

**WALLER LANSDEN DORTCH & DAVIS, LLP**

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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 JANUARY 1, 2019  
THROUGH MARCH 31, 2019**

**Motion Day: June 17, 2019**

**Objection Deadline: June 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, 2017<sup>1</sup>

Period for which compensation and reimbursement are sought January 1, 2019 through March 31, 2019

Amount of compensation sought as actual, reasonable, and necessary \$3,395.00

Amount of expense reimbursement sought as actual, reasonable, and necessary \$39.74

This is an interim application.

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<sup>1</sup> 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.  
4849-4325-9025.1

**Fees and Expenses Requested by Month**

<b><u>Time Period</u></b>	<b><u>Fees Requested</u></b>	<b><u>Expenses Requested</u></b>
January 1, 2019 through January 31, 2019	\$3,070.00	\$0.00
February 1, 2019 through February 28, 2019	\$65.00	\$36.34
March 1, 2019 through March 31, 2019	\$260.00	\$3.40
<b><u>TOTAL</u></b>	<b>\$3,395.00</b>	<b>\$39.74</b>

**Compensable Time by Professional**  
**From January 1, 2019 through March 31, 2019**

<b>Professional</b>	<b>Title</b>	<b>Hours</b>	<b>Fees</b>
Lauren R. Douglas	Director	3.6	\$1,170.00
Tyler L. Brasher	Director	9.2	\$2,225.00
<b>Total</b>		<b>12.8</b>	<b>\$3,395.00</b>

**Compensation by Project Category**  
**From January 1, 2019 through March 31, 2019**

<b><u>Project Category</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
Administration; Case Administration (B110)	12.8	\$3,395.00
<b>TOTAL</b>	<b>12.8</b>	<b>\$3,395.00</b>

**Expense Summary**  
**From January 1, 2019 through March 31, 2019**

<b><u>Month</u></b>	<b><u>Expense</u></b>	<b><u>Amount</u></b>
February 2019	Domain for Receivership Website	\$36.34
March 2019	Montgomery ALF, LLC 1099s	\$3.40

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Relief Defendants.

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

**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  
JANUARY 1, 2019 THROUGH MARCH  
31, 2019**

**Motion Day: June 17, 2019**

**Objection Deadline: June 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 January 1, 2019 through March 31, 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 JANUARY 2019**

16. During January 2019, HMP spent 11.8 hours providing services to the Receivership Estate, resulting in \$3,070.00 in fees and \$0.00 in expenses.

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

<b><u>Professional</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
Lauren R. Douglas	2.6	\$845.00
Tyler L. Brasher	9.2	\$2,225.00

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

<b><u>Project Category</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
Administration; Case Administration (B110)	11.8	\$3,070.00

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

<b><u>Receivership Entity</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
General Matters	11.5	\$2,987.50
Oxton Place of Douglas, LLC	0.1	\$32.50
Senior Solutions of Social Circle, LLC	0.2	\$50.00

20. No expenses were incurred by HMP in connection with the services provided in January 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 FEBRUARY 2019**

24. During February 2019, HMP spent 0.2 hours providing services to the Receivership Estate, resulting in \$65.00 in fees and \$36.34 in expenses.

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

<b><u>Professional</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
Lauren R. Douglas	0.2	\$65.00

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

<u>Project Category</u>	<u>Hours</u>	<u>Fees</u>
Administration; Case Administration (B110)	0.2	\$65.00

27. The services rendered by HMP during February 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	0.2	\$65.00

28. In connection with the services provided in February 2019, HMP incurred expenses in the amount of \$36.34 for the domain for the receivership website.

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 MARCH 2019

32. During March 2019, HMP spent 0.8 hours providing services to the Receivership Estate, resulting in \$260.00 in fees and \$3.40 in expenses.

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

<u>Professional</u>	<u>Hours</u>	<u>Fees</u>
Lauren R. Douglas	0.2	\$65.00

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

<u>Project Category</u>	<u>Hours</u>	<u>Fees</u>
Administration; Case Administration (B110)	0.8	\$260.00

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

<u>Receivership Entity</u>	<u>Hours</u>	<u>Fees</u>
Montgomery ALF, LLC	0.5	\$162.50
Gainesville ALF, LLC	0.1	\$32.50
Waterford Place ALF, LLC	0.2	\$65.00

36. In connection with the services provided in March 2019, HMP incurred expenses in the amount of \$3.40 for Form 1099s for Montgomery ALF, LLC.

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 **\$3,395.00** 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 **\$39.74** incurred in the rendering of such professional services on behalf of the Receiver during the Application Period.

45. During the Application Period, HMP rendered **12.8** hours of professional services, resulting in professional fees in the amount of **\$3,395.00** and associated reasonable and necessary expenses in the amount of **\$39.74**.

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 January 1, 2019 through March 31, 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 12.8 hours providing necessary professional services for the Receiver.

59. As a result, HMP requests compensation in the amount of \$3,395.00 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 \$39.74 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: May 15, 2019

Respectfully submitted,

/s/ Blake D. Roth

Blake D. Roth

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

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*Counsel for the Receiver*

**EXHIBIT A**  
**COMPUTERIZED TIME RECORDS**

**Healthcare Management Partners, LLC  
Time Activities by Employee Detail**  
Activity: January - March, 2019

Professional	Activity Date	Client	Product/Service	Memo/Description	Rates	Duration	Billable	Amount	Coding
Lauren R. Douglas	01/02/2019	BoKF-ALL	Services	Call with Lyme regarding Ace Technologies Wire; follow up correspondence with Laurie from Ace Technology regarding payment status	325.00	0.2 Yes		65.00 B110	
Lauren R. Douglas	01/09/2019	BoKF-ALL	Services	Call with F. Morales regarding notices from the GA Dept of Revenue	325.00	0.1 Yes		32.50 B110	
Lauren R. Douglas	01/11/2019	BoKF-ALL	Services	Email correspondence with L. Laney re: support for the Quarterly Report	325.00	0.1 Yes		32.50 B110	
Tyler L. Brasher	01/11/2019	BoKF-ALL	Services	Review HMP bills for QOR	0.00	0.3 No		0 B110	
Lauren R. Douglas	01/14/2019	BoKF-ALL	Services	Pull all bank statements for the QOR; follow up email with B. Roth regarding status of requested items	325.00	0.8 Yes		260.00 B110	
Tyler L. Brasher	01/14/2019	BoKF-ALL	Services	Attention to fees and expenses and revisions to same; Send same to Waller for filing	250.00	0.1 Yes		25.00 B110	
Tyler L. Brasher	01/14/2019	BoKF-ALL	Services	Work on cash flow for QOR	250.00	1 Yes		250.00 B110	
Tyler L. Brasher	01/14/2019	BoKF-ALL	Services	Work on cash flow for QOR	250.00	0.5 Yes		125.00 B110	
Lauren R. Douglas	01/15/2019	BoKF-ALL	Services	Call with T. Brasher regarding cash flow for the QOR	325.00	0.2 Yes		65.00 B110	
Lauren R. Douglas	01/15/2019	BoKF-ALL	Services	Call with W. Tishler regarding Q3 payroll estimates from the GA Dept. of Labor	325.00	0.1 Yes		32.50 B110	
Tyler L. Brasher	01/15/2019	BoKF-ALL	Services	Work on cash flows for QOR	250.00	0.8 Yes		200.00 B110	
Tyler L. Brasher	01/15/2019	BoKF-ALL	Services	Attention to QOR cash flows and correspondence with team re: same	250.00	0.2 Yes		50.00 B110	
Lauren R. Douglas	01/16/2019	BoKF-Douglas	Services	Call with the Executive Director regarding status of w2s	325.00	0.1 Yes		32.50 B110	
Lauren R. Douglas	01/17/2019	BoKF-ALL	Services	Call with T. Brasher regarding cash flow for QOR	325.00	0.2 Yes		65.00 B110	
Lauren R. Douglas	01/17/2019	BoKF-ALL	Services	Review previously submitted cash flow and discuss errors with T. Brasher	325.00	0.2 Yes		65.00 B110	
Lauren R. Douglas	01/17/2019	BoKF-ALL	Services	Follow up call with the Executive Director regarding status of w2s; email correspondence with F. Morales regarding w2s	325.00	0.1 Yes		32.50 B110	
Tyler L. Brasher	01/17/2019	BoKF-ALL	Services	Work on cash flows for QOR	250.00	1.6 Yes		400.00 B110	
Tyler L. Brasher	01/17/2019	BoKF-ALL	Services	Work on cash flow for QOR	250.00	1.1 Yes		275.00 B110	
Tyler L. Brasher	01/17/2019	BoKF-ALL	Services	Work on cash flow for QOR	250.00	0.7 Yes		175.00 B110	
Tyler L. Brasher	01/17/2019	BoKF-SocialCircle	Services	Attention to Social Circle cash flow variance for QOR	250.00	0.2 Yes		50.00 B110	
Lauren R. Douglas	01/25/2019	BoKF-ALL	Services	Review cash flow for the QOR	325.00	0.3 Yes		97.50 B110	
Lauren R. Douglas	01/28/2019	BoKF-ALL	Services	Discuss QOR cash flow with team member	325.00	0.2 Yes		65.00 B110	
Tyler L. Brasher	01/29/2019	BoKF-ALL	Services	Finalize cash flows	250.00	1.2 Yes		300.00 B110	
Tyler L. Brasher	01/29/2019	BoKF-ALL	Services	Attention to coding time entries for Manor House QOR	250.00	0.4 Yes		100.00 B110	
Tyler L. Brasher	01/29/2019	BoKF-ALL	Services	Finalize coding of time entries for QOR	250.00	0.2 Yes		50.00 B110	
Tyler L. Brasher	01/29/2019	BoKF-ALL	Services	Finalize cash flows	250.00	0.3 Yes		75.00 B110	
Tyler L. Brasher	01/29/2019	BoKF-ALL	Services	Review time entries and code for submission to SEC	250.00	0.5 Yes		125.00 B110	
Tyler L. Brasher	01/30/2019	BoKF-ALL	Services	Send QOR files	250.00	0.1 Yes		25.00 B110	
Lauren R. Douglas	02/28/2019	BoKF-ALL	Services	Call with D. Pierce re: 2018 1099s	325.00	0.2 Yes		65.00 B110	
Lauren R. Douglas	03/06/2019	BoKF-Gainesville	Services	Call with P. Adams re: Historical invoices for tax purposes	325.00	0.1 Yes		32.50 B110	
Lauren R. Douglas	03/08/2019	BoKF-Cedars (aka Montgomery)	Services	Email correspondence with Waller re: issuance of 1099s; Email correspondence with Workable Solutions re: information needed for 1099 reporting; set up Tax1099 for Montgomery	325.00	0.5 Yes		162.50 B110	
Lauren R. Douglas	03/11/2019	BoKF-Montgomery (aka Waterford)	Services	Issue 1099s; follow up correspondence with Workable Solutions and Waller re: status	325.00	0.2 Yes		65.00 B110	

**EXHIBIT B**  
**PROPOSED FORM OF ORDER**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

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

DWAYNE EDWARDS; TODD BARKER;  
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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.

**ORDER APPROVING 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 JANUARY 1, 2019 THROUGH MARCH 31, 2019**

Upon consideration 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 January 1, 2019 Through March 31,*

2019 (the “*Application*”)<sup>1</sup> 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 \$3,434.74 including compensation for necessary professional services rendered to the Receiver in the amount of \$3,395.00 and reimbursement for actual and necessary costs and expenses in the amount of \$39.74; and it is further
3. **ORDERED** that the Receiver is authorized to pay Applicant \$2,755.74 (such amount being \$3,395.00 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 \$39.74 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 \$2,755.74 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 \_\_\_\_\_

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<sup>1</sup> Capitalized terms used in this order and not otherwise defined shall have the meanings ascribed to them in the Application.  
4849-4325-9025.1

**WALLER LANSDEN DORTCH & DAVIS, LLP**

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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**

**DECLARATION OF SERVICE**

I, the undersigned, declare that on this 15th day of May 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 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 January 1, 2019 Through March 31, 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  
[edwards1687@gmail.com](mailto:edwards1687@gmail.com)

Joseph Schramm  
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100 Overlook Center, 2nd Floor  
Princeton, NJ 08540  
Email: [joseph.schramm@fisherbroyles.com](mailto:joseph.schramm@fisherbroyles.com)  
(for defendant Todd Barker)

Dated: May 15, 2019

/s/ Blake D. Roth  
Blake D. Roth  
Ryan K. Cochran (admitted *pro hac vice*)  
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*Counsel for the Receiver*