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Counsel for the Receiver

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DWAYNE EDWARDS; TODD BARKER;
SENIOR SOLUTIONS OF SOCIAL CIRCLE,
LLC; OXTON PLACE OF DOUGLAS, LLC,
d/b/a OXTON REAL ESTATE OF DOUGLAS,
LLC; ROME ALF, LLC; SAVANNAH ALF,
LLC; GAINESVILLE ALF, LLC; WATERFORD
PLACE ALF, LLC; MONTGOMERY ALF, LLC;
COLUMBUS ALF, LLC; and OPELIKA ALF,
LLC,

Defendants,

-and-

OXTON SENIOR LIVING, LLC; MANOR
HOUSE SENIOR LIVING, LLC; SUSAN
EDWARDS, a/k/a SUSAN ROGERS; SHARON
NUNAMAKER, a/k/a SHARON HADDEN; and
SDH DESIGN, LLC,

Relief Defendants.

Case No. 2:17-cv-393-ES-SCM

**SUMMARY OF HEALTHCARE
MANAGEMENT PARTNERS, LLC'S
NINTH INTERIM FEE APPLICATION
FOR COMPENSATION FOR
SERVICES RENDERED AND
REIMBURSEMENT OF COSTS AND
EXPENSES INCURRED AS ADVISOR
TO THE RECEIVER FOR THE
PERIOD FROM APRIL 1, 2019
THROUGH JUNE 30, 2019**

Motion Day: September 16, 2019

Objection Deadline: September 3, 2019

Name of Applicant: Healthcare Management Partners, LLC

Authorized to provide professional services to: Derek Pierce, as court-appointed receiver

Date of Retention: March 29, 2017, effective as of January 20, 2017¹

Period for which compensation and reimbursement are sought April 1, 2019 through June 30, 2019

Amount of compensation sought as actual, reasonable, and necessary \$2,495.00

Amount of expense reimbursement sought as actual, reasonable, and necessary \$0.00

This is an interim application.

¹ On the effective date of Healthcare Management Partners, LLC's ("**HMP**") retention in this case, HMP was currently serving as receiver with the Receiver in state court receiverships relating to several of the entities that are now subject to these receivership proceedings.

4817-9167-6317.1

Fees and Expenses Requested by Month

<u>Time Period</u>	<u>Fees Requested</u>	<u>Expenses Requested</u>
April 1, 2019 through April 30, 2019	\$1,460.00	\$0.00
May 1, 2019 through May 31, 2019	\$792.50	\$0.00
June 1, 2019 through June 30, 2019	\$242.50	\$0.00
<u>TOTAL</u>	\$2,495.00	\$0.00

Compensable Time by Professional
From April 1, 2019 through June 30, 2019

Professional	Title	Hours	Fees
Derek Pierce	Managing Director	0.60	\$300.00
Lauren R. Douglas	Director	1.70	\$617.50
Tyler L. Brasher	Director	5.65	\$1,412.50
Ward Tishler	Senior Associate	0.60	\$165.00
Total		8.55	\$2,495.00

Compensation by Project Category
From April 1, 2019 through June 30, 2019

<u>Project Category</u>	<u>Hours</u>	<u>Fees</u>
Administration; Case Administration (B110)	8.55	\$2,495.00
TOTAL	8.55	\$2,495.00

Expense Summary
From April 1, 2019 through June 30, 2019

None.

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NUNAMAKER, a/k/a SHARON HADDEN; and
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Relief Defendants.

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**HEALTHCARE MANAGEMENT
PARTNERS, LLC'S NINTH INTERIM
FEE APPLICATION FOR
COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT
OF COSTS AND EXPENSES
INCURRED AS ADVISOR TO THE
RECEIVER FOR THE PERIOD FROM
APRIL 1, 2019 THROUGH JUNE 30,
2019**

Motion Day: September 16, 2019

Objection Deadline: September 3, 2019

Healthcare Management Partners, LLC ("**HMP**"), advisor to the court-appointed receiver (the "**Receiver**") in the above-captioned civil action, by and through the Receiver's counsel, submits this interim fee application (the "**Interim Fee Application**") for compensation for

services rendered and reimbursement of costs and expenses, pursuant to paragraphs 62 through 65 of the *Order Appointing Receiver* (Dkt. No. 7) (the “**Receiver Order**”), for compensation for services rendered and reimbursement of costs and expenses incurred during the period from April 1, 2019 through June 30, 2019 (the “**Application Period**”) as advisor to the Receiver and, in support of this application, HMP respectfully states as follows:

BACKGROUND

1. On January 20, 2017, the Securities and Exchange Commission (the “**SEC**”) filed the *Complaint* (Dkt. No. 1), commencing the above-captioned action.

2. Pursuant to the Receiver Order, the Receiver has had exclusive jurisdiction and control over:

- a. Senior Solutions of Social Circle, LLC, Montgomery ALF, LLC and all of their respective assets, since entry of the Receiver Order;
- b. Oxtan Place of Douglas, LLC, d/b/a Oxtan Real Estate of Douglas, LLC, Gainesville ALF, LLC, and all of their respective assets, since January 25, 2017; and
- c. Waterford Place ALF, LLC and all of its assets, since April 6, 2017;
- d. Savannah ALF, LLC and all of its assets, since April 12, 2017;
- e. Rome ALF, LLC, Columbus ALF, LLC, and all of their respective assets, since April 26, 2017; and
- f. Opelika ALF, LLC and all of its respective assets, since June 2, 2017.

3. At all times during the Application Period, the Receiver has undertaken to take exclusive possession and control of all assets comprising the Receivership Estate.

4. Since the Receiver’s appointment, the Receiver undertook a marketing and sale process for the assets comprising the Receivership Estate, took steps to assure the safety and security of the residents of each of the Receivership Entities, analyzed and prepared forward looking financials for each of the Receivership Entities, and otherwise made progress in

stabilizing and normalizing the operations of each Receivership Entity, which efforts culminated in the sale of substantially all assets of the Receivership Estate.

5. In addition, the Receiver has been investigating the actions of the above-captioned defendants with respect to their operation of the Receivership Entities and, in particular, the allegations set forth in the Complaint.

6. As advisors to the Receiver, HMP has provided services facilitating and assisting the Receiver with the foregoing and generally assisting the Receiver in fulfilling his duties and obligations under the Federal Receiver Order.

7. To the extent services benefit only a single facility, HMP professionals have billed time solely to that facility.

8. To the extent services provided by HMP are of general benefit to all of the facilities, HMP has billed such time to a general matter with the intention of splitting the fees and costs associated with such services evenly across the facilities.

9. HMP maintains computerized time records of the time spent by all HMP professionals and paraprofessionals in connection with its services for the Receiver.

10. HMP's computerized time records reflect the category of the services provided, the date services were performed, the name of the professionals and paraprofessionals who rendered the services, a description of the services provided, the amount of time expended, and the cost of such services.

11. As set forth in greater detail below, HMP's activities on behalf of the Receiver with respect to the Receivership Estate during the Application Period were substantial, beneficial, and necessary for the Receiver and the fulfillment of the Receiver's duties and

obligations as receiver, and HMP's activities were in the best interests of the Receivership Estate.

12. HMP's activities on behalf of the Receiver are summarized for each month during the Application Period as set forth below.

13. Attached as **Exhibit A** to this application are computerized time records reflecting the services provided by HMP during the Application Period.

14. HMP has not previously submitted an interim fee application (or other fee application) for the Application Period.

15. To date, HMP has not taken any draws or otherwise been paid for services rendered to the Receiver during the Application Period.

DESCRIPTION OF SERVICES AND EXPENSES FOR APRIL 2019

16. During April 2019, HMP spent 5.00 hours providing services to the Receivership Estate, resulting in \$1,460.00 in fees and \$0.00 in expenses.

17. The services rendered by HMP during April 2019 were rendered by HMP professionals as follows:

<u>Professional</u>	<u>Hours</u>	<u>Fees</u>
Derek Pierce	0.10	\$52.50
Lauren R. Douglas	1.60	\$582.50
Tyler L. Brasher	3.30	\$825.00

18. The services rendered by HMP during April 2019 were categorized by project category as follows:

<u>Project Category</u>	<u>Hours</u>	<u>Fees</u>
Administration; Case Administration (B110)	5.00	\$1,460.00

19. The services rendered by HMP during April 2019 were rendered with respect to each Receivership Entity or matter as follows:

<u>Receivership Entity/Matter</u>	<u>Hours</u>	<u>Fees</u>
General Matters	4.2	\$1,145.00
Oxton Place of Douglas, LLC	0.7	\$262.50
Senior Solutions of Social Circle, LLC	0.1	\$52.50

20. No expenses were incurred by HMP in connection with the services provided in April 2019.

21. The data used for the foregoing descriptions came directly from computer printouts that are kept on each HMP client.

22. True and exact copies of HMP's computerized records reflecting the foregoing are attached to this Interim Fee Application as **Exhibit A** and are incorporated in this paragraph by reference.

23. The services provided by HMP as set forth above are set forth in greater detail in the computerized records in **Exhibit A**.

DESCRIPTION OF SERVICES AND EXPENSES FOR MAY 2019

24. During May 2019, HMP spent 2.85 hours providing services to the Receivership Estate, resulting in \$792.50 in fees and \$0.00 in expenses..

25. The services rendered by HMP during May 2019 were rendered by HMP professionals as follows:

<u>Professional</u>	<u>Hours</u>	<u>Fees</u>
Derek Pierce	0.2	\$105.00

Lauren R. Douglas	0.1	\$35.00
Tyler L. Brasher	1.95	\$487.50
Ward Tishler	0.6	\$165.00

26. The services rendered by HMP during May 2019 were categorized by project category as follows:

<u>Project Category</u>	<u>Hours</u>	<u>Fees</u>
Administration; Case Administration (B110)	2.85	\$792.50

27. The services rendered by HMP during May 2019 were rendered with respect to each Receivership Entity or matter as follows:

<u>Receivership Entity</u>	<u>Hours</u>	<u>Fees</u>
General Matters	2.85	\$792.50

28. No expenses were incurred by HMP in connection with the services provided in May 2019.

29. The data used for the foregoing descriptions came directly from computer printouts that are kept on each HMP client.

30. True and exact copies of HMP's computerized records reflecting the foregoing are attached to this Interim Fee Application as **Exhibit A** and are incorporated in this paragraph by reference.

31. The services provided by HMP as set forth above are set forth in greater detail in the computerized records in **Exhibit A**.

DESCRIPTION OF SERVICES AND EXPENSES FOR JUNE 2019

32. During June 2019, HMP spent 0.70 hours providing services to the Receivership Estate, resulting in \$242.50 in fees and \$0.00 in expenses.

33. The services rendered by HMP during June 2019 were rendered by HMP professionals as follows:

<u>Professional</u>	<u>Hours</u>	<u>Fees</u>
Derek Pierce	0.3	\$142.50
Tyler L. Brasher	0.4	\$100.00

34. The services rendered by HMP during June 2019 were categorized by project category as follows:

<u>Project Category</u>	<u>Hours</u>	<u>Fees</u>
Administration; Case Administration (B110)	0.7	\$242.50

35. The services rendered by HMP during June 2019 were rendered with respect to each Receivership Entity or matter as follows:

<u>Receivership Entity</u>	<u>Hours</u>	<u>Fees</u>
General Matters	0.7	\$242.50

36. No expenses were incurred by HMP in connection with the services provided in June 2019.

37. The data used for the foregoing descriptions came directly from computer printouts that are kept on each HMP client.

38. True and exact copies of HMP's computerized records reflecting the foregoing are attached to this Interim Fee Application as Exhibit A and are incorporated in this paragraph by reference.

39. The services provided by HMP as set forth above are set forth in greater detail in the computerized records in Exhibit A.

TERMS AND CONDITIONS OF COMPENSATION

40. Subject to this court's approval, HMP seeks payment on an hourly basis, plus reimbursement of actual, necessary expenses incurred by HMP during the Application Period.

41. The rates charged by HMP in this case are the same rates charged by HMP to its other clients, *less* a negotiated reduction at the request of the SEC.

42. Paragraph 64 of the Receiver Order provides that Quarterly Fee Applications "may be subject to a holdback in the amount of 20% of the amount of fees and expenses for each application filed with the court," and that "[t]he total amounts held back during the course of the receivership will be paid out at the direction of the Court as part of the final fee application submitted at the close of the receivership."

43. HMP has agreed that 20% of the fees sought to be approved in this Interim Fee Application shall be held back during the course of the receivership and paid out at the discretion of the court as part of the final fee application submitted at the close of the receivership.

44. By this Interim Fee Application, HMP seeks entry of an order granting interim approval, and directing payment, without further order of the court, at such times as the Receiver determines in his absolute discretion that funds are available, of (a) compensation in the amount of \$2,495.00 for professional services rendered in aid of the Receiver during the Application Period as advisors to the Receiver (less a 20% holdback on the fees) and (b) reimbursement of actual and necessary out of pocket disbursements and charges in the amount of \$0.00 incurred in

the rendering of such professional services on behalf of the Receiver during the Application Period.

45. During the Application Period, HMP rendered 8.55 hours of professional services, resulting in professional fees in the amount of \$2,495.00 and associated reasonable and necessary expenses in the amount of \$0.00.

46. Summaries of the hours spent, the names of each professional and paraprofessional rendering services to the Receiver during the Application Period, the agreed upon discounted rates, and the total value of time incurred by each of the HMP professionals and paraprofessionals rendering services to the Receiver are attached to this Interim Fee Application.

47. Copies of the computer generated time entries reflecting the time recorded for these services, organized by matter and in project billing categories are attached to this Interim Fee Application.

48. A statement of expenses incurred by HMP during the Application Period in connection with the HMP's services to the Receiver is attached to this Interim Fee Application.

49. HMP is charging \$0.15 per page for copying in this case, consistent with the SEC's guidelines.

50. HMP is seeking compensation for services performed and reimbursement of actual and necessary out of pocket disbursements and charges during the Application Period solely in connection with HMP's services to the Receiver in this action.

51. HMP has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with HMP's services to the Receiver.

52. There are no agreements or understandings between HMP and any other person for the sharing of compensation to be received for services rendered as advisors to the Receiver during this case.

53. All services for which compensation is requested and expenses for which reimbursement is requested are reasonable, necessary, and were performed for and on behalf of the Receiver during the Application Period.

54. The fees and expenses incurred during the Application Period were incurred in the best interests of the Receivership Estate.

55. HMP is and remains a disinterested party and does not hold any adverse relationship with the Receiver, the Receivership Entities, or the Receivership Estate.

CALCULATION OF TIME AND FEES

56. As set forth above, this Interim Fee Application covers the time period from April 1, 2019 through June 30, 2019.

57. All professional services for which compensation is requested in this Interim Fee Application, and all reimbursement for expenses incurred, have been for services directly related to the Receiver, Receivership Entities, and Receivership Estate.

58. As set forth in the attached exhibits, HMP's professionals and paraprofessionals have spent a total of **8.55** hours providing necessary professional services for the Receiver.

59. As a result, HMP requests compensation in the amount of **\$2,495.00** for actual, necessary professional services performed, all as set forth in greater detail above and in **Exhibit A** to this Interim Fee Application.

60. In addition, HMP has expended the sum of **\$0.00** for actual, necessary expenses incurred in providing services to the Receiver, all as set forth in greater detail above and in **Exhibit A** to this Interim Fee Application.

61. In preparing this Interim Fee Application, HMP has calculated the amount of time spent by each professional in performing actual, necessary legal services for the Receiver.

62. The data used came directly from computer printouts that are kept on each HMP client.

63. The hourly rates charged are the hourly rates charged by HMP to its standard clients, *less* an agreed upon discount as requested by the SEC.

64. HMP worked to avoid any duplication of efforts between parties, and in instances where more than one professional billed for a project, there was a need for multiple professionals' involvement.

NOTICE

65. HMP has provided a copy of this Interim Fee Application (including all exhibits) and notice of this Interim Fee Application to: (a) the Receiver; (b) the SEC, (c) Dwayne Edwards; (d) Joseph Schramm, counsel for Todd Barker; and (f) all other parties in interest who have entered an appearance in this case and requested service of papers.

66. HMP has also caused this Interim Fee Application (including all exhibits) to be posted to the website maintained by the Receiver for this matter.

67. Given the relief sought in this Interim Fee Application, HMP submits that no other or further notice is necessary or required.

NO PRIOR REQUEST

68. No prior request for the relief sought in this Interim Fee Application has been made to this or any other court.

CONCLUSION

69. Based upon the foregoing, HMP respectfully requests that this court enter an order, substantially in the form attached to this Interim Fee Application as **Exhibit B**, approving this Interim Fee Application.

Dated: August 15, 2019

Respectfully submitted,

/s/ Blake D. Roth

Blake D. Roth

Ryan K. Cochran (admitted *pro hac vice*)

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511 Union Street, Suite 2700

Nashville, Tennessee 37219

Telephone: 615.244.6380

Email: blake.roth@wallerlaw.com

Counsel for the Receiver

EXHIBIT A
COMPUTERIZED TIME RECORDS

EXHIBIT B
PROPOSED FORM OF ORDER

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SECURITIES AND EXCHANGE
COMMISSION,

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DWAYNE EDWARDS; TODD BARKER;
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PLACE ALF, LLC; MONTGOMERY ALF, LLC;
COLUMBUS ALF, LLC; and OPELIKA ALF,
LLC,

Defendants,

-and-

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HOUSE SENIOR LIVING, LLC; SUSAN
EDWARDS, a/k/a SUSAN ROGERS; SHARON
NUNAMAKER, a/k/a SHARON HADDEN; and
SDH DESIGN, LLC,

Relief Defendants.

**ORDER APPROVING HEALTHCARE MANAGEMENT PARTNERS,
LLC'S TENTH INTERIM FEE APPLICATION FOR COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF COSTS
AND EXPENSES INCURRED AS ADVISOR TO THE RECEIVER FOR
THE PERIOD FROM APRIL 1, 2019 THROUGH JUNE 30, 2019**

Upon consideration of *Healthcare Management Partners, LLC's Tenth Interim Fee Application for Compensation for Services Rendered and Reimbursement of Costs and Expenses Incurred as Advisor to the Receiver for the Period From April 1, 2019 Through June 30, 2019*

(the “*Application*”)¹ filed by Healthcare Management Partners, LLC (the “*Applicant*”); and upon consideration of all responses and objections to the Application; and upon finding that the relief requested in the Application should be granted, it is therefore

1. **ORDERED** that the Application is GRANTED; and it is further
2. **ORDERED** that the Applicant is awarded interim compensation for the Application Period in the total amount of \$2,495.00 including compensation for necessary professional services rendered to the Receiver in the amount of \$2,495.00 and reimbursement for actual and necessary costs and expenses in the amount of \$0.00; and it is further
3. **ORDERED** that the Receiver is authorized to pay Applicant \$1,996.00 (such amount being \$2,495.00 for compensation for necessary professional services rendered to the Receiver less a twenty percent (20%) holdback as permitted pursuant to paragraph 64 of the Receiver Order plus \$0.00 in actual and necessary costs and expenses incurred by the Applicant); and it is further
4. **ORDERED** the Receiver is granted authority to pay Applicant the sum of \$\$1,996.00 without further order of this court at such times as the Receiver determines in his absolute discretion, that sufficient funds are available; and it is further
5. **ORDERED** that this court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this order.

Dated: _____, 2019 _____

¹ Capitalized terms used in this order and not otherwise defined shall have the meanings ascribed to them in the Application.
4817-9167-6317.1

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Counsel for the Receiver

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d/b/a OXTON REAL ESTATE OF
DOUGLAS, LLC; ROME ALF, LLC;
SAVANNAH ALF, LLC; GAINESVILLE
ALF, LLC; WATERFORD PLACE ALF,
LLC; MONTGOMERY ALF, LLC;
COLUMBUS ALF, LLC; and OPELIKA ALF,
LLC,

Defendants,

-and-

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HOUSE SENIOR LIVING, LLC; SUSAN
EDWARDS, a/k/a SUSAN ROGERS;
SHARON NUNAMAKER, a/k/a SHARON
HADDEN; and SDH DESIGN, LLC,

Relief Defendants.

Case No. 2:17-cv-393-ES-SCM

DECLARATION OF SERVICE

I, the undersigned, declare that on this 15th day of August 2019, I caused a true and correct copy of the following documents to be filed with this court's CM/ECF system, and this

court's CM/ECF system electronically served all parties entitled to receive notice of the following documents:

1. *Healthcare Management Partners, LLC's Tenth Interim Fee Application for Compensation for Services Rendered and Reimbursement of Costs and Expenses Incurred as Advisor to the Receiver for the Period From April 1, 2019 Through June 30, 2019* and all exhibits attached thereto; and
2. this Declaration of Service.

In addition, I caused true and correct copies of the foregoing to be served by regular United States mail, postage prepaid, and electronic mail on the following parties:

Dwayne Edwards
411 Georgia Avenue
North Augusta, South Carolina 29841
beachcaremanagement@gmail.com

Joseph Schramm
FisherBroyles, LLP
100 Overlook Center, 2nd Floor
Princeton, NJ 08540
joseph.schramm@fisherbroyles.com
(for defendant Todd Barker)

Dated: August 15, 2019

/s/ Blake D. Roth
Blake D. Roth
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Counsel for the Receiver