS BEAUMONT TX 77701	\$9.91
06/08/2009	FedEx Tracking # 797660074110 Attn: Clerk of the Court U.S. District Court NORTHERN DISTRICT OF TEXAS DALLAS TX 75242	\$10.05
06/08/2009	FedEx Tracking # 797660087554 ATTN: CLERK OF THE COURT U.S. DISTRICT COURT WESTER DISTRICT OF TEXAS AUSTIN TX 78701	\$10.05
06/09/2009	FedEx Tracking # 797666325520 LESLIE GATTO U.S. DISTRICT COURT MIDDLE DISTRICT OF FLORIDA FORT MYERS FL 33901	\$6.53
06/09/2009	Photocopies (Outside Services), Invoice no.120763 - VENDOR: Speed Print One, Inc.	\$56.30
06/15/2009	Service of Process - Subpoena for deposition - VENDOR:Chicagoland Detective Services	\$75.00
06/15/2009	Witness Fee - VENDOR:Blue Cross Blue Shield	\$40.00
06/17/2009	FedEx Tracking # 797689377815 Attn: Scott Flint (Guest) La Quinta Inn 1 S FRANKLIN ST CHICAGO IL 60606	\$10.51
06/18/2009	FedEx Tracking # 797694991847 SUSAN BARNES DE RESENDIZ PRIVADA DE TINA #8 RANCHO LOS LABRADORES - APT # 605 SAN MIGUEL DE ALLENDE GT 37700	\$40.96
06/19/2009	FedEx Tracking # 863499051791 SCOTT J FLINT BROAD AND CASSEL 100 N TAMPA ST STE 3500 TAMPA FL 33602	\$21.61
06/19/2009	Travel - Airfare and Lodging for travel to Chicago for Founding Partners meeting - VENDOR:Scott Flint	\$864.25
06/23/2009	Court Reporter, Invoice no.3393 - VENDOR:Miami PSPI, LLC	\$35.00
06/24/2009	Photocopies (Outside Services), Invoice no.121041- VENDOR:Speed Print One, Inc.	\$3,832.03
06/25/2009	Conference Call Service, Invoice no.02363803 - VENDOR:Premiere Global Services	\$7.03
06/25/2009	Conference Call Service, Invoice no.02363803 - VENDOR:Premiere Global Services	\$11.19
06/26/2009	Service of Process - Deposition Subpoena on Judy Aller - VENDOR:Venture Investigations and Process Service	\$120.00

Re: Daniel S. Newman SEC v. Founding Managemnt Co., e 43125.0001	Page 113	
06/29/2009	FedEx Tracking # 796734002223 James D. Fox, Esq. Roetzel & Andress 850 PARK SHORE DR NAPLES FL 34103	\$6.53
07/01/2009	FedEx Tracking # 796743388380 Daniel S. Newman, Esq. Broad and Cassel One Biscayne Tower, 21st Floor MIAMI FL 33131	\$14.77
07/01/2009	Travel, Toll	\$2.50
07/01/2009	Travel, Toll	\$2.50
07/01/2009	Other Costs, Lunch	\$56.00
07/06/2009	FedEx Tracking # 796752229485 Daniel S. Newman, Esq. Broad and Cassel One Biscayne Tower, 21st Floor MIAMI FL 33131	\$10.84
07/08/2009	FedEx Tracking # 796759136982 James D. Fox, Esq. Roetzel & Andress 850 PARK SHORE DR NAPLES FL 34103	\$6.63
07/08/2009	Certified Copies	\$11.08
07/08/2009	Other Costs, Lunch	\$62.73
07/10/2009	FedEx Tracking # 797753709115 Scott Flint Broad and Cassel One Biscayne Tower MIAMI FL 33131	\$17.50
07/10/2009	FedEx Tracking # 797753709090 Scott Flint Broad and Cassel One Biscayne Tower MIAMI FL 33131	\$18.39
07/10/2009	FedEx Tracking # 796766656501 Scott Flint Broad and Cassel One Biscayne Tower MIAMI FL 33131	\$17.50
07/10/2009	FedEx Tracking # 796766656431 Scott Flint Broad and Cassel One Biscayne Tower MIAMI FL 33131	\$16.68
07/13/2009	Messenger Service - Wait time and travel to Fort Myers to file Original Complaint, Return Date Stamped Copy, and Issue Summons - VENDOR:Corporate Courier, Inc.	\$308.75
07/13/2009	Filing Fees - Complaint - VENDOR:U. S. District Court, Clerk of Court	\$350.00
07/13/2009	Travel - Cab fare in Miami to attend document review - VENDOR:Scott Flint	\$60.00
07/13/2009	Travel - Lodging in Miami for document reviewVENDOR:Scott Flint	\$218.86
07/13/2009	Travel - Airfare to Miami for document review - VENDOR:Scott Flint	\$315.20
07/13/2009	Travel - Meals while in Miami for document review - VENDOR:Scott Flint	\$37.53
07/13/2009	Other Costs, Attorney Admission Fee - VENDOR:Clerk, U.S. District Court	\$165.00
07/13/2009	Reversal from Void Check Number: 53444 Bank ID: M004 Voucher ID: 416494 Vendor: Clerk, U.S. District Court	-\$165.00

Re: Daniel S. Newm SEC v. Foundir Managemnt Co. 43125.0001	Page 114	
07/13/2009	Reversal from Void Check Number: 53443 Bank ID: M004 Voucher ID: 416493 Vendor: Clerk, U.S. District Court	-\$165.00
07/13/2009	Other Costs, Attorney Admission Fee - VENDOR:Clerk, U.S. District Court	\$165.00
07/14/2009	FedEx Tracking # 797762127086 Dottie Caplan, Caplan & Caplan 172 W FLAGLER ST STE 320 MIAMI FL 33130	\$56.12
07/15/2009	FedEx Tracking # 796779108388 SunTrust Bank Attention: Lockbox Processing 800 S FEDERAL HWY BOCA RATON FL 33432	\$42.18
07/16/2009	FedEx Tracking # 796783327175 Marissel Descalzo Carlton Fields 100 SE 2ND ST MIAMI FL 33131	\$9.83
07/16/2009	FedEx Tracking # 796781694075 Brenda Fradera, Legal Assistan Broad and Cassel One Biscayne Tower MIAMI FL 33131	\$13.67
07/17/2009	FedEx Tracking # 797771243907 Aradhana Raj Harris Bank 111 W. Monroe Street CHICAGO IL 60603	\$49.35
07/17/2009	FedEx Tracking # 797771226536 Joseph oster, Esq. Akerman Senterfitt 420 S ORANGE AVE STE 1200	\$42.18
07/18/2009	Other Costs - Crystaltech -foundingpartners-receivership.com	\$14.92
07/21/2009	Service of Process - Sun Capital Healthcare, Inc includes waiting time - VENDOR:Caplan, Caplan and Caplan	\$138.00
07/21/2009	Service of Process - HLP Properties of Port Arthur, LLC - VENDOR: Caplan, Caplan and Caplan	\$38.00
07/21/2009	Service of Process - Sun Capital, Inc - VENDOR:Caplan, Caplan and Caplan	\$38.00
07/22/2009	FedEx Tracking # 796784122417 Attention: Brenda Fradera Broad and Cassel 2 S. Biscayne Boulevard MIAMI FL 33131	\$10.67
07/23/2009	Other Costs - Overtime A/C	\$70.00
07/24/2009	FedEx Tracking # 797790906366 Trish Anzalone Broad and Cassel 2 S BISCAYNE BLVD FL 21 MIAMI FL 33131	\$8.22
07/24/2009	Filing Fees - VENDOR:Orange County Clerk of Court	\$42.00
07/27/2009	FedEx Tracking # 797797058775 The Honorable John E. Steele Attn: Nury H. Yoo, Law Clerk 2110 1ST ST STE 6- 109 FORT MYERS FL 33901	\$11.16
07/31/2009	FedEx Tracking # 796826031176 Howard Koslow Sun Capital Healthcare, Inc. 999 NW 51ST ST FL 3 BOCA RATON FL 33431	\$7.09
07/31/2009	Conference Call Service - VENDOR:InterCall	\$2.96
07/31/2009	Conference Call Service - VENDOR:InterCall	\$5.42

Re: Daniel S. Newman SEC v. Founding Managemnt Co., e 43125.0001	Partners Capital	Page 115
07/31/2009	Conference Call Service - VENDOR:InterCall	\$2.32
08/03/2009	FedEx Tracking # 797815167422 James D. Fox, Esquire Roetzel & Andress 850 PARK SHORE DR NAPLES FL 34103	\$43.82
08/07/2009	Filing Fees, Fee for Admission to Middle District - VENDOR:Clerk, U.S. District Court	\$165.00
08/10/2009	FedEx Tracking # 796846914158 Howard Koslow, COO Sun Capital, Inc. & Healthcare 999 Yamato Road BOCA RATON FL 33431	\$6.89
08/11/2009	FedEx Tracking # 797837694619 KEHINDE GEORGE, ESQUIRE ATTRIDE-STERLING WOLONIECKI LAW CRAWFORD HOUSE 50 CEDAR AVENUE HAMILTON HM11	\$26.68
08/11/2009	Photocopies (Outside Services), Invoice no.121857 - VENDOR: Speed Print One, Inc.	\$400.35
08/12/2009	Messenger Service, From: B&C To: US Exchange Commission, 801 Brickell Ave #1800 Miami, Fl., Invoice no.30990 - VENDOR: Arrow Express Messenger Service	\$20.00
08/18/2009	Other Costs, Lunch Meeting - VENDOR:Union Square Cafe	\$59.50
08/18/2009	Other Costs - Founding Partner's Website	\$14.92
08/24/2009	FedEx Tracking #796887448082 Howard Koslow Sun Capital Healthcare, Inc. 999 Yamato Road BOCA RATON FL 33431	\$6.89
08/25/2009	Messenger Service, From 100 SE 2 Street, #4000 To: B&C, Invoice no.31106 - VENDOR: Arrow Express Messenger Service	\$6.00
08/27/2009	FedEx Tracking # 797886554140 Howard Koslow, COO Sun Capital, Inc. 999 Yamato Road BOCA RATON FL 33431	\$43.82
08/27/2009	FedEx Tracking # 796899072918 Howard Koslow, COO Sun Capital Healthcare, Inc. 999 Yamato Road BOCA RATON FL 33431	\$43.82
08/28/2009	Other Costs, Lunch Meeting	\$32.01
08/31/2009	Court Reporter, Invoice no.FL142721 - VENDOR:Veritext Florida Reporting Co.	\$91.50
	Parking	\$161.00
	Long Distance Telephone	\$320.66
	Postage	\$3.52
	Telecopy Charges	\$418.50
	Online Research	\$29.68
	Photocopies	\$1,668.38

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One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9440
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

October 9, 2009 Invoice No.: 771832

Matter Name: SEC v. Founding Partners Capital

Managemnt Co., et al.

Client/Matter No: 43125.0001

Billing Attorney: Daniel S. Newman, PA

Previous Balance
Payments Received

Subtotal of Previous Balance

Professional Charges

Expenses

Subtotal of Current Charges

TOTAL BALANCE DUE (Previous and current balance)

\$0.00 \$0.00 \$398,200.00 11,501.57 \$409,701.57

\$409,701.57

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR PAYMENT

Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002

		ITEMIZED PROFESSIONAL CHARG	GES	
07/15/2009	DSN	ONE-conference with Roy Kobert regarding Sun Health Care and Sun Inc. related issues (.3); conference with counsel and accountants regarding Sun Health Care and Sun Inc. related issues, strategies and actions to be taken (.8).	1.10	\$346.50
07/15/2009	MAW	ONE-Telephone conferences with process server regarding receipt and instructions on service on rush service on Defendants; Prepare letter to Mr. Paparo regarding Sun Capital Complaint filed and accepting service	0.40	\$60.00
07/15/2009	MDM	ONE-Coordinate service of Sun complaint and confer with attorneys regarding same (.3); Draft correspondence to Sun's counsel regarding complaint and confer with Attorney de Resendiz regarding same (.5);	0.80	\$156.00
07/15/2009	SBR	ONE - correspondence with M. Magidson, D. Newman, and J. Etra regarding service of complaint on Sun principals (.2); Calls to J. Etra regarding service of complaint (.1); calls to M. Magidson re timing and service of process (.2); calls to M. Magidson and Sun's counsel regarding service of complaint and status of document production (.1); call from Sun counsel to discuss settlement conference (.3); correspondence with D. Newman, J. Etra, and D. Siegel re settlement meeting with Sun counsel (.2).	1.10	\$346.50
07/21/2009	P-A	FOUR-Review Complaint against Sun Care and others (.2); Post on Founding Partners website and prepare memo to Receiver and counsel (.3); ONE - Telephone conference with and prepare memo regarding call from Suntrust regarding Sun account (.3).	0.80	\$120.00
07/22/2009	DSN	ONE-Review Preliminary Response to TRO and edit same (1.1); meet with counsel re Motion for TRO and preparation of Response to same (1.1); office conference with counsel regarding various tasks to be performed in connection with Founding Partners matter (.5); office conference with Larry Heller's regarding Sun's filing of Motion for TRO (.3); meet with forensic accountants regarding Founding Partners matter (.3); telephone conference with forensic accountant regarding Motion for TRO (.3); draft correspondence to forensic accountant regarding Motion for TRO and necessity for Affidavit (.2).	5.40	\$1,701.00

te: Daniel S. Sun Capi 43125.00	tal Litiga	tion		
		telephone conference with Ross McDonough (.2); review TRO and supporting documents (1.4).		#0.02.00
07/22/2009	J-E	ONE- Reviewed TRO papers and worked on response.	2.80	\$882.00
)7/22/2009	MDM	ONE - Analyze Sun's TRO Motion, confer with attorneys regarding response to same, and revise same.	1.80	\$351.00
07/22/2009	SBR	ONE - Correspondence and conferences re Sun motion for TRO and review same.	2.90	\$913.50
07/23/2009	DSN	ONE-Review affidavit of Koslow (.7); revise Response to Motion for TRO (1.5); revise and work on preparation of Receiver's Affidvait (3.5); conference with Susan Barnes de Resendiz and David Siegel regarding David Siegel Affidavit and meeting with Susan Barnes de Resendiz and David Siegel regarding same (1.3); review correspondence from counsel for Sun (.1); review correspondence from counsel for Receiver to counsel for Sun (.1); telephone conference with SEC regarding Sun Capital matter (.2); conference with counsel regarding strategy for Response to TRO and other issues pertaining to strategy and tasks to be performed in the Sun matter (1.5).	8.90	\$2,803.50
07/23/2009	J-E	ONE-Reviewed Koslow affidavit and conferred with Receiver and co-counsel and accountants (1.0). Reviewed affidavits provided by Rick Addison and drafted section of opposition to motion for TRO (.5). Revisions to opposition to motion for TRO and identified areas requiring citations and factual support (3.0). Located and reviewed correspondence with Sun (1.0). Drafted and revised declaration of Mr. Newman (6.9). Worked on declaration of David Seigel (5).	12.90	\$4,063.50
07/23/2009	MAW	ONE - Telephone conference with process server regarding necessary revisions and signed Affidavits of Service for filing with the court; Prepare and file Affidavits of Service of Summonses on Defendants, Sun Capital, Inc., Sun Capital Healthcare, Inc. and HLP Properties of Port Arthur, LLC	0.60	\$90.00
07/23/2009	MDM	ONE - Confer with attorneys and the Receiver regarding response to Sun's TRO Motion and draft and prepare revisions to same, including reviewing numerous documents and pleadings (12.8); Draft Motion to Exceed Page Limits and Proposed Order and confer with attorneys	14.40	\$2,808.00

Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002				
07/23/2009	SBR	regarding same (1.6) ONE -Correspondence, calls, and conferences with D. Newman, J. Etra, M. Magidson, S. Flint, and D. Siegel re preparation of response and affidavits to TRO motion.	10.90	\$3,433.50
07/24/2009	DSN	ONE- Finalize affidavit for TRO Response (.4); review preliminary statement and certain factual statements in Response Brief (.5); conference with Judge and opposing counsel regarding preliminary injunction hearing date (.4); prepare for conference with Judge (.3); prepare for conference with Sun regarding settlement negotiations (.3); telephone conference to Sun Entities to which Sun did not attend (.2);	2.10	\$661.50
07/24/2009	J-E	ONE - Final revisions and edits to opposition to motion for TRO and supporting affidavit of Mr. Newman (2.0). Prepare for teleconference with Sun concerning proposed funding for the week and attended teleconference, until canceled by Sun (.5). Correspondence with Sun counsel on hearing concerning TRO and prepare hearing on TRO (1.0). Attended hearing on TRO, preparation for subsequent conference with Sun on continued funding, attended conference, and advised court of no agreement on funding (1.0). Meeting with witness (2.5). Advised of TRO and e mail correspondence regarding same (.5).	7.50	\$2,362.50
07/24/2009	MDM	ONE - Final revisions to Response to Sun's TRO Motion and file same (1.8); Confer with attorneys regarding Sun's request for enlargement of time to respond to Complaint (.4); Review correspondence regarding court-ordered status conference at 2 pm regarding status of funding and scheduling of oral argument and and confer with Receiver and attorneys in preparation for same (1.0); Participate in same (.5); Prepare for conference call with Sun and Sun's counsel regarding agreement for next week and participate in same (.5); Confer with attorneys regarding strategy (.8); Review Sun's motion to file reply papers and orders issued by Court on Sun's TRO motion and correspond with attorneys regarding same (.7)	5.70	\$1,111.50
07/24/2009	P-A	ONE - Receipt and review of correspondence from Penny O'Malley at Suntrust transmitting additional agreement for Receiver's review and execution (.3); Prepare correspondence to Receiver and counsel relative to same (.1);	0.70	\$105.00

Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002				
		Review correspondence regarding certified copies of order obtained from Middle District, and telephone conferences relative to same (.3).		
07/24/2009	SBR	ONE-Correspondence with S. Gold, D. Newman et al. re Sun's request for more time to answer complaint (1.4);); correspondence with D. Newman et al. re court's order on bank accounts and review same (1.0).	2.40	\$756.00
07/24/2009	SBR	ONE- Conferences with D. Siegel, D. Newman et al. to finalize accountants affidavit, review and revise response to TRO motion; and correspondence with accountants et al re preparation for hearing on TRO.	4.10	\$1,291.50
07/25/2009	DSN	ONE - Review and analyze court order granting TRO (.2); review correspondence from counsel and draft correspondence to counsel relating to strategy in light of TRO and tasks to be performed (.5).	0.70	\$220.50
07/25/2009	J-E	ONE - Analysis and plan for hearing, and memorandum and e-mail correspondence re same (2.0). Call with Mr. Flint regarding motion on conference (.5). E-mail to Sun counsel on request for 60-day extension of time to respond to complaint and reliance on Rule 4(d) (.5). Memo to file of witness interview (2.0).	5.00	\$1,575.00
07/25/2009	SBR	ONE- Correspondence with D. Newman, D. Siegel et al. re court decision on TRO and preparation for hearing, draft memo re same (7.6); correspondence with J. Etra re extension of time to answer Receiver's complaint (.2)	7.80	\$2,457.00
07/26/2009	MDM	ONE-Correspond with attorneys regarding strategy (1.1); Review court order on Sun's TRO motion (.2).	1.30	\$253.50
07/26/2009	SBR	ONE-Correspondence with J. Etra and S. Gold re extension of time to file complaint (.2)	0.20	\$63.00
07/27/2009	G-F	ONE - Review file in connection with correspondence from Sun Capital, Inc. or Sun Capital Healthcare, Inc.; Email correspondence with Paralegal Rodriguez regarding same.	0.30	\$45.00
07/27/2009	J-E	ONE - Prepare for evidentiary hearing in opposition to motion for preliminary injunction, review materials, meet with accountants. (6.0). Conference and e-mail with counsel for Mr. Gunlicks (.2). Work on emergency motion to continue oral argument, for expedited discovery, and for expedited briefing schedule and meet and confer email to Sun counsel (5.0).	11.20	\$3,528.00

Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002				Page 7
07/27/2009	MAW	ONE - Prepare and send letter and date stamped exhibits to Complaint to Ms. Yoo, law clerk to Judge Steele in Sun Capital Case; Prepare and send letter to Ms. Yoo, law clerk to Judge Steele enclosing date stamped copies of exhibits to Receiver's opposition to motion for restraining order; Prepare Notice of Pendency of Other Actions in Sun Capital case	1.30	\$195.00
07/27/2009	MDM	ONE - Strategy conference with attorneys regarding TRO hearing (1.0); Review and analyze draft Motion to Continue Preliminary Injunction Hearing and for Expedited Discovery and confer with Attorney Flint regarding same (2.4); Draft Notice of Pendency of Other Actions, correspond with Bermuda counsel and Attorney Etra regarding same, and file same (1.3); Strategy conferences with attorneys and accountants regarding; REDACTED (6.4)	11.10	\$2,164.50
07/27/2009	SJF	ONE - Continue drafting motion for continuance of oral argument on preliminary injunction (2.0); Research REDACTED .(1.6); Continue work on drafting motion to continue (2.4); Research (2.1); Research cases involving REDACTED	9.20	\$2,300.00
07/28/2009	J-E	es (1.1) ONE- Work on certificate of interested persons (.2). Prepare for hearing on motion for preliminary injunction. (.5). Revised draft motion to continue hearing and for expedited discovery (.5) meet and confer correspondence and calls with Sun counsel on motion to continue hearing and for discovery and negotiations re same (.5). Final revisions to motion and arranged for filing (.5)	2.20	\$693.00
07/28/2009	MAW	ONE - Prepare Certificate of Interested Person and Corporate Disclosure Statement in Sun Capital matter; Various revisions to Certificate of Interested Persons	0.80	\$120.00
07/28/2009	MDM	ONE - Work on Motion to Continue Preliminary Injunction hearing and confer with attorneys regarding same (4.2); Prepare exhibits for same (.5); Review and revise Certificate of Interested Parties and Corporate Disclosure based on new information received from investors, calls with Mr. Russell, counsel for a large group of investors regarding, and file same (2.1); Review order	7.70	\$1,501.50

Re: Daniel S Sun Cap 43125.00		Page 8		
		canceling preliminary injunction hearing and setting expedited discovery and briefing schedule and confer with attorneys regarding same (.3); Review documents retrieved from Founding Partners' offices (.6)		
07/28/2009	SBR	ONE - Correspondence, calls, research, and conferences to prepare for hearing on TRO.	11.80	\$3,717.00
07/29/2009	DSN	ONE- Meet with counsel regarding discovery.	1.50	\$472.50
07/29/2009	J-E	ONE-Reviewed Judge Steele's Order on unopposed motion to continue hearing. (.2). Legal analyses and conferences regarding	3.20	\$1,008.00
		REDACTED		
		(3.0).		
07/30/2009	DSN	ONE - Meet with counsel and strategize with counsel and discuss preparation for preliminary injunction hearing.	2.50	\$787.50
07/30/2009	J-E	ONE - Work on document management systems, amended complaint, document review, offshore and other matters.	2.00	\$630.00
07/30/2009	MDM	ONE - Review court-ordered deadlines in Sun case and calendar same.	0.10	\$19.50
08/02/2009	J-E	ONE-Work on document requests.	2.50	\$787.50
08/03/2009	DSN	ONE - review proposed items to be subpoenaed regarding Sun (.3).	0.30	\$94.50
08/05/2009	SBR	ONE - Correspondence from D. Siegel re SCHI document request and review changes.	0.20	\$63.00
08/06/2009	DSN	ONE- Conference with counsel regarding various issues pertaining to discovery relating to investors and Founding Partners, steps to be taken in connection with Preliminary Injunction hearing, tasks to be performed, research to be performed and other related issues (.7)	0.70	\$220.50
08/06/2009	J-E	ONE - Worked on legal issues regarding preliminary injunction hearing (.3). Worked on deposition and document discovery for preliminary injunction discovery period (5).	0.80	\$252.00
08/06/2009	SBR	ONE - correspondence from J. Etra re research on REDACTED	0.10	\$31.50
08/08/2009	J-E	ONE - Review of relevant agreement, Revised, edited document request to SCHI and distributed same with cover e-mail (3.3). Drafted rider to Rule 30(b)(6) deposition notice for SCHI (.4)	3.70	\$1,165.50
08/08/2009	SBR	ONE - correspondence from J. Etra re SCHI discovery (.1).	0.10	\$31.50

BROAD AND CASSEL

te: Daniel S. Sun Capi 43125.00	tal Litiga			Page 9
08/10/2009	DSN	ONE- Review and analyze items for 30(b)6 subpoena (.5); draft correspondence to counsel responding to same (.4); draft correspondence to counsel regarding investor subpoenas (.2)	1.10	\$346.50
08/10/2009	J-E	ONE - Comments from Receiver on draft rider to 30(b)(6) discovery requests, revised same, and conferred with other counsel on finalizing and serving same (1.5). Worked on coordination and priorities of the upcoming discovery requests. (.3).	1.80	\$567.00
08/10/2009	J-E	ONE -Comments from Receiver on draft discovery request to SCHI (.3). Meeting with accountant concerning document request to SCHI and issues involved in Preliminary Injunction briefing (1.0). Revised SCHI discovery requests (.8). Reviewed and final comments to final draft of SCHI document request (.3).	2.40	\$756.00
08/10/2009	MDM	ONE-Draft and revise investor subpoenas (3.3); Draft and revise SCHI RFP and serve same on Sun's counsel (2.6); Conferences with Attorneys Flint and Etra regarding same (.8).	6.70	\$1,306.50
.08/10/2009	SBR	ONE - correspondence with J. Etra re SCHI discovery.	0.20	\$63.00
08/11/2009	J-E	ONE-Work on 30(b)(6) subpoena to SCHI (.2). ONE - Worked on subpoenas to investors (.2). Correspondence with David Siegel re document request to SCI and reviewed draft of same (.4).	0.80	\$252.00
08/11/2009	MDM	ONE-Draft and revise RFP to SCI and confer with Attorney Etra regarding same (.7); Finalize and serve Notice of Taking Deposition of corporate representative of SCHI (.5)	1.20	\$234.00
08/11/2009	SBR	ONE - Review additional correspondence and borrowing base calculations from D. Siegel .	0.20	\$63.00
08/12/2009	SBR	ONE - Correspondence with M. Magidson re hearing on preliminary injunction.	0.10	\$31.50
08/13/2009	DSN	ONE- Review correspondence from counsel regarding conversation with Sun Capital Investment Banker.	0.10	\$31.50
08/13/2009	MDM	ONE- Correspond with Mr. Etra regarding discovery requests to SCI (.2)	0.20	\$39.00
08/13/2009	MDM	ONE-Call with Mr. Etra regarding RFP to SCI and other matters.	0.10	\$19.50
08/13/2009	SBR	ONE - Correspondence with B. Fradera re Promise stock certificates and review same (.4); correspondence with M. Magidson re agreement (.4).	0.80	\$252.00

e: Daniel S. Sun Capi 43125.00	tal Litiga	n, Receiver tion		Page 10
08/14/2009	DSN	ONE- Draft correspondence to counsel regarding letter received from counsel for Sun (.2).	0.20	\$63.00
)8/14/2009	J-E	ONE-Work on document request for SCI. (.5) Work on Rule 30(b)(6) deposition notice for SCI. (.2)	0.70	\$220.50
8/14/2009	SBR	ONE -Correspondence with D. Siegel re SCI deposition.	0.10	\$31.50
8/15/2009	SBR	ONE - Prepare list of loan defaults and review correspondence re same.	0.70	\$220.50
08/17/2009	SBR	ONE- Review Gunlicks documents and legal issues regarding Sun Capital's motion for preliminary injunction (2.2); call from D. Siegel re documents requested by Receiver at July 19 with Sun Capital (.4); conference with D. Newman and J. Etra re discovery, assignments, issues, and research regarding Sun Capital litigation (2.1); revise response to Sun Capital counsel regarding litigations issues and accusations (.2); correspondence with D. Siegel re review of emails (.2) REDACTED	5.10	\$1,606.50 \$157.50
08/18/2009	DSN	ONE-Correspondence to counsel for Sun (.4); review correspondence with counsel regarding Sun's request for enlargement of time (.1);	0.50	
08/18/2009	MDM	ONE - Draft First Amended Complaint against Sun.	0.90	\$175.50
08/18/2009	SBR	ONE- Revise response to Sun Capital's counsel and discuss with D. Newman (1.0); review materials from C. Kane re title insurance for mortgage on Promise Hospital of LA and correspondence with C. Kane and D. Newman re same (.8); call from S. Gold re documents production for SCHI (.3); call to D. Siegel re proposed restructuring terms, Stable-Value loans, and accountants' review of same and review documents regarding same (1.8); correspondence with D. Newman et al. re SCHI documents production (.2); correspondence with J. Etra re requests for admission (.1); review TRO motion for document review and legal issues for hearing on preliminary injunction (1.3); review Stable-Value and Global Fund documents regarding treatment of investments in Stable-Value and	8.00	\$2,520.00
08/19/2009	DSN	correspondence with D. Siegel re same (2.5) ONE -Review correspondence to counsel for Sun (.3); office conference with counsel regarding strategy for discovery and Sun's request for enlargement of time (.2); office conference with	0.90	\$283.50

Page 11 Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002 counsel regarding review of documents in connection with upcoming deposition of Sun individuals (.4). \$39.00 0.20 ONE - Conference with Receiver regarding MDM 08/19/2009 Amended Sun Complaint. \$2,961.00 9.40 ONE-Correspondence with D. Siegel re SBR 08/19/2009 withdrawal agreement (.1); correspondence with C. Kane regarding appraisal of LHA hospital for mortgage (.1); correspondence with D. Newman and J. Etra re discovery (.1); further revisions to letter to Sun Capital and conference with D. Newman regarding same (1.00); conference with M. Magidson and D. Newman re document review and review files from Gunlicks and REDACTED offices (3.9); call from D. Siegel re Global Fund tax issues and SCHI and SCI payments of interest (.7); conference with D. Newman and M. Magidson re documents regarding Stable-Value and Global Fund (.6); correspondence to D. Newman with documents regarding loan participations with Stable-Value (.3); further revisions to letter to Sun Capital counsel (.2); correspondence with J. Etra regarding response to SCHI counsel concerning document production (.1); correspondence with D. Siegel re interest payments from Sun Capital (.1); review REDACTED agreements documents re and correspondence to C. Kane et al. re same (1.20); review documents regarding Sun Capital's refusal to give financial information to Gunlicks and correspondence to D. Newman et al. re same (.60); correspondence with C. Kane regarding appraisal for mortgage on LHA property (.2); correspondence with S. Clarke regarding interview (.1); correspondence with M. Magidson re LHA mortgage and loan (.1); \$2,740.50 8.70 ONE- Correspondence with M. Magidson et al. re 08/20/2009 SBR LHA note (.4); correspondence with M. Magidson et al. regarding Sun Capital Funding (.2); correspondence with J. Etra re contents of lock boxes (.1); review motion for preliminary inunction and prepare evidence requirement (3.1); correspondence with D. Newman regarding Nondisclosure Agreement with Cain Bros. (.2); correspondence with D. Siegel regarding analysis of cash flow between Founding Partners funds and Sun Capital entities (.3); correspondence with D. Newman re Confidential Information

Memorandum from Cain Bros. (.1);

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Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002

> correspondence with D. Siegel re identification of evidence for hearing on preliminary injunction (.2); review documents re Gunlicks demands for financial information from Sun Capital (.6); correspondence with D. Siegel re Gunlicks' receipt of CIM (.1); correspondence with M. Magidson and review Gunlicks documents re financial reports (.5); correspondence with M. Magidson and to D. Siegel re Gunlicks restructuring files and review same (.3); call from D. Siegel regarding information in CIM (.3); correspondence from M. Magidson regarding dissolution of Sun Capital Funding after appointment of Receiver (.2); correspondence with M. Magidson re Gunlicks documents regarding interest payments from Sun Capital in 2009 (.2); correspondence with D. Siegel re Sun Capital's claim that the accountants have access to information concerning disbursements from lock boxes and to whom (.2); correspondence with D. Newman re status of review of Founding Partners documents (.4); correspondence with D. Newman et al. re Cain draft of CIM in Feb. 2009 (.1); correspondence with M. Magidson regarding Sun Motion to Lift Stay (.2); correspondence with D. Siegel re lock box information (.1); REDACTED correspondence with accountants re aspects of Sun Capital payment of interest from new investor funds (.2); correspondence with D. Newman re Sun Capital Funding (.1); correspondence with accountants regarding books and records of Sun Capital Funding, if any (.1); correspondence with J. Etra re progress on document review (.4); further correspondence from Houlihan Lokey (.1)

08/21/2009 DSN

FOUR- Review correspondence sent to counsel for Proskauer regarding discovery deadlines (.1); telephone conference with Susan DeResendiz and David Siegal regarding REDACTED and items to be requested in discovery (.5); review analysis provided by David Siegal (.2); review correspondence relating to the telephone conference between the Receiver's professional and third-party relating to Sun (.1).

0.90

2.90

\$283.50

\$913.50

08/21/2009 J-E

ONE-Drafted, revised, finalized, and sent letter to Proskauer on discovery (1.2). Conference call with health care specialists (.7). Conferences with Receiver and Ms. DeResendiz regarding litigation

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Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002				
08/21/2009	MDM	matters and other issues (1.0). ONE - Prepare summary of same (.2); Revisions to letter to Sun's counsel regarding discovery (.2); Conference with Mr. Flint regarding amended complaint (.3); Research REDACTED	2.60	\$507.00
08/21/2009	SBR	(1.9). ONE- Review Founding Partners files regarding loans with Sun Capital (2.3); research regarding REDACTED (1.3); review letter to S. Gold and correspondence with J. Etra re same (.2); conference with D. Newman and J. Etra regarding time and responsibilities, tasks, and assignments (1.1); correspondence with J. Etra and D. Siegel re Promise and Success discovery (.2); correspondence with D. Siegel re REDACTED Agreement with Cain Bros. (.1); call from D. Siegel re document review and	5.90	\$1,858.50
08/22/2009	SBR	evidence (.7) ONE- Correspondence with J. Etra re persons and entities to review subpoenas and document requests and call to J. Etra re same (1.2); correspondence with M. Magidson re amended complaint (.2); correspondence with D. Siegel re tax returns of Sun principals (.2)	1.60	\$504.00
08/23/2009	SBR	ONE- Correspondence with D. Newman re September scheduling of depositions and discovery (.1); correspondence with D. Siegel regarding discovery from Sun principals (.2); correspondence with D. Siegel re Cain Bros. CIM (.1); correspondence with M. Magidson et al re Koslow's decision to stop interest payments (.1); correspondence with J. Etra and M. Magidson re lock box information in public documents (.1); correspondence with M. Magidson re default letter to SCHI re LHA note (.1); review cases and articles regarding (1.8)	2.50	\$787.50
08/24/2009	DSN	ONE- Review correspondence from office manager of the Naples office (.1); review correspondence from counsel for Sun (.2); review correspondence from David Siegal regarding document requests (.2). FOUR- Meet with accountants and Receivers counsel regarding document requests and status of various items (.5); telephone conference with accountants regarding draft disclosure document and disclosure to be made concerning the treatment of	1.20	\$378.00

Re: Daniel S. Sun Capi 43125.00	tal Litiga	n, Receiver		Page 14
08/24/2009	J-E	forms K-1 (.2) ONE-Meeting with accountant on additional document requests (1.2). Reviewed letter from Proskauer refusing to meet and confer on discovery and drafted response (1.0). Worked on	3.20	\$1,008.00
08/24/2009	, MDM	document and review and case organization (1.0). ONE - Prepare subpoena to William Gunlicks (.5); Draft and revise default notice letter to SCHI relating to LHA loan (.8); Conference regarding amended complaint (.3); Review Sun's answer, affirmative defenses and counterclaims (.8).	2.40	\$468.00
08/24/2009	SBR	ONE- Preparation for and meet with D. Siegel, D. Newman and J. Etra re discovery requests (3.6); review files regarding Pacifica and other bankrupt factoring clients of Sun (.4); continue work on legal issues and organizing research (.7); correspondence with D. Siegel and M. Prinsloo re National Futures Association review of Founding Partners and review correspondence (.2); correspondence with M. Magidson, D. Newman, and J. Etra regarding payment of interest on LHA nete and review and revise same (1.20); correspondence with J. Etra re Global Fund documents and review same (.8); correspondence with B. Fradera regarding default letter on LHA Note (.2); review Gunlicks file on Pacifica and correspondence with J. Etra re same (.3); correspondence with M. Magidson regarding letter demanding quarterly reports (.1); correspondence with D. Siegel regarding amount collected in lock boxes prior to TRO (.2); review list of key words from accountants (.1); call from M. Prinsloo re lock box collections and disbursements (.2); calls from D. Siegel and M. Prinsloo re payment of hospital receivables (.3); correspondence from D. Siegel re documents needed from Promise and Success (.2); conference with D. Newman and J. Etra re document review (.4); review correspondence from S. Gold (.2)	9.10	\$2,866.50
08/25/2009	DSN	ONE- Review correspondence to Sun (.1); review correspondence to counsel for Sun regarding litigation issues (.1); review correspondence to be sent relating to default issues (.3); draft correspondence to counsel relating to default issue correspondence (.2).	0.70	\$220.50
08/25/2009	J-E	ONE-Worked on hospital subpoenas (1.5). Worked on witness issues (.6) Revised and	4.70	\$1,480.50

Re: Daniel S. Newman, Receiver
Sun Capital Litigation
43125.0002

finalized lette
Reviewed de:

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finalized letter to Proskauer on discovery (.8); Reviewed defeneses counterclaims and memo on REDACTED ... (1.8).\$1,911.00 ONE-Analysis of Sun's answer, affirmative 9.80 08/25/2009 **MDM** defenses and counterclaims (.8); Correspond with attorneys regarding same (.2); Conference with Mr. Etra and Mrs. de Resendiz regarding document review (1.4); Document review (7.1); Review Sun's RFP (.2); Review letter to Sun's counsel regarding discovery (.1). 8.50 \$2,677.50 ONE-Conference with J. Etra and M. Magidson 08/25/2009 SBR regarding protocol for document review (1.4); correspondence with D. Newman re letters demanding quarterly, weekly, and annual reports as well as Independent Public Accountants Borrower's Report (.4); continue document review and legal issue identification (2.2); conference with M. Magidson re Founding Partners document review (.3); conferences with M. Magidson, D. Newman, and J. Etra regarding document review status (.8); prepare letter demanding weekly reports from Sun Capital (.3); correspondence from J. Etra re Sun Capital counterclaims and motion to dismiss (.2); correspondence with D. Newman et al. regarding Hybrid-Value Fund (.1); prepare demand letters for quarterly reports, annual report, and Independent Public Accountants Borrower's Report (1.3); call to D. Siegel re borrower reports of defaults of CSAs (.3); conference with J. Etra re Phil Fues and other trial witnesses (.4); memo to D. Newman et al. re REDACTED

correspondence with D. Newman et al. regarding certification to Mayer-Brown re Global Value Fund (.2); correspondence with M. Magidson re Chris Bowers (.1); correspondence with J. Etra re Sun Capital's requirement to report loan defaults to lender pursuant to CSA (.2)

08/26/2009 DSN

ONE- Review correspondence from account relating to document request (.1). Litigation: Review and analyze documents from accountants regarding Sun Financials (.2); draft correspondence to accountant regarding document received (.1); review correspondence from accountant regarding same (.1); conference with counsel regarding response to counter-claim and

1.80

\$567.00

Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002				Page 16
		related issues (.4); review letters to Sun regarding various defaults (.5); conference with counsel regarding same (.1); office conference with counsel regarding strategy for various litigation issues (.3);		20.00
08/26/2009	J-R	ONE - Meeting with Dan and attorneys regarding upcoming production.	0.40	\$60.00
08/26/2009	SBR	ONE- Correspondence from D. Siegel re accounts receivable liquidation value per Sun documents (.1); correspondence with D. Newman re letters demanding financial reports from Sun (.4); review and summarize draft agreements and amendments between Sun Capital and Founding Partners (1.1); document review and identification of legal issues and conferences with M. Magidson, D. Newman, and J. Etra re same (5.0); correspondence with D. Newman et al. re SCHI purchases of receivables from bankrupt companies (.2); review rules on loss recognitions for tax and reporting purposes and correspondence with accountants regarding same (.6); correspondence with M. Magidson et al. regarding Sun's purchases of National Century accounts receivable (.2); correspondence with accountants regarding Founding Partners cash and liquidity issues (.1); correspondence with D. Newman et al regarding lending limits in CSAs (.1); correspondence with D. Siegel regarding tax reporting issues (.2); correspondence with D. Newman et al. re document review (.2); call from D. Siegel regarding Founding Partners cash flow and tax issues (.4)	8.60	\$2,709.00
08/27/2009	DSN	ONE- Draft correspondence to counsel regarding correspondence to Sun (.1);	0.10	\$31.50
08/27/2009	J-E	ONE - Reviewed Sun's formal responses to document requests.	0.50	\$157.50
08/27/2009	MDM	ONE- Review Sun's RFP (.6); Confer with attorneys and paralegals regarding response to same (.5)	1.10	\$214.50
08/27/2009	SBR	ONE- Continue document review and legal issue analysis (3.0); correspondence with D. Newman, J. Etra, and B. Fradera regarding further requests for documents (.3); review REDACTED	10.50	\$3,307.50
		with J. Etra (.9); research re REDACTED (.7); research regarding		
		REDACTED (.9);		

Page 17 Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002 correspondence with D. Newman et al. regarding no waiver of weekly reports (.2); correspondence with M. Magidson re cross-default provisions of CSAs and review same (.3); research regarding REDACTED (2.6); correspondence with J. Etra re discussion with Bill Russell (.1); correspondence with J. Etra, D. Newman, and M. Magidson re documents review (.2); correspondence with M. Magidson re documents concerning weekly reports (.1); correspondence with J. Etra et al. re choice of law and research re same (1.2) \$315.00 1.00 ONE - Work on discovery requests . 08/28/2009 J-E \$195.00 1.00 ONE- Correspond with attorneys regarding **MDM** 08/28/2009 document review and other task list items \$2,740.50 8.70 ONE- Review documents re Sun Capital SBR 08/28/2009 restructuring proposals in 2008 and 2009 (.8); correspondence with J. Etra re subpoena to Mark Dawson (.1); conference with J. Etra. and call to D. Newman regarding accountants' review (.6); REDACTED review: (.2); review CSAs and correspondence with J. Etra to prepare for SCHI depositions (1.1); review legal issues re: REDACTED correspondence with J. Etra re same (2.6); correspondence with D. Newman et al. re January 2009 interest invoices to Sun Capital (.2); correspondence with J. Etra re CSA and Borrow Base Certificates to prepare for SCHI deposition (.5); correspondence with S. Flint regarding suit against Sun Capital principals (.1); correspondence from B. Fradera re SCHI deposition (.1); correspondence regarding SCI response to request for documents and deposition and review same (.3); call to D. Siegel re and conference with J. Etra re same (.4); correspondence with A. Lang regarding Founding Partners' ability to make Jan. 29 advance (.2);

REDACTED

ONE- Review correspondence from attorneys

ONE- Correspondence from D. Newman and to

C. Kane re status of mortgage preparation on

1(1.5)

1.00

3.60

\$195.00

\$1,134.00

research regarding

(.5); Document review (.5)

MDM

SBR

08/29/2009

08/29/2009

				Page 18
Re: Daniel S. Sun Capit 43125.000	tal Litiga	n, Receiver		1 ago 10
		LHA property (.2); correspondence with D. Newman et al. re payment of interest by Sun Capital (.2); correspondence with D. Newman et al re burden of proof (.1); review defendant's answer and lender liability issues (2.8); correspondence with D. Newman re April 9 memo (.1); correspondence with J. Etra and S. Flint re SCHI commitment to lend (.2)		0279.00
08/30/2009	DSN	ONE- Draft correspondence to Ian Anderson (.1). FOUR- Review various documents pertaining to Sun litigation (.4); draft response to NorthShore Community Bank (.4); review legal issue pertaining to Pamela Gunlick's motion and follow-up on same (.2); draft correspondence to Phil VonKahle regarding personal items (.1).	1.20 4.20	\$378.00 \$819.00
08/30/2009 08/30/2009	MDM SBR	ONE- Document review. ONE- Correspondence from J. Etra re suit against Proskauer and review article re same (.2); correspondence with D. Newman re possible liens against hospitals, Promise, and Success (.1); correspondence with M. Magidson re Pacifica (.2); review and file electronic correspondence (3.2); review research on REDACTED (1.3)	5.00	\$1,575.00
08/31/2009	DSN	ONE- Review correspondence to Sun regarding security assets and conference with counsel regarding same (.5); conference with counsel regarding discovery and related issues (.3); draft correspondence with counsel regarding various issues including strategy, subpoenas and discovery (.1.1)	1.90	\$598.50
08/31/2009	J-E	ONE - Brief review of new document request from Sun and distributed same with comments (.2). Brief review of cover letter from Sun on initial document production and distributed same	0.30	\$94.50
08/31/2009	MDM	(.1). ONE-Confer and correspond with attorneys regarding subpoenas to Promise and Success (.4); Document review (6.4); Confer with Mrs. de Resendiz regarding same (.6); Correspond with attorneys and Receiver regarding Sun's responses to RFP and investor subpoenas (.2)	7.60	\$1,482.00
08/31/2009	SBR	ONE- Asset Analysis and Recovery: Conference with J. Etra re evidence regarding payment of interest (.2); correspondence with J. Etra et al. re deposition schedule (.2); correspondence from M. Magidson re : memos and review same (.2);	10.30	\$3,244.50

Page 19

Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002

> review sections of CSAs re defaults and legal issues arising therefrom (3.2); correspondence from J. Etra regarding interview of J. Lawlor (.1); correspondence from M. Etra regarding Koslow memo dated 1/29/2009 (.2); correspondence with J. Etra re document requests for Promise and Success (.2); review C. Bowers memos (.2); correspondence with J. Etra et al.re evidence of borrowers' intent to prepay loans (.1); call from M. Kennelly re status of case and correspondence regarding Sun's answer to complaint (.1); correspondence with J. Etra et al. regarding CSA concentration limits relating to amount of any one accounts receivable and amount of purchases of accounts receivable from any one seller (.2); review correspondence and documents requests from K. Clarke (.2); correspondence with J. Etra et al. re Gunlicks' limits on purchase of DSH receivables (.1); correspondence with J. Etra et al. re SCHI funding of "interim Medicare billing" (.2); research

REDACTED

REDACTED

(1.7); correspondence and conference with D. Newman regarding letters to Sun demanding financial reports required by CSA and review letters re same (1.2); conference with D. Newman regarding requirements of CSAs (.4); correspondence with J. Etra regarding interview and Hybrid-Value investments (.1); correspondence with D. Siegel regarding purchase agreements with Sun Entities (.1); correspondence from D. Newman regarding letters to Sun requesting financial information and call to J. Carrion regarding revisions to letters (.2); call to M. Magidson regarding document review and issues in case (.7); correspondence with M. Magidson re Pacifica (.1); correspondence with J. Etra regarding choice of law issues (.2); correspondence with J. Etra re subpoenas to Sun principals (.1); correspondence with J. Etra regarding Sun document production under confidentiality agreement (.1)

08/31/2009 SJF

ONE - Edit definitions and instructions to Promise subpoenas and edit requests for

documents

\$625.00

08/31/2009 SJF

ONE - Draft document and 30(b)(6) subpoenas

1.20

2.50

\$300.00

\$100,347.00

BROAD AND CASSEL ATTORNEYS AT LAW

Re: Daniel S. Newman, Receiver Sun Capital Litigation

43125.0002

TIMEKEEPER SUMMARY									
DSN J-E SBR MDM	Daniel S. Newman, PA Jonathan Etra Susan Barnes de Resendiz Michael Magidson	33.80 72.10 149.20 81.90	hrs @ hrs @ hrs @ hrs @	\$315.00 \$315.00 \$315.00 \$195.00	per hour per hour per hour per hour	\$10,647.00 \$22,711.50 \$46,998.00 \$15,970.50 \$3,225.00			
SJF P-A	Scott J. Flint Patricia Anzalone	12.90 1.50	hrs @ hrs @	\$250.00 \$150.00	per hour per hour	\$225.00			
G-F	Gisela Fasco	.30	hrs @	\$150.00 \$150.00	per hour per hour	\$45.00 \$465.00			
MAW J-R	Margaret Weaver Junelle Rodriguez	3.10 .40	hrs @ hrs @	\$150.00	per hour	\$60.00			
TIMEKEEPER TOTAL <u>\$100,347.00</u>									

Re: Daniel S. Newman, Receiver Sun Capital Litigation 43125.0002

	ITEMIZED EXPENSES	
09/11/2009	Service of Process on Peter R. Baronoff, Invoice no.2009012019 - VENDOR:Rock Legal Services & Investigations, Inc.	\$130.20
09/16/2009	FedEx Tracking # 796948258039 Howard Koslow, COO Sun Capital Healthcare, Inc. 999 Yamato Road BOCA RATON FL 33431	\$43.41
09/16/2009	FedEx Tracking # 796948251744 Howard Koslow, COO Sun Capital, Inc. 999 Yamato Road BOCA RATON FL 33431	\$43.41
09/18/2009	FedEx Tracking # 796957161416 Sarah S. Gold, Esq. Proskauer Rose, LLP 1585 BROADWAY NEW YORK CITY NY 10036	\$51.48
09/18/2009	Witness Fee - VENDOR: Success Healthcare, Inc.	\$92.95
09/18/2009	Witness Fee - VENDOR: Promise Healthcare, Inc.	\$92.95
09/22/2009	Court Reporter, Invoice no.FL144260 - VENDOR: Veritext Florida Reporting Co.	\$91.50
	Long Distance Telephone	\$19.32
	Photocopies	\$74.12
	TOTAL EXPENSES	\$639.34



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9400
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

October 9, 2009 Invoice No.: 771936

Matter Name: Sun Capital Litigation Client/Matter No: 43125.0002

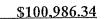
Billing Attorney: Daniel S. Newman, PA

Previous Balance
Payments Received
Subtotal of Previous Balance

Professional Charges
Expenses
Subtotal of Current Charges

TOTAL BALANCE DUE (Previous and current balance)

\$0.00 \$100,347.00 639.34 \$100,986.34



PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR PAYMENT

Re: Daniel S. Newman, Receiver

Texas Litigation 43125.0003

		ITEMIZED	PROFESSION	IAL CHA	ARGES	
08/17/2009	SBR	preparations of r Founding Partne Founding Partne	ndence with T. Oxfor notion for his withdrars' counsel in Annan- ars' case (1.2); correspectors conference certific	awal as dale v. oondence	1.40	\$441.00
08/26/2009	SBR	ONE- Review co	ourt orders and corre n et al. regarding app andale v. Sun Capita	spondence ointment of	0.60	\$189.00
08/27/2009	SBR	intervention in A (.1); research me Annandale v. St correspondence selection of med and pleadings re discussions (.2)	ndence with S. Flint of Annandale v. Sun Capediator appointed by an Capital case (.5); with F. Addison regulator (.3); review congarding parties settled a review notice of head an Capital case (.1)	oital case court in arding crespondence ement	1.20	\$378.00
		TOTAL PROI	FESSIONAL CH	ARGES		\$1,008.00
		TIM	EKEEPER SU	MMARY	7	
SBR St	ısan Barne	es de Resendiz	3.20 hrs @	\$315.00	per hour	\$1,008.00
		TIMEKEEPE	R TOTAL			<u>\$1,008.00</u>

Re: Daniel S. Newman, Receiver Texas Litigation 43125.0003

ITEMIZED EXPENSES	
Long Distance Telephone	· \$1.26
Photocopies	\$0.68
TOTAL EXPENSES	\$1.94



One Biscayne Tower
21st Floor
2 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305.373.9440
Facsimile: 305.373.9443
Federal Tax Id: 59-0630785
www.broadandcassel.com

Daniel S. Newman, Receiver

October 9, 2009 Invoice No.: 771935

Matter Name: Texas Litigation Client/Matter No: 43125.0003

Billing Attorney: Daniel S. Newman, PA

Previous Balance
Payments Received
Subtotal of Previous Balance

Professional Charges Expenses Subtotal of Current Charges

TOTAL BALANCE DUE (Previous and current balance)

\$0.00 \$0.00 \$1,008.00 1.94 \$1,009.94 \$1,009.94

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR PAYMENT

ATTORNEYS AT LAW

Re: Daniel S. Newman, Receiver Bermuda Litigation 43125.0004

		ITEMIZED PROFESSIONAL CHARG	ES	
05/20/2009	J-E	ONE-Reviewed order appointing receiver. Call with prior receiver and SEC. Reviewed filings. Analysis of motion to dismiss. Work on Bermuda issues.	3.00	\$945.00
06/19/2009	J-E	ONE- Conferences with counsel from Bermuda and Cayman (.8). Conference with SEC and OIA concerning offshore issues (.5). Prepare for and attend meeting with Cayman liquidator and his counsel and follow up conference with Receiver (2.7).	4.00	\$1,260.00
06/24/2009	DSN	ONE-Draft correspondence to potential counsel in Bermuda (.1); review correspondence from potential counsel in Bermuda (.1).	0.20	\$63.00
06/29/2009	DSN	ONE - Review correspondence from Bermuda counsel regarding action by liquidator (.1); draft correspondence to Bermuda counsel regarding same (.2)	0.30	\$94.50
07/03/2009	DSN	ONE- review correspondence from Kehinde George regarding filing in Cayman (.1); draft correspondence to Kehinde George regarding filing in Cayman and retrieve documents to attach to email to Kehinde George (.2); draft correspondence to Ross McDonough, Cayman Islands counsel, regarding actions to be taken (.1).	0.40	\$126.00
07/06/2009	DSN	ONE -Draft correspondence to Cayman counsel regarding availability for ocunsel call.	0.10	\$31.50
07/06/2009	J-E	ONE -Conference call with Bermuda counsel.	0.30	\$94.50
07/06/2009	SBR	ONE - Review draft letter to Bermuda counsel.	0.10	\$31.5
07/07/2009	DSN	ONE-Review correspondence from Ross McDonough (.1); review correspondence from Jan Woloneicki regarding Bermuda proceeding (.1); review correspondence from Jonathan Etra regarding summary of call with Cayman and Bermuda counsel and strategy for actions to be taken (.2).	0.40	\$126.00
07/08/2009	DSN	ONE-draft correspondence to Kehinde George regarding status of actions to be taken in Bermuda	0.20	\$63.0
07/08/2009	J-E	ONE Work on Cayman and Bermuda issues .	0.40	\$126.0
07/10/2009	J-G	ONE - Review and analyze elements of the record relevant to dispute with Cayman/Bermuda parties	0.70	\$175.0
07/11/2009	J-G	. ONE - Additional research relevant to power to	2.90	\$725.0

Re: Daniel S Bermuda 43125.00	a Litigati	·		Page 4
e.		access Bermuda bank accounts (1.5); conference with Receiver regarding progress and analysis (.1); prepare additional analysis based on research and incorporate into memorandum for Receiver's use (1.3).		
07/13/2009	DSN	ONE-Review and analyze Receivership Memo (.4); office conference with counsel regarding changes to be made to Receivership Memo (.2).	0.60	\$189.00
07/14/2009	DSN	ONE - draft counsel regarding correspondence to be sent to Bermuda counsel regarding receiverships.	0.10	\$31.50
07/14/2009	J-E	ONE-Worked on Bermuda and Cayman issues.	0.60	\$189.00
07/15/2009	DSN	ONE-Review affidavit provided by Bermuda counsel and documents attached to affidavit; revise same (.3); draft correspondence to Bermuda (.1); telephone conference with Bermuda counsel regarding affidavit and proposed changes (.2).	0.60	\$189.00
07/15/2009	J-E	ONE - Work on Receiver's affidavit in support of motion to intervene in Bermuda court and correspondence with Bermuda counsel on additional information needed in subsequent filings.	1.00	\$315.00
07/16/2009	DSN	ONE - telephone conference with Bermuda counsel regarding July 16, 2009 hearing on Joint Liquidator Motion and Strategy (.5); review correspondence from Bermuda counsel regarding hearing and other issues (.2); draft correspondence to Bermuda counsel (.1).	0.80	\$252.00
07/16/2009	J-E	ONE Conference call with Bermuda counsel and materials and information needed in Bermuda litigation and follow up on same.	0.80	\$252.00
07/17/2009	DSN	ONE- Draft correspondence to Bermuda counsel regarding strategy and timing for next hearing (.1); review correspondence from Bermuda counsel regarding strategy and timing for next hearing (.1); review correspondence from Bermuda counsel regarding materials for preparation of Bermuda action (2).	0.40	\$126.00
07/20/2009	J-E	ONE - Reviewed petitions by Cayman liquidators, analysis re same, and correspondence with Cayman counsel re issues therein (1.0). Obtained and reviewed Bermuda court order on scheduling of briefs on dispute over Bank of Bermuda funds (.2). Met with accountants on analysis needed for submission to Bermuda Court (.5). Conference call with Bermuda counsel (.5).	3.40	\$1,071.00

BROAD AND CASSEL

ATT	OR	NEY	S	ΑT	LAW
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Re: Daniel S Bermuda 43125.00	a Litigati			Page 5
		Provided materials to Bermuda counsel (.2). Review and analysis and UK case law on cross- border insolvency (1.0).		-
07/22/2009	DSN	ONE-telephone conference with Joint Provision Liquidator regarding and analyze potential settlement.	0.50	\$157.50
07/22/2009	J-E	ONE-Conferences with Cayman liquidators and Receiver's offshore counsel.	1.00	\$315.00
07/23/2009	DSN	ONE-Review correspondence from Bermuda counsel (.1); draft correspondence to Bermuda counsel (.1).	0.20	\$63.00
07/24/2009	DSN	ONE- review correspondence from Jan Woloniecki, Bermuda counsel (.1); draft correspondence to Jan Wolonieck regarding telephone conference (.1); telephone conference with Jan Wolonieck and Kehinde George (.3).	0.50	\$157.50
07/27/2009	J-E	ONE - Correspondence with Bermuda counsel.	0.20	\$63.00
07/28/2009	J-E	ONE-Calls with counsel for investors (.4). Call with Bermuda counsel (.1).	0.50	\$157.50
07/29/2009	DSN	ONE- review correspondence from Ross McDonough (.1); draft correspondence to Ross McDonough (.1).	0.20	·\$63.00
07/30/2009	DSN	ONE - Telephone conference with Ross McDonough regarding meeting with Joint Liquidator's counsel (.4); draft correspondence to Ross McDonough regarding meeting with JPL (.1); review correspondence from Ross McDonough regarding meeting with JPL (.1).	0.60	\$189.00
07/31/2009	DSN	ONE-Telephone conference with Jan Wolenecki (.2); review correspondence from JPL (.1); draft correspondence to JPL (.1);	0.40	\$126.00
08/03/2009	DSN	ONE - Review correspondence from Joint Liquidator regarding potential resolution (.2); draft correspondence to Bermuda and Cayman counsel regarding same (.1).	0.30	\$94.50
08/04/2009	DSN	ONE-Telephone conference with Ross McDonough and John Etra regarding strategy relating to Bermuda action (.3); telephone with Jan Wolonecki and Ross McDonough (.1); FOUR - conference with Brenda Fradera regarding updating Receivership web site; review correspondence from Ross McDonough, Cayman counsel regarding Founding Partners Global Fund (.1).	0.50	\$157.50
08/04/2009	J-E	ONE-Conference call with offshore counsel.	0.50	\$157.50

BROAD AND CASSEL

ATTORN	IEYS	ΑT	LAW
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Re: Daniel S Bermuda 43125.00	a Litigatio			Page 6
08/06/2009	DSN	ONE-Draft correspondence to Ian Stokoe, JPL (.1); telephone conference with Ian Stokoe, counsel for JPL and receivers counsel regarding status of proceeding in Bermuda and related issues (.6).	0.70	\$220.50
08/06/2009	J-E	ONE - Conference call with Cayman Joint Provisional Liquidators	0.40	\$126.00
08/10/2009	DSN	ONE-Review correspondence from Joint Liquidators (.1); draft correspondence to Joint Liquidators (.1).	0.20	\$63.00
08/11/2009	DSN	ONE- Review correspondence from counsel from Bermuda relating to various issues (.1); draft correspondence to Bermuda counsel regarding affidavit (.2); conference with counsel regarding preparation for draft of affidavit from Bermuda (.4); review and analyze draft correspondence to counsel for investor (.2); review and analyze correspondence from Michael Moeckler regarding Chicago office (.1) (NO CHARGE); review and analyze correspondence from Vince Paparo (.2); draft correspondence to counsel regarding response to same (.2).	1.30	\$409.50
08/11/2009	MDM	ONE-Correspond with Receiver regarding information required by Bermuda counsel and work on affidavit for same (1.6); Call with accountants regarding same (.6).	2.20	-\$429.00
08/12/2009	MDM	ONE - Revise summary to be provided to Bermuda counsel (.4); Review draft memo prepared by Mr. Lang for Bermuda counsel and correspond with the Receiver regarding same (1.2).	1.60	\$312.00
08/13/2009	DSN	ONE- Review correspondence relating to draft memo's to Bermuda counsel and provide comments to same (.5).	0.50	\$157.50
08/13/2009	MDM	ONE- Continue to draft and revise memo for Bermuda counsel and correspond with Receiver regarding same.	1.50	\$292.50
08/14/2009	DSN	ONE- Draft correspondence to Joint Provision Liquidators regarding telephone conference (.1); review correspondence from Joint Provisional Liquidators regarding telephone conference (.1).	0.20	\$63.00
08/17/2009	DSN	ONE-Telephone conference with Bermuda counsel regarding strategy and steps to be taken (.9); telephone conference with Joint Liquidators and Bermuda counsel regarding potential resolution of dispute on Bermuda funds (.7); telephone conference with Bermuda counsel and	3.00	\$945.00

Re: Daniel S Bermuda 43125.00		Page 7		
		follow-up call with Joint Liquidators (.3); review and analyze documents from counsel relating to Global Fund (.4); review correspondence from Joint Provisional Liquidators (.1); draft correspondence to Joint Provisional Liquidator (.6).		
08/17/2009	J-E	ONE-Reviewed draft materials provided to Bermuda counsel (.2). Conferences with Receiver and with Bermuda counsel regarding JPLs and Bermuda litigations (.8). Conference with JPLs and their counsel (.8).	1.80	\$567.00
08/17/2009	MDM	ONE - Call with Bermuda counsel.	0.70	\$136.50
08/17/2009	SBR	ONE- Correspondence with D. Siegel, A. Lang, and M. Magidson re Global Fund agreement (.3); call from D. Siegel re Global Fund investments in U.S.A. REDACTED review CSA and other documents re same (1.00); correspondence with D. Newman re Global Fund legal issues and facts (.2); call from D. Siegel and M. Prinsloo re Global Fund investment in Stable-Value Fund (.2)	1.70	\$535.50
08/19/2009	DSN	ONE - Draft correspondence to joint liquidation in Cayman (.1); review correspondence from joint liquidation in Cayman (.1).	0.20	\$63.00
08/20/2009	DSN	ONE- Begin preparation of motion in connection with the Bermuda action (.4); telephone conference with Bermuda counsel regarding preparation of draft documents and other issues pertaining to Bermuda litigation (.4); telephone conference with Joint Provisional Liquidators regarding possibility of settlement (.6); review order entered by Bermuda Court and obtained by Joint Provisional Liquidators (.3).	1.70	\$535.50
08/20/2009	J-E	ONE-Conference call with Joint Provisional Liquidators and counsel and follow up call with Bermuda counsel.	0.80	\$252.00
08/21/2009	DSN	ONE - Revise correspondence to JPLs outlining potential protocol.	0.70	\$220.50
08/21/2009	DSN	FOUR-Review correspondence from Jan Wolonecki relating to outline of potential protocol (.3)	0.30	\$94.50
08/21/2009	J-E	ONE-Comments and revisions to letter to Joint Provisional Liquidators.	0.30	\$94.50
08/21/2009	SBR	ONE- Review and revise letter to JPL in Bermuda (.5)	0.50	\$157.50
08/25/2009	DSN	ONE- Revise and prepare additional revisions to	4.10	\$1,291.50

Re: Daniel S. Newman, Receiver Bermuda Litigation 43125.0004

		JPL (.2); telephone conference with investor B.L. (.5); review documents identified by counsel and discuss in detail various documents and implications of same (1.0); numerous conferences with counsel relating to litigation issues, research and tasks to be performed (.7); telephone conference with Joint Provisional Liquidators, Bermuda counsel and Cayman counsel regarding potential protocol (.9); telephone conference with Bermuda counsel in follow-up to conversation with Joint Provisional Liquidators (.3); telephone conference with Joint Provisional Liquidators regarding drafting of protocol (.2); telephone conference with Bermuda counsel regarding drafting protocol (.1); draft correspondence to Bermuda counsel regarding enlargement of time for Bermuda Affidavit (.2)		
08/25/2009	J-E	ONE- Reviewed letter from counsel to Joint Provisional Liquidators on protocol and release of funds, conferred with Receiver re same, teleconference with Joint Provisional Liquidator, his counsel and Receiver's offshore counsel, follow up conferences with Receiver and Receiver's offshore counsel.	1.50	\$472.50
08/27/2009	DSN	ONE- Review correspondence from Bermuda counsel regarding draft protocol (.2); conference with counsel regarding various legal issues to be addressed (.5);	0.70	\$220.50
08/27/2009	SBR	ONE- Review article on Stanford receiver case and distribute to D. Newman et al. (.2)	0.20	\$63.00
08/28/2009	DSN	ONE- Review draft protocol from Burmuda counsel and make revisions to same (.7); review proposed Joint Interest document and revise same provided by Bermuda counsel (.3); telephone conference with Bermuda counsel regarding draft protocol and revisions to be made and strategy (.7); review draft protocol (.8); telephone conference with Jan Wolonecki and John Etra regarding draft (1.2).	3.70	\$1,165.50
08/28/2009	J-E	ONE - Work on draft protocol with Joint Provisional Liquidators, including call with Bermuda counsel.	1.50	\$472.50
08/29/2009	DSN	ONE - Review revised protocol quoted by Receiver's counsel in Bermuda and analyze same	0.50	\$157.50
08/30/2009	J-E	ONE - Review and comments on new version of draft protocol for Joint Provisional Liquidators.	0.40	\$126.00
08/31/2009	DSN	ONE- Draft correspondence to counsel regarding	0.60	\$189.00

Re: Daniel S. Newman, Receiver Bermuda Litigation 43125.0004 Page 9

draft protocol (.1); review revised draft protocol (.4); draft correspondence to Ian Stokoe regarding draft protocol (.1).

draft protocol (.1

08/31/2009 J-E

ONE - Worked on draft protocol for Joint

0.30

\$94.50

Provisional Liquidators.

TOTAL PROFESSIONAL CHARGES

\$18,103.50

	TIN	/IEKEEI	PER SU	JMMAR`	Y	
DSN	Daniel S. Newman, PA	25.70	hrs @	\$315.00	per hour	\$8,095.50
J-E	Jonathan Etra	22.70	hrs @	\$315.00	per hour	\$7,150.50
SBR	Susan Barnes de Resendiz	2.50	hrs @	\$315.00	per hour	\$787.50
MDM	Michael Magidson	6.00	hrs @	\$195.00	per hour	\$1,170.00
J-G	Jeffery Geldens	3.60	hrs @	\$250.00	per hour	\$900.00



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Daniel S. Newman, Receiver

October 9, 2009 Invoice No.: 771937

Matter Name: Bermuda Litigation Client/Matter No: 43125.0004

Billing Attorney: Daniel S. Newman, PA

Previous Balance
Payments Received
Subtotal of Previous Balance

Professional Charges
Expenses
Subtotal of Current Charges

TOTAL BALANCE DUE (Previous and current balance)

\$0.00 \$0.00 \$18,103.50 0.00 \$18,103.50

\$18,103.50

PAYMENT DUE UPON RECEIPT

TO ENSURE PROPER CREDIT, PLEASE RETURN REMITTANCE PAGE WITH YOUR PAYMENT

BERKOWITZ DICK POLLACK & BRANT

Asset Analysis & Recovery	Asset Analysis & Recovery	Asset Analysis & Recovery	Asset Analysis & Recovery	Asset Analysis & Recovery Asset Analysis & Recovery	Asset Analysis & Recovery	Asset Analysis & Recovery	Asset Analysis & Recovery Asset Analysis & Recovery	Asset Analysis & Recovery	Asset Analysis & Recovery Asset Analysis & Recovery Asset Analysis & Recovery	Asset Analysis & Recovery	Activity Category
David Siegel	Martin Prinsloo	Martin Prinsloo	Gary Rosenthal	Richard Pollack David Siegel	Gary Rosenthal	Gary Rosenthal	Whitney Schiffer David Siegel	Gary Rosenthal	Richard Pollack Whitney Schiffer	Gary Rosenthal	Staff Name
6/10/09	6/9/09	6/9/09	6/9/09	6/8/09 6/9/09	6/8/09	6/8/09	6/5/09 6/8/09	6/5/09	6/4/09 6/4/09	6/4/09	Date
Review of documents, preparation of bank and investment account information; preparation of planning outline, conference calls with Receiver's paralegal, meeting with Speed Print personnel to give instructions, preparation of emails and exhibits.	documentation. Traveled to client site in Naples Florida. Reviewed various files, boxes, cabinets, etc. for relevant information. Reviewed client prepared inventory.	and its related nospitals Assist client's representative to catalog computer evidence that was packed and shipped to Miami. Prepare inventory of computer equipment for BDPB. Took pictures of the computer evidence, offices and furniture containing hard copy	Creation of listing of information to request from Sun Capital	2006 financial statements; review of Naples inventory listing; updating of E&Y request listing Founding Partners review of case status and issues Analysis of Fund accounting records in Naples office; selection of documents for copying in Miami. Preparation of schedules, conference call with Receiver and Receivers Counsel.	request for information from E&Y Meeting with David Siegel to discuss case; meeting with Rich Pollack to discuss E&Y listing; review of Stable Value Fund	documents, preparation of work papers. Meeting with Dan Newman and Jonathan Etra to discuss scope of work to be performed in Narles as well as review of	strategy with start, create attorney occurrient request rist. Review documents Founding Partners and Sun Capital. Meeting with Receiver and Receiver's Counsel, review of	Cassel) regarding Founding Partners and Sun Capital receivership case. Review documents submitted by Dan Newman; discuss		Meeting with Jonathan Etra and Daniel Newman - overview of case and strategize on issues and approach	Description
6.50	8.00	2.00	1.00	1.00 10.00	2.00	1.50	0.70 4.00	2.00	1.00	1.00	Hours
300.00	250.00	250.00	300.00	310.00 300.00	300.00	300.00	300.00 300.00	300.00	310.00	300.00	Rate
1,950.00	2,000.00	500.00	300.00	310.00 3,000.00	600.00	450.00	210.00 1,200.00	600.00	310.00 300.00	300.00	Amount

Activity Category	Staff Name	Date	Description	Hours	Rate	Amount
Asset Analysis & Recovery	Gary Rosenthal	6/10/09	Review of Howard Koslow affidavit; internet search on Promise/Success hospitals/review of inventory of Naples	3.00	300.00	900.00
Asset Analysis & Recovery	Martin Prinsloo	6/10/09	documents Review listing of bank accounts, chain of custody information	1.50	250.00	375.00
Asset Analysis & Recovery	Martin Prinsloo	6/11/09		0.20	250.00	50.00
Asset Analysis & Recovery	Richard Pollack	6/11/09	Founding Partners review of case status and issues	00	310.00	310.00
Asset Analysis & Recovery	Adam Lang	6/12/09	Prepare organizational chart and relationship list	2.50	250.00	625.00
Asset Analysis & Recovery	Gary Rosenthal	6/12/09	Research on DSH payments	1.00	300.00	300.00
Asset Analysis & Recovery	Richard Pollack	6/12/09	Founding Partners review of case status and issues	1.00	310.00	310.00
Asset Analysis & Recovery	David Siegel	6/15/09	Review of documents and search for tax ID numbers.	1.50	300.00	450.00
Asset Analysis & Recovery	Richard Pollack	6/15/09	Founding Partners review of case status and issues	0.50	310.00	155.00
Asset Analysis & Recovery	David Siegel	6/16/09	Conference call with the Receiver, Sun Capital's legal counsel and BDPB members; preparation of document request and	4.00	300.00	1,200.00
Asset Analysis & Recovery	Gary Rosenthal	6/16/09	Phone conference with attorneys and Sun Capital; meeting with David Siegel to review request for information	1.50	300.00	450.00
Asset Analysis & Recovery	Richard Pollack	6/16/09	Review of documents; prepare for and meet with Vince	3.00	310.00	930.00
Asset Analysis & Recovery	David Siegel	6/17/09	r aparo. Conference call with Receiver and Receiver's Counsel.	1.00	300.00	300.00
	•		planning.			
Asset Analysis & Recovery	David Siegel	6/18/09	Analysis of documents and planning.	2.50	300.00	750.00
Asset Analysis & Recovery	Gary Rosenthal	6/18/09	Review of information related to DSH receivables	1.20	300.00	360.00
Asset Analysis & Recovery	David Siegel	6/19/09	Analysis of financial statements, analysis of computer files, meeting with Receiver and Receiver's Counsel, research,	6.00	300.00	1,800.00
			preparation of schedule and memo.			
Asset Analysis & Recovery	Gary Rosenthal	6/19/09	Memo on DSH payments	1.00	300.00	300.00
Asset Analysis & Recovery	Gary Rosenthal	6/19/09	Research on internet regarding DSH payments; factoring and financing of healthcare receivables; review of bankrupt	3.20	300.00	960.00
			company financed as DIP by Sun Capital and related reporting			
Asset Analysis & Recovery	Whitney Schiffer	6/19/09	or ractored receivables Telephone conversation with John Schneider, Mo Dept of	0.20	300.00	60.00
			Social Services, regarding Missouri payment procedures in connection with DSH and direct Medicaid payments.			
Asset Analysis & Recovery	Whitney Schiffer	6/19/09	Telephone conference with Dan Newman, Jonathan, Etra, Gary Rosenthal, David Siegel and Martin Prinsloo regarding	0.80	300.00	240.00
			•			

Founding Partners Receivership Detailed Time Descriptions

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Activity Category	Staff Name	Date	Description	Hours	Rate A	Amount
Asset Analysis & Recovery	Whitney Schiffer	6/19/09	Review of documents provided by Broad & Cassel (Mo Dept of Social Services, Regulations, correspondence from Missouri Dept of Social Services regarding various hospitals DSH, FRA allowance and direct Medicaid payment calculations). Meeting with Gary Rosenthal and David Siegel regarding such	1.50	300.00	450.00
Asset Analysis & Recovery	David Siegel	6/23/09	Analysis of legal pleadings and exhibits, conference call with	5.00	300.00	1,500.00
Asset Analysis & Recovery	Whitney Schiffer	6/23/09	Receiver, preparation of memo, schedule and chart. Review of founding partners documents and financial statements	2.00	300.00	600.00
Asset Analysis & Recovery	David Siegel	6/24/09	Analysis of SunTrust lock box website, preparation of lockbox summary reports, conference calls with Don LaRosa of Sun Capital, conference call with Receiver's Counsel. Analysis of computer images, preparation of memo, planning.	7.00	300.00	2,100.00
Asset Analysis & Recovery Asset Analysis & Recovery Asset Analysis & Recovery	Richard Pollack Dan Hughes David Siegel	6/25/09 6/26/09 6/29/09	Founding Partners review of case status and issues Meeting with counsel. Data analysis. Conference calls with Sun Capital management, analysis of lock box information; lock box research, conference calls with Receiver and Receiver's Counsel; analysis of founding partners documents, investor information and computer data.	1.00 3.20 7.50	310.00 300.00 300.00	310.00 960.00 2,250.00
Asset Analysis & Recovery	Scott Bouchner	6/29/09	Review and analysis of lock box issues and related	1.20	300.00	360.00
Asset Analysis & Recovery	David Siegel	6/30/09	Analysis of documents and Founding Partners computer files, conference calls with Receiver's Counsel and Sun Capital Mgmt, preparation of schedules, emails and exhibits.	8.00	300.00	2,400.00
Total Asset Analysis & Recovery	ery		; ;	115.70		34,095.00
Forensic Accounting Forensic Accounting	Adam Lang Martin Prinsloo	6/5/09 6/5/09	Read complaint and analysis of initial production Discuss engagement status and preliminary review of documents.	1.20 1.00	250.00 250.00	300.00 250.00
Forensic Accounting	Martin Prinsloo	6/5/09	Organization of production received. Preparation of work	2.50	250.00	625.00
Forensic Accounting	Martin Prinsloo	6/12/09	Supervision and review of creation of Relationship Flowchart and listing. Request and review Autotrack reports for targets.	2.00	250.00	500.00
Forensic Accounting Forensic Accounting	Sharon Foote Martin Prinsloo	6/15/09 6/16/09	Preparation of work papers and index documents obtained. Create images of CD and DVD's acquired at Founding Partners' office on 06.09.2009.	1.00 2.50	195.00 250.00	195.00 625.00

Activity Category	Staff Name	Date	Description	Hours	Rate	Amount
Forensic Accounting	Sharon Foote	6/16/09	Preparation of work papers and index documents obtained.	4.00	195.00	780.00
Forensic Accounting	Martin Prinsloo	6/17/09	Organize and review initial documents obtained during client visit.	1.00	250.00	250.00
Forensic Accounting	Martin Prinsloo	6/19/09	Initial review of computer equipment based on instructions from counsel that computers were prevails imaged.	1.00	250.00	250.00
Forensic Accounting Forensic Accounting	Martin Prinsloo Martin Prinsloo	6/19/09 6/23/09	Meeting to discuss engagement status. Took custody of evidence and complete chain of custody information	1.50 1.00	250.00 250.00	375.00 250.00
Forensic Accounting	Martin Prinsloo	6/23/09	Review drive marked "A" evidence number assigned FP-18. Extract Quick Books Files. Copy first image to Best Evidence Drive (FP-18-1_FPARTNR1).	2.50	250.00	625.00
Forensic Accounting Forensic Accounting Forensic Accounting	Adam Lang Joel Glick Martin Prinsloo	6/24/09 6/24/09 6/24/09	Analysis of production received Analysis of computer images Continue with the copying of the four evidence drives to BDPB Best Evidence drives. Setup associates to start review of	1.20 4.50 2.50	250.00 250.00 250.00	300.00 1,125.00 625.00
			image contents. Prepare status memorandum of progress of computer forensic analysis. Review and print image creation logs of original images. Start verification of first of copied images.			
Forensic Accounting Forensic Accounting	Sharon Foote Adam Lang	6/24/09 6/25/09	Print and analyze reports from QuickBooks file. Analysis of production received	1.50 3.20	195.00 250.00	292.50 800.00
Forensic Accounting	Danielle Goldstein	6/25/09	Analysis and indexing of production received Analysis and indexing of production received	6.00 6.00	300.00	1 200.00 1 200.00
,) 1 5	Receiver's Counsel, preparation of forensic outline.	י י)	200
Forensic Accounting	Martin Prinsloo	6/25/09	Analysis of computer images Continue with the copying of the four evidence drives to BDPB Best Evidence drives with verification.	1.50	250.00	375.00
Forensic Accounting Forensic Accounting	Sharon Foote Adam Lang	6/25/09 6/26/09	Prepare work papers and index for QuickBooks reports. Analysis of production received in summation; search for investor addresses and shareholder registers	0.50 6.00	195.00 250.00	97.50 1,500.00
Forensic Accounting	Danielle Goldstein	6/26/09	Analysis and indexing of production received	3.00	150.00	450.00
Forensic Accounting Forensic Accounting	Dany Lowe David Siegel	6/26/09 6/26/09	Document management. Preparation of forensic outline, meeting with Receiver's Counsel, supervision of staff.	0.50 5.00	95.00 300.00	47.50 1,500.00
Forensic Accounting	Martin Prinsloo	6/26/09	Continue with the copying of the four evidence drives to BDPB Best Evidence drives with verification.	1.50	250.00	375.00
Forensic Accounting	Waluit milisioo	60/17/0	working drive 23634_WD-01 with verification. Setup and monitoring of indexing of server image FP-18-01_FPARTNR1. Complete indexing.		20.00	
Forensic Accounting	Martin Prinsloo	6/28/09	Setup FP-15-05 for indexing, monitoring of progress.	1.00	250.00	250.00

57,881.25						Client Totals:
273.75	l					Out of pocket expense Total
116.60	1		Mileage - trip to Naples and return to Miami	6/9/09	Martin Prinsloo	Out of pocket expense
108.35			Mileage - trip to Naples and return to Ft Lauderdale	6/9/09	David Siegel	Out of pocket expense
17.79			Meals - in Naples	6/9/09	David Siegel	Out of pocket expense
17.79			Meals - in Naples	6/9/09	Martin Prinsloo	Out of pocket expense
9.22			Meals - in Naples	6/9/09	David Siegel	Out of pocket expense
4.00			Tolls - trip to Naples and return to Ft Lauderdale	6/9/09	David Siegel	Out of pocket expense
57,607.50		216.50	Totals - All Categories			
23,512.50		100.80	:			Total Forensic Accounting
1,000.00	250.00	4.00	Assist with review and access of documents contained on evidence drives.	6/30/09	Martin Prinsloo	Forensic Accounting
			01_FOUNDINGPAR I01. Setup indexing of evidence items image FP-15-03_FOUNDINGPART03.			
250.00	250.00	1.00	Complete the indexing of the evidence item FP-15-	6/30/09	Martin Prinsloo	Forensic Accounting
600 00	150 00	4 00	Analysis of Gunlicks' investments in funds	6/30/09	Anva Stasenko	Forensic Accounting
		į	production; analysis of QuickBooks files and monthly financials		į	Ğ
1,800,00	250.00	7 20	electronic data. Analysis of contributions and redemptions: review of	6/30/09	Adam I and	Forensic Accounting
125.00	250.00	0.50	Meeting to discuss engagement status and further review of	6/29/09	Martin Prinsloo	Forensic Accounting
			of second server image FP-15-01_FOUNDINGPART01.			
3/5.00	250.00	1.50	Complete the indexing of the evidence items related to Gunlicks (FP-15-05, FP-15-08 and FP-15-09, Setup indexing	60/62/9	Martin Prinsioo	Forensic Accounting
600.00	150.00	4.00	Analysis of Gunlicks' Contributions and Redemptions	6/29/09	Jorge Lopez	Forensic Accounting
150.00	300.00	0.50	Data Analysis	6/29/09	Dan Hughes	Forensic Accounting
			contributions and redemptions for all funds by Gunlicks and related entities			
2,250.00	250.00	9.00	Analysis of production and electronic data; prepare analysis of	6/29/09	Adam Lang	Forensic Accounting
			documentation and evidence listing.			
			Verify MD% checksums on copied images. Update case			**************************************
375.00	250.00	1.50	Continue copy of Best Evidence Drives to Working Drives.	6/28/09	Martin Prinsloo	Forensic Accounting
 Amount	Rate	Hours	Description	Date	Staff Name	Activity Category

Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Activity Category
David Siegel Dan Hughes	Scott Bouchner Whitney Schiffer	David Siegel	Adam Lang Dan Hughes	Whitney Schiffer	Rachel Merritt	Martin Prinsloo	Dan Hughes David Siegel	Adam Lang	Whitney Schiffer	Martin Prinsloo	Dan Hughes David Siegel	Staff Name
and understanding of factor system and the factoring of patient receivables, DSH receivables and commercial receivables. Assistance with preparation of document request listing for documents to be available to BDPB on July 6, 2009. 7/4/09 Preparation of memo and emails. 7/6/09 Reviewed memos from onsite meeting with Sun Capital representatives. Meeting with Whitney Schiffer to go over memo and Sun Capitals AR factoring business model. Reviewed staff work with respect to Sun Capital Purchases, Advances, & Collections for 2008.	exhibits of meeting with Larry Leder of Sun Capital. 7/3/09 Review of memorandum. 7/3/09 Preparation of narrative regarding meeting with Sun Capital representatives	Capital. Preparation for meetings at Sun Capital. 7/3/09 Analysis of documents and work papers, preparation of detailed memo and	review of documents requested in document request. 7/3/09 Analysis of production received; review of Sun production boxes 7/3/09 Reviewed and analyzed documents. Review of financial information for Sun	Spreadsheet 7/2/09 Meetings with Larry Leder, Anna Spedale, Robin regarding factoring system and processes for factoring healthcare and commercial receivables and	version of Index provided by counsel. 7/2/09 Analysis of Purchases and Advances Reports and Collection Reports for underlying investments of Sun Capital; Review of Production; Creation of	Counsel. 7/2/09 Assist with the document review of Sun-Capital documents. Prepare OCR	inquiry 7/2/09 Reviewed and analyzed documents produced. 7/2/09 Meeting with CFO of Sun Capital, interview and review of operations and monthly financial statements. Conference call with Receiver and Receiver's	summary A/R listing of factored health care receivables. 7/2/09 Analysis of Sun Capital production; review of FP production; analysis of collections and advances for Sun Capital; respond to counsel's document	February 2009 to June 2009. 7/1/09 Meeting with David Sigel and review of documents obtained form Founding Partners computers (Jan and Feb 2009 internal financial statements and	7/1/09 Prepare database and summary of SunTrust lock box transaction from	7/1/09 Meeting with counsel and review of production. 7/1/09 Analysis of legal pleadings, Founding Partners financial records, Sun Capital Financial records and lock box records; meeting with Receiver and Receiver's Counsel, conference calls with Sun Capital's Treasurer and Sun Capitals CFO. Preparation of schedules, emails and exhibits, planning.	Date Description Ht
1.50 300.00 3.50 300.00	0.75 300.00 4.50 300.00	10.00 300.00	3.00 250.00 6.00 300.00	8.00 300.00	8.25 150.00	1.00 250.00	9.00 300.00 8.00 300.00	8.50 250.00	1.00 300.00	1.50 250.00	6.75 300.00 9.00 300.00	Hours Rate
450.00 1,050.00	225.00 1,350.00	3,000.00	750.00 1,800.00	2,400.00	1,237.50	250.00	2,700.00 2,400.00	2,125.00	300.00	375.00	2,025.00 2,700.00	Amount

Asset Analysis and Recovery Dan I	•		Asset Analysis and Recovery Gary Asset Analysis and Recovery Rach	Asset Analysis and Recovery David	Asset Analysis and Recovery Dan I	Asset Analysis and Recovery Adam	Asset Analysis and Recovery Rach	Asset Analysis and Recovery David	Asset Analysis and Recovery Dan I	Asset Analysis and Recovery Adam	Asset Analysis and Recovery Dan I	Asset Analysis and Recovery White	Asset Analysis and Recovery Rach	Asset Analysis and Recovery Gary	Activity Category S Asset Analysis and Recovery David
Dan Hughes 7.	σ	Adam Lang 7	Gary Rosenthal Rachel Merritt	David Siegel	Dan Hughes	Adam Lang	Rachel Merritt	David Siegel	Dan Hughes	Adam Lang .	Dan Hughes	Whitney Schiffer	Rachel Merritt	Gary Rosenthal	Staff Name Di David Siegel
7/10/09 Analysis of Sun Capital monthly financial statements, accounts receivable aging reports, detailed factoring schedules and loan schedules. Analysis of Sun Capital factoring agreements and preparation of exhibits.		2009 Due From Related Parties Schedule, and Pivot Tables 7/10/09 Prepare index of Sun documents and bank statements received; analysis of	Larry Leder, preparation of production status report, supervision of staff. 7/9/09 Review of E&Y report and discussion with David S 7/9/09 Analysis of 13 Week Cash Flow, Pivot Tables, May 2009 AR Schedule, May	questions to present to Sun Capital representatives regarding AK balances and related party receivables. 7/9/09 Analysis of documents produced by Sun Capital, conference calls with Receiver's Counsel, preparation of emails and memo to Sun Capital CFO,	a ×		with pivot	e calls with Receiver's Counsel, preparation	of AR for February to may 2009 Sun Capital financial performance and tracked trends in receivables	ð	Sun's factoring system and factor memorandum. 7/7/09 Reviewed correspondence regarding document production. Reviewed new	ding documents received,	7/6/09 Continued work on and analysis of Report Spreadsheet (Healthcare,	of emails. 7/6/09 Obtain an understanding and review issues relating to accounts receivable	Description Hour with Larry Leder of Sun Capital, review of documents and preparation
4.00 300.00	2,00 300.00	4.70 250.00	1.75 300.00 6.00 150.00	8.00 300.00	6.50 300.00	6.50 250.00	6.00 150.00	7.00 300.00	4.75 300.00	3.50 250.00	3.50 300.00	1.00 300.00	9.50 150.00	0.25 300.00	.00 300.00
1,200.00	600.00	1,175.00	525.00 900.00	2,400.00	1,950.00	1,625.00	900.00	2,100.00	1,425.00	875.00	1,050.00	300.00	1,425.00	75.00	Amount 2,400.00

	Asset Analysis and Recovery Rachel Merritt	Asset Analysis and Recovery Rachel Merritt	Asset Analysis and Recovery David Siegel	Asset Analysis and Recovery Dan Hughes	Asset Analysis and Recovery Gary Rosenman Asset Analysis and Recovery Adam Lang		Asset Analysis and Recovery David Siegel	Asset Analysis and Recovery Dan Hughes	Asset Analysis and Recovery Sharon Foote Asset Analysis and Recovery David Siegel	Asset Analysis and Recovery Gary Rosenthal Asset Analysis and Recovery Rachel Merritt	Asset Analysis and Recovery Gary Rosenthal	Asset Analysis and Recovery Gary Rosenthal	Asset Analysis and Recovery David Siegel	W SOUTH THE SECOND
7/14/09 Analysis of Global Fund activity and shareholder register; analysis of Global	7/13/09 Examination and analysis of REDACTED Agreements relating to Sun Capital Healthcare, Compilation of Comparative Index to record which documents were produced and the differences between them.	Counsel, Preparation of work papers. 7/13/09 Analysis of A, B, and E Stock Classes for Global Fund Inc. and Global Fund	7/13/09 Analysis of complaint and document request, conference call with Receiver's	7/13/09 Reviewed, analyzed, and discussed financial statements, reports issued by accountants, and other financial records that showed results of operations for Sun Capital Healthcare, Inc. Reviewed REDACTED Agreements for Sun Capital Healthcare, Inc. Reviewed index and analysis of Master Purchase and Sale Agreements. Reviewed various legal filings such as motions, affidavits, and letters / correspondence from counsel.	7/13/09 Review of Repart In agreement and 7/13/09 Analysis of Global Fund bank statements, financial statements and shareholder register; tracing of funds for Global Fund; internal status meeting		and Sun Capital, Inc. 7/12/09 Analysis of Sun Capital financial records, conference call with Receiver's Counsel, analysis of legal pleadings, preparation of document request,	documents. 7/12/09 Read / analyzed various legal filings related to this case drafted by the Receiver and drafted by counsel representing Sun Capital Healthcare, Inc.	Agreement Index 7/10/09 Analysis and indexing of documents received from Sun Capital. 7/11/09 Analysis of Sun Capital financial records, preparation of emails and	7/10/09 Meeting with attorneys to review collateral issues 7/10/09 Bank Statement Index, Finalizing AR Schedules, REDACTED	information 7/10/09 Review of E&Y 2006 report of Stable Value Fund REDACTED	h David and Dan to discuss collateral issue	7/10/09 Analysis of Sun Capital monthly financial statements, accounts receivable aging reports, detailed factoring schedules and loan schedules. Preparation of schedules and exhibits for meeting with Receiver and Receiver's Counsel.	
4.00 250.00	3.10 150.00	2.30 150.00	3.50 300.00	5.00 300.00	6.30 250.00		6.50 300.00	3.00 300.00	8.00 195.00 2.00 300.00	3.00 300.00 6.25 150.00	0.50 300.00	0.50 300.00	7.50 300.00	Entre Ruin
1,000.00	465.00	345.00	1,050.00	1,500.00	1,575.00	450.00	1,950.00	900.00	1,560.00 600.00	900.00 937.50	150.00	150.00	2,250.00	Amaint

Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery		Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Activity Category
Gary Rosenthal Rachel Merritt	David Siegel	Dan Hughes	Dan Hughes	Rachel Merritt	Gary Rosenthal	David Siegel	Dan Hughes	Adam Lang	Rachel Merritt Rachel Merritt		David Siegel	Dan Hughes	Dan Hughes	Adam Lang	Rachel Merritt	Rachel Merritt	Dan Hughes	Staff Name
Capital and Counsel. 7/17/09 Meeting with David Siegel regarding asset recovery issues 7/17/09 Tracing Global Fund Redemptions and Compiling BDPB Founding Partners Analysis into binder.	from the Sun Entities. 7/17/09 Analysis of documents and preparation of work papers, conference call with Larry Leder of Sun Capital, meeting with Receiver and Receiver's Counsel. Preparation of exhibits and preparation for Sunday meeting with Receiver, sun	same internally with the BDPB forensic and healthcare teams. 7/17/09 Preparation of analysis and documents for upcoming meeting with principals	redemptions. 7/17/09 Reviewed production of financial information for the Sun entities prior to pofential meetings with Sun principals and other consultants. Discussed the	7/16/09 Comparison of Shareholders between funds, work with subscriptions and	documents and preparation of schedules. Conference call with Sun Capital's CFO, Larry Leder. Preparation of document request and emails. 7/16/09 Discussion with David Siegel regarding lockbox and related factoring issues	7/16/09 Conference calls with Receiver and Receiver's Counsel, analysis of	7/16/09 Read / analyzed correspondence and analysis between the principals and management of Founding Partners and the principals of the Sun entities.	7/16/09 Prepare organizational chart for Promise; review and analysis of Global Fund	7/15/09 Global Fund Snarenoider Analysis, creation of fiatite and address report. 7/15/09 Global Fund Analysis of organization and share classes, continued work with Global Fund binder.		the same. 7/15/09 Analysis of Sun Capital financial statements, accounts receivable records and	7/15/09 Meetings and discussions regarding case strategy and analysis in support of		Fund work document binder 7/15/09 Analysis of Commercial account receivable aging schedules	table. 7/14/09 Organization and analysis of Global Fund documents. Creation of Global	and identification of the investors. 7/14/09 Creation of database for Global Fund Stocks for further analysis via pivot	7/14/09 Analysis of SCHC REDACTED Agreements. Discussion and analysis of Global Fund Ltd. relative to source of origin tracing of the assets	Date Description
1.50 300.00 4.50 150.00	5.00 300.00	2.00 300.00	2.00 300.00	6.20 150.00	0.50 300.00	6.50 300.00	2.50 300.00	3.00 250.00	4.10 150.00		6.00 300.00	1.00 300.00	2.00 300.00	2.00 250.00	3.90 150.00	3.10 150.00	2.00 300.00	Hours Rate
450.00 675.00	1,500.00	600.00	600.00	930.00	150.00	1,950.00	750.00	750.00	615.00	375	1,800.00	300.00	600,00	500.00	585.00	465.00	600.00	Amount

Asset Analysis and Recovery Asset Analysis and Recovery Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery		Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Activity Category Asset Analysis and Recovery
Rachel Merritt Rachel Merritt Rachel Merritt Rachel Merritt	Joao Gomes Joseph Malca	Dan Hughes David Siegel	Dan Hughes	Adam Lang	Rachel Merritt	Gary Rosenthal Gary Rosenthal	David Siegel		Dan Hughes	Dan Hughes	Gary Rosenthal	David Siegel	Staff Name David Siegel
7/21/09 Creation of Balance Sheet AR Comparison for SCHI 7/21/09 Analysis of Subscriptions 7/21/09 Locating and Organizing documents for a Global Fund investor binder. 7/21/09 Analysis of additional Global Fund documents	with Sun Capital personnel, review documents and obtain exhibits. Conference call with Receivers Counsel, preparation of emails. 7/21/09 Monitoring of Sun Capital disbursements. 7/21/09 Financial analysis of Promise and Success entities for Jan through May 2009	Statements and AR Analysis. 7/21/09 Analysis of Global Value Fund documents. 7/21/09 Perform cash monitoring procedures, on site at Sun Capitals offices. Meet	fund; prepare for visit to FP offices 7/21/09 Analysis of the Promise and Success Healthcare entities. Profit and Loss	Founding Partners network. Discussion about the nature of the funds. Analysis of subscriptions and bank statements. 7/21/09 Analysis of Global Fund investor documents; internal meetings re: Global	to start additional analyses regarding asset recovery 7/20/09 Global Fund work. Analyzing documents from boxes of production and	7/20/09 Research California DSH payments 7/20/09 Review additional information received on July 19th with Dan Hughes so as	7/20/09 Monitoring of cash transactions at the offices of Sun Capital. Review of documents and procedures, meetings with Sun Capital and Promise Healthcare personnel. Conference calls with Receiver's Counsel and BDPB team members. Preparation of emails.	analyzed banking information, investor subscription and redemption information, read agreements and correspondence regarding the Fund(s), and participated in a meeting with counsel to discuss the upcoming hearing to be held in Bermuda.	7/20/09 Analysis of documents for Founding Partners Global Fund. Reviewed and	7/20/09 Discussion and analysis of the Sun entities package of documents related to operating results for the Promise and Success hospital entities.	7/19/09 Meeting with Receiver, attorneys and principals of Sun Capital to discuss asset recovery issues and obtain additional information for analysis purposes	preparation of emails and exhibits. 7/19/09 Attend meeting with Sun Capital, Sun's Counsel and investment banker and the Receiver and Receiver's Counsel to discuss settlement proposal and temporary funding. Analysis of documents and consult on negotiations.	escription Receiver's Counsel, review of documents,
0.90 150.00 2.90 150.00 3.30 150.00 3.90 150.00	2.00 150.00 2.00 95.00	4.00 300.00 8.00 300.00	3.00 300.00	3.30 250.00	5.60 150.00	1.00 300.00 4.00 300.00	9.00 300.00		4.50 300.00	4.50 300.00	8.50 300.00	8.00 300.00	Hours Rate 2.00 300.00
135.00 435.00 495.00 585.00	300.00 190.00	1,200.00 2,400.00	900.00	825.00	840.00	300.00 1,200.00	2,700.00		1,350.00	1,350.00	2,550.00	2,400.00	Amount 600.00

Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Activity Category Asset Analysis and Recovery
Dan Hughes	Joao Gomes Adam Lang	Gary Rosenthal	David Siegel	David Siegel	David Siegel	Dan Hughes	Adam Lang	Rachel Merritt Rachel Merritt	Joao Gomes Martin Prinsloo	Gary Rosenthal	David Siegel	David Siegel	Dan Hughes	Dan Hughes	Staff Name Adam Lang
administration; assistance with declaration prepared for court; analysis of box logs and indexes; review of Koslow affidavit; analysis of Global Fund shareholder register and investor files 7/24/09 Assistance to counsel with financial analysis of the Sun entities for use in related to motions and declaration filings with the court.	agreement between Hospital and SCHI 7/23/09 Monitoring Sun Capital lock box funds on site. 7/24/09 Analysis of HLP loans and other Stable Value Fund loans; email	or sun financial documents and preparation of afficient. 7/23/09 Review of lock box requirements for government accounts included in	documents to verity racts in Receiver's motion. 7/23/09 Meeting with Receiver's Counsel and Receiver to prepare affidavit. Analysis	affidavit. 7/23/09 Meeting with Receiver and Receiver's Counsel. Review of Draft motion in response to Sun Capital's motion for a TRO. Analysis of Sun financial	in response to Mr. Koslow's affidavit: 7/23/09 Analysis of lock box information received from SunTrust via email. Analysis of lock box information obtained on-line from SunTrust website. Analysis of Sun Capital financial documents and preparation of points to be included in	7/23/09 Read / analyzed Howard Koslow's 2nd affidavit. Conducted analysis related to the assertions made by Mr. Koslow. Assisted David Siegel with his affidavit	subscription documents, and misc. Global Fund work 7/23/09 Analysis of accrued interest, balance sheet and profit & loss of Sun Capital for	Capital personnel. Prepare summary of transactions. 7/22/09 Completion of Investor Binder 7/22/09 Adjustment of Cash Analysis to exclude new non-factors, work with	7/22/09 Obtained access to Bank of America lock boxes through discussion with Sun	personnel 7/22/09 Analysis of receivables reported on May hospital financials to receivables	7/22/09 Analysis of SunTrust lock box information. Conference calls with Sun Capital	referenced to subscription documents and banking records. Review of additional information located on FP computer networks. 7/22/09 Analysis of accounts receivable detail and reports received from Sun Capital.	balances due from Promise, Success, and other entities. 7/22/09 Global Fund - Analysis of investor subscriptions and redemptions cross	log of documents obtained 7/22/09 Analysis of Sun Capital financial documents relating to cash received various	Date Date Description 7/22/09 Retrieve Global Fund investor documents and other miscellaneous documents from Founding Partners' offices in Naples; prepare index and box
2.50 300.00	8.50 150.00 4.00 250.00	0.30 300.00	9.50 300.00	2.50 300.00	2.00 300.00	6.10 300.00	6.90 250.00	2.40 150.00 5.30 150.00	5.50 150.00 3.00 250.00	0.50 300.00	2.20 300.00	1.00 300.00	3.00 300.00	1.75 300.00	Hours Rate 8.00 250.00
750.00	1,275.00 1,000.00	90.00	2,850.00	750.00	600.00	1,830.00	1,725.00	360.00 795.00	825.00 750.00	150.00	660.00	300.00	900.00	525.00	Amount 2,000.00

Asset Analysis and Recovery	David Siegel David Siegel David Siegel David Siegel David Siegel David Siegel Gary Rosenthal Joao Gomes Rachel Merritt Adam Lang Dan Hughes David Siegel David Siegel David Siegel Gary Rosenthal	7/24/09 Conference calls with Receiver's counsel. 7/24/09 Conference calls with Receiver's counsel and accounting staff to discuss and amount of lock box receipts and disbursements; preparation of schedule conference calls with Receiver's counsel and accounting staff to discuss document management issues and planning. 7/24/09 Conference calls with Receiver and Receiver's Counsel; review of Receiver Receiver and Receiver and Receiver's Counsel; review of Receiver's motion in opposition to TRO, verification of numbers in Receiver's motion. 7/24/09 Meeting with Receiver and Receiver's Counsel; analysis of Sun Capital financial documents and preparation of affidavit. 7/24/09 Meeting with Receiver and Receiver's Counsel; analysis of Sun Capital financial documents and preparation of affidavit. 7/24/09 Monitoring Sun Capital lock box funds and entry/organization of data - on sil counsel to discuss issues. 7/24/09 Monitoring Sun Capital lock box funds and entry/organization of data - on sil counsel to discuss issues. 7/24/09 Analysis of boxes taken from FP office on 7.22.09 and Global Fund Investor Analysis of the Sun entities in preparation for upcoming hearings. Preliminary analysis of the Sun entities in preparation for upcoming hearings. Read / analyzed various agreements between FP and Sun for accounting purposes in anticipation of upcoming hearings. 7/27/09 Analysis of documents, identification of exhibits for hearing, preparation of schedules, preparation of emails. 7/27/09 Conference call with Receiver's Counsel to review loan documents and other key documents, identification of defaults, identification of areas of anticipated accounting testimony. 7/27/09 Analysis of Sobal Fund bank accounts & tracing of funds; analysis of Sun Capital related party loans in 2009/ tracing disbursements to bank accounts.
Asset Analysis and Recovery	David Siegel	Review of information obtained from monitor. 7/24/09 Conference calls with Martin Prinloo and Joao Gomes to determine sources
t Analysis and Kecovery	David Siegei	and amount of lock box receipts and disbursements; preparation of schedule,
Asset Analysis and Recovery	David Siegel	conterence call with Receiver's counsel. 7/24/09 Conference calls with Receiver's counsel and accounting staff to discuss
Accet Analysis and Recovery	David Slegel	document management issues and planning. 7/24/09 Preparation of email to Larry Leder requesting financial information for
Asset Analysis and Recovery	David Siegel	
	ć	
Asset Analysis and Recovery	David Siegel	
Asset Analysis and Recovery	Gary Rosenthal	
Asset Analysis and Recovery	Joao Gomes	7/24/09 Monitoring Sun Capital lock box funds and entry/organization of data - on site.
Asset Analysis and Recovery	Rachel Merritt	7/24/09 Analysis of boxes taken from FP office on 7.22.09 and Global Fund Investor Analysis
Asset Analysis and Recovery		
Asset Analysis and Recovery	Dan Hughes	7/27/09 Meeting with counsel to discuss upcoming hearing on Th. 7/30. Preliminary analysis of the Sun entities in preparation for upcoming hearings. Read / analyzed various agreements between FP and Sun for accounting purposes
Asset Analysis and Recovery	David Siegel	in anticipation of upcoming healings. 7/27/09 Analysis of documents, identification of exhibits for hearing, preparation of schedules, preparation of emails.
Asset Analysis and Recovery	David Siegel	
Asset Analysis and Recovery	Erin Auble	anticipated accounting testimony. 7/27/09 Analysis of Global Fund bank accounts & tracing of funds; analysis of Sun
Asset Analysis and Recovery	Gary Rosenthal	•
Asset Analysis and Recovery		7/27/09 Review of Counsel's memo; of
Asset Analysis and Recovery	Gary Rosenthal	7/27/09 Review of Counsel's memo; discuss issues with David Siegel, and prepare listing of items to discuss with counsel for Thursday's hearing 7/27/09 Meeting with Receiver and Receiver's Counsel; research DSH receivable

Asset Analysis and Recovery Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Activity Category Asset Analysis and Recovery
Rachel Merritt Adam Lang Dan Hughes	David Siegel Gary Rosenthal	Dan Hughes	Rachel Merritt Adam Lang	David Siegel	David Siegel	David Siegel David Siegel	David Siegel	Dan Hughes	Adam Lang	Erin Auble Gary Rosenthal Rachel Merritt	Dan Hughes David Siegel	Staff Name Adam Lang
with David Siegel 7/30/09 Analysis of Sun Trust Lock Box and GL Accounts for Sun Capital 7/31/09 Compile and analysis Global Fund shareholder register 7/31/09 Review of Sun entities documents and analysis of historical balance sheets and operating performance.	regarding activities and analysis related to Founding Partners and Sun Capital entities. Analysis of Global Fund and investor reports. 7/30/09 Conference call with Receiver and Counsel. Preparation of subpoena list. 7/30/09 Review of cataloged files to determine if information on DSH or other contract information is available that we have not reviewed to date: review of listings.	investor register; analysis of FP/Sun Capital loans 7/30/09 Responding to requests from the Receiver and/or Receiver's counsel	in interview of Phil Fues. 7/29/09 Helping with binder index and 7.22.09 box index 7/30/09 Analysis of Global Fund bank accounts; prepare combined Global fund	authored by Phil Fues. Preparation of email memo listed areas to be explored	Sun's repoining obligations and corresponding discovery request. 7/29/09 Analysis of Sun general ledgers and accounting records, preparation of	7/29/09 Analysis of loan documents: calculation of interest and default interest. 7/29/09 Analysis of REDACTED agreement, preparation of emails detailing	7/29/09 Analysis of documents, preparation of work papers to support declaration.	(LTA, SEC, etc.), uaching or payments in our Secritory and experience of the secretary secretary in the Secretary se	7/29/09 Analysis of related party loans; analysis of loans between FP and Sun Capital	testimony. 7/28/09 Preparation of document binder in support of David Siegel's declaration. 7/28/09 Research on receivables, contingent receivables, DSH receivables 7/28/09 Locating and organizing documents for September 30th hearing. Indexing	7/28/09 Financial analysis and review of documents in preparation for upcoming hearing on Thursday, July 30, 2009. 7/28/09 Analysis of documents, preparation of schedules to calculate borrowing base deficiency. Review of Judges orders. review of emails and attachments. Preparation of exhibits and work papers in support of declaration and	Tescription 7/28/09 Analysis of Sun Capital Healthcare and Sun Capital Inc. general ledgers for 2009; prepare analysis of Sun Capital related party payments; analysis of Global fund investor files; prepare support binders for Siegel Declaration
2.00 150.00 4.50 250.00 1.00 300.00	1.70 300.00 1.50 300.00	2.00 300.00	1.30 150.00 7.00 250.00	2.50 300.00	2.00 300.00	0.50 300.00 1.40 300.00	2.60 300.00	2.00 300.00	6.50 250.00	7.00 95.00 1.50 300.00 2.20 150.00	2.00 300.00 7.00 300.00	6.00 250.00
300.00 1,125.00 300.00	510.00 450.00	600.00	195.00 1,750.00	750.00	600.00	150.00 420.00	780.00	600.00	1,625,00	665.00 450.00 330.00	600.00 2,100.00	1,500.00

Forensic Accounting Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting Forensic Accounting Forensic Accounting	Forensic Accounting	Fee / Employment Applications David Siegel Fee / Employment Applications David Siegel Fee / Employment Applications David Siegel Total Fee / Employment Applications	Total Document Management	Document Management Document Management	Case Administration Case Administration Total Case Administration	Total Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Activity Category Asset Analysis and Recovery
Martin Prinsloo Martin Prinsloo	Martin Prinsloo	Martin Prinsloo	Anya Stasenko Erin Auble Martin Prinsloo	Adam Lang	David Siegel David Siegel David Siegel Cations		Dany Lowe David Siegel	David Siegel David Siegel	overy	Rachel Merritt	David Siegel David Siegel	Staff Name Dan Hughes
7/2/09 Update chain of custody and computer evidence documentation. 7/3/09 Complete the indexing of the computer evidence item FP-15- 04_FOUNDINGPART04. Setup indexing of computer evidence items image FP-15-07_FOUNDINGPART07. Backup of all cases previously created.	7/2/09 Complete the indexing of the computer evidence item FP-15- 06_FOUNDINGPART06. Setup indexing of computer evidence items image FP-15-04_FOUNDINGPART04. Backup of all cases previously created.	FF-13-00_FOUNDINGFAKTOR. 7/1/09 Continue with the review and access of documents contained on computer evidence drives.	7/1/09 Analysis of Gunlicks' investments in funds. 7/1/09 Analysis of Gunlicks' investments in funds. 7/1/09 Analysis of Gunlick's contributions and distributions in funds. 7/1/09 Complete the indexing of the computer evidence item FP-15- 03_FOUNDINGPART03. Setup indexing of computer evidence items image	7/1/09 Analysis of contributions and withdrawals; investigation and organization of	7/13/09 Preparation of detailed time records for Receiver's fee application. 7/17/09 Preparation of detailed time schedule for fee application. 7/22/09 Preparation of detailed time report for Receiver. ————————————————————————————————————	The last of the la	7/21/09 Document management. 7/31/09 Identification of documents for scanning into Receiver's document management system.	7/22/09 Meeting with Receiver to discuss case issues and status. 7/30/09 Meetings with staff to assess the status of accounting projects, preparation of memo to Receiver detailing all accounting projects.		7/31/09 Analysis of Sun Trust Bank Statements and Accounts for SCI and SCHC. Classification of GL and Lock Box Accounts. Matching Bank Accounts to GL Numbers.	7/31/09 Preparation of documents to evaluate settlement proposal. 7/31/09 Preparation of document requests for Sun Capital and Promise Healthcare.	Date: Description 7/31/09 Review of Global Fund information to assist counsel with Bermuda
0.50 250.00 1.50 250.00	1.00 250.00	4.50 250.00	6.50 150.00 2.00 95.00 0.50 250.00	8.25 250.00	1.00 300.00 1.00 300.00 1.70 300.00 3.70	2.00	0.50 95.00 1.50 300.00	0.50 300.00 3.80 300.00 4.30		5.30 150.00	2.00 300.00 2.50 300.00	Hours Rate 0.50 300.00
125.00 375.00	250.00	1,125.00	975.00 190.00 125.00	2,062.50	300.00 300.00 510.00 1,110.00	497.50	47.50 450.00	1,140.00 1,140.00 1,290.00	147,739.00	795.00	600.00 750.00	Amount 150.00

Founding Partners Receivership Detailed Time Description

Client Totals:	Out of pocket expense Total Out of pocket expense	Out of pocket expense Out of pocket expense	Out of pocket expense Out of pocket expense Out of pocket expense	Total Professional fees	Total Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting	こうこうこう はんば 医療経験 野野 大学 大学 大学 はいません ないない はんない はんない はんない はんない はんない はんない はんな
	Adam Lang Firm	Hirm David Siegel Adam Lang	Firm Martin Prinsloo Martin Prinsloo	٠		Martin Prinsloo	Julie Kaufman	Erin Auble	Richard Pollack	Martin Prinsloo	Martin Prinsloo	Julie Kaufman	Erin Auble	Martin Prinsloo	Martin Prinsloo	Julie Kaufman	Erin Auble	Richard Pollack	THE PERSON NAMED OF THE PE
	7/22/09 Tolls 7/30/09 Copy service	7/13/09 Copy service 7/19/09 Mileage to Sun Capital and back on Sunday 71@ .55 7/22/09 Mileage to Naples and back	6/12/09 Background Research 6/22/09 1 External hard drive for forensic acquisition. 6/25/09 4 External hard drives for forensic acquisition.			7/31/09 Started with the creation of a single database of all indexed case files.	7/31/09 Review and organization of production	7/31/09 Indexing Founding Partners documents.	mail discovery. 7/30/09 Analysis of case issues and discussions with staff and Counsel	7/30/09 Review indexed forensic case of server to determine extend of electronic e-	7/30/09 Convert Global Statements into electronic format.	7/30/09 Review and organization of production	7/30/09 Indexing Global Fund documents.	7/29/09 Assist with the preparation for hearing testimony.	7/29/09 Convert Global Statements into electronic format.	7/29/09 Review and organization of production	7/29/09 Indexing of Global Fund documents and preparation of email work papers	7/28/09 Review of documents.	
745.30				745.30	143,20		7.00 95.00	7.00 95.00	0.50 310.00	2.50 250.00			6.70 95.00	3.50 250.00	2.00 250.00		9.00 95.00	1.00 310.00	
180,640.04	4.00 213.30 1,088.29	39.05 60.39	45.00 128.39 522.11	179,551.75	28,915,25	875.00	665.00	665,00	155.00	625.00	625.00	855.00	636.50	875.00	500.00	308.75	855.00	310.00	

Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery
Rachel Merritt David Siegel	Dan Hughes	Adam Lang	Rachel Merritt	David Siegel	David Siegel	Adam Lang	Rachel Merritt	David Siegel	David Siegel	David Siegel	Adam Lang	Rachel Merritt	Adam Lang	David Siegel	David Siegel	David Siegel	David Siegel	Adam Lang
8/7/09 8/9/09	8/7/09	8/7/09	8/6/09	8/6/09	8/6/09	8/6/09	8/5/09	8/5/09	8/5/09	8/5/09	8/5/09	8/4/09	8/4/09	8/3/09	8/3/09	8/3/09	8/3/09	8/3/09
Classification of tax documents Analysis of Sun Capital Financial Statements and schedules, preparation of draft calculation of borrowing base deficiency as of 5/31/09.	Internal meetings and discussions regarding status of work to date and issues / analyses needed going forward.	Analysis of Global fund shareholder information; analysis of Stable Value Fund shareholder register and QuickBooks information; analysis of tax returns received	Work with binders - organizing documents for analysis.	Analysis of Focus Management Report, preparation of memo.	Analysis of loan assignment agreement and Global Fund financial	Analysis of Global Fund bank statements; prepare Global Fund investor register for counsel; prepare cash flow analysis and integrate with Global fund shareholder register	Updating and Indexing Founding Partners binders. Organizing data for Analysis.	Agreement, preparation of draft document production request. Analysis of documents from Gunlicks loan file and preparation of exhibits and work papers.	Analysis of Founding Partners/Sun Capital Credit and Security	Analysis of Focus Management report and conference call with	Statement information and identification of missing accounts. Prepare Global Fund shareholder analysis; analysis of Global Fund Outstanding The State of Control of Control of the State of Control of C	Sun Trust Bank Statement Analysis for SCI and SCHI. Verification of	paper pinder. Analysis of Global Fund investor addresses; analysis of Global Fund transfers and investor register	Analysis of Sun financial statements and accounts receivable aging reports and analyses as of 12/31/08 through 5/31/09. Preparation of exhibits and schedules in support of DJS testifying binder and work	documents from Sun Capital. Analysis of FP GLS and Sun Capital GLs, preparation of schedules to document the debt owed by Sun to FP and the increase in amounts Due from Related Parties as reflected in the accounting records of Sun.	Analysis of emails related to Founding Partners and Sun Capital. Preparation of exhibits and work papers to document efforts to obtain	Capting, alialysis of missing pains account information Review of documents including FP correspondence with Sun and Accurate soluted to the Credit and Security corresponds.	Update shareholder register for Global Fund; analysis of investor addresses in Global Fund; analysis of REDACTED from Sun
1.10 1.50	0.50	6.50		2.50	1.50 3	5.00 2	1.00	2.70 3	2.30 3	0.50 3	3.80 2	2.90 1	6.00 250.00	4.50 300.00	1.50 3	1.50 3	1.00 300.00	6.00 2
150.00 300.00	300.00	250.00	150.00	300.00	300.00	250.00	150.00	300.00	300.00	300.00	250.00	150.00	250.00	300.00	300.00	300.00	300.00	250.00
165.00 450.00	150.00	1,625.00	345.00	750.00	450.00	1,250.00	150.00	810.00	690.00	150.00	950.00	435.00	1,500.00	1,350.00	450.00	450.00	300.00	1,500.00

Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery		Asset Analysis and Recovery	Asset Analysis and Recovery		Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Activity Category
Anya Stasenko David Siegel	Adam Lang	Rachel Merritt	David Siegel	Adam Lang	David Siegel	Anya Stasenko		Adam Lang	David Siegel		Adam:Lang	David Siegel	Adam Lang	David Siegel	David Siegel	David Siegel	Adam Lang	Staff Name
8/17/09 8/17/09 REI	8/17/09	8/14/09	8/14/09	8/14/09	8/13/09	8/13/09		8/13/09	8/12/09		8/12/09	8/11/09	8/11/09	8/10/09	8/10/09	8/10/09	8/10/09	Date
Analysis of Global Fund bank transactions, preparation of schedule Analysis of agreement, REDACTEDagreement and REDACTED agreement between Global Fund and FP SVF and related documents. Conference call with Receiver's Counsel; preparation of email memo.	Analysis of Global Fund investment in Stable Value Fund; search of FP network for documents: analysis of SVF K-1's	In FP SVF and letter to Sun Capitalis Counsel. Sorting and Organizing Emails and: REDACTED	Conference calls with Receiver's Counsel and Adam Lang to discuss REDACTED agreement and issues related to Global Fund's investment	preparation or memo explaining documents. Analysis of Stable Value Fund books and records; analysis of payments	Conference call with Receiver's Counsel, analysis of REDACTED agreement, organization chart and other documents, assist Counsel with	Analysis of Global Fund bank transactions, preparation of schedule	Global Fund memorandum; analysis of Global fund redemptions/subscriptions per financial statements; analysis of Global Fund bank statements and cash flows	Capital's weekly reports. Prepare analysis of Global Fund investor with US addresses; update	Preparation of email to Receiver's Counsel to suggest content of Sun	request; phone call with receiver's counsel re: Global Fund analyses; prepare analysis of Global Fund investor addresses; prepare analysis of Global Fund Bermuda bank balances; Global Fund source/use analysis and analysis of transfers between Global Fund and Stable Value Fund	borrowing base deficiency and exhibits for subpoena. Prepare memo on Global Fund analyses in re: Bermuda attorney's	Analysis of SCI C&S agreement, general ledger, aging reports and accounts receivable analysis. Preparation of schedule to calculate	Analysis of Global fund redemptions and subscriptions; phone call with receiver's counsel; analysis of Global Fund bank statements and payees	conference calls with Receiver's Counsel. Meeting with Receiver's Counsel to continue preparation of Sun Capital document request/subpoena. Review of agreement, schedules and Sun Capital records, identification of exhibits.	Analysis of Sun Capital financial records and documents, preparation of schedules to calculate borrowing base deficiencies for SCHI and SCI;	Analysis of Sun Capital accounting records and loan documents to prepare for meeting with Receiver's Counsel	Analysis of Global Fund payees; analysis of subscriptions and redemptions	
5.00 7.30	8.20	2.50	1.50	5.00		0.70		7.00	0.30		8.20	3.00	8.50	2.30	1.50	1.20	2.80	
150.00 300.00	250.00	150.00	300.00	250.00	300.00	150.00		7.00 250.00	300.00		8.20 250.00	300.00	250.00	2.30 300.00	300.00	1.20 300.00	250.00	
750.00 2,190.00	2,050.00	375.00	450.00	1,250.00	750.00	105.00		1,750.00	90.00		2,050.00	900.00	2,125.00	690.00	450.00	360.00	700.00	Amount

Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery	Asset Analysis and Recovery Asset Analysis and Recovery	Asset Analysis and Recovery	Activity Category Asset Analysis and Recovery
Anya Stasenko	Rachel Merritt Adam Lang	David Siegel David Siegel	David Siegel	Anya Stasenko	Adam Lang	Dan Hughes David Siegel	Anya Stasenko	Adam Lang	David Siegel	Dan Hughes David Siegel	Adam Lang	David Siegel	Anya Stasenko	Adam Lang	Anya Stasenko David Siegel	Adam Lang	Staff Name Martin Prinsloo
8/25/09	8/24/09 8/25/09	8/24/09 8/24/09	8/24/09	8/24/09	8/24/09	8/21/09 8/21/09	8/21/09	8/21/09	8/20/09	8/20/09 8/20/09	8/20/09	8/19/09	8/19/09	8/19/09	8/18/09 8/18/09	8/18/09	Date 8/17/09
and tax returns Analysis of investor Form K-1's for 2004 through 06 preparation of schedule	production requests for subpoenas. FP email administration - organizing emails for analysis. Analysis of Sun Capital financial statements; analysis of FPSVF K-1's	request for specific issue. Analysis of lock box data. Meeting with Receiver's Counsel and assist with preparing document	Conference call with Receiver's Counsel and preparation of document	redemptions; analysis of SVFII & Equity Fund General ledgers from inception; search for documents pursuant to counsel requests Analysis of investor Form K-1's for 2004 through 06 preparation of schedule	between Sun and FP. Analysis of SVF, SVFII and Equity Fund shareholder contributions and	Read correspondence and analysis of Sun Capital documents Review of schedules with Receiver's Counsel related to cash flow	organization of documents; analysis of K-1's and tax returns Analysis of investor Form K-1's for 2004 through 06 preparation of	and SCH, preparation of schedules and emails. Analysis of cash flow between Sun Capital and Stable Value;	Conference calls with Receiver's counsel regarding litigation issues and Sun Capital loan defaults. Analysis of cash flow between, FP SVF, SCI	Read correspondence and analysis of Sun Capital documents Analysis of Sun Capital accounting records and search for transactions related to SCF	Analysis of cash flow between Sun Capital and Founding Partner Stable Value	Analysis of FPSVF cash flow related to Sun Capital loans. Preparation of schedules	Analysis of investor Form K-1's for 2004 through 06 preparation of	proposal. Analysis of Stable Value shareholders contributions and redemptions- prepare investor register; analysis of SV K-1's; analysis of cash flows between Sun Capital and FP Stable Value fund	Analysis of Global Fund bank transactions, preparation of schedule Conference call with Receiver's Counsel, analysis of settlement	Analysis of Stable Value fund investments in Global fund; analysis of Stable Value fund investor contributions and redemptions	Description m for documents related to REDACTED Agreement
5.00 150	0.20 150 1.20 250	1.00 300 3.00 300	1.00 300	7.00 150	6.70 250	1.00 300.00 1.00 300.00	6.50 150	3.00 250	3.00 300.00	1.00 300.00 0.50 300.00	6.50 250.00	1.00 300.00	6.50 150.00	7.00 250.00	3.00 150.00 0.50 300.00	4.50 250.00	Hours Rate 3.00 250.00
150.00 750.00	30.00 250.00 300.00	300.00 300.00 300.00 900.00	300.00 300.00	150.00 1,050.00	250.00 1,675.00	300.00 300.00 300.00	150.00 975.00	250.00 750.00	3,00 900.00	300.00 300.00 150.00	1,625.00	300.00),00 975,00	1,750.00	.00 450.00 150.00	1,125.00	te Amount 750.00

Activity Category Asset Analysis and Recovery Asset Analysis and Recovery Asset Analysis and Recovery Asset Analysis and Recovery Asset Analysis and Recovery	David Siegel Rachel Merritt Adam Lang David Siegel David Siegel	8/25/09 8/25/09 8/25/09 8/26/09 8/26/09	Analysis of Sun Capital financial statements and schedules. Conference calls with Receiver and Receiver's Counsel. Preparation of emails and work papers. Scanning Tax Returns and other organization tasks. Phone call with ; analysis of Sun Capital financial statement documents REDACTED Preparation of questions and conference call with REDACTED Counsel. Analysis of Sun Capital documents, conference call with Receiver and Receiver's Counsel. regarding Sun Capital litigation. Preparation of	Hours Rate 4.00 300.00 1.00 150.00 1.80 250.00 1.00 300.00 2.50 300.00
Asset Analysis and Recovery	Adam Lang	8/27/09	Analysis of Stable Value shareholder register from inception through 2009; search for documents	8.00 250.00
Asset Analysis and Recovery	Adam Lang	8/28/09	Analysis of FP Stable Value K-1's and general ledger activity- comparison of tax to book; analysis of Hybrid Value and SFVII K-1s	5.70 250.00
Asset Analysis and Recovery	Anya Stasenko	8/28/09	Analysis of investor Form K-1's for 2004 through 06 preparation of schedule	4.00 150.00
Asset Analysis and Recovery	Anya Stasenko	8/31/09	Analysis of investor Form K-1's for 2004 through 06 preparation of schedule	2.50 150.00
Asset Analysis and Recovery	David Siegel	8/31/09	Preparation of document request for subpoena to Promise Healthcare.	
Asset Analysis and Recovery	David Siegel	8/31/09	Analysis of emails and documents identified on Founding Partners	4.50 300.00
			Sun Capital litigation issues. Preparation of exhibits and work papers.	
Asset Analysis and Recovery	Sharon Foote	8/31/09	Obtain RMA data for NAICS 622110 and check for availability of First Research Industry Profile.	0.50 195.00
Computer Forensics	Martin Prinsloo	8/3/09	Research the hosting of the Microsoft Exchange Server of Founding	2.00 250.00
Computer Forensics	Martin Prinsloo	8/3/09	Continue with the creation of combined database of all drive evidence.	2.50 250.00
Computer Forensics	Martin Prinsloo	8/4/09	Continue with the creation of combined database of all drive evidence.	1.50 250.00
Computer Forensics	Martin Prinsloo	8/7/09	Continue with the creation of combined database of all drive evidence.	2.50 250.00
Computer Forensics	Martin Prinsloo	8/14/09	Complete excel database of Data files for review by counsel. Includes deduplicated Excel, PDF, Access, QuickBooks and Word files.	3.00 250.00
Computer Forensics Computer Forensics	Martin Prinsloo Martin Prinsloo	8/24/09 8/27/09	Prepare and discuss keyword search term list for e-mails. Search for and convert Lotus 123 files based on discussion with REDACTED	1.50 250.00 1.00 250.00
Computer Forensics Computer Forensics	Martin Prinsloo Martin Prinsloo	8/27/09 8/27/09	Update and finalize report of applied search terms. Start processing of e-mails to enable application of search terms and deduction.	1.50 250.00 1.50 250.00
Computer Forensics	Martin Prinsloo	8/28/09	Transfer custody of original evidence drives (FP-15, FP-16, FP-17 and FP-18) back to counsel.	
Computer Forensics	Martin Prinsloo	8/28/09	Continue conversion of Lotus 123 files to enable further analysis.	1.50 250.00

Activity Category	Staff Name	Date	Description	Hours Rate	Amount
Computer Forensics	Martin Prinsloo	8/28/09	Continue processing of e-mails to enable application of search terms and deduplication. Continue with the export pst files from evidence	5.50 250.00	1,375.00
Computer Forensics	Martin Prinsloo	8/31/09	Download tax document from Larson Allen LLP ftp site.		125.00
Computer Forensics	Martin Prinsloo	8/31/09	Update SunTrust Lockbox transaction database.	1.50 250.00	375.00 1 125.00
Computer Forensics	Mai ill F Hilsloo	0/0.1/00	and evidence listing.		1, 12000
Fee / Employment Applications	David Siegel	8/10/09	Analysis of detailed time and preparation of schedule for inclusion in	2.10 300.00	630.00
Fee / Employment Applications	David Siegel	8/11/09	Receiver's fee application. Analysis of detailed time descriptions and back up invoices for out of	1.50 300.00	450.00
			pocket expenses, preparation of schedule for Receiver's fee application.		
Forensic Accounting	Dan Hughes	8/3/09	Reviewed discovery requests regarding SCHI and SCI. Analysis and	1.00 300.00	300.00
			research regarding Global Fund.		
Forensic Accounting	Erin Auble	8/3/09	Preparing index for and organizing Global Fund files		684.00
Forensic Accounting	Julie Kaufman	8/3/09	Review and Organization of Production	4.50 95.00	427.50
Forensic Accounting	Dan Hughes	8/4/09	Reviewed pleadings and document request lists and status reports.	0.50 300.00	150.00
Forensic Accounting	Erin Auble	8/4/09	Preparing an index of investor addresses	4.00 95.00	380.00
Forensic Accounting	Julie Kaufman	8/4/09	Review and Organization of Production		380.00
Forensic Accounting	Martin Prinsloo	8/4/09	Assist with the preparation of Global fund bank statement transaction	2.00 250.00	500.00
Forensic Accounting	Dan Hughes	8/5/09	Analysis and review of financial documents regarding borrowing base,	0.50 300.00	150.00
Forensic Accounting	Frin Auble	8/5/09	loan availability, detaults, etc.	3.00 95.00	285,00
Forensic Accounting	Julie Kaufman	8/5/09	Review & Organization of Production		380.00
Forensic Accounting	Erin Auble	8/6/09	Preparing index for and organizing Global Fund files		285.00
Forensic Accounting	Martin Prinsloo	8/6/09	Assist with the preparation of Global fund bank statement transaction	1.50 250.00	375.00
			database.		21
Forensic Accounting	Martin Prinsloo	8/6/09	Continue with the creation of combined database of all drive evidence.	1.50 250.00	375.00
Forensic Accounting	Scott Bouchner	8/6/09	Discussion of case status	0.70 300.00	210.00
Forensic Accounting	David Siegel	8/7/09	Analysis of stockholder transactions, conference call with Receiver,	1.00 300.00	300.00
Forensic Accounting	Erin Auble	8/7/09	Contended calls with investor's CFA Preparing index for and organizing Global Fund files	3.00 95.00	285.00
Forensic Accounting	Julie Kaufman	8/7/09	Review and Organization of Production		190.00
Forensic Accounting	Dan Hughes	8/10/09	Reviewed various discovery requests and provided comments and/or		300.00
		0000	analysis to counsel.		500 00
Forensic Accounting	Martin Fillision	8/40/09	Assist will setup will adiabases alla payer analysis.		310.00
Forensic Accounting	Dan Hinghes	8/11/09	Richal Fund Bermida case analysis and conference call with counsel	2.50 300.00	750.00
ו סופויסוס ליכיסמו וווי פּ	Dan Laginos	0	regarding the status of our work to date.		
Forensic Accounting	Martin Prinsloo	8/11/09	Update transaction database of Lockbox account for Sun Capital	1.50 250.00	375.00
Forensic Accounting	Dan Hinhes	8/12/09	Accounts. Analysis of Global Fund documents and accounting records.	2.00 300.00	600,00
Forensic Accounting	David Siegel	8/12/09	Review of memo and schedules related to FP Global Fund and the		510.00
		!	REDACTED 3. Conference calls with Adam Lang		

to discuss issues and edit memo and schedules.

Tax Issues	Tax Issues	Tax Issues Tax Issues	Tax Issues	7	Forensic Accounting	Forensic Accounting	Forensic Accounting	Forensic Accounting		Forensic Accounting	Doropsio Association	Forensic Accounting	Forensic Accounting	Forensic Accounting	normalia Appointing	Forensic Accounting	Forensic Accounting Forensic Accounting	:	Forensic Accounting	Forensic Accounting	Forensic Accounting		Forensic Accounting			ć	Forensic Accounting Forensic Accounting	Activity Category
Adam Lang	Dustin Grizzle	Adam Lang David Siegel	David Siegel		David Siegel	Scott Bouchner	David Siegel	David Siegel	! !	Martin Prinsloo	Markin Dringloo	Martin Prinsloo	Martin Prinsloo	Richard Pollack	Martin Dringloo	Martin Prinsloo	Richard Pollack David Siegel		Martin Prinsloo	Martin Principo	Whitney Schiffer David Siegel		Martin Prinsloo				Richard Pollack David Siegel	
8/14/09	8/10/09	8/10/09 8/10/09	8/7/09	00700	8/28/09	8/27/09	8/27/09	8/27/09		8/26/09	8/36/00	8/26/09	8/26/09	8/25/09	8/25/00	8/24/09	8/19/09 8/24/09		8/19/09	8/19/09	8/18/09 8/19/09		8/18/09				8/17/09	Date
Assist tax department with compilation of tax information and prior year tax returns for all receivership entities	and records needed to prepare zono tax returns. Tax consulting re: Tax return preparation, QB files, GL analysis, and Open Items	Assist tax department with compiling tax return information Conference calls with members of tax department to identify documents	Analysis of tax issues.	Receiver and Receiver's Counsel.	Analysis of accuments identified by searches on Founding Partners computers, preparation of exhibits and emails, Conference calls with		Analysis of emails and attachments, preparation of work papers.	Analysis of documents obtained from FP's computers by word searches. Preparation of exhibits and work papers.	schedule and chart.	Update SunTrust Lockbox transaction database. Prepare summary	results. Search for selected documents. Propose hinder of Sun Control Einspeid Statements	o evide		Meetings with staff, review of documents and case management	2009. Indate ConTract Lockbox transaction database	Discuss Lockbox transactions and database with counsel. Prepare	Meetings with staff, review of documents and case management Analysis of FP SVF partner transactions, preparation of schedules.		Update SunTrust Lockbox receipt transactions database and summary.	between FFC and Ext. Analysis of general leager and FF SVF accounting records. Conference call with Receiver's Counsel related to issues with Global Fund REDACTED Discuss electronic discovery with counsel and vendor	Meeting with David Siegel regarding REDACTED agreements. Review of Jagreement, agreement and emails agreement and EB SVE	á	Assist with the preparation of shareholder databases. Discuss electronic	analysis of tax opinions, conference call with Receiver's Counsel, meetings with Audit and Tax Directors.	financial statements and tax returns of GF and SVF, analysis of journal entries in SVF GL, analysis of correspondence between FPC and E&Y,	participation agreement, withdrawal and assignment agreements,	Meetings with staff, review of documents and case management Investigation of investments of Global Fund in SVF. analysis of	
1.50 2	3.50 18	0.50 2t 0.90 3t	0.50 30		5.50 J			4.50 30		1.00 25				1.00 31			1.00 31 1.00 30		2.50 25		3.60 30		2.50 25				1.00 31 8.50 30	7.000
250.00 37	150.00 52	250.00 12t 300.00 27t	300.00 150		300.00 1,650.00			300.00 1,350.00	•	250.00 250				310.00 310		_	310.00 310 300.00 300		250.00 625		300.00 210.00		250.00 625				310.00 310.00 300.00 2.550.00	Amou
375.00	525.00	125.00 270.00	150.00	3	0.00	150.00	300.00	0.00		250.00	350 00	875.00	125.00	310.00	3	0.00	310.00) }	625.00	125 00	080.00	, }	625.00				310.00 550.00	

Tax Issues	Tax Issues Tax Issues Tax Issues	Tax Issues	Tax Issues Tax Issues Tax Issues	Tax Issues Tax Issues	Tax Issues Tax Issues Tax Issues Tax Issues	Tax Issues Tax Issues	Tax Issues Tax Issues Tax Issues
							Activity Category S
Adam Lang Andreea Cioara Andreea Cioara Benjamin Myers David Siegel Dustin Grizzle Joel Glick Andreea Cioara	David Oleger Dustin Grizzle Andreea Cioara Adam Lang	David Siegel	Dustin Grizzle Andreea Cioara Benjamin Myers	Andreea Cioara David Siegel	Dustin Grizzle Andreea Cioara Anya Stasenko David Siegel	Adam Lang Art Dichter	Staff Name Art Dichter David Siegel Dustin Grizzle
8/24/09 8/24/09 8/24/09 8/24/09 8/24/09 8/24/09 8/24/09 8/25/09	8/21/09 8/22/09 8/23/09	8/21/09	8/20/09 8/21/09 8/21/09	8/20/09 8/20/09	8/18/09 8/19/09 8/19/09 8/19/09	8/18/09	Date 8/17/09 8/17/09 8/17/09
Search for K-1's, addresses and general investor information Run conflict checks with Tax Counsel Review of prior years tax returns and issues. Preparation of Form 1065 for the year ended December 31, 2008. Analysis of tax issues, and conference calls with tax staff. Prepared 1065 for the year ended 12/31/2008 Correspond with former tax preparer to request prior year work papers Review of correspondence	available to Receiver related to the filing of 2008 tax returns. Tax consulting re: current year tax preparation Tax research, various emails Analysis of SVF, SVFII and Equity Fund contributions and redemptions for 2008; analysis of Partner K-1 information for all 3 funds	call with Receiver and Receiver's Counsel related to filing 2008 tax returns. Preparation of draft memo for Receiver's use in notifying limited partners as to tax issues. Conference calls with Tay Counsel and RDPR tay director as to options	Conference call with Receiver to discuss the plan for meeting the tax filing requirements and notifying limited partners. Tax consulting re: review of prior year tax returns Calls with Receiver, Tax Counsel, David Siegel, tax research. Review of FP files and identification and retrieval of Tax Returns and tax documents.	emails and preparation of memo. Meeting with David Siegel, plan of tax return filing, calls with Receiver, letter to Receiver. Review of tax returns, meeting with Andreea Cioara to review Founding Partners Tax filing requirements and issues involving the 2008 returns.	Tax consulting re: review of prior year tax returns and correspondence with Receiver's staff. Engagement planning Assist tax department with compilation of prior year returns Conference call with Receiver and investor's CPA. Research IRS code to determine limited partner rights to tax return information. Review of	Assist tax department with gathering tax documents; compile prior year tax returns and information for Stable Value Fund, Equity Fund and FPCMC Review documents relating US tax exposure to Founding Partners Global Fund Ltd.	Meeting with David Siegel for briefing on tax issues in case Conference call with Receiver, analysis of tax opinions prepared by Mayer Brown, preparation of emails and meeting with Art Dichter of tax department. Tax consulting re: review of PY tax returns.
1.00 0.50 1.00 6.00 0.50 2.50 0.70 0.50		2.00		4.00 3.00	1.00 0.50 1.50 2.90		Hours 0.50 2.00
250.00 300.00 300.00 120.00 300.00 150.00 250.00 300.00	150.00 300.00 250.00	300.00	150.00 300.00 120.00	300.00	150.00 300.00 150.00 300.00	250.00	Rate Am 300.00 300.00
250.00 150.00 300.00 720.00 150.00 375.00 175.00 150.00	300.00 300.00 550.00	750.00	75.00 750.00 276.00	1,200.00 900.00	150.00 150.00 225.00 870.00	250.00 450.00	Amount 150.00 600.00 225.00

Client Totals:		Tax Issues	Tax Issues	Tax Issues	Tax Issues		Tax Issues	Tax Issues		Tax Issues	Tax Issues		Tax Issues		Tax Issues	Tax Issues	Tax Issues	Tax Issues	Tax Issues	Activity Category
																· ·				ategory
		David Siegel	Andreea Cioara	Andreea Cioara	Dustin Grizzle		David Siegel	Andreea Cioara		David Siegel	David Siegel		Andreea Cioara		David Siegel	Andreea Cioara	Adam Lang	Dustin Grizzle	Anya Stasenko	Staff Name
		8/31/09	8/31/09	8/29/09	8/28/09		8/28/09	8/28/09		8/27/09	8/27/09		8/27/09		8/26/09	8/26/09	8/26/09	8/25/09	8/25/09	Date
A	Preparation of email to former CPA to request information.	Conference calls with Receiver and FPSVF investor related to 2008 K-1.	Review of prior years tax returns and issues.	Review of prior years tax returns and issues.	Prepared 1065 for the year ended 12/31/2008	preparation of proposed revisions to investor tax disclosure.	Analysis of tax issues, conference calls with Receiver and Tax Director,	1 hr review of letter to investors. 1 hr review of returns	returns.	Meeting with Receiver to discuss issues and alternatives with 2008	Meeting with Tax Director to discuss issues with 2008 returns.	Receiver, calls with Tax Counsel	Review of prior year tax returns, information requests, meeting with	regarding tax issues.	Review of and preparation of emails and conference call with Receiver	Information request, started preparation of tax returns	Investigate status of 2008 tax returns and K-1's for tax department	Prepared 1065 for the year ended 12/31/2008	Assist tax department with compilation of prior year returns	Description
451.10		1.00 300.00	1.00 300.00	1.00 300.00	5.20 150.00		1.50 300.00	2.00 300.00		1.50 300.00	1.00 300.00		3.00 300.00		1.50 300.00	1.50 300.00	0.70 250.00	1.00 150.00	2.50 150.00	Hours Rate
106,800.00		300.00	300.00	300.00	780.00		450.00	600.00		450.00	300.00		900.00		450.00	450.00	175.00	150.00	375.00	Amount