

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

Case No: 6:21-cv-694-CEM-DCI

HARBOR CITY CAPITAL CORP., et al.,

Defendants,

and

CELTIC ENTERPRISES, LLC and
TONYA L. MARONEY

Relief Defendants.

_____ /

RECEIVER'S UNOPPOSED SEVENTH QUARTERLY FEE
APPLICATION FOR ORDER AWARDING FEES AND
REIMBURSEMENT OF COSTS TO RECEIVER
AND HER PROFESSIONALS

Katherine C. Donlon, the Court-appointed Receiver over the corporate Defendants and Relief Defendant Celtic Enterprises, LLC (the “**Receiver**” and the “**Receivership**” or “**Receivership Estate**”) pursuant to the Court’s Order dated November 8, 2021 (Doc. 75) (the “**Order Appointing Receiver**”), respectfully submits this Seventh Quarterly Fee Application to the Court for the entry of an order awarding fees and the reimbursement of costs to the Receiver and her professionals. This Application covers all fees and costs

incurred from April 1, 2023 through June 30, 2023. Attached as **Exhibit 1** is the Receiver's Fund Accounting Report.¹

During the time covered by this Motion, among other things, the Receiver and her counsel have done the following:

- As it relates to the most significant asset of the Receivership, 143 Lansing Island Drive, the following occurred:
 - Continued efforts to resolve the ongoing issues relating to the pending foreclosure of the 143 Lansing Island Drive property, including efforts to resolve the demand for attorney's fees and interest asserted by the foreclosure attorneys in an effort to move forward with respect to sale of property;
 - Reviewed the Court's Report and Recommendation as to the sale of the Property.
 - Mediate with Mortgage Holder as to fees, interest, and principle demands.
 - Draft and prepare settlement agreement on terms agreed to by parties at mediation.
 - Confirm dismissal of state court and appellate court proceedings as to state court foreclosure action.
 - Communicate with title agent and lienholders regarding satisfaction of liens;
 - Communicate with title agent regarding closing on the sale of the property at 143 Lansing Island Drive;
 - Close on the sale of the property on April 28, 2023;
- Addressed removal of assets, including vehicle, from property;

¹ The Securities and Exchange Commission ("**SEC**" or the "**Commission**") provided the Receiver with detailed Billing Instructions for Receivers in Civil Actions Commenced by the Commission (the "**Billing Instructions**"). The Accounting Report is one of the requirements contained in the Billing Instructions.

- Draft motion to lift asset freeze to sell jet skis and vehicle;
- Draft motion for J. Maroney to show cause why he should not be held in contempt of court for refusing to provide title to sell jet skis and vehicle;
- Continued to field telephone calls and emails from investors and maintained the Receiver's website www.harborcityreceivership.com.

Case Background and Status

As of the date of filing this Application, the Court has appointed Katherine C. Donlon as Receiver over the assets of the following entities:

- (1) Defendants Harbor City Capital Corp., Harbor City Ventures, LLC, HCCF-1, LLC, HCCF-2, LLC, HCCF-3, LLC, HCCF-4, LLC, HCCF-5, LLC, Harbor City Digital Ventures, Inc., and HCC Media Funding, LLC (“collectively **“Harbor City defendants”** or the **“defendants”**); and
- (2) Relief defendant Celtic Enterprises, LLC (**“Celtic”** or **“relief defendant”**).

The foregoing corporate defendants and relief defendant are referred to as the **“Receivership Entities.”**

On August 2, 2023, the Receiver filed her Seventh Quarterly Status Report (Doc. 167) (the **“Quarterly Status Report”**), which contains information regarding the case background and status; the recovery of assets; financial information about Receivership Entities; the Receiver's proposed course of action regarding assets in the Receivership Estate; the potential establishment of a claims process; and related (and/or contemplated) litigation involving Receivership Entities. The Quarterly Status Report addresses all activity that resulted in the fees and costs sought in this motion.

Professional Services Rendered and Costs Incurred

The Order Appointing Receiver authorizes the Receiver to “solicit persons and entities (‘Retained Personnel’) to assist her in carrying out the duties and responsibilities described in this Order” and states that the “Receiver and Retained Personnel are entitled to reasonable compensation and expense reimbursement from the Receivership Estates,” subject to approval by the Court. *See* Doc. 72-1 ¶55. The Order Appointing Receiver also specifically authorized the Receiver to retain Nicole D. Newlon of Johnson, Newlon & DeCort, P.A. (“**JND**”) to provide legal services. *See* Doc. 72-1 ¶2. The Order Appointing Receiver requires that the Receiver obtain the Court’s authorization of the retention of any Retained Personnel, other than counsel mentioned. *See* Doc. 72-1 ¶ 54. The Receiver has previously filed six Quarterly Fee Applications on January 31, 2022 (Doc 82), May 24, 2022 (Doc. 89), August 15, 2022 (Doc. 106), November 14, 2022 (Doc. 123), February 16, 2023 (Doc. 143), and May 16, 2023 (Doc. 155). The Court approved these fee applications on May 26, 2022 (Doc. 92), August 25, 2022 (Doc. 107), October 25, 2022 (Doc 119), January 13, 2023 (Doc. 135), May 25, 2023 (Doc. 157). There has been no ruling on the Sixth Fee Application.

As shown in the Quarterly Status Report, the Professionals have provided services and incurred expenses to investigate the affairs of the Receivership Entities, preserve Receivership assets, attempt to locate and

recover assets, and analyze records to determine potential litigation. These services are for the benefit of aggrieved investors, creditors, and other interested parties.

I. The Receiver.

The Receiver requests the Court award her fees for the professional services rendered from April 1, 2023 through June 30, 2023, in the amount of \$9,975.00. The standard hourly rate the Receiver charges clients in private litigation is \$425. However, the Receiver agreed, for purposes of her appointment as the Receiver, that her hourly rate would be reduced to \$350, representing nearly an eighteen percent discount off the standard hourly rate which she charges clients in comparable matters. This rate was set forth in the Receiver's submission to the SEC. *See* Doc. 60, Ex. 1.

The Receiver commenced services upon her appointment. The Receiver has billed her time for these activities in accordance with the Billing Instructions, which request that this motion contain a narrative of each "business enterprise or litigation matter" for which outside professionals have been employed. The Billing Instructions identify each such business enterprise or litigation matter as a separate "project." Further, the Billing Instructions request that time billed for each project be allocated to one of

several Activity Categories.² At this early stage of the Receivership, no separate matters have been commenced to warrant billing as a separate project.

For the time covered by this motion, the work of the Receiver and JND focused on investigating the fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing additional assets for the Receivership, and analyzing investor information for an eventual claims process and possible litigation. These activities of the Receiver are set forth in detail in the Quarterly Status Report. A copy of the statement summarizing the Receiver's services rendered for the Receivership is attached as **Exhibit 2**. The Receiver's time and fees for services rendered for each Activity Category from April 1, 2023 through June 30, 2023, are as follows:

² The Activity Categories set forth by the Commission in the Billing Instructions are as follows: (1) Asset Analysis and Recovery, which is defined as identification and review of potential assets including causes of action and non-litigation recoveries; (2) Asset Disposition, which is defined as sales, leases, abandonment and related transaction work (where extended series of sales or other disposition of assets is contemplated, the Billing Instructions provide that a separate category should be established for each major transaction); (3) Business Operations, which is defined as issues related to operation of an ongoing business; (4) Case Administration, which is defined as coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.; (5) Claims Administration and Objections, which is defined as expenses in formulating, gaining approval of and administering any claims procedure; and (6) Employee Benefits/Pensions, which is defined as review issues such as severance, retention, 401K coverage and continuance of pension plan. The Billing Instructions provide that time spent preparing motions for fees may not be charged to the Receivership Estate. In accordance with these instructions, the Receiver created an additional Activity Category for work on fees motions and has accounted for time spent on such work but has not charged any amount for that work.

Receivership
Receiver's Time and Fees for Services Rendered

Activity Category	Hours Expended	Fee Amount
Asset Analysis and Recovery	.4	\$140.00
Asset Disposition	26.8	\$9,380.00
Business Operations	0	\$0.00
Case Administration	1.3	\$455.00
TOTAL	28.5	\$9,975.00

II. Johnson, Newlon & DeCort P.A. ("JND")

The Receiver requests the Court award JND fees for professional services rendered and costs incurred from April 1, 2023 through June 30, 2023, in the amounts of \$8,155.00 and \$5,778.83, respectively. A categorization and summary of all fees and costs for which JND seeks reimbursement is attached as **Exhibit 3**.

As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, JND's attorneys and paralegals have agreed to reduce their standard rates as provided in the fee schedule attached as **Exhibit 4**. JND began providing services upon the appointment of the Receiver. The activities of JND for the time covered by this motion are set forth in the Quarterly Status Report. JND has billed time for these activities in accordance with the Billing Instructions. As discussed above, at this stage of the Receivership, the work of the Receiver and JND is focused on continuing their

investigation of the fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing assets for the Receivership, and analyzing investor information for the eventual claims process and possible litigation. JND's time and fees for services rendered on this matter for each Activity Category are as follows:

Receivership
JND's Time and Fees for Services Rendered

Activity Category	Hours Expended	Fee Amount
Asset Analysis and Recovery	.8	\$120.00
Asset Disposition	22.7	\$7,545.00
Case	1.4	\$490.00
Business Operations	0	\$0.00
Total	24.9	\$8,155.00

A summary of the professionals' hours rendered during the time covered by this Motion is set forth below.

Professional	Position	Yrs. Exp.	Billed Hours	Rate	Total
Nicole D. Newlon (NDN)	Partner	18	21.6	\$350.00	\$7,560.00
Christopher DeCort (CD)	Partner	13	.5	\$350.00	\$175.00
Michelle Patel (MBP)	Paralegal	18	2.8	\$150.00	\$420.00
Fees			24.9		\$8,155.00
Disbursements					\$5,778.83
Total					\$13,933.83

In addition to these legal fees, JND advanced costs of \$5,778.83 as summarized below. Much of the expenses are related to the utilities and upkeep on 143 Lansing Drive as well as the resolution with the underlying lender.

Costs	Total
Utilities/Upkeep for 143 Lansing Island Drive	\$1,555.08
E-Hounds Platform Fees	\$2,380.00
Mediator	\$1,818.75
Notary Fee for Closing	\$25,00
Total	\$5,778.83

MEMORANDUM OF LAW

It is well settled that this Court has the power to appoint a receiver and to award the receiver and those appointed by her fees and costs for their services. *See, e.g., S.E.C. v. Elliott*, 953 F.2d 1560 (11th Cir. 1992) (receiver is entitled to compensation for faithful performance of his duties); *Donovan v. Robbins*, 588 F. Supp. 1268, 1272 (N.D. Ill. 1984) (“[T]he receiver diligently and successfully discharged the responsibilities placed upon him by the Court and is entitled to reasonable compensation for his efforts.”); *S.E.C. v. Custable*, 1995 WL 117935 (N.D. Ill. Mar. 15, 1995) (receiver is entitled to fees where work was of high quality and fees were reasonable); *S.E.C. v. Mobley*, 1317RCC, 2000 WL 1702024 (S.D.N.Y. Nov. 13, 2000) (court awarded reasonable fees for the receiver and his professionals); *see also* Doc. 11 ¶ 16. The determination of fees to be awarded is largely within the discretion of the

trial court. *See Monaghan v. Hill*, 140 F.2d 31, 34 (9th Cir. 1944). In determining reasonable compensation for the services rendered by the Receiver and her Professionals, the Court should consider the circumstances surrounding the Receivership. *See Elliot*, 953 F.2d at 1577.

In determining the reasonableness of fees, the Court must calculate the lodestar, which is the “number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.” *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983). This is in part based on the nature and extent of the services rendered and the value of those services. *See Grant v. George Schumann Tire & Battery Co.*, 908 F.2d 874, 877-78 (11th Cir. 1990) (bankruptcy fee award case addressing the issue of attorney’s fees generally before considering specific requirements in the bankruptcy context). Additionally, the Court should consider the twelve factors set forth in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974), a case involving an award of attorneys’ fees under federal civil rights statutes, as incorporated by the Eleventh Circuit in *Grant*, a bankruptcy case, are as follows: (1) the time and labor required; (2) the novelty and difficulty of the questions presented; (3) the skill required to perform the legal services properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee for similar work in the community; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or by the circumstances;

(8) the amount involved and results obtained; (9) the experience, reputation, and ability of the attorney; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. Based on the information provided herein as well as the Receiver's Seventh Quarterly Status Report, the Receiver believes that the Court when considering these factors and the work accomplished during this quarter of the Receivership will determine that the Receiver's motion for fees is reasonable and should be granted.

A receiver and the team she assembles is entitled to reasonable compensation and courts have looked at several factors in determining reasonableness: (1) the results achieved by the receiver; (2) the ability, reputation and other professional qualities of the receiver; (3) the size of the estate and its ability to afford the expenses and fees; and (4) the time required to conclude the receivership. *SEC v. W.L. Moody & Co*, 374 F. Supp. 465, 480-484 (S.D. Tex. 1974). In this case, the Receiver and her counsel have negotiated the final sale and closing for the Receivership's largest asset and continued investigating, locating, preserving and/or liquidating assets for the benefit of defrauded investors. Additionally, the Receiver has kept in communication with the defrauded investors and various regulators investigating the fraud.

Here, because of the nature of this case, it is necessary for the Receiver to employ attorneys experienced and familiar with financial frauds, federal

receiverships, securities, banking, and finance. Further, to perform the services required and achieve the results obtained to date, the skills and experience of the Receiver and the Professionals in the areas of fraud, securities, computer and accounting forensics, and financial transactions are indispensable.

As discussed above, the Receiver and JND have discounted their normal and customary rates as an accommodation to the Receivership and to conserve Receivership assets. The rates charged by the attorneys and paralegals are at or below those charged by attorneys and paralegals of comparable skill from other law firms in the Middle District of Florida.

While the Receiver is sensitive to the need to conserve the Receivership Entities' assets, she believes the fees and costs expended to date are reasonable, necessary, and benefited the Receivership. Notably, the Commission has no objection to the relief sought in this motion. *Custable*, 1995 WL 117935 at *7 ("In securities law receiverships, the position of the SEC in regard to the awarding of fees will be given great weight.").

CONCLUSION

Under the Order Appointing Receiver, the Receiver, among other things, is authorized and empowered to engage professionals to assist her in carrying out her duties and obligations. The Order Appointing Receiver further provides that she apply to the Court for authority to pay herself and her

Professionals for services rendered and costs incurred. In exercising her duties, the Receiver has determined that the services rendered and their attendant fees and costs were reasonable, necessary, advisable, and in the best interests of the Receivership.

WHEREFORE, Katherine C. Donlon, the Court-appointed Receiver, respectfully requests that this Court award the following sums and direct that payment be made from the Receivership assets:

Katherine C. Donlon, Receiver	\$9,975.00
Johnson, Newlon & DeCort	\$13,933.83

LOCAL RULE 3.01(g) CERTIFICATION

The Receiver has conferred with counsel for the SEC and is authorized to represent to the Court that the SEC does not object to the relief requested in this motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 14, 2023, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court through the CM/ECF system, which served counsel of record.

/s/ Nicole D. Newlon

NICOLE D. NEWLON (FBN: 832391)

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bwalker@jnd-law.com

Counsel for Receiver Katherine Donlon

RECEIVER'S CERTIFICATION

The Receiver has reviewed this Seventh Quarterly Fee Application for Order Awarding Fees, Costs, and Reimbursement of Costs to Receiver and Her Professionals (the “**Application**”).

To the best of the Receiver’s knowledge, information, and belief formed after reasonable inquiry, the Application and all fees and expenses herein are true and accurate and comply with the Billing Instructions provided to the Receiver by the Securities and Exchange Commission.

All fees contained in the Application are based on the rates listed in the fee schedule, attached as Exhibit 4. Such fees are reasonable, necessary, and commensurate with (if not below the hourly rate that is commensurate with) the skill and experience required for the activity performed.

The Receiver has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth in the Billing Instructions for photocopies and facsimile transmission).

To the extent the Receiver seeks reimbursement for any service which the Receiver justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), the Receiver has requested

reimbursement only for the amount billed to the Receiver by the third-party vendor and/or paid by the Receiver to such vendor. The Receiver is not making a profit on such reimbursable services.

The Receiver believes that the fees and expenses included in this Application were incurred in the best interests of the Receivership Estate. With the exception of the Billing Instructions and the Court-approved engagements described above, the Receiver has not entered into any agreement, written or oral, express or implied, with any person or entity concerning the amount of compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

s/ Katherine C. Donlon

Katherine C. Donlon

EXHIBIT 1



Oldsmar / Tampa / St. Petersburg

727-785-4447

813-498-1294

727-784-5491 Fax

www.pdr-cpa.com

Katherine C Donlon As Receiver for
Harbor City Capital Corp, et. al.
Tampa, FL

We have compiled the standardized fund accounting report for the period of April 1, 2023 to June 30, 2023 and from inception to June 30, 2023, included in the accompanying prescribed form (Civil Court Docket No. 6:21-cv-694-CEM-DCI). We have not audited or reviewed the accompanying standardized fund accounting report and accordingly, do not express an opinion or any assurance about whether the standardized fund accounting report is in accordance with the form prescribed by the Civil Court Docket No. (6:21-cv-694-CEM-DCI)

Consolidated Harbor City Capital Corp, et al Receivership is responsible for the preparation and fair presentation of the standardized fund account report in accordance with requirements prescribed by the Civil Court Docket No 6:21-cv-694-CEM-DCI and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the standardized fund accounting report.

Our responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist consolidated Harbor City Capital Corp, et al Receivership in presenting financial information in the form of a standardized fund accounting report without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the standardized fund accounting report.

This standardized fund accounting report is presented in accordance with the requirements of the Civil Court Docket No. 6:21-cv-694-CEM-DCI, which differ from accounting principles generally accepted in the United States of America. This report is intended solely for the information and use of the Civil Court Docket No 6:21-cv-694-CEM-DCI and is not intended and should not be used by anyone other than this specified party.

Oldsmar, Florida
July 20, 2023

Standardized Fund Accounting Report for
Katherine C Donlon as Receiver for Harbor City Capital Corp et al. - Cash Basis
Receivership; Civil Court Case No: 6:21-cv-694-CEM-DCI
Reporting Period 04/01/2023 to 06/30/2023

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 04/01/2023):			886.16
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income			
Line 3	Cash and Securities			
Line 4	Interest Dividend Income			
Line 5	Business Asset Liquidation			
Line 6	Personal Asset Liquidation	322,009.8		
Line 7	Third-Party Litigation Income			
Line 8	Miscellaneous - Other			
	Total Funds Available (Line 1 - 8):		322,009.8	328,392.14
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	3,093.3		
Line 10b	Business Asset Expenses	2		
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	Total Third-Party Litigation Expenses	-		
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
	Total Disbursements for Receivership Operations		3,308	3,308
Line 11	Disbursements for Distribution Expenses Paid by the Fund			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administrator			
	Independent Distribution Consultant (IDC)			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses			
Line 11b	Distribution Plan Implementation Expenses:			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance Call Center			
	4. Fund Administrator Bond			
	Miscellaneous			
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses			
	Total Plan Implementation Expenses			
	Total Disbursements for Distribution Expenses Paid by the Fund			
Line 12	Disbursements to Court/Other:			
Line 12a	Investment Expenses Court Registry Investment System (CRIS) Fees			
Line 12b	Federal Tax Payments			
	Total Disbursements to Court/Other:			
	Total Funds Disbursed (Lines 9 - 11)			3,308
Line 13	Ending Balance (As of 06/30/2023)			2,460.06

Standardized Fund Accounting Report for
Katherine C Donlon as Receiver for Harbor City Capital Corp et al. - Cash Basis
Receivership; Civil Court Case No: 6:21-cv-694-CEM-DCI
Reporting Period 04/01/2023 to 06/30/2023

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash Cash Equivalents			2 4,6 .06
Line 14b	Investments			
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund - Net Assets			2 4,6 .06
OTHER SUPPLEMENTAL INFORMATION:		Detail	Subtotal	Grand Total
Report of Items Not To Be Paid by the Fund				
Line 15	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
Line 1 a	Plan Development Expenses Not Paid by the Fund			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses Not Paid by the Fund		-	
Line 1 b	Plan Implementation Expenses Not Paid by the Fund			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance Call Center			
	4. Fund Administrator ond			
	. Miscellaneous			
	6. Federal Account for Investor Restitution			
	(FAIR) Reporting Expenses			
	Total Plan Implementation Expenses Not Paid by the Fund		-	
Line 1 c	Tax Administrator Fees onds Not Paid by the Fund:			
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			-
Line 16	Disbursements to Court/Other Not Paid by the Fund:			
Line 16a	Investment Expenses CRIS Fees			
Line 16b	Federal Tax Payments			
	Total Disbursements to Court/Other Not Paid by the Fund		-	
Line 17	DC & State Tax Payments			
Line 18	No of Claims			
	of Claims Received This Reporting Period			
	of Claims Received Since Inception of Fund			
Line 19	No of Claimants/Investors:			
Line 19a	of Claimants Investors Paid This Reporting Period			
	of Claimants Investors Paid Since Inception of Fund			

Receiver:
y:
Title
Date

Standardized Fund Accounting Report for
Katherine C Donlon as Receiver for Harbor City Capital Corp et al. - Cash Basis
Receivership; Civil Court Case No: 6:21-cv-694-CEM-DCI
Reporting Period Since Inception to 06/30/2023

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (as of 1/1/2022)			-
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	-		
Line 3	Cash and Securities	1,944,291.91		
Line 4	Interest Dividend Income			
Line 5	Business Asset Liquidation			
Line 6	Personal Asset Liquidation	322,000.98		
Line 7	Third-Party Litigation Income			
Line 8	Miscellaneous - Other			
	Total Funds Available (Line 1 - 8):		481,948.89	481,948.89
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	13,111.18		
Line 10b	Business Asset Expenses	3,826.65		
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	Total Third-Party Litigation Expenses	-		
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
	Total Disbursements for Receivership Operations		22,938.83	22,938.83
Line 11	Disbursements for Distribution Expenses Paid by the Fund			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administrator			
	Independent Distribution Consultant (IDC)			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses			
Line 11b	Distribution Plan Implementation Expenses:			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance Call Center			
	4. Fund Administrator Bond			
	5. Miscellaneous			
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses			
	Total Plan Implementation Expenses			
	Total Disbursements for Distribution Expenses Paid by the Fund			
Line 12	Disbursements to Court/Other:			
Line 12a	Investment Expenses Court Registry Investment System (CRIS) Fees			
Line 12b	Federal Tax Payments			
	Total Disbursements to Court/Other:			
	Total Funds Disbursed (Lines 9 - 11)			22,938.83
Line 13	Ending Balance (As of 06/30/2023)			2,460.06

Standardized Fund Accounting Report for
Katherine C Donlon as Receiver for Harbor City Capital Corp et al. - Cash Basis
Receivership; Civil Court Case No: 6:21-cv-694-CEM-DCI
Reporting Period Since Inception to 06/30/2023

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash Cash Equivalents			2 4,6 .06
Line 14b	Investments			
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund - Net Assets			2 4,6 .06
OTHER SUPPLEMENTAL INFORMATION:		Detail	Subtotal	Grand Total
Report of Items Not To Be Paid by the Fund				
Line 15	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
Line 1 a	Plan Development Expenses Not Paid by the Fund			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses Not Paid by the Fund		-	
Line 1 b	Plan Implementation Expenses Not Paid by the Fund			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance Call Center			
	4. Fund Administrator ond			
	. Miscellaneous			
	6. Federal Account for Investor Restitution			
	(FAIR) Reporting Expenses			
	Total Plan Implementation Expenses Not Paid by the Fund		-	
Line 1 c	Tax Administrator Fees onds Not Paid by the Fund:			
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			-
Line 16	Disbursements to Court/Other Not Paid by the Fund:			
Line 16a	Investment Expenses CRIS Fees			
Line 16b	Federal Tax Payments			
	Total Disbursements to Court/Other Not Paid by the Fund		-	
Line 17	DC & State Tax Payments			
Line 18	No of Claims			
	of Claims Received This Reporting Period			
	of Claims Received Since Inception of Fund			
Line 19	No of Claimants/Investors:			
Line 19a	of Claimants Investors Paid This Reporting Period			
	of Claimants Investors Paid Since Inception of Fund			

Receiver:
y:
Title
Date

EXHIBIT 2



INVOICE

Invoice # 7213
Date: 07/20/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00007-Harbor City - Receiver - AAR (Asset Analysis and Recovery)

Harbor City - Receiver - AAR (Asset Analysis and Recovery)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	05/01/2023	Emails with L. McDonough (.1).	KD	0.10	\$350.00	\$35.00
Service	06/15/2023	Telephone call with L. McDonough regarding investor information (.2); confer with M. Patel regarding same (.1).	KD	0.30	\$350.00	\$105.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	0.4	\$350.00	\$140.00
Subtotal			\$140.00
Total			\$140.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6990	05/15/2023	\$4,620.00	\$0.00	\$4,620.00

Current Invoice

Invoice # 7213 - 07/20/2023

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7213	07/20/2023	\$140.00	\$0.00	\$140.00
Outstanding Balance				\$4,760.00
Total Amount Outstanding				\$4,760.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Invoice # 7213 - 07/20/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 7213
Date: 07/20/2023



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INVOICE

Invoice # 7214
Date: 07/20/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00008-Harbor City - Receiver - (ASDIS - Asset Disposition)

Harbor City - Receiver - (ASDIS - Asset Disposition)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	04/03/2023	Emails with EEG regarding payment (.1); communicate with G. Baum regarding status update and concerns from buyer (.2).	KD	0.30	\$350.00	\$105.00
Service	04/04/2023	Telephone calls with F. Fawcett and G. Baum regarding status update (.3); confer with N. Newlon regarding emergency motion (.3).	KD	0.60	\$350.00	\$210.00
Service	04/06/2023	Communicate with G. Baum regarding status update (.1).	KD	0.10	\$350.00	\$35.00
Service	04/07/2023	Review Report and Recommendation regarding Motion for Clarification and Emergency Motion (.3); confer with N. Newlon regarding same (.2); communicate with G. Baum regarding Court's Report and Recommendation (.2).	KD	0.70	\$350.00	\$245.00
Service	04/10/2023	Confer with N. Newlon regarding Report and Recommendation and opposing counsel's response thereto (.2); execute extension to closing date (.1).	KD	0.30	\$350.00	\$105.00
Service	04/11/2023	Confer with outside attorneys regarding potential mediators for dispute with lenders (.3); emails with N. Newlon regarding mediators and mediation (.2); communicate with G. Baum regarding potential mediation (.1).	KD	0.60	\$350.00	\$210.00
Service	04/12/2023	Emails with J. Schneider and N. Newlon regarding mediation (.2).	KD	0.20	\$350.00	\$70.00

Service	04/13/2023	Email to F. Fawcett regarding Court's Report and Recommendation and upcoming mediation (.2); communicate with G. Baum confirming mediation (.1).	KD	0.30	\$350.00	\$105.00
Service	04/17/2023	Communicate with G. Baum regarding mediation and buyer's furniture delivery (.2).	KD	0.20	\$350.00	\$70.00
Service	04/18/2023	Attend mediation with Benworth (5.3); confer with A. Johnson regarding mediation (.2); communicate with G. Baum and F. Fawcett regarding settlement (.3).	KD	5.80	\$350.00	\$2,030.00
Service	04/18/2023	Confer with N. Newlon regarding liens and other monetary items in preparation for mediation (.5); attend mediation with Mortgage holder regarding disposition of property (5.5); email to A. Johnson regarding mediation and resolution (.1); email to G. Mederos regarding sale of Mercedes (.2); communicate with G. Baum regarding Mercedes and resolution of mediation (.3).	KD	6.60	\$350.00	\$2,310.00
Service	04/19/2023	Emails with F. Fawcett regarding resolution and closing (.3); confer with N. Newlon regarding liens and payoffs (.2); review revisions to release (.2); emails with D. Starr at title company regarding outstanding issues (.3); communicate with G. Baum regarding potential sale of jet skis (.2).	KD	1.20	\$350.00	\$420.00
Service	04/20/2023	Emails with G. Mederos regarding sale of Mercedes (.2); emails with N. Newlon regarding revisions to agreement (.2); communicate with G. Baum regarding transporting Mercedes to dealership and cleaning 143 Lansing Island Drive (.3).	KD	0.70	\$350.00	\$245.00
Service	04/21/2023	Emails with N. Newlon regarding revisions from opposing counsel (.2); emails with N. Newlon and title company regarding closing (.2); follow up with N. Newlon regarding execution of agreement (.1); emails with G. Baum and N. Newlon regarding EEG payment (.1).	KD	0.60	\$350.00	\$210.00
Service	04/24/2023	Emails with N. Newlon and title company regarding closing, settlement statement and HUD (.2); emails with G. Mederos and J. Maroney regarding information for sale of Mercedes (.3).	KD	0.50	\$350.00	\$175.00
Service	04/25/2023	Emails with N. Newlon regarding execution of settlement agreement (.1).	KD	0.10	\$350.00	\$35.00

Service	04/26/2023	Review and revise motion to approve sale of Mercedes and jet skis (.3); 3.01 email to A. Johnson regarding same (.1); emails with J. Maroney regarding same (.1); review Court's Order on pending motion (.2); emails with title company and counsel regarding closing (.3); communicate with G. Baum regarding potential buyer for jet skis (.1).	KD	1.10	\$350.00	\$385.00
Service	04/27/2023	Emails with N. Newlon and title company regarding revisions to settlement statement (.3); execute closing documents (.3).	KD	0.60	\$350.00	\$210.00
Service	04/28/2023	Emails with title company and counsel regarding wire instructions (.1).	KD	0.10	\$350.00	\$35.00
Service	05/01/2023	Confer with N. Newlon regarding dismissal of foreclosure action (.1).	KD	0.10	\$350.00	\$35.00
Service	05/02/2023	Review Court's order approving sale of Mercedes and jet skis (.2); confer with N. Newlon regarding bill of sale for jet skis (.2); emails with G. Merderos regarding transfer of title and lien on Mercedes (.2); emails and telephone call with J. Maroney regarding Court's order approving sale of Mercedes and jet skis (.3); email to G. Baum regarding Court's order on jet skis (.2).	KD	1.10	\$350.00	\$385.00
Service	05/03/2023	Emails with T. Albanese regarding sale of jet skis (.2); confer with N. Newlon regarding requirements for sale of jet skis (.2).	KD	0.40	\$350.00	\$140.00
Service	05/04/2023	Telephone call with T. Albanese regarding wire information for jet skis (.2).	KD	0.20	\$350.00	\$70.00
Service	05/05/2023	Emails with J. Maroney regarding bill of sale for jet skis (.2).	KD	0.20	\$350.00	\$70.00
Service	05/08/2023	Emails with T. Albanese and M. Patel regarding utilities for Lansing Island property (.2); emails with G. Maderos and J. Maroney regarding Mercedes (.2); telephone call to J. Maroney regarding transfer of jet skis and Mercedes (.1).	KD	0.50	\$350.00	\$175.00
Service	05/15/2023	Confer with N. Newlon regarding order to show cause regarding Maroney's failure to execute bill of sale (.1).	KD	0.10	\$350.00	\$35.00
Service	05/16/2023	Review draft motion for order to show cause and confer with N. Newlon regarding revisions (.4); emails with J. Maroney regarding motion for order to show cause	KD	0.70	\$350.00	\$245.00

(.3).						
Service	05/17/2023	Emails with J. Maroney regarding jet ski keys (.2).	KD	0.20	\$350.00	\$70.00
Service	05/19/2023	Emails with J. Maroney regarding jet ski keys (.1).	KD	0.10	\$350.00	\$35.00
Service	05/25/2023	Emails with N. Newlon regarding issues with transfer of car title and revisions needed to motion for order to show cause (.2); review revised motion (.2).	KD	0.40	\$350.00	\$140.00
Service	05/26/2023	Review Court's Order granting motion for order to show cause (.2); email to J. Maroney regarding same (.1).	KD	0.30	\$350.00	\$105.00
Service	06/12/2023	Emails with G. Mederos and J. Maroney regarding return of documents related to sale of Mercedes (.2).	KD	0.20	\$350.00	\$70.00
Service	06/13/2023	Emails with G. Mederos and J. Maroney confirming receipt and executed documents (.1).	KD	0.10	\$350.00	\$35.00
Service	06/15/2023	Telephone calls with T. Albanese and Brevard County DMV regarding transfer of title for jet skis (.3); detailed email to J. Maroney regarding same (.2).	KD	0.50	\$350.00	\$175.00
Service	06/16/2023	Email to L. McDonough regarding New York investors (.2).	KD	0.20	\$350.00	\$70.00
Service	06/26/2023	Telephone call with Brevard County DMV regarding jet skis (.2); emails with J. Maroney regarding same (.1); emails with G. Mederos regarding Mercedes proceeds (.1).	KD	0.40	\$350.00	\$140.00
Service	06/26/2023	Review Mira plaintiffs' motion to discharge order to show cause (.2); confer with N. Newlon regarding same (.1).	KD	0.30	\$350.00	\$105.00
Service	06/27/2023	Emails with water company regarding refund check (.1).	KD	0.10	\$350.00	\$35.00
Service	06/28/2023	Review Court's Order discharging Order to Show Cause (.1).	KD	0.10	\$350.00	\$35.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	26.8	\$350.00	\$9,380.00
Subtotal			\$9,380.00
Total			\$9,380.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6991	05/15/2023	\$7,140.00	\$0.00	\$7,140.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7214	07/20/2023	\$9,380.00	\$0.00	\$9,380.00
Outstanding Balance				\$16,520.00
Total Amount Outstanding				\$16,520.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Invoice # 7214 - 07/20/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 7214
Date: 07/20/2023



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INVOICE

Invoice # 7215
Date: 07/20/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00009-Harbor City - Receiver - (CASE - Case Administration)

Harbor City - Receiver - (CASE - Case Administration)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	04/04/2023	Telephone call with investor LD (.3).	KD	0.30	\$350.00	\$105.00
Service	05/01/2023	Review and revise quarterly status report (.5); review fund accounting (.2).	KD	0.70	\$350.00	\$245.00
Service	05/03/2023	Update receivership website (.3).	KD	0.30	\$350.00	\$105.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	1.3	\$350.00	\$455.00
Subtotal			\$455.00
Total			\$455.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6992	05/15/2023	\$735.00	\$0.00	\$735.00

Current Invoice

Invoice # 7215 - 07/20/2023

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7215	07/20/2023	\$455.00	\$0.00	\$455.00
Outstanding Balance				\$1,190.00
Total Amount Outstanding				\$1,190.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Invoice # 7215 - 07/20/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 7215
Date: 07/20/2023



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EXHIBIT 3



INVOICE

Invoice # 7210
Date: 07/18/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00001-Harbor City - Legal Team - (AAR - Asset Analysis and Recovery)

Harbor City - Legal Team - (AAR - Asset Analysis and Recovery)

Services

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	06/16/2023	Review of information from accountant and SEC regarding investors (.5); prepare list of NY investors including contact information and amount of investments (.3).	MBP	0.80	\$150.00	\$120.00
Services Subtotal						\$120.00

Expenses

Type	Date	Description	Quantity	Rate	Total
Expense	04/03/2023	E-Hounds Inv. #42612 (2/28/23) - Review website platform.	1.00	\$595.00	\$595.00
Expense	04/30/2023	E-Hounds Inv. #44009 (4/30/2023) - Review website platform.	1.00	\$595.00	\$595.00
Expense	06/12/2023	E-Hounds Inv. #44108 (5/2023)- Review website platform.	1.00	\$595.00	\$595.00
Expense	06/30/2023	E-Hounds Inv. #45241 (6/30/2023) - Review website platform.	1.00	\$595.00	\$595.00
Expenses Subtotal					\$2,380.00

Invoice # 7210 - 07/18/2023

Time Keeper	Quantity	Rate	Total
Michelle B. Patel	0.8	\$150.00	\$120.00
Subtotal			\$2,500.00
Total			\$2,500.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6996	05/15/2023	\$2,766.36	\$0.00	\$2,766.36

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7210	07/18/2023	\$2,500.00	\$0.00	\$2,500.00
Outstanding Balance				\$5,266.36
Total Amount Outstanding				\$5,266.36

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Invoice # 7210 - 07/18/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 7210
Date: 07/18/2023



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INVOICE

Invoice # 7212
Date: 07/18/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00003-Harbor City - Legal Team - CASE (Case Administration)

Harbor City - Legal Team - CASE (Case Administration)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	05/01/2023	Draft Status Report and send to Receiver; edits to same and finalize for filing.	NDN	1.40	\$350.00	\$490.00

Time Keeper	Quantity	Rate	Total
Nicole D. Newlon	1.4	\$350.00	\$490.00
Subtotal			\$490.00
Total			\$490.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6989	05/15/2023	\$4,515.00	\$0.00	\$4,515.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7212	07/18/2023	\$490.00	\$0.00	\$490.00

Invoice # 7212 - 07/18/2023

Outstanding Balance	\$5,005.00
Total Amount Outstanding	\$5,005.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Invoice # 7212 - 07/18/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 7212
Date: 07/18/2023



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INVOICE

Invoice # 7211
Date: 07/18/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00002-Harbor City - Legal Team - ASDIS (Asset Disposition)

Harbor City - Legal Team - ASDIS (Asset Disposition)

Services

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	04/10/2023	Review Report and Recommendation regarding sale of property and confer with Receiver regarding same (.3); exchange emails with A. Reed regarding report and recommendation and review/consider proposal to mediate dispute, including emailing potential mediators (.3)	NDN	0.60	\$350.00	\$210.00
Service	04/11/2023	Exchange emails with A. Read and A. Rey, as well as the Receiver, regarding mediating dispute with mortgage holder.	NDN	0.60	\$350.00	\$210.00
Service	04/12/2023	Exchange multiple emails regarding mediation (1.0); confer with potential mediator (.3); confer with Receiver regarding mediation (.2).	NDN	1.50	\$350.00	\$525.00
Service	04/13/2023	Exchange multiple emails with counsel for Benworth, the Mediator, and the Receiver regarding the mediation (.8); review letter to Mediator regarding payment (.1).	NDN	0.90	\$350.00	\$315.00
Service	04/17/2023	Exchange emails with Receiver regarding mediation (.1); email B. Walker regarding compiling documents for mediator and review letter to mediator with documents (.1).	NDN	0.20	\$350.00	\$70.00
Service	04/18/2023	Mediation of dispute with Mortgage holder	NDN	6.00	\$350.00	\$2,100.00

		regarding disposition of property (5.5); draft settlement agreement and edit same (.5).				
Service	04/18/2023	Review and calculate total receivership fees and costs for mediation (.7).	MBP	0.70	\$150.00	\$105.00
Service	04/19/2023	Email lienholders (3) for payoff information to forward to title company; upon receipt forward to title company (.2); review edits to settlement agreement by lienholder and email Receiver regarding same (.5).	NDN	0.70	\$350.00	\$245.00
Service	04/19/2023	Review redline of settlement agreement and confer with N. Newlon regarding the impact of certain revisions proposed by opposing counsel.	CLD	0.50	\$350.00	\$175.00
Service	04/20/2023	Exchange emails with Receiver regarding agreement on settlement and confer regarding same (.3); exchange emails with opposing counsel regarding agreement and review revisions to same (.5); review emails to Title Agent regarding agreement and disposition of asset (.2); email Title Agent regarding dismissal of appeal (.1).	NDN	1.10	\$350.00	\$385.00
Service	04/20/2023	Confer with Receiver regarding removing vehicle from home before closing (.2); research storage facilities for housing vehicle on short-term basis (.4).	MBP	0.60	\$150.00	\$90.00
Service	04/20/2023	Arrange for payment for final cleaning of receivership property before closing (.1).	MBP	0.10	\$150.00	\$15.00
Service	04/21/2023	Exchange multiple emails regarding edits to agreement and providing executed copies (.5); review emails from Title Agent regarding closing and necessary documents for same (.2).	NDN	0.70	\$350.00	\$245.00
Service	04/24/2023	Exchange emails with Title Company, the Receiver, and A. Read regarding the sale of the property and the closing.	NDN	0.40	\$350.00	\$140.00
Service	04/25/2023	Finalize motion to lift asset freeze to sell jet skis and vehicle.	NDN	0.60	\$350.00	\$210.00
Service	04/26/2023	Review and revise motion regarding lifting asset freeze based on edits by Receiver (.4); exchange emails regarding agreement (.2).	NDN	0.60	\$350.00	\$210.00
Service	04/27/2023	Exchange multiple emails regarding sale of property with counsel for Benworth, Title Company, and Receiver.	NDN	0.60	\$350.00	\$210.00
Service	04/28/2023	Exchange emails regarding sale of property; confer with F. Fawsett regarding	NDN	0.70	\$350.00	\$245.00

		same.				
Service	05/01/2023	Exchange emails with mortgage holder regarding dismissal of state and appellate proceedings; review dismissal.	NDN	0.20	\$350.00	\$70.00
Service	05/01/2023	Review ORder lifting asset freeze to sell jet skis and car (.1).	NDN	0.10	\$350.00	\$35.00
Service	05/02/2023	Review dismissal filed in appellate proceedings regarding stay of foreclosure action.	NDN	0.10	\$350.00	\$35.00
Service	05/03/2023	Draft Bill of Sale for jetskis.	MBP	0.30	\$150.00	\$45.00
Service	05/03/2023	Exchange emails and research regarding title and bill of sale regarding jet skis, including addressing lost title issues.	NDN	0.40	\$350.00	\$140.00
Service	05/04/2023	Exchange emails with opposing counsel and draft motion to lift stay for pending action to foreclose lien in Brevard to dismiss case (paid in full at time of closing).	NDN	0.60	\$350.00	\$210.00
Service	05/08/2023	Review of email from Buyers regarding outstanding water utility bill on property (.1); research same and telephone call with clerk at City of Melbourne (.1); payment of bills in name of Celtic Enterprises from services incurred in 2022 (.1).	MBP	0.30	\$150.00	\$45.00
Service	05/10/2023	Exchange emails with C. Turner regarding CFPI/Celtic and lift stay for purposes of dismissing action.	NDN	0.20	\$350.00	\$70.00
Service	05/12/2023	Exchange emails with Receiver regarding issues with state court dismissal of foreclosure action (.2).	NDN	0.20	\$350.00	\$70.00
Service	05/15/2023	Draft motion for order to show cause regarding J. Maroney should not be held in contempt as to sale of vehicle/jet skis.	NDN	1.30	\$350.00	\$455.00
Service	05/15/2023	Draft and file proposed order regarding lifting stay in state court action regarding Central Florida Product Installations for dismissal of cause.	NDN	0.10	\$350.00	\$35.00
Service	05/15/2023	Contact A. Rey regarding deficiencies in filing and correcting same for dismissal of state court foreclosure complaint.	NDN	0.10	\$350.00	\$35.00
Service	05/16/2023	Edits to motion for order to show cause regarding J. Maroney (.5); review emails between Receiver and J. Maroney regarding same (.3).	NDN	0.80	\$350.00	\$280.00
Service	05/25/2023	Finalize motion for order to show cause and	NDN	0.50	\$350.00	\$175.00

Invoice # 7211 - 07/18/2023

file same (.4); review order on motion for order to show cause (.1).						
Service	06/26/2023	Review motion on order to show cause to ensure it comports with agreement and forward same to Receiver for review.	NDN	0.40	\$350.00	\$140.00
Services Subtotal						\$7,545.00

Expenses

Type	Date	Description	Quantity	Rate	Total
Expense	04/13/2023	Utilities payment to City of Melbourne.	1.00	\$173.75	\$173.75
Expense	04/20/2023	Cleaning fees paid to Steamboat Cleaning, Inc.	1.00	\$950.00	\$950.00
Expense	04/25/2023	Invoice from mediator's office for conducting mediation session on 4/18/23.	1.00	\$1,818.75	\$1,818.75
Expense	04/27/2023	Notary services for closing on 4/27/23.	1.00	\$25.00	\$25.00
Expense	05/08/2023	Payment of outstanding utilities on property in name of Celtic Enterprises for services 1/31/22 - 3/11/22.	1.00	\$179.45	\$179.45
Expense	05/11/2023	Utilities paid to City of Melbourne.	1.00	\$251.88	\$251.88
Expenses Subtotal					\$3,398.83

Time Keeper	Quantity	Rate	Total
Christopher L. DeCort	0.5	\$350.00	\$175.00
Nicole D. Newlon	20.2	\$350.00	\$7,070.00
Michelle B. Patel	2.0	\$150.00	\$300.00
Subtotal			\$10,943.83
Total			\$10,943.83

Detailed Statement of Account**Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6997	05/15/2023	\$22,708.64	\$0.00	\$22,708.64

Invoice # 7211 - 07/18/2023

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7211	07/18/2023	\$10,943.83	\$0.00	\$10,943.83
Outstanding Balance				\$33,652.47
Total Amount Outstanding				\$33,652.47

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Invoice # 7211 - 07/18/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 7211
Date: 07/18/2023



Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, [click here](#) if you're viewing on a computer or smartphone.

EXHIBIT 4

JOHNSON, NEWLON & DeCORT, P.A.

PROPOSED RATES

<u>Professional</u>	<u>Range of Standard Rates</u>	<u>Proposed Rate</u>
Receiver	\$425	\$350
Partner	\$250-\$470	\$350
Associate	\$195-\$250	\$240
Paralegal	\$165-\$190	\$150