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MAR 13 2020

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MARIPOSA SUPERIOR COURT

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9 County of Mariposa

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF MARIPOSA

12
13 COUNTY OF MARIPOSA,

14 Plaintiff,

15 v.

16 JDC LAND COMPANY, LLC; a California
17 limited liability company;
18 CONTINENTAL HERITAGE INSURANCE
19 COMPANY; and
DOES 1 through 50,

20 Defendants.

Action Filed: March 13, 2017
Case Number: 10887

**COUNTY OF MARIPOSA'S OPPOSITION
TO RECEIVER'S MOTION FOR
DISCHARGE, EXONERATION OF SURETY,
AND ORDER DIRECTING REPAYMENT OF
FEES AND COSTS**

[Filed concurrently with:
1. Declaration of Attorney Jones.
2. Proof of Service.]

Hearing

Date: April 2-3, 2020
Judge: F. Dana Walton

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I. INTRODUCTION

The County of Mariposa (“County”) hereby files this Opposition to the Receiver’s Motion for Discharge, Exoneration of Surety, and Payment of Costs (“Discharge Motion”) based on the Receiver’s claim that he is entitled to **\$437,084.27** in fees for supervising the abatement of the code violations on the Subject Property.¹ This figure does not include the costs to actually fix up the Subject Property—that staggering figure just represents the total amount of the fees charged by the Receiver and his 26 employees who billed more than 1,500 hours on this receivership.

The County does not object to the Receiver’s right to obtain reasonable compensation for the services he performed. However, the sheer number of billers and duplicate and excessive billing on each of the Receiver’s monthly invoices cannot be overlooked. **A whopping 26 employees of California Receivership Group (“CRG”) billed time to this matter.** It is not surprising with 26 employees working on this case that numerous examples of duplicative and excessive billing abound.

In addition to the duplicate and excessive billing entries, the Receiver’s fees should also be reduced by eliminating the fees charged by 11 CRG employees who were not authorized by the Court to work on this case. A further reduction in the Receiver’s fees is necessitated by the Receiver’s unilateral, and unapproved, increase in the hourly billing rates for 11 CRG employees, five of whom received billing rate increases of 50% or more. Accordingly, as shown in the table below, the County requests that the Court reduce the fees awarded to the Receiver by **\$151,224.83**.

Amount Billed By 11 CRG Employees Not Authorized To Work On This Case	\$54,614.00
Amount Billed By 11 CRG Employees At Hourly Rates Higher Than Those Approved By The Court	\$54,798.08
Amount Billed With Duplicate Billing Records	\$1,411.50
50% Reduction In Amount Billed By Three Or More CRG Employees For Reviewing The Same Document Or Email	\$4,295.25

¹ As used herein, the term “Subject Property” refers to the parcels of real property located at 5873, 6071, and 6133 CYA Road, Mariposa, California 95338, Assessor’s Parcel Numbers 008-140-0210, 008-140-0220, and 008-140-023 (collectively, “Subject Property”).

50% Reduction In Amount Billed For Weekly Status Meetings	\$8,795.50
Amount Billed For Observing Hearing and Status Conferences	\$3,085.00
Amount Billed for defense of Federal Lawsuit	\$24,225.50
TOTAL REDUCTION IN FEES:	<u>\$151,224.83</u>

The Receiver's abusive and systemic pattern of overbilling justifies a further reduction in his fees by twenty percent (20%). There is no doubt that additional overbilling and duplicative billing exists. Because of the sheer number of CRG employees who billed their time to this receivership and the way the time by each of the 26 employees was billed, coupled with the fact that none of the monthly billing statements are attached as exhibits to the Receiver's Discharge Motion, the Receiver has made it impossible to determine the total amount of duplicative work and overbilling that has occurred. For this reason, the County requests that the Court reduce the total amount of fees that the Receiver has charged to the receivership estate by an additional twenty percent (20%). This 20% further reduction is not excessive, and the County would be justified in asking for more.

II. LEGAL AUTHORITY

A. The Court Is Required To Scrutinize The Receiver's Fees To Ensure They Are Reasonable

"[A] receiver is an agent and officer of the court, and property in the receiver's hands is under the control and continuous supervision of the court." (*People v. Stark* (2005) 131 Cal.App.4th 184, 204.) The Court has every right to expect its agent to be candid and transparent in his dealings with the property. However, "[b]ecause it is the judge who appointed the receiver to a position of trust, the judge must closely scrutinize the receiver's account to make sure that all expenditures are reasonable." (Cal. Judges Benchbook, Civ. Proc. Before Trial, § 14.166.) Moreover, although the Court has approved the Receiver's monthly accountings, the Court "retains jurisdiction to award a greater or lesser amount as the full, fair, and final value of the services received." (Cal. Rules of Court, Rule 3.1183(a).) "The amount of fees awarded to a receiver is 'in the sound discretion of the trial court and in the absence of a

1 clear showing of an abuse of discretion, a reviewing court is not justified in setting aside an order fixing
2 fees.” (*Melikian v. Aquila, Ltd.* (1998) 63 Cal.App.4th 1364, 1368.) “A receiver, as any fiduciary, may
3 be surcharged and his or her surety held liable for a failure to properly carry out the duties imposed by
4 the order of appointment.” (*Stewart v. State of California* (1969) 272 Cal.App.2d 345, 351.)

5 **B. The Court Should Reduce The Receiver’s Fees By The Amount Billed By The 11 CRG**
6 **Employees Who Were Not Approved By The Court To Work On This Case**

7 The County disputes the billing entries for the 11 CRG employees who were not listed in the
8 declaration of Mark Adams in support of the County’s Motion for the Appointment of a Receiver and
9 for Other Relief (“Receivership Motion”). (Jones Decl., ¶ 5, Exhibit B [Declaration of Receiver Mark
10 Adams In Support of the County’s Receivership Motion, Exhibit 2 – California Receivership Group Rate
11 List].) The following 11 employees were not listed by the Receiver in Exhibit 2, and were therefore not
12 approved by the Court to work on this case: (1) Suzanne Spence (billed \$7,625.00); (2) Sharon Tian
13 (billed \$460.00); (3) Sheila Vossough (billed \$4,211.00); (4) CJ Britz (billed \$1,780.00); (5) Tisa Grenda
14 (billed \$1,230.00); (6) Trevor Axt (billed \$26,276.00); (7) Patricia Albiol (billed \$2,847.00); (8) Marc
15 Deekter (billed \$615.00); (9) Karen Xu (billed \$5,758.50); (10) David Ballou (billed \$2,212.00); and
16 (11) Jared Salvati (billed \$1,600.00), for a total of **\$54,614.00**. (Jones Decl., ¶ 5.)

17 No job titles have been provided for these individuals and no justification has been provided for
18 their hourly rates, which range from \$100 to \$275 per hour. The Receiver has also failed to provide any
19 explanation as to why the 15 employees originally identified in his declaration were insufficient and, in
20 fact, were so insufficient that the Receiver had to use an additional 11 employees to work on this case.
21 Moreover, if the Receiver did in fact have a legitimate reason for needing an additional 11 employees to
22 work on this case, the Receiver should have sought the Court’s approval prior to allowing their work on
23 this case. Thus, as these 11 CRG employees were not authorized by the Court to work on this case, the
24 County requests that the total amount billed by these 11 employees, which is **\$54,614.00**, be excluded
25 from the amount paid to the Receiver. (Jones Decl., ¶ 6.)

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C. The Court Should Reduce The Receiver's Fees By The Amount Billed By 11 CRG Employees At Hourly Rates Unilaterally Increased By The Receiver At Rates As High As Eighty-Four Percent Higher Than The Rates Authorized By The Court

After he was appointed, the Receiver unilaterally (and without the Court's approval) increased the hourly billing rates for 11 CRG employees substantially beyond what was approved by the Court when it issued the Order appointing the Receiver. (Jones Decl., ¶ 7.) For example, although the Receiver stated at the time of his appointment that Lou Laurenti's billing rate was \$150, *the same month he was appointed*, the Receiver unilaterally increased Lou Laurenti's billing rate to \$175, then *two months later*, further increased Lou Laurenti's billing rate to \$225. (Jones Decl., ¶ 7.) Additionally, *less than 2 months after he was appointed*, the Receiver unilaterally increased the billing rate of Erick Traschikoff from \$80 to \$140, Andrew Adams from \$300 to \$350, Lyna Chon from \$250 to \$290, Christmas Meyers from \$150 to \$175, Marcia Wehde from \$175 to \$200, Eddie Gao from \$125 to \$150, and Elizabeth Weinstein from \$175 to \$200. (Jones Decl., ¶ 7.)

In total, the Receiver unilaterally, and without Court approval or authorization, increased the hourly billing rates for the following 11 employees: Tom Yatteau increased from \$160 to \$295 (**84% increase**); Erick Traschikoff increased from \$80 to \$140 (**75% increase**); Leah Jaques increased from \$125 to \$200 (**60 % increase**); Eddie Gao increased from \$125 to \$200 (**60% increase**); Lou Laurenti increased from \$150 to \$225 (**50% increase**); Pierce Harper increased from \$125 to \$150 (**20% increase**); Andrew Adams increased from \$300 to \$350 (**16% increase**); Lyna Chon increased from \$250 to \$290 (**16% increase**); Christmas Meyers increased from \$150 to \$175 (**16% increase**); Marcia Wehde increased from \$175 to \$200 (**14% increase**); and Elizabeth Weinstein increased from \$175 to \$200 (**14% increase**). (Jones Decl., ¶ 8; Exhibit B [Declaration of Receiver Mark Adams In Support of the County's Receivership Motion, Exhibit 2 – California Receivership Group Rate List].) The County disputes these unilaterally increased hourly rates and asks to the extent the Court awards any fees for these employees that these fees be reduced by **\$54,798.08**, which represents the amount overbilled by the Receiver at billing rates higher than those approved by the Court. (Jones Decl., ¶ 8. Exhibit C.)

Although the Receiver may attempt to provide some justification for these billing rate significant increases, the fact remains that the Receiver was appointed based on the representations he made in

1 his declaration about these hourly rates in support of the County's Receivership Motion, and he should
2 be held to those representations as they were made under oath. Additionally, these huge billing rate
3 increases, some of which were increased by 84%, can hardly be considered reasonable regardless of the
4 justification the Receiver provides. (Jones Decl., ¶ 9.)

5 Since the Receiver failed to seek the Court's approval for these unilateral hourly billing rate
6 increases, and failed to even notify the Court that he was unilaterally increasing these employees' hourly
7 billing rates beyond what the Court had approved, in most cases less than two months' prior, the County
8 respectfully requests that the Court reduce the award of fees for these employees to equal what they
9 should have been had the Receiver billed their time at the hourly billing rates approved by the Court.
10 (Jones Decl., ¶ 8.) The County disputes these increased hourly rates and asks to the extent the Court
11 awards fees for these employees that these fees be reduced by \$54,798.08, which represents the amount
12 overbilled by the Receiver at billing rates higher than those approved by the Court. (Jones Decl., ¶ 8.)

13 **D. The Court Should Reduce The Receiver's Fees By The Amount Billed For Duplicate**
14 **Billing Entries**

15 Prior to attaching California Receivership Group's ("CRG") invoices to his monthly accountings,
16 the Receiver should have reviewed the CRG invoices and eliminated all duplicate billing entries.
17 However, as the Receiver chose not to perform this important task himself, and it would be unreasonable
18 to burden the Court with again having to review the Receiver's monthly accountings, it has been left to
19 the County to comb through 29 months of Receiver reports to identify for the Court those billing entries
20 for which the Receiver billed at least twice for the exact same work performed by the same employee.
21 After conducting a detailed review of the Receiver's billing records, the County found a number of
22 examples of duplicate billing records, which are described in the following paragraphs.

23 On August 15, 2017, Elizabeth Weinstein billed twice for "Review and approve Bond invoice;
24 update a/p spreadsheet; forward to SS for processing". On August 30, 2017, Lou Laurenti billed three
25 times for "rev email sent by MA re drone". On November 8, 2017, Marcy Wehde billed twice for
26 "Review and respond to emails re: funding". On November 13, 2017, Sharon Han billed twice for
27 "Prepared Substitution of Trustee and Deed of Reconveyance for Recording. Submitted for Recording
28 via on Trac". On November 13, and November 14, 2017, Mark Adams billed twice for "Emails review

1 and f/u w/ Matthew Silver re: planning t/c for updates/planning.” (Jones Decl., ¶ 11.)

2 On January 8, 2018, Lou Laurenti billed twice for “email ex with MA re Cox on property”. On
3 January 18 and 19, 2018, Mark Adams billed twice for “Email review & f/u w/ AA & Matthew Silver
4 re planning t/c to strategize for court hearing.” On January 23, 2018, Marcy Wehde billed twice for
5 “Review funding info, update interest accrual spreadsheet, emails w/ EW”. On February 5, 2018,
6 Christmas Meyers billed twice for “Review, scan and archive signed October 2017 Monthly Accounting
7 Order.” On February 5, 2018, Christmas Meyers billed twice for “Review, scan, archive, and circulate
8 Order Approving Increase to Receiver’s Certificate.” On March 1, 2018, CJ Britz billed twice for “create
9 March MAR subfolder in drive”. On March 7, 2018, Lou Laurenti billed twice for “email ex with CB
10 re hotel invoice for PDA” On March 22, 2018, Erick Traschikoff billed twice for “Drafted renewal
11 trespass enforcement letter and send email to CJ to review letter.” On April 11 and April 12, 2018, Erica
12 Connelly billed twice for “Email EG, LL, CB re: caretaker schedule.” On June 13 and June 14, 2018,
13 Erick Traschikoff billed twice for “Draft renewal trespass enforcement letter.” On July 30, 2018, CJ
14 Britz billed twice for “link property photos to inspection sheet of database”. On August 23, 2018, Mark
15 Adams billed twice for “Legal research re demand for assurance” On August 14, 2018, Marcy Wehde
16 billed twice for “Review and respond to emails w/ Randy Newman”. On September 18, 2018, Mark
17 Adams billed twice for “Email review and f/u with EG, Meranda Taylor, regarding estimate and timeline
18 for the steel building.” On September 7 and 10, 2018, Erick Traschikoff billed twice for “Email EG RE
19 documentation of security report, confirm to EC that report w/ pictures have been received.” On October
20 15, 2018, Lisa Grenda billed twice for “updated spreadsheets; t/c with EW re: Pipkin invoice; looked in
21 files for hard copy; refiled”. On November 2, 2018, Leah Jaques billed twice for “F/U call to Clerk re
22 status of filing Twelfth Report”. On November 28, 2018, Erick Traschikoff billed twice for “Flag
23 Trespass Enforcement Letter for MA to sign.” On November 29, 2018, Lou Laurenti billed twice for
24 “email ex with EG and Stan re meeting at property”. On December 10, 2018, Marcy Wehde billed twice
25 for “Review and respond to emails w/ EG re: listing”. (Jones Decl., ¶ 12.)

26 On January 2, 2019, Elizabeth Weinstein billed twice for “Prep P&I’s; send to MA”. On January
27 3, 2019, and January 7, 2019, Mark Adams billed twice for “Email doc review w/ James Chase regarding
28 Plaintiff County of Mariposa’s Status Conference Report and Proof of Service of Plaintiff County of

Mariposa's Status Conference Report." On January 12, 2019, Mark Adams billed twice for "t/c w/ controller re: pending c/f matters". On January 25, 2019, Eddie Gao billed twice for "Email exchange w/ MA re: BDG final report." On March 4, 2019, Erica Connelly billed twice for "Email PA re: contractor inspection invoice." On March 14, 2019, Mark Adams billed twice for "Email doc review w/ Marc Angelucci Regarding Revised Reply to Oppositions to Petition for Writ." On April 18, 2019, Marcy Wehde billed twice for "Review and respond to emails re: offer". On April 19, 2019, Marcy Wehde billed twice for "Review and respond to emails re: County fees". On April 26, 2019, Elizabeth Weinstein billed twice for "Discuss property updates and next steps". (Jones Decl., ¶ 13.)

Based on these duplicate billing entries, the County requests that the Court reduce the amount of fees awarded to the Receiver by \$1,411.50. (Jones Decl., ¶ 14.)

E. The Court Should Reduce The Receiver's Fees For Time Billed By Three Or More CRG Employees For Reviewing The Same Document Or Email

With 26 employees working on this case, it is understandable that the Receiver would bill once or twice for a review of the same document or email. However, the County objects to the Receiver's billing for time spent by more than two CRG employees reviewing the same document or email as excessive. In many cases, the same document was sent to five different CRG employees to review. (Jones Decl., ¶ 15.) Similarly, the same email was often sent to three or more employees, and often as many as five CRG employees, for review. (Jones Decl., ¶ 15.) The County contends that it is unreasonable and excessive to bill for this many employees reviewing the same document or email and therefore objects to \$8,589.50 of the Receiver's fees on this basis, and requests a 50% reduction to \$4,295.25.³ (Jones Decl., ¶ 15.)

F. The Court Should Reduce The Receiver's Fees For Time Billed By Multiple CRG Employees For Attending A Weekly Status Meeting Every Week For 29 Months

The Receiver's billing records are replete with entries for weekly status meetings, which generated more than \$17,000.00 in fees. (Jones Decl., ¶ 16.) The County contends that billing for weekly status meetings, which were attended by an average of six (6) CRG employees and sometimes

³ The specific billing entries that the County objects to are set forth in Exhibit D to the Declaration of Attorney Amanda R. Jones filed concurrently with this Opposition.

as many as ten (10) employees, is excessive. (Jones Decl., ¶ 16.) As a preliminary matter, holding a weekly meeting every week for 29 months does not appear reasonable. Instead, the County suggests that status meetings could have been held bi-weekly or monthly. Additionally, the County contends that it is unreasonable to have 6 to 10 employees billing for their time attending a weekly status meeting. (Jones Decl., ¶ 16.) For example, nine (9) different CRG employees billed for time spent at a weekly status meeting held on November 1, 2019, which resulted in a charge of \$447.00 for a meeting which lasted only 12 minutes. (Jones Decl., ¶ 16.) (Jones Decl., ¶ 16.) The County therefore suggests that a reduction of 50% for the **\$17,591.00** amount that the Receiver billed for attendance at weekly status meetings is appropriate, which would result in a reduction of the Receiver's fees in the amount of **\$8,795.50**. (Jones Decl., ¶ 17.)

G. The Receiver's Fees Should be Reduced By The Amount Billed By Lou Laurenti For Observing The Appointment Hearing And Eddie Gao For Observing Status Conferences, All Of Which The Receiver Also Attended And Already Billed His Time

On July 17, 2017, the Court held a hearing on the Receivership Motion. On July 17, 2017, Mark Adams billed \$4,305.00 for attending the hearing on the Receivership Motion. As if this cost was not enough, that same day, Lou Laurenti, billed 15 hours for his attendance at the same hearing on the Receivership Motion, at an additional cost of **\$2,625.00**. (Jones Decl., ¶ 18.) There was no reason for Lou Laurenti to attend this hearing when Mark Adams, the Court-Appointed Receiver, was already attending the hearing. (Jones Decl., ¶ 18.) The County therefore objects to this **\$2,625.00** charge as unreasonable. Similarly, on January 7, 2019, and again on January 14, 2019, Eddie Gao billed **\$280.00** and **\$180.00**, respectively, for "observing" and "audit" of a status conference by CourtCall. (Jones Decl., ¶ 19.) As other CRG staff members were already attending both of these status conferences, the Receiver should not have also billed for Eddie Gao's attendance at the status conference. (Jones Decl., ¶ 19.) The County therefore objects to these fees, which total **\$3,085.00**, as they are unreasonable and unnecessary. (Jones Decl., ¶ 19.)

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H. The Receiver's Fees Should Be Reduced By The Amount Billed for Time Spent Defending Against The Federal Action

The County objects to the Receiver's compensation for time spent defending against the federal lawsuit filed by Jerry Cox against the Receiver, the County, and other defendants in *Jerry Cox v. Mariposa County, et. al.*, Case No. 1:19-cv-01105-AWI-BAM, filed on August 12, 2019, in the United States District Court for the Eastern District of California ("Federal Lawsuit"). Any recovery of the Receiver's fees for defending against the Federal Lawsuit should be recovered in that federal case. Moreover, as these fees were not incurred to abate the code violations on the Subject Property, it is not appropriate for the Receiver to seek recovery of those fees from the Receivership Estate. These fees should be recovered from Jerry Cox, who is not a defendant in this case, and did not own the Subject Property. Finally, as the Federal Lawsuit is still pending, it would be premature to award any fees to the Receiver for his defense of the Federal Lawsuit. The County therefore requests that the Court reduce the award of the Receiver's fees by \$24,225.50, which represents the total amount billed by the Receiver for his defense in the Federal Lawsuit. (Jones Decl., ¶ 20; Exhibit E.)

I. The County's Opposition Is Timely And Not Precluded By Rule 3.1183 Of The California Rules Of Court

The Receiver may attempt to argue, as it has done unsuccessfully in other cases, that the County's Opposition is untimely under Rule 3.1183 of the California Rules of Court. However, Rule 3.1183 of the California Rules of Court does not preclude the County from opposing the Receiver's final accounting because: (1) that rule only applies to interim accountings; (2) the plain language of the Order appointing the Receiver allows the County to object to the Receiver's final accounting; and (3) the County has shown good cause for raising its objections at this time.

Rule 3.1183(b) states that "[u]nless good cause is shown, objections to a receiver's interim report and accounting must be made within 10 days of notice of the report and accounting." (Emphasis added.) Here, the County is objecting to the Receiver's final accounting. Thus, under the plain language of the rule, it does not apply to the County's Opposition.

Second, in the Order appointing the Receiver, the Court specifically stated that the "Receiver's compensation and reimbursement shall be subject to review and final approval by this Court at the time

Receiver presents Receiver's final accounting to this Court." (Jones Decl., ¶ 3, Exhibit A [Order appointing Receiver], 2:23–25 [emphasis added].) As the Court specifically reserved the right to review and give its final approval at the time of the final accounting, and that time is now, the County's objections are timely and must be considered by the Court before it renders a decision on the Receiver's final accounting. This interpretation of the Order appointing the Receiver is also supported by Rule 3.1183(a) of the California Rules of Court which provides that "[i]nterim fees are subject to final review and approval by the court. The court retains jurisdiction to award a greater or lesser amount as the full, fair, and final value of the services received." Thus, even if the parties made no objection to the Receiver's interim monthly accountings, the Court has the authority to award a lesser amount based on the duplication of work performed by the Receiver's 26 employees, the Receiver's unauthorized substantial increases in the hourly rates charged by CRG's employees, and the excessive amount requested by the Receiver for the performance of this work.

Finally, Rule 3.1183(b) allows objections to **interim** accountings to be made at a later date when "good cause" is shown. Here, ample good cause exists. The County could not properly dispute the Receiver's final accounting until all of the work was completed and a full and final tally of the total amount of work performed in each category, and the amount charged for that work, had been provided. The cumulative total of more than 29 months' worth of invoices is staggering, totaling \$437,084.27. The sheer amount of the claimed fees, coupled with the billing entries of 26 employees over a period of 29 months at unauthorized rates, constitutes more than sufficient good cause for the County to raise its objections as this time. Moreover, the County could not properly object to the Receiver's monthly accountings while the case was ongoing and the accountings were still being developed/added to by the Receiver.

Thus, for the foregoing reasons, the County's objections to the Receiver's final accounting are proper and timely.

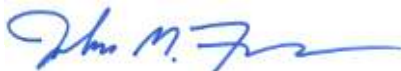
III. CONCLUSION

For the foregoing reasons, the County respectfully requests that the Court reduce the amount of the Receiver's fees by \$151,224.83 or more. By reducing the Receiver's fees by this amount, the Court will eliminate the fees charged: (1) by employees who were not authorized to work on this case; (2) at

1 billing rates substantially higher than those approved by the Court; (3) for duplicate billing entries; (4)
2 by 50% for multiple employees reviewing the same document or email; (5) by 50% for multiple
3 employees attending weekly status meetings; and (6) for observing the appointment hearing and status
4 conferences when the Receiver had already billed for this time. The Receiver's abusive and systemic
5 pattern of overbilling justifies an even further reduction in his fees.

6
7 Dated: March 19, 2020

SILVER & WRIGHT LLP

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13 COUNTY OF MARIPOSA
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MARIPOSA COUNTY COUNSEL

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF MARIPOSA

COUNTY OF MARIPOSA,

Plaintiff,

v.

JDC LAND COMPANY, LLC; a California
limited liability company;
CONTINENTAL HERITAGE INSURANCE
COMPANY; and
DOES 1 through 50,

Defendants.

Action Filed: March 13, 2017
Case Number: 10887

**DECLARATION OF ATTORNEY AMANDA
R. JONES IN SUPPORT OF COUNTY OF
MARIPOSA'S OPPOSITION TO
RECEIVER'S MOTION FOR DISCHARGE,
EXONERATION OF SURETY, AND ORDER
DIRECTING REPAYMENT OF FEES AND
COSTS**

[Filed concurrently with:
1. Opposition to Receiver's Motion for
Discharge.
2. Proof of Service.]

Hearing
Date: April 2-3, 2020
Judge: F. Dana Walton

DECLARATION OF ATTORNEY AMANDA R. JONES IN SUPPORT
OF PLAINTIFF COUNTY OF MARIPOSA'S OPPOSITION TO
RECEIVER'S MOTION FOR DISCHARGE

I, Amanda R. Jones, declare as follows:

1. I am a competent adult over the age of 18 years and have personal knowledge of the following facts. I make this declaration in support of the County of Mariposa's Opposition to the Receiver's Motion for Discharge.

2. I am an attorney licensed to practice law in the State of California. I am employed by the law firm of Silver & Wright LLP ("Special Counsel"). I represent Plaintiff County of Mariposa ("County") in its Verified Complaint for Nuisance Abatement and Receivership regarding the parcels of real property located at 5873, 6071, and 6133 CYA Road, Mariposa, California 95338, Assessor's Parcel Numbers 008-140-0210, 008-140-0220, and 008-140-023 (collectively, "Subject Property") in Superior Court of California, County of Mariposa, case number 10887.

3. A true and correct copy of the Order appointing the Receiver is attached to this declaration as **Exhibit A**.

4. I have personally reviewed the Receiver's Motion for Discharge and all the declarations and exhibits attached to the Receiver's Motion for Discharge. For the following reasons, the County requests that the Court reduce the fees awarded to the Receiver by **\$151,224.83**.

5. The County disputes the billing entries for the 11 CRG employees who were not listed in the declaration of Mark Adams in support of the County's Motion for the Appointment of a Receiver and for Other Relief ("Receivership Motion"). The following 11 employees were not listed by the Receiver in Exhibit 2 to the Receivership Motion, and were therefore not approved by the Court to work on this case: (1) Suzanne Spence (billed \$7,625.00); (2) Sharon Han (billed \$460.00); (3) Sheila Vossough (billed \$4,211.00); (4) CJ Britz (billed \$1,780.00); (5) Lisa Grenda (billed \$1,230.00); (6) Trevor Axt (billed \$26,276.00); (7) Patricia Albiol (billed \$2,847.00); (8) Marc Deckter (billed \$615.00); (9) Karen Xu (billed \$5,758.50); (10) David Ballou (billed \$2,212.00); and (11) Jared Salvati (billed \$1,600.00), for a total of **\$54,614.00**. A true and correct copy of Exhibit 2 to the Declaration of Mark

1 Adams in support of the County's Receivership Motion is attached to this declaration as Exhibit B.

2 6. No job titles have been provided for these individuals and no justification has been
3 provided for their hourly rates, which range from \$100 to \$275 per hour. The Receiver has also failed
4 to provide any explanation as to why the 15 employees originally identified in his declaration in support
5 of the County's Receivership Motion were insufficient and, in fact, were so insufficient that the Receiver
6 had to use an additional 11 employees to work on this case. Moreover, if the Receiver did in fact have
7 a legitimate reason for needing an additional 11 employees to work on this receivership, the Receiver
8 should have sought the Court's approval prior to allowing their work on this receivership. Thus, as these
9 11 additional CRG employees were not authorized by the Court to work on this receivership, the County
10 requests that the total amount billed by these 11 employees, which is \$54,614.00, be excluded from the
11 amount paid to the Receiver.

12 7. In addition, after he was appointed, I observed that the Receiver unilaterally increased the
13 hourly billing rates for 11 CRG employees substantially beyond what was approved by the Court when
14 it issued the Order appointing the Receiver. For example, although the Receiver stated at the time of his
15 appointment that Lou Laurenti's billing rate was \$150, *the same month he was appointed*, I observed
16 that the Receiver unilaterally increased Lou Laurenti's billing rate to \$175, then *two months later*, further
17 increased Lou Laurenti's billing rate to \$225. Additionally, *less than 2 months after he was appointed*,
18 I observed that the Receiver unilaterally increased the billing rate of Erick Traschikoff from \$80 to \$140,
19 Andrew Adams from \$300 to \$350, Lyna Chon from \$250 to \$290, Christmas Meyers from \$150 to
20 \$175, Marcia Wehde from \$175 to \$200, Eddie Gao from \$125 to \$150, and Elizabeth Weinstein from
21 \$175 to \$200.

22 8. In this paragraph, I explain the Receiver's unapproved, unilateral hourly rate increases in
23 detail. I observed that the Receiver unilaterally, and without Court approval or authorization, increased
24 the hourly billing rates for the following 11 employees: Tom Yatteau increased from \$160 to \$295 (84%
25 increase); Erick Traschikoff increased from \$80 to \$140 (75% increase); Leah Jaques increased from
26 \$125 to \$200 (60 % increase); Eddie Gao increased from \$125 to \$200 (60% increase); Lou Laurenti
27 increased from \$150 to \$225 (50% increase); Pierce Harper increased from \$125 to \$150 (20%
28 increase); Andrew Adams increased from \$300 to \$350 (16% increase); Lyna Chon increased from

1 \$250 to \$290 (16% increase); Christinas Meyers increased from \$150 to \$175 (16% increase); Marcia
2 Wehde increased from \$175 to \$200 (14% increase); and Elizabeth Weinstein increased from \$175 to
3 \$200 (14% increase). The County disputes these unapproved increased hourly rates and asks to the
4 extent the Court awards any fees for these employees that these fees be reduced by \$54,798.08, which
5 represents the amount overbilled by the Receiver at billing rates higher than those approved by the Court.
6 A chart showing how this number was calculated is attached to this declaration as Exhibit C.

7 9. Although the Receiver may attempt to provide some justification for these exorbitant
8 billing rate increases, the fact remains that the Receiver was appointed **based on the representations of**
9 **hourly rates** he made in his declaration in support of the County's Receivership Motion and he should
10 be held to those representations of the hourly rates as they were made under oath. Since the Receiver
11 failed to seek the Court's approval for these unilateral hourly billing rate increases, and failed to even
12 notify the Court that he was unilaterally increasing these employees' hourly billing rates way beyond
13 what the Court had approved, in most cases less than two months' prior, the County respectfully requests
14 that the Court reduce the award of fees for these employees to equal what they should have been had the
15 Receiver billed their time at the hourly billing rates approved by the Court.

16 10. In addition, after I conducted a detailed review of the Receiver's billing records, I found
17 a number of examples of duplicate billing records, which I have described in the following paragraphs.

18 11. On August 15, 2017, Elizabeth Weinstein billed twice for "Review and approve Bond
19 invoice; update a/p spreadsheet; forward to SS for processing". On August 30, 2017, Lou Laurenti billed
20 three times for "rev email sent by MA re drone". On November 8, 2017, Marcy Wehde billed twice for
21 "Review and respond to emails re: funding". On November 13, 2017, Sharon Han billed twice for
22 "Prepared Substitution of Trustee and Deed of Reconveyance for Recording. Submitted for Recording
23 via on Trac". On November 13, and November 14, 2017, Mark Adams billed twice for "Emails review
24 and f/u w/ Matthew Silver re: planning t/c for updates/planning."

25 12. On January 8, 2018, Lou Laurenti billed twice for "email ex with MA re Cox on
26 property". On January 23, 2018, Marcy Wehde billed twice for "Review finding info, update interest
27 accrual spreadsheet, emails w/ FW". On February 5, 2018, Christmas Meyers billed twice for "Review,
28 scan and archive signed October 2017 Monthly Accounting Order. On February 5, 2018, Christmas

1 Meyers billed twice for "Review, scan, archive, and circulate Order Approving Increase to Receiver's
2 Certificate." On March 1, 2018, CJ Britz billed twice for "create March MAR subfolder in drive". On
3 March 7, 2018, Lou Laurenti billed twice for "email ex with CB re hotel invoice for PDA" On March
4 22, 2018, Erick Traschikoff billed twice for "Drafted renewal trespass enforcement letter and send email
5 to CJ to review letter." On April 11 and April 12, 2018, Erica Connelly billed twice for "Email EG, LL,
6 CB re: caretaker schedule." On June 13 and June 14, 2018, Erick Traschikoff billed twice for "Draft
7 renewal trespass enforcement letter." On July 30, 2018, CJ Britz billed twice for "link property photos
8 to inspection sheet of database". On August 23, 2018, Mark Adams billed twice for "Legal research re
9 demand for assurance" On August 14, 2018, Marcy Wehde billed twice for "Review and respond to
10 emails w/ Randy Newman". On September 18, 2018, Mark Adams billed twice for "Email review and
11 fu with EG, Meranda Taylor, regarding estimate and timeline for the steel building." On September 7
12 and 10, 2018, Erick Traschikoff billed twice for "Email EG RE documentation of security report, confirm
13 to EC that report w/ pictures have been received." On October 15, 2018, Lisa Grenda billed twice for
14 "updated spreadsheets; t/c with EW re: Pipkin invoice; looked in files for hard copy; refiled". On
15 November 2, 2018, Leah Jaques billed twice for "F/U call to Clerk re status of filing Twelfth Report".
16 On November 28, 2018, Erick Traschikoff billed twice for "Flag Trespass Enforcement Letter for MA
17 to sign." On November 29, 2018, Lou Laurenti billed twice for "email ex with EG and Stan re meeting
18 at property". On December 10, 2018, Marcy Wehde billed twice for "Review and respond to emails w/
19 EG re: listing".

20 13. On January 2, 2019, Elizabeth Weinstein billed twice for "Prep P&I's: send to MA" On
21 January 12, 2019, Mark Adams billed twice for "t/c w/ controller re: pending c/f matters". On January
22 25, 2019, Eddie Gao billed twice for "Email exchange w/ MA re: BDG final report." On March 4, 2019,
23 Erica Connelly billed twice for "Email PA re: contractor inspection invoice." On March 14, 2019, Mark
24 Adams billed twice for "Email doc review w/ Marc Angelucci Regarding Revised Reply to Oppositions
25 to Petition for Writ." On April 18, 2019, Marcy Wehde billed twice for "Review and respond to emails
26 re: offer". On April 19, 2019, Marcy Wehde billed twice for "Review and respond to emails re: County
27 fees". On April 26, 2019, Elizabeth Weinstein billed twice for "Discuss property updates and next
28 steps".

1 14. Based on these duplicate billing entries, the County requests that the Court reduce the
2 amount of fees awarded to the Receiver by \$1,411.50.

3 15. With twenty-six (26) employees working on this receivership, it is understandable that
4 the Receiver would bill once or twice for a review of the same document or email. However, the County
5 objects to the Receiver's billing for time spent by more than two CRG employees reviewing the same
6 document or email as excessive and unnecessary. In many cases, I observed that the same document
7 was sent to five different CRG employees to review. Similarly, I observed that the same email was often
8 sent to three or more employees, and often as many as five CRG employees, for review, each of whom
9 billed time for his or her review of that same email. The County contends that it is unreasonable and
10 excessive to bill for this many employees reviewing the same document or email and therefore requests
11 a reduction of 50% of the \$8,590.50 that the Receiver's billed for these tasks, which would result in a
12 reduction of the Receiver's fees in the amount of \$4,295.25. A chart showing how this number was
13 calculated is attached to this declaration as Exhibit D.

14 16. I also observed that the Receiver's billing records are replete with entries for weekly
15 status meetings, which generated \$17,591.00 in fees. The County contends that the practice of billing
16 for weekly status meetings, which were attended by an average of six (6) CRG employees and sometimes
17 as many as ten (10) employees, was excessive and unnecessary. Holding a weekly meeting every week
18 for 29 months is not reasonable. Instead, the County believes that status meetings could have been held
19 bi-weekly or monthly. Additionally, the County contends that it is unreasonable to have 6 to 10
20 employees billing for their time attending a weekly status meeting. For example, nine (9) different CRG
21 employees billed for time spent at a weekly status meeting held on November 1, 2019, which resulted in
22 a charge of \$447.00 for a meeting which lasted only 12 minutes.

23 17. The County therefore requests a reduction of 50% for \$17,591.00 that the Receiver billed
24 for attendance of numerous CRG employees at weekly status meetings, which would result in a reduction
25 of the Receiver's fees in the amount of \$8,795.50. A chart showing how this number was calculated is
26 attached to this declaration as Exhibit E.

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1 18. The Receiver's fees should be reduced by the amount billed by Lou Laurenti for
2 observing the appointment hearing and Eddie Gao for observing status conferences for which the
3 Receiver billed his time attending the same hearings. On July 17, 2017, the Court held a hearing on the
4 County's Receivership Motion. I observed that, on July 17, 2017, Mark Adams billed \$4,305.00 for
5 attending the hearing on the Receivership Motion. As if this cost was not enough, I observed that, on
6 that same day, Lou Laurenti, billed 15 hours for his attendance at the same hearing on the Receivership
7 Motion, at an additional cost of \$2,625.00. There was no reason for Lou Laurenti to attend this hearing
8 when Mark Adams, the Court-Appointed Receiver, was already attending the hearing. The County
9 therefore objects to this charge as unreasonable.

10 19. Similarly, on January 7, 2019, and again on January 14, 2019, I observed that Eddie Gao
11 billed \$280.00 and \$180.00, respectively, for "observing" and "audit" of a status conference by
12 CourtCall. As other CRG staff members were already attending both of these status conferences, the
13 Receiver should not have also billed for Eddie Gao's attendance at the status conference. The County
14 therefore objects to these fees, which total \$3,085.00 (\$2,625.00 + \$280.00 + \$180.00 = \$3,085.00) as
15 they are unreasonable and unnecessary.

16 20. The County objects to the Receiver's compensation for time spent defending against the
17 federal lawsuit filed by Jerry Cox against the Receiver, the County, and other defendants in *Jerry Cox v.*
18 *Mariposa County, et. al.*, Case No. 1:19-cv-01105-AWI-BAM, filed on August 12, 2019, in the United
19 States District Court for the Eastern District of California ("Federal Lawsuit"). The County requests that
20 the Court reduce the award of the Receiver's fees by \$24,225.50, which represents the total amount
21 billed by the Receiver for his defense in the Federal Lawsuit. A chart showing how this number was
22 calculated is attached to this declaration as Exhibit E.

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21. Based on the foregoing, the following summarizes the total amount of the reduction the County is seeking in the Receiver's fees:

- A. \$54,614.00 for the amount billed by the 11 employees of CRG that the Court did not approve to work on this receivership.
- B. \$54,798.08 for the amount attributable to the Receiver's unauthorized increase in the hourly rates charged by CRG's employees working on this receivership.
- C. \$1,411.50 for the duplicate billing entries.
- D. \$4,295.25 for the unnecessary and duplicate billing by numerous employees of CRG reviewing the same document or email, which represents a 50% reduction of the \$8,590.50 billed for these duplicate tasks.
- E. \$8,795.50 for the unnecessary and duplicate billing by numerous employees of CRG attending weekly meetings for 29 months, which represents a 50% reduction of the \$17,591.00 billed for these weekly meetings.
- F. \$3,085.00 for Lou Laurenti and Eddie Gao billing for observing the same hearing as the Receiver, who also billed for his time attending the same hearing.
- G. \$24,225.50 for the defense of the Federal Lawsuit.

Thus, the total amount of reduction in the Receiver's fees should be **\$151,224.83** (\$54,614.00 + \$54,798.08 + \$1,411.50 + \$4,295.25 + \$8,795.50 + \$3,085.00 + \$24,225.50 = \$151,176.83).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Dated: March 19, 2020

SILVER & WRIGHT LLP

By: _____



Amanda R. Jones
Attorneys for Plaintiff
County of Mariposa

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EXHIBIT A

ORDER APPOINTING RECEIVER

FILED JULY 17, 2017

1 STEVEN W. DAHLEM, SBN 135498
2 MARIPOSA COUNTY COUNSEL

Exempt from filing fees pursuant to
Government Code section 6103.

3 MATTHEW R. SILVER, SBN 245528
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12 Attorneys for Plaintiff
13 County of Mariposa

FILED
MARIPOSA SUPERIOR COURT

JUL 17 2017

MARLEE BEAUDOIN
COURT CLERK

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF MARIPOSA

FILED BY FAX

13 COUNTY OF MARIPOSA,

14 Plaintiff,

15 v.

16 JDC LAND COMPANY, LLC; a California
17 limited liability company;
18 CONTINENTAL HERITAGE INSURANCE
19 COMPANY; and
20 DOES 1 through 50,

21 Defendants.

Action Filed: March 13, 2017
Case Number: 10887

Judge: F. Dana Walton
Dept.: 3

[PROPOSED] ORDER

[Filed concurrently with:

1. Receivership Motion;
2. Memorandum of Points and Authorities;
3. Declaration of Building Director Kinslow;
4. Declaration of Planning Director Williams;
5. Declaration of Environmental Health Specialist Hodge;
6. Declaration of Deputy Fire Chief Jackson;
7. Declaration of Attorney Silver;
8. Declaration of Receiver Adams;
9. Request for Judicial Notice; and
10. Appendix of Exhibits.]

Hearing:

Date: July 17, 2017
Time: 1:30 p.m.
Dept.: 3

ORDER

Plaintiff County of Mariposa's ("County") Motion For The Appointment Of A Receiver And For Other Relief ("Receivership Motion") regarding the parcels of real property known as 5873, 6071 and 6133 CYA Road, Mariposa, California 95338, Assessor's Parcel Numbers 008-140-0210, 008-140-0220, and 008-140-0230 (collectively, "Subject Property") in case number 10887 in the Superior Court of California, County of Mariposa, Department 3 ("Court"), came on for hearing before this Court. All appearances were as noted in the Court's record. The Court has considered all papers filed in support of and in opposition to the Receivership Motion, the argument of counsel at the hearing, and all other matters properly before the Court.

THE COURT HEREBY FINDS AND DECLARES THAT:

1. The Subject Property is substandard, constitutes a public nuisance, and is being maintained in a manner that violates State and local laws.
2. The building violations on the Subject Property are so extensive and of such a nature that the health and safety of the residents and the public is substantially endangered.
3. The County, as the local enforcement agency, properly issued Defendants a notice and order to repair or abate the building violations and nuisance conditions on the Subject Property ("N&O") pursuant to Health and Safety Code section 17980.6.
4. The County afforded Defendants a reasonable time to rehabilitate the Subject Property pursuant to Health and Safety Code sections 17980(a) and 17980.7.
5. Defendants failed to comply with the N&O and failed to rehabilitate the Subject Property within a reasonable time.
6. The County sufficiently provided Defendants with at least three-days advance notice of the filing of the Receivership Petition before the Receivership Petition was filed in accordance with Health and Safety Code section 17980.7(c).
7. Defendants, and all recorded legal interest holders, were properly served with the Summons and the Receivership Complaint.

1 8. The nuisance conditions on the Subject Property have been ongoing and they will likely
2 persist unless this Court appoints a receiver to rehabilitate the Subject Property.

3 9. Pursuant to Health and Safety Code section 17980.7(c), Business and Professions Code
4 section 17203, Code of Civil Procedure section 564, California Rules of Court, rule 3.1200 et seq., and
5 the Court's inherent equitable powers, this Court has the authority to, and hereby does, appoint a receiver
6 to rehabilitate the Subject Property.

7 10. California Receivership Group, a California public benefit corporation, through its Present
8 Court Receiver Mark Adams, has sufficiently demonstrated the necessary capacity and expertise to
9 acquire funding, develop a viable rehabilitation plan, and supervise the rehabilitation of the Subject
10 Property.

11
12 THEREFORE, IT IS HEREBY ORDERED that Mark Adams ("Receiver") is appointed as the
13 Court's receiver over the Subject Property, with full powers granted to receivers under Health and Safety
14 Code section 17980.7(c) and Code of Civil Procedure sections 564, et seq., subject to the further
15 requirements of this Order and any further orders of this Court. Receiver shall immediately, and before
16 performing any duties: (1) execute and file a receiver's oath with this Court; and (2) file the bond required
17 by Code of Civil Procedure section 567(b) in the amount of \$20,000 with this Court. Upon filing the
18 oath and bond as required by this Order, Receiver is authorized to immediately borrow up to \$25,000 on
19 behalf of the receivership estate for purposes of securing the Subject Property and developing a
20 rehabilitation plan for the Subject Property in accordance with this Order. Receiver shall be entitled to
21 reimbursement of all expenses and compensation for his services at the rates stated in the Declaration of
22 Mark Adams, filed concurrently with the Receivership Motion, for all services related to this
23 appointment, payable monthly out of the receivership estate, provided that Receiver's compensation and
24 reimbursement shall be subject to review and final approval by this Court at the time Receiver presents
25 his final accounting to this Court, which shall be accompanied by records adequately documenting the
26 expenses incurred and services rendered.

1 IT IS FURTHER ORDERED THAT, pursuant to the powers granted pursuant to Health and
2 Safety Code section 17980.7(c), Business and Professions Code 17203, and Code of Civil Procedure
3 sections 564, et seq.:

4 1. Receiver shall take full and complete possession and control of the Subject Property,
5 including the tangible and intangible personal property located on or about the Subject Property or used
6 in connection with the Subject Property.

7 2. Receiver shall manage the Subject Property and shall pay the operating expenses of the
8 Subject Property, including taxes, insurance, utilities, maintenance, and other debts.

9 3. Receiver shall collect all rents and income derived from the Subject Property as funds of the
10 receivership estate and shall use the funds of the receivership estate to pay for the costs of operating,
11 managing, maintaining, and rehabilitating the Subject Property.

12 4. Receiver shall develop a rehabilitation plan for the Subject Property and shall obtain at least
13 three rehabilitation cost estimates from licensed contractors to perform the repairs necessary to
14 rehabilitate the Subject Property. Receiver shall submit the rehabilitation plan, the cost estimates, and
15 his recommendations to this Court for approval.

16 5. Receiver shall rehabilitate the Subject Property in accordance with the rehabilitation plan
17 approved by this Court and shall bring the Subject Property into compliance with all applicable State
18 and local laws.

19 6. Receiver may enter into contracts for goods and services, and employ licensed contractors
20 for repairs, as necessary to rehabilitate the Subject Property.

21 7. Receiver shall apply for permits and other governmental approvals as necessary to undertake
22 and complete the rehabilitation of the Subject Property.

23 8. Receiver shall reimburse the County out of the receivership estate for all of the County's
24 reasonable inspection costs, investigation costs, enforcement costs, court costs, fines, and penalties and
25 attorneys' fees incurred related to this Action. The County shall be entitled to submit demands upon the
26 receivership estate for recovery of these reasonable costs, expenses, and fees, which shall be paid by
27 Receiver.

1 9. Receiver may borrow funds as necessary to pay for the rehabilitation of the Subject Property
2 and to pay the costs and debts of the receivership estate. All funds borrowed by Receiver on behalf of
3 the receivership estate shall be entitled to become first-priority liens against the Subject Property
4 superseding all other interests subject to this Order. Receiver may issue and record Receiver's
5 Certificates of Indebtedness ("Certificates") to evidence and secure the debts of the receivership estate.
6 The debt evidenced by the Certificates shall be due and payable upon completion of Receiver's duties
7 hereunder with respect to the rehabilitation of the Subject Property. If the Certificates cannot be
8 immediately satisfied when they become due, Receiver may apply to this Court to sell the Subject
9 Property free and clear of all subordinate liens and encumbrances pursuant to Code of Civil Procedure
10 section 568.5.

11 10. Receiver may temporarily relocate occupants of the Subject Property, as necessary, to
12 effectuate the rehabilitation of the Subject Property.

13 11. Receiver shall prepare and serve monthly reports identifying: the total amount of rent and
14 income received from the Subject Property; the nature and amount of any expenditures by the
15 receivership estate; and the progress of the rehabilitation of the Subject Property.

16 12. Receiver may apply to this Court for further powers, instructions, or orders as necessary to
17 enable him to perform his duties and to effectuate the rehabilitation of the Subject Property.

18
19 IT IS FURTHER ORDERED THAT Defendants and Defendants' agents are hereby enjoined
20 during the duration of the receivership from:

21 1. Demanding, collecting, receiving, or diverting any rents, profits, or income from the Subject
22 Property.

23 2. Interfering with Receiver in the Receiver's operation and rehabilitation of the Subject
24 Property.

25 3. Transferring or encumbering any interests in the Subject Property.

26 4. Canceling, reducing, or modifying any existing policies of insurance applicable to the
27 Subject Property.

1 5. Claiming any deductions with respect to State taxes for interest, taxes, expenses,
2 depreciation, or amortization paid or incurred with respect to the Subject Property throughout the
3 duration of the receivership.

4 IT IS FURTHER ORDERED THAT:

5 1. During the pendency of the receivership, and until approved by the County, the Subject
6 Property shall not be used or occupied.

7 2. Defendants shall immediately surrender possession and control of the Subject Property to
8 Receiver.

9 3. Defendants shall immediately surrender all keys and instruments necessary for complete
10 access to all areas of the Subject Property to Receiver.

11 4. Defendants shall surrender all books and records relating to the Subject Property to Receiver
12 upon request.

13 5. Defendants shall advise Receiver as to the nature and extent of all policies of insurance
14 applicable to the Subject Property.

15 6. Defendants shall immediately forward all income, rents, and bills received that are related
16 the Subject Property to Receiver.

17 7. Defendants shall cooperate with Receiver in his management and rehabilitation of the
18 Subject Property.

19
20 Dated: JUL 17 2017

F. DANA WALTON

JUDGE OF THE SUPERIOR COURT

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EXHIBIT B
DECLARATION OF MARK ADAMS IN SUPPORT OF THE
COUNTY’S RECEIVERSHIP MOTION
FILED JUNE 20, 2017

1 STEVEN W. DAHLEM, SBN 135498
2 MARIPOSA COUNTY COUNSEL

Exempt from filing fees pursuant to
Government Code section 6103.

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12 Attorneys for Plaintiff
13 County of Mariposa

FILED
MARIPOSA SUPERIOR COURT

JUN 20 2017
CYNDI THOMPSON
COURT CLERK

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF MARIPOSA

FILED BY FAX

16 COUNTY OF MARIPOSA,0

17 Plaintiff,

18 v.

19 IDC LAND COMPANY, LLC; a California
20 limited liability company;
21 CONTINENTAL HERITAGE INSURANCE
22 COMPANY; and
23 DOES 1 through 50,

24 Defendants.

Action Filed: March 13, 2017
Case Number: 10887

Judge: F. Dana Walton
Dept.: 3

**DECLARATION OF RECEIVER MARK
ADAMS IN SUPPORT OF THE COUNTY'S
RECEIVERSHIP MOTION**

[Filed concurrently with:

1. Receivership Motion;
2. Memorandum of Points and Authorities;
3. Declaration of Building Director Kinslow;
4. Declaration of Planning Director
Williams;
5. Declaration of Environmental Health
Specialist Hodge;
6. Declaration of Deputy Fire Chief Jackson;
7. Declaration of Attorney Silver;
8. Request for Judicial Notice;
9. Appendix of Exhibits; and
10. Proposed Order.]

Hearing:

Date: July 17, 2017
Time: 1:30 p.m.
Dept.: 3

DECLARATION OF RECEIVER MARK ADAMS

1 **DECLARATION OF RECEIVER MARK ADAMS IN SUPPORT OF THE COUNTY'S**
2 **RECEIVERSHIP MOTION**

3
4 I, Mark Adams, declare as follows:

5 1. I am the President of the California Receivership Group, a California public benefit
6 corporation ("CRG"), a company with vast experience in Health and Safety Code ("HSC") based
7 receiverships. I am submitting this Declaration in regards to the County of Mariposa's ("County")
8 Receivership Motion for the parcels of real property known as 5873, 6071 and 6133 CYA Road,
9 Mariposa, California 95338, Assessor's Parcel Numbers 008-140-0210, 008-140-0220, and 008-140-
10 0230 (collectively, "Subject Property").

11 2. As President of CRG, I believe I am the most experienced health and safety receiver operating
12 in California and I have substantial experience serving as a court-appointed receiver over substandard
13 nuisance properties. I have been appointed as a receiver by 94 Superior Court Judges and one United
14 States District Court Judge. As a receiver, I have overseen the rehabilitation of 160 different substandard
15 properties, including apartment buildings, single-family dwellings, single room occupancies, and various
16 other dilapidated properties. A copy of my curriculum vitae, along with a synopsis of my professional
17 experience as a receiver, is attached to this Declaration as **Exhibit 1** and is herein.

18 3. On May 14, 2012, I was previously appointed as a receiver by the Mariposa County Superior
19 Court in the case designated as *County of Mariposa v. Wayne Scholkowsky et al.*, Case No. 8890. In
20 that case, I served as a successful health and safety receiver over a severely dilapidated junkyard property
21 located in Coulterville, California, and was able to abate all unlawful, substandard, and severely
22 dangerous conditions in a safe, effective, and efficient manner.

23 4. California Receivership Group, a California Public Benefit Corporation, is a community
24 development corporation within the meaning of H&S section 17980.7(c)(2) and therefore eligible for
25 this nomination. Our team members are billed out at various rates and it is our practice to have the
26 receivership's activities worked on by the most inexpensive member of our team who also has the
27 requisite knowledge and experience to accomplish a professional result. A rate sheet for all of our team
28

1 members is attached as **Exhibit 2** to this Declaration and it is incorporated herein. Our monthly
2 accountings show all billed time by line item and broken out by team member.

3 5. I am familiar with the Subject Property and, in my professional opinion, the appointment of
4 a receiver over the Subject Property is appropriate in order to bring the Subject Property back into
5 compliance with the HSC, the California Building Standards Code, and all other applicable state and
6 local laws.

7 6. I and the members of the CRG team are qualified and willing to act as the court appointed
8 receiver for the Subject Property, and we are capable of completing the necessary work to bring the
9 Subject Property back into compliance with all state and local laws.

10 7. I am not a party to this action, I do not represent any parties to this action, and I am not related
11 to any judge of the Court by consanguinity or affinity within the third degree.

12
13 I declare under penalty of perjury under the laws of the State of California that the foregoing is
14 true and correct.

15
16 Dated: June 9, 2017


MARK ADAMS
President
California Receivership Group

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EXHIBIT 1

**COURT RECEIVER MARK ADAMS
CURRICULUM VITAE**

MARK S. ADAMS
ATTORNEY AT LAW
2716 Ocean Park Boulevard, Suite 3010
Santa Monica, CA 90405
madams@calreceivers.com
(310) 471-8181
Fax (310) 471-8180

RECEIVERSHIP EXPERIENCE

Considered to be the most experienced health and safety receiver working in California. Appointed by 98 different Superior Court judges and one United States District Court judge in 28 different counties as health and safety receiver on 170 different dilapidated properties.

Innovative approach includes arranging first-of-its-kind receivership certificate financing, hiring contractors and cleanup crews, and managing properties ranging from single family residences to large apartment complexes and motels. In various projects, has arranged for the removal of 1,100 tons (2.4 million pounds) of debris from one 5-acre site (including \$170,000 in recycling revenue); cleaned out an apartment building overrun by a drug dealer and a prostitute; recovered \$120,000 from a mortgage fraud perpetrator on behalf of a 75-year-old previous owner; and managed a 267-pad mobile home park housing over 3,000 migrant farmworkers. Appointed on approximately 10 motels throughout the state, including the 73,000 square foot Saddleback Inn in Santa Ana, which was demolished after a fire; a dilapidated historical Route 66 motel in Needles, which was opened to the county fire department for training purposes; a large, thoroughly-vandalized hotel in Palmdale that will be brought back up to code and reopened; and a century-old hotel in Oroville that was cleared of drug dealers and vagrants, then revitalized to become housing for a local college.

Special expertise in dealing with recalcitrant property owners, whether they be passive investors, slumlords, convicted felons, drug addicts, hoarders, or the mentally ill.

Nominated as receiver by attorneys for Los Angeles County, Alhambra, San Fernando, Westminster, West Covina, Rolling Hills Estates, La Habra, Rancho Cucamonga, Upland, Costa Mesa, Highland, Palos Verdes Estates, Crescent City, Rancho Palos Verdes, Buena Park, Norco, Santa Clarita, Fullerton, Rialto, Chula Vista, Whittier, Hawthorne, Eureka, Oroville, Glendale, Santa Ana (on nomination of the Orange County District Attorney and in a separate case by the City Attorney), Brea, Anaheim, Arroyo Grande, Gardena, Palm Desert, Needles, San Juan Capistrano, Mariposa County, Fontana, Newport Beach, Pomona, Dana Point, Davis, Cathedral City, Desert Hot Springs, Los Banos, La Mirada, Mammoth Lakes, Thousand Oaks, Vista, Ridgecrest, El Centro, Merced, San Luis Obispo, Tustin, Paradise, Stockton, Newark, Oakland, Chino, Montebello, Compton, Rancho Mirage, Indio, Walnut, Coachella, Exeter, Paso Robles, Porterville, El Cerrito, Healdsburg, Lake Elsinore, Cazadero, Lawndale, Irvine, Anderson, Banning, Brawley, Modesto, Ojai, Sacramento, Ventura, Ukiah, Santee, Williams, Lompoc, and Palmdale.

PROFESSIONAL EXPERIENCE**CALIFORNIA RECEIVERSHIP GROUP, PBC****PRESIDENT, 1999-Present**

Specializing in real estate, real estate finance, and litigation for appointment of slum housing receivers under Health and Safety Code Section 17980.7, Penal Code, Code of Civil Procedure Section 564 *et seq.*, and Business and Professions Code Section 17203, see above.

PRINCIPAL, CIVITAS HOUSING CO.**SENIOR V.P., DE MIRANDA MANAGEMENT****1997-1999**

Responsible for affordable housing management activities for a professional property management firm which managed 4,400 apartment units in the Los Angeles metropolitan area. Worked with various clients in arranging bank financing for real estate projects.

Co-founded and helped administer the Blue Ribbon Citizens Committee on Slum Housing, the catalyst for the City of Los Angeles' substantially expanded slum housing inspection program.

SOUTHERN CALIFORNIA HOUSING DEVELOPMENT CORPORATION**DIRECTOR, LOS ANGELES DIVISION, 1995-1998**

Managed Los Angeles operations for this nonprofit housing developer.

FANNIE MAE**DIRECTOR OF PUBLIC AFFAIRS, 1992-1995**

Responsible for congressional relations in the nine western states.

ATTORNEY/CONSULTANT**1988-1992**

Corporate and housing finance work for clients such as the California Housing Finance Agency and Great Western Bank.

CALLIE MAE, INC.**PRESIDENT, 1982-1987**

Founded and managed a mortgage banking company which sold over \$500 million in home mortgage loans to California public pension funds and other institutional investors.

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH**CONSULTANT, 1978-1981**

Worked in the policy development arm of the Governor's office.

BALL, HUNT, HART, BROWN AND BAERWITZ**ATTORNEY, 1976-1978**

Associate in the litigation department.

EDUCATION

GEORGETOWN UNIVERSITY LAW CENTER – J.D. 1975

LOYOLA MARYMOUNT UNIVERSITY – B.A. 1972

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EXHIBIT 2

CALIFORNIA RECEIVERSHIP GROUP RATE LIST

California Receivership Group, PBC
Employee Rates

First Name	Last Name	Title	Billing Rate
Andrew	Adams	General Counsel/Receiver	\$300
Mark	Adams	President/Receiver	\$350
Lyna	Chon	Counsel/Receiver	\$250
Erica	Connelly	Assistant Director of Operations	\$150
Matthew	Connelly	Construction Consultant	\$100
Eddie	Gao	Receivership Coordinator	\$125
Pierce	Harper	Asst. Dir. of Operations (No. Cal. Division)	\$125
Leah	Jaques	Asst. Paralegal	\$125
Lou	Laurenti	Director of Security Services	\$150
Christmas	Myers	Paralegal	\$150
Margie	Stewart	Professional Organizer	\$75
Erick	Traschikoff	Administrative Assistant	\$80
Marcia	Wehde	Vice President of Operations	\$175
Elizabeth	Weinstein	Controller	\$175
Tom	Yatteau	Asst. Dir. of Operations (So. Cal Division)	\$160

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EXHIBIT C
CHART SHOWING HOURLY RATE INCREASES
BY CALIFORNIA RECEIVERSHIP GROUP

ANDREW ADAMS -\$300

			Hours Worked * Difference in Rate
Jul-17			
Aug-17			
Sep-17	1.3	\$350	\$65.00
Oct-17	1.6	\$350	\$80.00
Nov-17	0.7	\$330	\$21.00
Dec-17	0.8	\$330	\$24.00
Jan-18	4.5	\$330	\$135.00
Feb-18	1	\$330	\$30.00
Mar-18	0.9	\$330	\$27.00
Apr-18	0.7	\$330	\$21.00
May-18	0.5	\$330	\$15.00
Jun-18	0.6	\$330	\$18
Jul-18	1.8	\$330	\$54.00
Aug-18	0.3	\$330	\$9.00
Sep-18	1	\$350	\$50.00
Oct-18	1.8	\$350	\$90.00
Nov-18	3.1	\$350	\$155.00
Dec-18	2.3	\$350	\$115.00
Jan-19	2.5	\$350	\$125.00
Feb-19	0.9	\$350	\$45.00
Mar-19	5.6	\$350	\$280
Apr-19	2.4	\$350	\$120
May-19	7.8	\$350	\$390
Jun-19	2.5	\$350	\$125
Jul-19	8.6	\$350	\$430
Aug-19	6.6	\$350	\$330
Sep-19	26.7	\$350	\$1,335
Oct-19	45.8	\$350	\$2,290
Nov-19	12.2	\$350	\$610
Total	144.5		\$6,989.00

LYNA CHON - \$250

			Hours Worked * Difference in Rate
Jul-17			
Aug-17			
Sep-17	0.5	\$290	\$16.00
Oct-17	0.4	\$290	\$16.00
Nov-17	0.3	\$290	\$12.00
Dec-17	2.5	\$290	\$100.00
Jan-18			
Feb-18			

Mar-18			
Apr-18			
May-18			
Jun-18			
Jul-18			
Aug-18			
Sep-18			
Oct-18			
Nov-18			
Dec-18			
Jan-19			
Feb-19			
Mar-19			
Apr-19	4.4	\$290	\$176
May-19			
Jun-19			
Jul-19			
Aug-19			
Sep-19	3.9	\$290	\$156
Oct-19			
Nov-19			
Total	12		\$476

EDDIE GAO - \$125

			Hours Worked * Difference in Rate
Jul-17			
Aug-17			
Sep-17	11.5	\$150	\$287.50
Oct-17	7.6	\$150	\$190
Nov-17	19.4	\$150	\$485.00
Dec-17	9.3	\$150	\$232.50
Jan-18	14.1	\$150	\$352.50
Feb-18	11.7	\$150	\$292.50
Mar-18	6.5	\$150	\$162.50
Apr-18	1.7	\$150	\$42.50
May-18	7.3	\$150	\$182.50
Jun-18	5.4	\$150	\$135
Jul-18	5	\$150	\$125.00
Aug-18	9.4	\$150	\$235.00
Sep-18	10.5	\$200	\$787.50
Oct-18	12.3	\$200	\$922.50
Nov-18	13.6	\$200	\$1,020.00
Dec-18	15.8	\$200	\$1,185.00

Jan-19	18.3	\$200	\$1,372.50
Feb-19	6.7	\$200	\$502.50
Mar-19	8.3	\$200	\$622.50
Apr-19	10.6	\$200	\$795
May-19	9.8	\$200	\$735
Jun-19	5	\$200	\$375
Jul-19	15.3	\$200	\$1,147.50
Aug-19	9.8	\$200	\$735.00
Sep-19	29.2	\$200	\$2,190
Oct-19	42.5	\$200	\$3,187.50
Nov-19	24.2	\$200	\$1,815
Total	340.8		\$20,115.00

PIERCE HARPER - \$125

			Hours Worked * Difference in Rate
Jul-17			
Aug-17			
Sep-17			
Oct-17			
Nov-17			
Dec-17			
Jan-18			
Feb-18			
Mar-18			
Apr-18			
May-18			
Jun-18			
Jul-18			
Aug-18			
Sep-18			
Oct-18			
Nov-18			
Dec-18			
Jan-19	0.4	\$150	\$10.00
Feb-19			
Mar-19			
Apr-19			
May-19			
Jun-19			
Jul-19			
Aug-19			
Sep-19			
Oct-19			

Nov-19			
Total	0.4		\$10.00

LEAH JAQUES - \$125

			Hours Worked * Difference in Rate
Jul-17			
Aug-17			
Sep-17			
Oct-17			
Nov-17			
Dec-17			
Jan-18			
Feb-18			
Mar-18			
Apr-18			
May-18	1.5	\$175	\$75.00
Jun-18	2.2	\$175	\$110
Jul-18	0.7	\$175	\$35.00
Aug-18	1.6	\$175	\$80
Sep-18	4	\$200	\$300
Oct-18	4.3	\$200	\$322.50
Nov-18	2.8	\$200	\$210
Dec-18	0.7	\$200	\$52.50
Jan-19	1	\$200	\$75.00
Feb-19	1.8	\$200	\$135
Mar-19	1.7	\$200	\$127.50
Apr-19	0.8	\$200	\$60.00
May-19	1.7	\$200	\$127.50
Jun-19	0.1	\$200	\$7.50
Jul-19	1.4	\$200	\$105
Aug-19	1	\$200	\$75.00
Sep-19	0.4	\$200	\$30
Oct-19	0.1	\$200	\$7.50
Nov-19	6.2	\$200	\$465
Total	34		\$2,400.00

LOU LAURENTI - \$150

			Hours Worked * Difference in Rate
Jul-17	28.4	\$175	\$710.00
Aug-17	21.1	\$175	\$527.50
Sep-17	19.4	\$225	\$1,455.00
Oct-17	19.6	\$225	\$1,470
Nov-17	12.56	\$225	\$942.50

Dec-17	4.8	\$225	\$360.00
Jan-18	10	\$225	\$750
Feb-18	15.6	\$225	\$1,170
Mar-18	2.8	\$225	\$210
Apr-18	1.2	\$225	\$90.00
May-18	2.5	\$225	\$187.50
Jun-18	0.6	\$225	\$45
Jul-18	1.7	\$225	\$127.50
Aug-18	1.9	\$225	\$142.50
Sep-18	4.2	\$225	\$315
Oct-18	1.6	\$225	\$120.00
Nov-18	1.8	\$225	\$135
Dec-18	2.8	\$225	\$210
Jan-19	1.1	\$225	\$82.50
Feb-19	1	\$225	\$75.00
Mar-19	1.5	\$225	\$112.50
Apr-19	1.3	\$225	\$97.50
May-19	0.3	\$225	\$22.50
Jun-19			
Jul-19			
Aug-19	1.1	\$225	\$82.50
Sep-19			
Oct-19	13.5	\$225	\$1,012.50
Nov-19	2.2	\$225	\$165
Total	174.56		\$10,617.50

CHRISTMAS MEYERS - \$150

			Hours Worked * Difference in Rate
Jul-17			
Aug-17			
Sep-17	5.3	\$175	\$132.50
Oct-17	2.7	\$175	\$67.50
Nov-17	1.3	\$175	\$32.50
Dec-17	1.7	\$175	\$42.50
Jan-18	3	\$175	\$75.00
Feb-18	3.4	\$175	\$85.00
Mar-18	1.9	\$175	\$47.50
Apr-18	3.2	\$175	\$80
May-18	4.3	\$175	\$107.50
Jun-18	2.4	\$175	\$60.00
Jul-18	3.5	\$175	\$87.50
Aug-18	3.3	\$175	\$82.50
Sep-18	1.7	\$200	\$85.00

Oct-18	5.6	\$200	\$280.00
Nov-18	7.8	\$200	\$390.00
Dec-18	4.5	\$200	\$225.00
Jan-19	6.6	\$200	\$330.00
Feb-19	0.9	\$200	\$45.00
Mar-19	5.8	\$200	\$290
Apr-19	2.2	\$200	\$110
May-19			
Jun-19			
Jul-19			
Aug-19			
Sep-19			
Oct-19			
Nov-19			
Total	71.1		\$2,655.00

ERICK TRASCHIKOFF - \$80

			Hours Worked * Difference in Rate
Jul-17			
Aug-17			
Sep-17	0.2	\$140	\$28.00
Oct-17	0.3	\$140	\$18.00
Nov-17	0.4	\$140	\$24.00
Dec-17	0.2	\$140	\$12.00
Jan-18	0.6	\$140	\$36.00
Feb-18	2.4	\$140	\$144
Mar-18	2.4	\$140	\$144
Apr-18	0.1	\$140	\$6.00
May-18	0.1	\$140	\$6.00
Jun-18	1.1	\$140	\$66
Jul-18	0.8	\$140	\$48.00
Aug-18	0.7	\$140	\$42.00
Sep-18	0.8	\$140	\$48.00
Oct-18	0.2	\$140	\$12
Nov-18	1	\$140	\$60
Dec-18	0.3	\$140	\$18
Jan-19	0.3	\$140	\$18
Feb-19	1	\$140	\$60.00
Mar-19	0.3	\$140	\$18
Apr-19	1.5	\$140	\$90
May-19	0.2	\$140	\$12.00
Jun-19	0.1	\$140	\$6.00
Jul-19	0.1	\$140	\$6.00

Aug-19	0.3	\$140	\$18.00
Sep-19	0.1	\$140	\$6.00
Oct-19	0.1	\$140	\$6.00
Nov-19	0.2	\$140	\$12.00
Total	15.8		\$964.00

MARCIA WEHDE - \$175

			Hours Worked * Difference in Rate
Jul-17			
Aug-17			
Sep-17	3.68	\$200	\$92.08
Oct-17	4.1	\$200	\$102.50
Nov-17	4.6	\$200	\$115.00
Dec-17	1.3	\$200	\$32.50
Jan-18	2.1	\$200	\$52.50
Feb-18	3.9	\$200	\$97.50
Mar-18	1.6	\$200	\$40.00
Apr-18	0.7	\$200	\$17.50
May-18	1.4	\$200	\$35.00
Jun-18	1.1	\$200	\$27.50
Jul-18	3.6	\$200	\$90.00
Aug-18	4.8	\$200	\$120
Sep-18			
Oct-18	1.7	\$240	\$110.50
Nov-18	3.5	\$240	\$227.50
Dec-18	2.1	\$240	\$136.50
Jan-19	4.6	\$240	\$299
Feb-19	0.8	\$240	\$52.00
Mar-19	1.4	\$240	\$91.00
Apr-19	6.1	\$240	\$396.50
May-19	3.5	\$240	\$227.50
Jun-19	3.9	\$240	\$253.50
Jul-19	4.1	\$240	\$266.50
Aug-19	4.1	\$240	\$266.50
Sep-19	2.8	\$240	\$182
Oct-19	12.4	\$240	\$806
Nov-19	4.4	\$240	\$286
Total	88.28		\$4,423.08

ELIZABETH WEINSTEIN - \$175

			Hours Worked * Difference in Rate
Jul-17			
Aug-17			

Sep-17	7.3	\$200	\$182.50
Oct-17	5.1	\$200	\$127.50
Nov-17	5.5	\$200	\$137.50
Dec-17	3.8	\$200	\$95.00
Jan-18	2.3	\$200	\$57.50
Feb-18	6.7	\$200	\$167.50
Mar-18	2.6	\$200	\$65.00
Apr-18	1.5	\$200	\$37.50
May-18	3.2	\$200	\$87.50
Jun-18	1.9	\$200	\$47.50
Jul-18	4	\$200	\$100
Aug-18	2.1	\$200	\$52.50
Sep-18	1.9	\$240	\$123.50
Oct-18	2.7	\$240	\$175.50
Nov-18	3	\$240	\$195
Dec-18	3.9	\$240	\$253.50
Jan-19	3.8	\$240	\$247
Feb-19	2	\$240	\$130
Mar-19	2.2	\$240	\$143
Apr-19	2.6	\$240	\$169.00
May-19	2.5	\$240	\$162.50
Jun-19	2.1	\$240	\$136.50
Jul-19	2.3	\$240	\$149.50
Aug-19	1.9	\$240	\$123.50
Sep-19	2.3	\$240	\$149.50
Oct-19	3	\$240	\$195
Nov-19	6.2	\$240	\$403
Total	88.4		\$3,913.50

TOM YATTEAU - \$160

			Hours Worked * Difference in Rate
Jul-17			
Aug-17			
Sep-17			
Oct-17			
Nov-17			
Dec-17			
Jan-18	0.2	\$250	\$18.00
Feb-18	0.3	\$250	\$27.00
Mar-18	0.8	\$250	\$72.00
Apr-18	0.4	\$250	\$36.00
May-18	0.1	\$250	\$9.00
Jun-18			

Jul-18			
Aug-18			
Sep-18	1.7	\$295	\$229.50
Oct-18	6.3	\$295	\$850.50
Nov-18			
Dec-18			
Jan-19			
Feb-19	0.4	\$295	\$54.00
Mar-19	0.4	\$295	\$54
Apr-19	0.2	\$295	\$27.00
May-19	0.2	\$295	\$27.00
Jun-19	1	\$295	\$135
Jul-19	4	\$295	\$540
Aug-19	0.1	\$295	\$13.50
Sep-19			
Oct-19	0.4	\$295	\$54
Nov-19	0.3	\$295	\$88.50
Total	16.8		\$2,235.00

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EXHIBIT D

**CHART SHOWING EXCESSIVE BILLING BY CALIFORNIA RECEIVERSHIP GROUP
FOR REVIEW OF THE SAME DOCUMENT OR EMAIL.**

7/18/2017	Erica Connelly	Review Appointment Order; email MA, AA, CM, EW, MCW re: initial funding. Research property tax status; email County Tax Collector re: same. Draft Deed of Trust and Receiver's Cert. No. 1; email LJ, MCW re: same for review.	
7/19/2017	Erica Connelly	Call Mariposa County Sherrif re: trespassing enforcement and posting of property; email MA, AA, CM, LL, Et re: same; email M. Silver, MA re: same; draft Trespassing Enforcement letter; email ET re: same for signature and mailing. Email EG, MCW re: Deed of Trust and Receiver's Cert. No. 1 for signature and recordation. Update receivership information for staff reference; email LJ re: same	
7/26/2017	Erica Connelly	Email EG, LL, ET, MA re: Trespassing Enforcement letter.	
7/27/2017	Erica Connelly	Call to County Sheriff's Office re: Trespassing Enforcement; email EG, LL, ET, MA re: same.	
7/27/2017	Erica Connelly	Call to County's Sherriff's office re: Trespassing Enforcement; email EG, LL, ET, MA re: same.	
7/28/2017	Mark Adams	Email f/u and Doc Review - MW, AA, EC re City's interim demand for fees and costs	
7/28/2017	Erica Connelly	Email MA, EG, LL re: trespassing enforcement. Emails to AA, EW, MCW, MA, EG re: City demand; post demand to shared drive. Email JS re: security agreement.	
8/1/2017	Erica Connelly	Email EG re: lien release for property board-up; document cost for same; email EW, EG, MCW, MA re: same. Calls/text to B. Verley re: portable toilet rental and placement; emails to EG, MA, LL, EW re: same.	
8/2/2017	Erica Connelly	Document security hours for staff reference; emails to LL, EW, EG, MA re: same. Call to B. Verley re: portable toilet rental.	
8/14/2017	Erica Connelly	Emails to EG re: invoice for property board-up. Email LJ re: funding documents. Document funding information for staff reference; email MCW, MA, EW, EG re: same.	
8/22/2017	Erica Connelly	Emails to EW, EG, MA, LL re: per diem security charge; emails to Pipkin Security re: same and request for revised invoice; email EW, LL, WG re: revised invoice.	
8/23/2017	Erica Connelly	Email Candis at PDA re: security invoices. Post veterinary report and invoice to shared drive; email EG, MA, EW, MCW re: same.	

9/25/2017	Erica Connelly	Emails/calls to EW re: monthly accounting report; revise report; emails to MA, SH, CM, EW re: final report for review and signature, filing of same; text MA re: same; emails to CM re: documentation for monthly accounting report; review same. Review security invoices; email EW, LL, EW re: same.	
9/26/2017	Erica Connelly	Email SH, EG, MCW re: funding document recordation.	
9/27/2017	Erica Connelly	Emails to AW re: MA review/approval of monthly accounting report. Emails to SH, EG, MCW re: funding document recordation; emails to EW, MA, CM, AA, MCW re: same.	
10/2/2017	Mark Adams	Email review and f/u - EG, AW and LL re upcoming travel arrangements and security escorting details	
10/3/2017	Elizabeth Weinstein	Email to MA, MW and EG re: incoming wire	
10/3/2017	Erica Connelly	Document funding information for staff reference; email EW, MCW, MA, EG re: same. Review security invoices; emails to EW, EG, LL re: same.	
10/4/2017	Mark Adams	Email review and f/w - AA, LL and Rhonda Chef re prep for hearing 10/4	
10/5/2017	Mark Adams	Email review and f/u - Brenda Lewis, AW and EW re invoice for Drone Flyovers payment	
10/6/2017	Mark Adams	Email review and f/u - Brenda Lewis, EW and AW re unpaid drone flyover invoice	
10/13/2017	Mark Adams	Email f/u - CM, AA and MW re circulating draft of proposed order and prepping funding with GFYF	
10/27/2017	Erica Connelly	Draft revisions to Substitution of Trustee and Reconveyance; emails to MCW, SH, EG re: same.	
11/1/2017	Elizabeth Weinstein	Review Pipkin invoice 42435; forward to LL, EG and EC; update a/p spreadsheet	
11/1/2017	Elizabeth Weinstein	Review Pipkin invoice 42459; forward to LL, EG and EC; update a/p spreadsheet	
11/1/2017	Elizabeth Weinstein	Review Pipkin invoice 42490; forward to LL, EG and EC; update a/p spreadsheet	
11/2/2017	Erica Connelly	Review security invoices; emails to EW, EG, LL, EB re: same. Email SH re: Funding Order; email MCW re: funding documents. Email MCW re: Substitution of Trustee and Reconveyance.	
11/3/2017	Erica Connelly	Emails to MCW re: Substitution of Trustee and Reconveyance. Review revised security invoice; email EW, EG, CB re: same. Document revised security hours for staff reference; email LL, EW, EG re: same. Draft Amendment to Deed of Trust and Receiver's Certificate No. 4; email LJ MCW-re; same for review; email MCW re: trustee information.	

11/7/2017	Erica Connelly	Emails to SH, MCW, EG, CM re: Subsitution of Trustee and Reconveyance; call SH re: same. Email SH re: recordation of Amendment to Deed of Trust and Receiver's Cert. No. 4	
11/9/2017	Erica Connelly	Email SH, MCW, EG re: Subsitution of Trustee and Reconveyance for recordation.	
11/10/2017	Elizabeth Weinstein	Email to MA, MW and EG re: incoming wire	
11/13/2017	Erica Connelly	Document funding information for staff reference; email EW, MA, MCW, AA re: same.	
11/20/2017	Erica Connelly	Emails to ET, MA, EG re: power service; call to PG&E re: same. Post JMC inspection documentation to shared drive; email EG, MA, MCW, EW re: same. Review security invoices; email EW, LL, EB, ET, EG re: same.	
11/21/2017	Erica Connelly	Emails to EG, MA, ET re: power service. Emails to LL, EW, CB, ET, EG re: revision to security invoices; document revised security hours for staff reference.	
11/29/2017	Erica Connelly	Post JMC inspection invoice to shared drive; email EG, MCW, EW re: same. Review security invoices; emails to EW, CB, LL, ET re: same and security reports.	
11/30/2017	Erica Connelly	Review security invoices and documentation for same; emails to EW, CB, EG, ET, LL re: same.	
12/1/2017	Erica Connelly	Review documentation and invoice for security reimbursement; email EW, EG, ET, CB, LL re: same. Email EG, ET re: transfer of power account.	
12/11/2017	Erica Connelly	Review security invoice; email CB, EW, ET, LL re: same	
12/12/2017	Elizabeth Weinstein	Reconcile and close November books; Prepare November financial statement for monthly accounting report; send same to MW, EC, CM, and MA	
12/14/2017	Erica Connelly	Review security invoices; emails to LL, EW, CB, EG, ET re: same	
12/21/2017	Erica Connelly	Call to PG&E to pay power bill; email EW, EG, MA re: same. Review security invoice; emails to LL, EW, CB, EG, Et re: same.	
1/1/2018	Elizabeth Weinstein	Email to LL, EC, and EG re: ATV security invoice	
1/3/2018	Erica Connelly	Calls to PG&E re: property account; email EG re: same. Review security invoice; email EW, CB, ET re: same. Document trespassing enforcement letter renewal for staff reference.	
1/22/2018	Erica Connelly	Review security invoice; email EW, CB, ET, LL re: same.	
2/1/2018	Erica Connelly	Document security termination for staff reference; email LL, MA, EG, EW re: same.	

2/2/2018	Erica Connelly	Review security invoices; emails to EW, CB, ET re: same.	
2/5/2018	Erica Connelly	Email EW, MCW re: property tax status; email MA, MCW, AA, EG, EW re: documentation of same.	
2/6/2018	Erica Connelly	Draft caretaker Independent Contractor Agreement (ICA); emails to AA, EW, LL, EG re: same; email J. Irwin, LL re: ICA for review and signature. Draft Amendment to Deed of Trust and Receiver's Cert. No. 5; email LJ, MCW re: same for review.	
2/7/2018	Leah Jaques	Prepared funding documents for recording; Call to Rapid Legal RE same; E-mail to EC, MW and EG re same	
2/7/2018	Erica Connelly	Draft Independent Contractor Agreement Addendum for caretaker S. Renzelman; emails to LL, MA, EW, EG, S. Renzelman re: same; email EG, MCE re: Amendment to Deed of Trust and Receiver's Cert. No. 5 for signature and recordation. Post insurance document to shared drive; document same for staff reference; email MCW, EW re: same.	
2/13/2018	Erica Connelly	Review security invoice; email EW, ET, LL, EG re: same. Document loan information for staff reference.	
2/15/2018	Erica Connelly	Review security invoices; emails to CM, ET, LL, EW re: same; call to LL re: same.	
2/21/2018	Erica Connelly	Email LL re: caretaker paperwork. Emails to LL, EW, ET, CB re: review of security invoices; call to EW re: same.	
2/23/2018	Erica Connelly	Emails to EW, EG, MA, LL re: portable toilet removal.	
2/26/2018	Erica Connelly	Emails to LL, EG, EW, MA, ET re: portable toilet. Email LJ, CB re: monthly accounting report.	
2/27/2018	Erica Connelly	Email CB, LL, EG, ET re: security invoice.	
3/9/2018	Erica Connelly	Review caretaker invoice and reports; email LL, EG, EW, CB, ET, MA re: same.	
3/14/2018	Erica Connelly	Email ET, EG re: invoice for portable toilet rental; research documentation for same; email EW, MCW, EG re: same.	
5/1/2018	Mark Adams	Email doc review w/ AR, EG, AA, CM, LJ re Order Approving Stipulation to Continue Hearing on May 14, 2018 at 2:00 p.m. in Dept 3 re Cya Road.	
5/25/2018	Erica Connelly	Emails to EG, MCW, MA re: design professional contract; post documents to shared drive.	
6/14/2018	Mark Adams	Email review & f/u w/CM, LJ, EG re Fifth Report with MAs edits	
7/25/2018	Erica Connelly	Review S.Renzelman invoice for property checks; email ET, EG, LL, EW, LG re: same.	
8/15/2018	Erica Connelly	Email EW, LG, MCW re: demo contract; post same to shared drive.	

8/23/2018	Erica Connelly	Review/revise drafted text/cash balances for monthly accounting report; email LJ, CB, TA re: report for MA review/signature.	
8/23/2018	Erica Connelly	Emails to EG, EW, LG, MCW, MA re: inspection invoice.	
8/24/2018	Erica Connelly	Email EG, EW, LG, MCW, MA re: revised inspection invoice.	
8/28/2018	Erica Connelly	Email LJ, TA, CB re: monthly accounting report.	
9/5/2018	Erica Connelly	Email MA, LL, EG, EW, AA re: property checks.	
9/6/2018	Mark Adams	Email review and f/u w/ LL, EG, EC regarding ICA and beginning investigation	
9/6/2018	Erica Connelly	Email LL re: Independent Contractor Agreement for property checks; draft document re: same; speak to MA re: same; emails to EW, AA, LL, MA, EG, D. Sizemore re: same. Document trespassing enforcement request for staff reference.	
9/7/2018	Erica Connelly	Post invoice for property check to shared drive; emails to LL, EG, EW, ET, LG re: same. Document delivery of trespassing enforcement request for staff reference; email ET re: same.	
9/10/2018	Erica Connelly	Review property check report and photos; emails to LL, ET, LG re: property check invoices.	
9/12/2018	Erica Connelly	Review Independent Contractor Agreement for property checks; emails to LL, D. Sizemore, AA, EW re: same.	
9/18/2018	Mark Adams	Email review and f/u w/ LL, EG, LJ regarding Various Threatening Messages Submitted to Website Contact Form.	
9/18/2018	Leah Jaques	F/U e-mail to MA, LL and AA re threatening messages submitted to website contact form	
9/19/2018	Erica Connelly	Draft monthly accounting report; email LJ, CB, TA re: report for MA review/signature.	
9/21/2018	Erica Connelly	Email LL re: security paperwork. Email AH, EW re: D. Sizemore paperwork for property checks.	
9/24/2018	Erica Connelly	Emails to AH, LL, D. Sizemore re: property checks, paperwork for same. Document receivership information for staff reference.	
10/1/2018	Christmas Myers	Review MA, EG, and LJ's email re 10th Report Draft	
10/10/2018	Christmas Myers	Emails w/ EG, AA, and TA re Notice of Related Case; update Notices and sent o TA for filing	
10/15/2018	Christmas Myers	Email exchanges w/ MA, EG, and TA re Eleventh Report draft	
10/16/2018	Erica Connelly	Port property tax bill to shared drive; email MA, EW, LG re: same.	
10/17/2018	Erica Connelly	Draft monthly accounting report; email LJ, CB, TA re: report for MA review/signature.	

11/26/2018	Mark Adams	Email doc review and f/u w/ TA, AA, EG regarding Deft's Objections to August and September 2018 accountings; (Proposed) Order for Suit v. CRG	
11/26/2018	Christmas Myers	Review TA, AA and EG's email re Deft's Objections to August & September 2018 accountings; (Proposed) Order for Suit v. CRG	
11/26/2018	Erica Connelly	Draft monthly accounting report; email LJ, ET, TA re: report for MA review/signature.	
12/3/2018	Erica Connelly	Review County LCA report request; email EG, EW, LG re: same.	
12/5/2018	Christmas Myers	Review and f/u to MA, MG and EG's email re Dropbox folder with all Monthly Accountings	
12/6/2018	Christmas Myers	Review TA, AA, and EG's emails re Deft's Initial Proposal for Liquidation of Assets on Property	
12/6/2018	Christmas Myers	Review AA, EG, and MA's emails re Opposition draft	
12/19/2018	Erica Connelly	Email MCW, EG, EW, LG, PA, MA re: contractor invoice.	
12/19/2018	Patricia Alboil	Review contract, invoice and lean release. Post same to drive. Email EG, EW, LG, EC, MW, MA	
12/21/2018	Erica Connelly	Review/revise drafted text/cash balances for monthly accounting report; email LJ, ET, MA re: report for MA review/signature.	
12/31/2018	Mark Adams	Email review and f/u w/ EG, MW, EW regarding Updated Payroll Calculation.	
1/2/2019	Christmas Myers	Review and f/u to EG, SS, and MA's email re 14th Report	
1/8/2019	Christmas Myers	Review TA, MA, and AA's email re Notice of Non Renewal of Land Conservation Act Contract	
1/14/2019	Mark Adams	Email doc review and f/u w/ TA, EW, EG regarding payment from Cox.	
1/17/2019	Patricia Alboil	Submit signed CAVCON contract to accounting via email to EW, MW, LG, EC, MA, EG. Obtain copy of Contractors License with workers comp details. Post same to drive. Email EG, EC, MW.	
1/23/2019	Mark Adams	Email doc review and f/u w/ AA, EG, CM regarding Lodgment of Comps.	
1/23/2019	Christmas Myers	Review AA, EG and MA's emails re Lodgment of Comps	
1/24/2019	Patricia Alboil	Review discussion on issuing CAVCON contract. Email	
2/8/2019	Erica Connelly	Review County Comments on Final Observation & Report; email EG, PA, CM, TA, MA, AA re: same.	
2/15/2019	Mark Adams	Email doc review and f/u w/ EG, EC, TA, MW regarding Estimate from Jimmy Hendricks Construction.	

2/15/2019	Patricia Alboil	Review removal and demo estimate. Verify contractors license and workers comp. Provide list of additional insurance and payment documents required. Email EG, MW, EC, EW, LG, MA. Update contract and properties spreadsheet. Request approval for estimate. Email MW, EG, EW, LG, MA, EC.	
2/15/2019	Erica Connelly	Post Lower Storage Bldg proposal to shared drive; message EG re: same; emails to EG, PA, MCW, EW, LG, MA re: same, contractor license.	
2/19/2019	Erica Connelly	Document contractor insurance for staff reference; email PA re: same. Post insurance documents to shared drive; document same for staff reference; email EW, LG, MCW re: same.	
2/20/2019	Patricia Alboil	Review GL insurance document. Post same to drive. Email EG, MW, EC, ET.	
2/21/2019	Erica Connelly	Email MA, ET, EG, PA, LL re: trespassing enforcement.	
2/22/2019	Erica Connelly	Draft monthly accounting report; email LJ, ET, TA re: report for MA review/signature.	
3/5/2019	Leah Jaques	Research into additional harrasing videos posted about CRG and case by Respondent on social media; E-mail to EG, MA and AA re same	
3/6/2019	Patricia Alboil	Review release and invoice. Post same to drive. Request approval for payment. Email EG, MW, EW,	
3/18/2019	Leah Jaques	Uploaded pleadings to Dropbox for State Bar Response; Edited Response letter; E-mail to MA, AA and EG re same	
3/20/2019	Erica Connelly	Emails to PA, EG, MCW re: contractor insurance.	
3/25/2019	Erica Connelly	Post property tax notices to shared drive; emails to EG, MA, MCW, EW re: same.	
4/19/2019	Elizabeth Weinstein	Review payoff calculation; email to MA, MW and EG re: same	
4/19/2019	Erica Connelly	Email MCW, ET, DB re: property tax status.	
5/31/2019	Mark Adams	Email doc review and f/u w/ SV, AA, TA regarding Provisional Order RE Sale Draft.	
8/5/2019	Patricia Alboil	Veridy COI for liability and workers comp. Verifiy CSLB license. Email EW MW DV EC ET	

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EXHIBIT E
**CHART SHOWING EXCESSIVE BILLING AT WEEKLY MEETINGS BY CALIFORNIA
RECEIVERSHIP GROUP**

DATE	BILLER	AMOUNT BILLED FOR WEEKLY STATUS MEETING
7/21/2017	Mark Adams	
7/21/2017	Elizabeth Weinstein	
7/21/2017	Eddie Gao	
7/21/2017	Erica Connelly	
7/21/2017	Marcy Wehde	
7/21/2017	Lyna Chon	
7/21/2017	Andrew Adams	
7/28/2017	Mark Adams	
7/28/2017	Elizabeth Weinstein	
7/28/2017	Erica Connelly	
7/28/2017	Marcy Wehde	
7/28/2017	Eddie Gao	
7/28/2017	Lyna Chon	
7/28/2017	Andrew Adams	
8/4/2017	Elizabeth Weinstein	
8/4/2017	Christmas Myers	
8/4/2017	Erica Connelly	
8/4/2017	Marcy Wehde	
8/4/2017	Eddie Gao	
8/4/2017	Lyna Chon	
8/4/2017	Andrew Adams	
8/11/2017	Mark Adams	
8/11/2017	Elizabeth Weinstein	
8/11/2017	Christmas Myers	
8/11/2017	Marcy Wehde	
8/11/2017	Eddie Gao	
8/11/2017	Lyna Chon	
8/18/2017	Mark Adams	
8/18/2017	Elizabeth Weinstein	
8/18/2017	Christmas Myers	
8/18/2017	Erica Connelly	
8/18/2017	Marcy Wehde	
8/18/2017	Lyna Chon	
8/18/2017	Andrew Adams	
8/25/2017	Mark Adams	
8/25/2017	Elizabeth Weinstein	
8/25/2017	Christmas Myers	
8/25/2017	Erica Connelly	
8/25/2017	Marcy Wehde	
8/25/2017	Eddie Gao	
8/25/2017	Lyna Chon	

8/25/2017 Andrew Adams

9/1/2017 Mark Adams

9/1/2017 Elizabeth Weinstein

9/1/2017 Christmas Myers

9/1/2017 Erica Connelly

9/1/2017 Eddie Gao

9/1/2017 Lyna Chon

9/1/2017 Andrew Adams

9/8/2017 Elizabeth Weinstein

9/8/2017 Christmas Myers

9/8/2017 Erica Connelly

9/8/2017 Marcy Wehde

9/8/2017 Eddie Gao

9/8/2017 Lyna Chon

9/8/2017 Andrew Adams

9/15/2017 Mark Adams

9/15/2017 Elizabeth Weinstein

9/15/2017 Christmas Myers

9/15/2017 Erica Connelly

9/15/2017 Marcy Wehde

9/15/2017 Eddie Gao

9/15/2017 Lyna Chon

9/15/2017 Lyna Chon

9/22/2017 Mark Adams

9/22/2017 Christmas Myers

9/22/2017 Erica Connelly

9/22/2017 Eddie Gao

9/22/2017 Lyna Chon

9/22/2017 Andrew Adams

9/29/2017 Mark Adams

9/29/2017 Elizabeth Weinstein

9/29/2017 Christmas Myers

9/29/2017 Erica Connelly

9/29/2017 Marcy Wehde

9/29/2017 Eddie Gao

9/29/2017 Lyna Chon

9/29/2017 Andrew Adams

10/6/2017 Elizabeth Weinstein

10/6/2017 Christmas Myers

10/6/2017 Erica Connelly

10/6/2017 Marcy Wehde

10/6/2017 Eddie Gao

10/6/2017 Andrew Adams

10/13/2017 Mark Adams

10/13/2017 Elizabeth Weinstein

10/13/2017 Christmas Myers

10/13/2017 Erica Connelly

10/13/2017 Marcy Wehde

10/13/2017 Eddie Gao

10/13/2017 Andrew Adams

10/20/2017 Mark Adams

10/20/2017 Elizabeth Weinstein

10/20/2017 Christmas Myers

10/20/2017 Erica Connelly

10/20/2017 Marcy Wehde

10/20/2017 Eddie Gao

10/20/2017 Andrew Adams

10/27/2017 Mark Adams

10/27/2017 Elizabeth Weinstein

10/27/2017 Christmas Myers

10/27/2017 Erica Connelly

10/27/2017 Marcy Wehde

10/27/2017 Eddie Gao

10/27/2017 Sheila Vossough

10/27/2017 Andrew Adams

11/3/2017 Mark Adams

11/3/2017 Elizabeth Weinstein

11/3/2017 Christmas Myers

11/3/2017 Erica Connelly

11/3/2017 Marcy Wehde

11/3/2017 Eddie Gao

11/3/2017 Andrew Adams

11/3/2017 Lyna Chon

11/9/2017 Marcy Wehde

11/9/2017 Erica Connelly

11/9/2017 Eddie Gao

11/9/2017 Andrew Adams

11/9/2017 Lyna Chon

11/9/2017 Sheila Vossough

11/17/2017 Mark Adams

11/17/2017 Marcy Wehde

11/17/2017 Elizabeth Weinstein

11/17/2017 Christmas Myers

11/17/2017 Marcy Wehde

11/17/2017 Erica Connelly

11/17/2017 Eddie Gao

11/17/2017 Andrew Adams

11/17/2017 Lyna Chon

11/17/2017 Sheila Vossough

12/1/2017 Mark Adams

12/1/2017 Elizabeth Weinstein

12/1/2017 Erica Connelly

12/1/2017 Marcy Wehde

12/1/2017 Eddie Gao

12/1/2017 Andrew Adams

12/1/2017 Lyna Chon

12/1/2017 Sheila Vossough

12/8/2017 Mark Adams

12/8/2017 Elizabeth Weinstein

12/8/2017 Christmas Myers

12/8/2017 Erica Connelly

12/8/2017 Marcy Wehde

12/8/2017 Eddie Gao

12/8/2017 Andrew Adams

12/8/2017 Lyna Chon

12/8/2017 Sheila Vossough

12/19/2017 Mark Adams

12/19/2017 Elizabeth Weinstein

12/19/2017 Erica Connelly

12/19/2017 Marcy Wehde

12/19/2017 Eddie Gao

12/19/2017 Andrew Adams

12/19/2017 Lyna Chon

12/19/2017 Sheila Vossough

12/29/2017 Mark Adams

12/29/2017 Elizabeth Weinstein

12/29/2017 Erica Connelly

12/29/2017 Eddie Gao

12/29/2017 Andrew Adams

12/29/2017 Lyna Chon

12/29/2017 Sheila Vossough

1/5/2018 Mark Adams

1/5/2018 Elizabeth Weinstein

1/5/2018 Christmas Myers

1/5/2018 Erica Connelly
1/5/2018 Eddie Gao
1/5/2018 Andrew Adams
1/5/2018 Sheila Vossough

1/12/2018 Mark Adams
1/12/2018 Elizabeth Weinstein
1/12/2018 Christmas Myers
1/12/2018 Erica Connelly
1/12/2018 Eddie Gao
1/12/2018 Andrew Adams

1/19/2018 Mark Adams
1/19/2018 Elizabeth Weinstein
1/19/2018 Christmas Myers
1/19/2018 Erica Connelly
1/19/2018 Eddie Gao
1/19/2018 Andrew Adams
1/19/2018 Tom Yatteau

1/26/2018 Mark Adams
1/26/2018 Elizabeth Weinstein
1/26/2018 Christmas Myers
1/26/2018 Erica Connelly
1/26/2018 Eddie Gao
1/26/2018 Andrew Adams
1/26/2018 Tom Yatteau

2/2/2018 Elizabeth Weinstein
2/2/2018 Christmas Myers
2/2/2018 Christmas Myers
2/2/2018 Marcy Wehde
2/2/2018 Eddie Gao
2/2/2018 Andrew Adams
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2/9/2018 Mark Adams
2/9/2018 Elizabeth Weinstein
2/9/2018 Erica Connelly
2/9/2018 Marcy Wehde
2/9/2018 Eddie Gao
2/9/2018 Sheila Vossough
2/9/2018 Tom Yatteau

2/16/2018 Elizabeth Weinstein
2/16/2018 Christmas Myers
2/16/2018 Leah Jaques

2/16/2018 Erica Connelly

2/16/2018 Marcy Wehde

2/16/2018 Eddie Gao

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5/18/2018 Mark Adams

5/18/2018 Elizabeth Weinstein

5/18/2018 Leah Jaques

5/18/2018 Erica Connelly

5/18/2018 Marcy Wehde

5/18/2018 Eddie Gao

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5/25/2018 Mark Adams

5/25/2018 Elizabeth Weinstein

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6/29/2018 Elizabeth Weinstein

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7/6/2018 Elizabeth Weinstein

7/6/2018 Christmas Myers

7/6/2018 Erica Connelly

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7/20/2018 Andrew Adams

7/27/2018 Elizabeth Weinstein

7/27/2018 Christmas Myers

7/27/2018 Erica Connelly

7/27/2018 Marcy Wehde

7/27/2018 Eddie Gao

7/27/2018 Andrew Adams

8/3/2018 Mark Adams

8/3/2018 Erica Connelly

8/3/2018 Marcy Wehde

8/3/2018 Andrew Adams

8/10/2018 Mark Adams

8/10/2018 Leah Jaques

8/10/2018 Marcy Wehde

8/10/2018 Andrew Adams

8/17/2018 Mark Adams

8/17/2018 Elizabeth Weinstein

8/17/2018 Leah Jaques

8/17/2018 Christmas Myers

8/17/2018 Erica Connelly

8/17/2018 Marcy Wehde

8/17/2018 Eddie Gao

8/17/2018 Andrew Adams

8/24/2018 Mark Adams

8/24/2018 Christmas Myers

8/24/2018 Erica Connelly

8/24/2018 Eddie Gao

8/31/2018 Mark Adams

8/31/2018 Elizabeth Weinstein

8/31/2018 Christmas Myers

8/31/2018 Erica Connelly

9/7/2018 Mark Adams

9/7/2018 Elizabeth Weinstein

9/7/2018 Christmas Myers

9/7/2018 Erica Connelly

9/7/2018 Andrew Adams

9/14/2018 Mark Adams

9/14/2018 Elizabeth Weinstein

9/14/2018 Christmas Myers

9/14/2018 Eddie Gao

9/21/2018 Mark Adams

9/21/2018 Elizabeth Weinstein

9/21/2018 Christmas Myers

9/21/2018 Erica Connelly

9/21/2018 Eddie Gao

9/21/2018 Andrew Adams

9/28/2018 Mark Adams

9/28/2018 Elizabeth Weinstein

9/28/2018 Erica Connelly

9/28/2018 Eddie Gao

9/28/2018 Andrew Adams

10/5/2018 Elizabeth Weinstein

10/5/2018 Christmas Myers

10/5/2018 Leah Jaques

10/5/2018 Eddie Gao

10/5/2018 Erick Traschikoff

10/5/2018 Andrew Adams

10/12/2018 Mark Adams

10/12/2018 Elizabeth Weinstein

10/12/2018 Christmas Myers

10/12/2018 Leah Jaques

10/12/2018 Trevor Axt

10/12/2018 Erica Connelly

10/12/2018 Eddie Gao

10/12/2018 Andrew Adams

10/19/2018 Mark Adams

10/19/2018 Elizabeth Weinstein

10/19/2018 Christmas Myers

10/19/2018 Trevor Axt

10/19/2018 Erica Connelly

10/19/2018 Eddie Gao

10/26/2018 Elizabeth Weinstein

10/26/2018 Christmas Myers

10/26/2018 Trevor Axt

10/26/2018 Erica Connelly

10/26/2018 Eddie Gao

10/26/2018 Andrew Adams

11/2/2018 Mark Adams

11/2/2018 Elizabeth Weinstein

11/2/2018 Christmas Myers

11/2/2018 Trevor Axt

11/2/2018 Erica Connelly

11/2/2018 Eddie Gao
11/2/2018 Andrew Adams

11/9/2018 Mark Adams
11/9/2018 Elizabeth Weinstein
11/9/2018 Leah Jaques
11/9/2018 Erica Connelly
11/9/2018 Trevor Axt
11/9/2018 Eddie Gao
11/9/2018 Andrew Adams

11/16/2018 Mark Adams
11/16/2018 Elizabeth Weinstein
11/16/2018 Leah Jaques
11/16/2018 Erica Connelly
11/16/2018 Eddie Gao
11/16/2018 Andrew Adams

11/30/2018 Leah Jaques
11/30/2018 Christmas Myers
11/30/2018 Erica Connelly
11/30/2018 Eddie Gao
11/30/2018 Andrew Adams

12/7/2018 Elizabeth Weinstein
12/7/2018 Andrew Adams

12/14/2018 Mark Adams
12/14/2018 Elizabeth Weinstein
12/14/2018 Christmas Myers
12/14/2018 Leah Jaques
12/14/2018 Erica Connelly
12/14/2018 Patrica Albiol
12/14/2018 Eddie Gao

12/21/2018 Mark Adams
12/21/2018 Elizabeth Weinstein
12/21/2018 Christmas Myers
12/21/2018 Leah Jaques
12/21/2018 Patrica Albiol
12/21/2018 Eddie Gao

1/4/2019 Mark Adams
1/4/2019 Elizabeth Weinstein
1/4/2019 Christmas Myers
1/4/2019 Leah Jaques
1/4/2019 Erica Connelly

1/4/2019 Marcy Wehde

1/4/2019 Patrica Albiol

1/4/2019 Eddie Gao

1/4/2019 Andrew Adams

1/11/2019 Mark Adams

1/11/2019 Elizabeth Weinstein

1/11/2019 Trevor Axt

1/11/2019 Erica Connelly

1/11/2019 Marcy Wehde

1/11/2019 Patrica Albiol

1/11/2019 Eddie Gao

1/11/2019 Andrew Adams

1/18/2019 Elizabeth Weinstein

1/18/2019 Leah Jaques

1/18/2019 Christmas Myers

1/18/2019 Trevor Axt

1/18/2019 Erica Connelly

1/18/2019 Marcy Wehde

1/18/2019 Patrica Albiol

1/18/2019 Eddie Gao

1/25/2019 Mark Adams

1/25/2019 Elizabeth Weinstein

1/25/2019 Christmas Myers

1/25/2019 Leah Jaques

1/25/2019 Erica Connelly

1/25/2019 Marcy Wehde

1/25/2019 Patrica Albiol

1/25/2019 Eddie Gao

2/1/2018 Elizabeth Weinstein

2/1/2019 Christmas Myers

2/1/2019 Leah Jaques

2/1/2019 Trevor Axt

2/1/2019 Marcy Wehde

2/1/2019 Patrica Albiol

2/1/2019 Eddie Gao

2/1/2019 Andrew Adams

2/8/2019 Mark Adams

2/8/2019 Marcy Wehde

2/8/2019 Andrew Adams

2/22/2019 Mark Adams

2/22/2019 Elizabeth Weinstein

2/22/2019 Christmas Myers

2/22/2019 Leah Jaques

2/22/2019 Trevor Axt

2/22/2019 Patrica Albiol

2/22/2019 Eddie Gao

2/22/2019 Andrew Adams

2/22/2019 Tom Yatteau

3/8/2019 Elizabeth Weinstein

3/8/2019 Leah Jaques

3/8/2019 Erica Connelly

3/8/2019 Patrica Albiol

3/8/2019 Andrew Adams

3/8/2019 Tom Yatteau

3/22/2019 Mark Adams

3/22/2019 Elizabeth Weinstein

3/22/2019 Christmas Myers

3/22/2019 Leah Jaques

3/22/2019 Erica Connelly

3/22/2019 Marcy Wehde

3/22/2019 Patrica Albiol

3/22/2019 Eddie Gao

3/22/2019 Andrew Adams

3/22/2019 Tom Yatteau

3/29/2019 Mark Adams

3/29/2019 Elizabeth Weinstein

3/29/2019 Christmas Myers

3/29/2019 Leah Jaques

3/29/2019 Erica Connelly

3/29/2019 Marcy Wehde

3/29/2019 Patrica Albiol

3/29/2019 Eddie Gao

3/29/2019 Andrew Adams

3/29/2019 Tom Yatteau

4/12/2019 Mark Adams

4/12/2019 Elizabeth Weinstein

4/12/2019 Christmas Myers

4/12/2019 Erica Connelly

4/12/2019 Marcy Wehde

4/12/2019 Patrica Albiol

4/12/2019 Eddie Gao

4/12/2019 Tom Yatteau

4/19/2019 Mark Adams
4/19/2019 Elizabeth Weinstein
4/19/2019 Christmas Myers
4/19/2019 Trevor Axt
4/19/2019 Erica Connelly
4/19/2019 Marcy Wehde
4/19/2019 Patrica Albiol
4/19/2019 Eddie Gao
4/19/2019 Andrew Adams
4/19/2019 Tom Yatteau

4/26/2019 Mark Adams
4/26/2019 Elizabeth Weinstein
4/26/2019 Elizabeth Weinstein \$48.00 (double billed)
4/26/2019 Trevor Axt
4/26/2019 Erica Connelly
4/26/2019 Marcy Wehde
4/26/2019 Patrica Albiol
4/26/2019 Eddie Gao
4/26/2019 Andrew Adams

5/3/2019 Mark Adams
5/3/2019 Elizabeth Weinstein
5/3/2019 David Ballou
5/3/2019 Erica Connelly
5/3/2019 Marcy Wehde
5/3/2019 Patrica Albiol
5/3/2019 Eddie Gao
5/3/2019 Andrew Adams
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5/17/2019 Elizabeth Weinstein
5/17/2019 Trevor Axt
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5/17/2019 Patrica Albiol
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5/31/2019 Mark Adams
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5/31/2019 Marcy Wehde
5/31/2019 Patrica Albiol
5/31/2019 Andrew Adams

8/9/2019 Andrew Adams
8/9/2019 Elizabeth Weinstein
8/9/2019 Karen Xu

8/9/2019 Trevor Axt
8/9/2019 Patrica Albiol
8/9/2019 Eddie Gao
8/9/2019 Andrew Adams

8/16/2019 Karen Xu
8/16/2019 Marcy Wehde
8/16/2019 Patrica Albiol
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8/23/2019 Mark Adams
8/23/2019 Elizabeth Weinstein
8/23/2019 Karen Xu
8/23/2019 Trevor Axt
8/23/2019 Marcy Wehde
8/23/2019 Patrica Albiol
8/23/2019 Eddie Gao
8/23/2019 Andrew Adams

9/6/2019 Mark Adams
9/6/2019 Elizabeth Weinstein
9/6/2019 Karen Xu
9/6/2019 Trevor Axt
9/6/2019 Marcy Wehde
9/6/2019 Eddie Gao
9/6/2019 Andrew Adams

9/27/2019 Elizabeth Weinstein
9/27/2019 Karen Xu
9/27/2019 Trevor Axt
9/27/2019 Marcy Wehde
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10/4/2019 Elizabeth Weinstein
10/4/2019 Karen Xu
10/4/2019 Trevor Axt
10/4/2019 Patrica Albiol
10/4/2019 Andrew Adams
10/4/2019 Tom Yatteau

10/11/2019 Eddie Gao
10/11/2019 Mark Adams
10/11/2019 Elizabeth Weinstein
10/11/2019 Karen Xu
10/11/2019 Trevor Axt
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10/11/2019 Tom Yatteau
10/11/2019 Andrew Adams

10/25/2019 Patrica Albiol
10/25/2019 Eddie Gao
10/25/2019 Andrew Adams
10/25/2019 Tom Yatteau

11/1/2019 Mark Adams
11/1/2019 Elizabeth Weinstein
11/1/2019 Karen Xu
11/1/2019 Trevor Axt
11/1/2019 Marcy Wehde
11/1/2019 Patrica Albiol
11/1/2019 Eddie Gao
11/1/2019 Andrew Adams
11/1/2019 Tom Yatteau

11/8/2019 Karen Xu
11/8/2019 Trevor Axt
11/8/2019 Marcy Wehde
11/8/2019 Eddie Gao
11/8/2019 Andrew Adams

11/15/2019 Mark Adams
11/15/2019 Elizabeth Weinstein
11/15/2019 Karen Xu
11/15/2019 Trevor Axt
11/15/2019 Eddie Gao
11/15/2019 Andrew Adams

11/22/2019 Trevor Axt
11/22/2019 Mark Adams
11/22/2019 Elizabeth Weinstein
11/22/2019 Karen Xu
11/22/2019 Marcy Wehde
11/22/2019 Patrica Albiol
11/22/2019 Eddie Gao
11/22/2019 Tom Yatteau

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EXHIBIT F

**CHART SHOWING BILLING FOR DEFENSE OF FEDERAL LAWSUIT BY CALIFORNIA
RECEIVERSHIP GROUP**

8/27/2019	Leah Jaques	Emails with EG re Cox v Mariposa - Summons	
8/27/2019	Trevor Axt	review emails RE cox v county	
8/27/2019	Eddie Gao	In-depth review and analysis of summons & complaint re: Cox federal suit; comms v/ AA and staff re: factual rebuttals.	
8/27/2019	Andrew Adams	MTDismiss, anti-slapp research	
8/27/2019	Andrew Adams	Emails re: complaint, anti-slapp	
8/27/2019	Andrew Adams	Motion to dismiss, anti-SLAPP; draft letter to owner counsel re: complaint.	
8/27/2019	Andrew Adams	CYA federal complaint, review	
8/28/2019	Leah Jaques	F/U e-mails with EG And MA re Cox v Mariposa - Summons	
8/28/2019	Trevor Axt	review summons RE procedure and dates, fu emails w AA: update cal/DB	
8/28/2019	Eddie Gao	Review and revise AA letter to Angelucci re: federal complaint; case history review re: the same.	
8/29/2019	Andrew Adams	Fed suit letter, to new attys	
9/4/2019	Eddie Gao	Discussion w/ AA re: response to federal complaint.	
9/5/2019	Andrew Adams	Motion to dismiss, edits research drafting.	
9/6/2019	Andrew Adams	Fed motions, to file. Edits	
9/9/2019	Eddie Gao	Draft case history summary for federal suit; discussions w/ AA re: the same; archive review re: the same.	
9/9/2019	Eddie Gao	Discussion w/ AA re: response to federal complaint.	
9/9/2019	Andrew Adams	Anti-slapp drafting, research	
9/9/2019	Andrew Adams	Anti-SLAPP research, drafting	
9/9/2019	Andrew Adams	MtD opp, anti-SLAPP opp. Research and drafting	
9/10/2019	Mark Adams	Email doc review and f/u w/ Marc Angelucci, AA regarding Response to Meet and Confer re Baker Rule and Rooker-Feldman.	
9/10/2019	Trevor Axt	review fax/email service, summarize, circulate, archive - Angelucci's Letter in response to CRG letter RE federal case	
9/10/2019	Eddie Gao	Further drafting and archive review re: case history summary for federal suit.	
9/10/2019	Andrew Adams	MtD, anti-SLAPP research drafting. Review letter from owner counsel with citations and argument.	
9/10/2019	Andrew Adams	Motion to dismiss/anti slapp research.	
9/10/2019	Andrew Adams	Factual recount for MtD, anti-SLAPP	
9/11/2019	Mark Adams	Email review and f/u w/ TA, AA regarding Angelucci's Letter RE Federal Case.	
9/11/2019	Mark Adams	Call w/ AA re response pleading	
9/11/2019	Trevor Axt	federal - discuss incoming motion to strike w AA; f/u w KX	
9/11/2019	Trevor Axt	federal - gather all final receiver report pleadings, parse all pleadings/reports and compile them into unformatted base report; email to EG as base for decl	

9/11/2019	Trevor Axt	fed - review complaint and procedural info contained; begin citing complaint RE statement of facts	
9/11/2019	Trevor Axt	fed - discuss statement of facts cites e EG	
9/11/2019	Eddie Gao	Review and revise case history summary for response to federal complaint; comms w/ AA re: the same.	
9/11/2019	Eddie Gao	Draft declaration of MA for federal suit; coordinate w/ TA re: compiling info from all reports filed in receivership matter; comms w/ staff re: revisions and editing schedule.	
9/11/2019	Eddie Gao	Review and f/u on Angelucci response letter re: federal case.	
9/11/2019	Eddie Gao	t/c AA re: federal suit response and declaration.	
9/11/2019	Andrew Adams	MtD, anti-SLAPP edits, drafting	
9/11/2019	Andrew Adams	MtD/anti-SLAPP motion edits, drafting.	
9/11/2019	Lyna Chon	Call with AA to discuss editing motion to dismiss and strike	
9/12/2019	Trevor Axt	federal - discuss cite review w AA, begin review of local rules & ECF filing procedure	
9/12/2019	Trevor Axt	fed - review courtroom procedure RE mtn filing, f/u emails w AA	
9/12/2019	Trevor Axt	federal - review emails re status of mtn to dismiss, f/u emails RE same; initial cite	
9/12/2019	Trevor Axt	federal - draft proof of service, conv w EG RE service to parties, update PoS RE EG discussion; send PoS draft to AA EG for review	
9/12/2019	Leah Jaques	F/U email with LC re Motion to Strike federal complaint	
9/12/2019	Leah Jaques	E-mail with AA re TOC TOA for Motion to Dismiss/Strike	
9/12/2019	Leah Jaques	Discussion with TA re federal filing requirements for Motion to Dismiss	
9/12/2019	Eddie Gao	Discussion w/ TA re: proof of service and service addresses for parties in federal suit.	
9/12/2019	Eddie Gao	Citations for summary of facts to complaint and declaration of MA; further revisions to summary of facts; discussions w/ AA and TA re: the same.	
9/12/2019	Eddie Gao	Review AA edits to Decl of MA re: federal suit; f/u email re: the same.	
9/12/2019	Eddie Gao	revise paragraph citations to declaration in summary of facts for motion to dismiss federal suit.	
9/12/2019	Jared Salvati	Motion to Dismiss/Strike: Cite checking and in-text editing	
9/12/2019	Andrew Adams	anti-slapp, amend complaint, timing	
9/12/2019	Andrew Adams	Declaration of MA, Edits, exhibits and attachments	
9/12/2019	Andrew Adams	Edits to motion to dismiss, anti-SLAPP	
9/12/2019	Andrew Adams	Prep motion, format, pages, cites	
9/12/2019	Andrew Adams	MtD, anti-slapp filing requirements. Scheduling	

9/12/2019	Lyna Chon	Emails from AA and staff re draft Motion to Dismiss and Strike; fl/up email re revising today	
9/12/2019	Lyna Chon	Continue reviewing and revising Motion to Dismiss and Strike; email to staff with comments and questions	
9/12/2019	Lyna Chon	Review AA's draft Motion to Dismiss and Strike, start revising	
9/13/2019	Trevor Axt	fed - review AA email RE draft and EG f/u email RE same; begin final draft review; create ToC and ToA; compile for ECF and prep final for AA review	
9/13/2019	Trevor Axt	fed - incorporate final AA edits; file w ECF; begin prepping USPS service and court copy; eserve; archive	
9/13/2019	Trevor Axt	federal - discuss status of mtn draft/decl w/ EG	
9/13/2019	Trevor Axt	fed - review AA email RE PoS draft, update PoS RE same	
9/13/2019	Leah Jaques	E-mails with AA, TA and JS re Motion to Strike	
9/13/2019	Eddie Gao	Final AQ review and edits to motion to dismiss and strike re: federal suit.	
9/13/2019	Eddie Gao	Review and confirm federal suit POS.	
9/13/2019	Andrew Adams	Motion to dismiss/strike. Edits. Review comments	
9/13/2019	Andrew Adams	Final edits to motion to dismiss, anti-slapp	
9/13/2019	Andrew Adams	Motion to dismiss, anti-slapp. Final edits, email to EG, TA on edits. POS	
9/16/2019	Trevor Axt	federal - review docket, retrieve unserved documents	
9/16/2019	Trevor Axt	fed - review local rules RE briefing schedule, f/u email w legal RE same	
9/16/2019	Trevor Axt	federal - review, archive, summarize, circulate - Minute order RE SC; County's Stip Re Time Extension on Answer	
9/16/2019	Eddie Gao	Discussions w/ TA re: federal case briefing schedule.	
9/17/2019	Karen Xu	(Federal) Review email from TA RE Motion to Dismiss, update database/calendar accordingly	
9/17/2019	Trevor Axt	federal - review minute order RE continuance, archive, f/u w AA EG RE re-setting, update cal/DB	
9/17/2019	Eddie Gao	Review minute order re: federal case judge reassignment; discussions w/ TA re: the same.	
9/19/2019	Mark Adams	Email doc review w/ TA regarding Cox's Declining of Magistrate Judge.	
9/19/2019	Trevor Axt	federal - discuss w AA; retrieve, review, archive, summarize, circulate Cox's Declining of Magistrate Judge	
9/19/2019	Eddie Gao	Comms w/ staff re: federal suit jurisdiction.	
10/1/2019	Andrew Adams	Draft Reply to MtD, anti-slapp	
10/2/2019	Mark Adams	Email doc review w/ TA regarding Oppo/Reply Filings in Eastern District.	

10/2/2019	Mark Adams	Email doc review and f/u w/ TA, AA regarding Deft's Oppo to Motion to Dismiss; FRCP 56 Affidavit to Continue Motion to Dismiss.	
10/2/2019	Karen Xu	Review email RE Deft's Oppo to Motion to Dismiss; FRCP 56 Affidavit to Continue Motion to Dismiss	
10/2/2019	Trevor Axt	emails w AA RE deft's oppo; retrieve, review, compile, summarize, circulate - deft's oppo to motion to dismiss; review EDCA rules re oppo/reply and email research to legal	
10/2/2019	Eddie Gao	Review Cox oppo to motion to dismiss re: federal suit.	
10/2/2019	Andrew Adams	Mtd, anti-SLAPP Opp review, reply notes	
10/2/2019	Andrew Adams	Review opp to MTD, Mot to strike draft reply	
10/2/2019	Andrew Adams	Review Opp to motion to dismiss/anti-slapp, notes.	
10/4/2019	Andrew Adams	Drafting reply to Opp to MtD, anti-SLAPP	
10/7/2019	Trevor Axt	federal - review Hon Ishii's rules; update cal/DB; email to AA EG KX RE findings	
10/7/2019	Trevor Axt	federal - review reply draft, edit and reformat, f/u w AA RE same	
10/7/2019	Eddie Gao	Review and revise reply to fed suit oppo to motion to dismiss.	
10/7/2019	Andrew Adams	Research, edits to Reply, MtD, anti-SLAPP motion	
10/7/2019	Andrew Adams	Research for MTD, reply, Prep oral arg	
10/7/2019	Andrew Adams	Reply edits	
10/8/2019	Mark Adams	Drafting reply to Cox's pleading	
10/8/2019	Mark Adams	Email doc review w/ TA regarding Receiver's Reply to Defendant's Opposition to Motion to Dismiss.	
10/8/2019	Mark Adams	Email doc review and f/u w/ AA, TA regarding Reply to Cox Opp., Final.	
10/8/2019	Karen Xu	Review email from TA RE Receiver's reply to defendant's opposition to Motion to dismiss	
10/8/2019	Karen Xu	Review email from TA Re CYA Federal Hearing	
10/8/2019	Trevor Axt	federal - review, edit and format final draft; PoS; compile and ECF file; eserve; USPS serve; archive; courtesy copy - reply to JDC's oppo	
10/8/2019	Trevor Axt	federal - review deputy's response email, f/u email w/ deputy; f/u email w legal RE same	
10/8/2019	Trevor Axt	review AA emails RE courtroom rules; f/u RE same	
10/8/2019	Trevor Axt	federal - review courtroom rules and docket; email to courtroom deputy RE docketing	
10/8/2019	Andrew Adams	Reply to Opp	
10/8/2019	Andrew Adams	Reply to Opp. MTD, anti-SLAPP	
10/8/2019	Andrew Adams	Edits to reply	
10/8/2019	Andrew Adams	Reply final review	
10/9/2019	Trevor Axt	fed - review, retrieve, archive, summarize, circulate - docket text RE vacating motion to dismiss; f/u w EG	

10/9/2019	Trevor Axt	fed - review emails from MC RE JDC oppo service; circulate JDC oppo; f/u email w AA EG RE lack of service	
10/9/2019	Andrew Adams	POS check, parties	
10/10/2019	Andrew Adams	Fed hearing, no oral argument.	
10/11/2019	Trevor Axt	federal - review stip service; f/u email w AA	
10/14/2019	Trevor Axt	federal - retrieve, review, archive, summarize, circulate - County's Stip and Signed Order Extended Time for County to Respond to Initial Complaint	
10/15/2019	Trevor Axt	federal - review docket RE updates; f/u w AA RE same	
10/15/2019	Trevor Axt	federal - further docket review; call to courtroom RE ruling; f/u w AA	
10/15/2019	Marcy Wehde	Emails re: federal dismissal	
10/21/2019	Trevor Axt	review federal docket RE extension; update DB and cal approp	
10/28/2019	Karen Xu	Review email from TA RE County's Motion to Strike, update database/calendar with new hearing date	
10/28/2019	Trevor Axt	retrieve, review, archive, summarize, circulate - County's Anti SLAPP Motion	
10/28/2019	Eddie Gao	Review County motion to strike re: federal case; f/u staff re: the same.	
10/28/2019	Andrew Adams	Fed - Review City's motion to strike	
11/1/2019	Karen Xu	call with clerk of federal court, request for telephonic appearance. Notify atty and update calendar	
11/12/2019	Mark Adams	Email doc review w/ TA regarding JDC's Oppo to County's Motion to Dismiss.	
11/12/2019	Trevor Axt	federal - retrieve opposition and compile 11 filings into cohesive pleading; review, archive, summarize, circulate - JDC's Opposition to County's MTD; Decl of Angelucci ISO; Table of Exhibits RE Angelucci's Decl; Decl of Cox ISO; Affidavit to Continue and Stay Hearing on County's Motion to Dismiss	
11/12/2019	Eddie Gao	Review JDC opposition to County motion to dismiss, and supporting declarations.	
11/19/2019	Trevor Axt	federal - review, archive, summ, circulate - County's Reply to JDC Oppo to Motion to Strike; RJN RE Cox's Claim	
11/19/2019	Andrew Adams	County reply to Opp to anti-slapp	
11/21/2019	Mark Adams	Email doc review w/ TA regarding Minute Order RE County's AntiSLAPP Under Submission.	
11/21/2019	Trevor Axt	review, archive, summarize, circulate - Minute Order RE County's AntiSLAPP Under Submission; update cal/DB	

STEVEN W. DAHLEM, SBN 135498
MARIPOSA COUNTY COUNSEL

Exempt from filing fees pursuant to
Government Code section 6103.

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Irvine, California 92606
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Fax: 949-385-6428

Attorneys for Plaintiff
County of Mariposa

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF MARIPOSA

COUNTY OF MARIPOSA,

Plaintiff,

v.

JDC LAND COMPANY, LLC; a California
limited liability company;
CONTINENTAL HERITAGE INSURANCE
COMPANY; and
DOES 1 through 50,

Defendants.

Action Filed: March 13, 2017
Case Number: 10887

PROOF OF SERVICE

[Filed concurrently with:
1. Opposition to Receiver's Motion for
Discharge.
2. Declaration of Attorney Jones.]

Hearing
Date: April 2-3, 2020
Judge: F. Dana Walton

PROOF OF SERVICE

At the time of this service I was over 18 years of age and I was not a party to this action. My business address is 3 Corporate Park, Suite 100, Irvine, California 92606. On the date specified below, I served the following documents ("Documents"):

- 1. COUNTY OF MARIPOSA'S OPPOSITION TO RECEIVER'S MOTION FOR DISCHARGE, EXONERATION OF SURETY, AND ORDER DIRECTING REPAYMENT OF FEES AND COSTS.**
- 2. DECLARATION OF ATTORNEY AMANDA R. JONES IN SUPPORT OF COUNTY OF MARIPOSA'S OPPOSITION TO RECEIVER'S MOTION FOR DISCHARGE, EXONERATION OF SURETY, AND ORDER DIRECTING REPAYMENT OF FEES AND COSTS.**

The Documents were served on the following persons ("Persons"):

Marc E. Angelucci, Esq.
Attorney for Defendant JDC Land Company, LLC
Postal Office Box 6414
Crestline, California 92325
marc.angelucci@yahooo.com

Andrew Adams
California Receivership Group, PBC
Court Receiver
2716 Ocean Park Boulevard, Suite 3010
Santa Monica, California 90405
aadams@calreceivers.com

The Document was delivered by:

☐ **Personal Service.** At _____ (time), I personally delivered the Document to the Persons at the addresses identified above. For service on a party, delivery was either made to the party, or by leaving the documents at the party's residence with a person not less than 18 years of age. For service on a party's agent, delivery was either made to the party's agent, or at the party's agent's office by leaving the documents with a receptionist or an individual in charge of the office in an envelope clearly labeled to identify the agent being served.

☐ **United States Mail.** I served the Document by enclosing a true copy in a sealed envelope addressed to the Persons at the addresses identified above and depositing the envelope in the United States mail with the postage fully prepaid in the county where I reside or am employed.

1 ☐ **Certified Mail with Return Receipt Requested.** I served the Document by enclosing a true
2 copy in a sealed envelope addressed to the Persons at the addresses identified above and depositing the
3 envelope with the United States Post Office with the postage fully prepaid as certified mail with return
4 receipt request in the county where I reside or am employed.

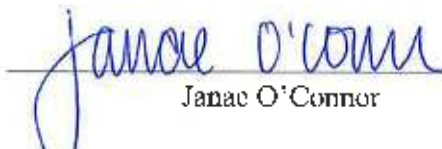
5 ☒ **Next Day Delivery.** I served the Document by enclosing a true copy in a sealed envelope
6 addressed to the Persons at the addresses identified above and depositing the envelope for collection
7 with a next day delivery carrier.

8 ☐ **Messenger Service.** I served the Document by enclosing a true copy in a sealed envelope
9 addressed to the Persons at the addresses identified above and providing them to a professional
10 messenger service for delivery. A declaration of service by the messenger service is attached.

11 ☐ **Facsimile.** Based on an agreement of the parties to accept service by facsimile, I faxed the
12 Document to the Persons at the fax numbers identified above. No error was reported by the fax machine
13 and I did not receive any indication that the transmission was unsuccessful.

14 ☒ **Email.** Based on an agreement of the parties to accept service by email, I emailed the
15 Document to the Persons at the email addresses identified above. I did not receive any indication that
16 the email transmission was unsuccessful.

17
18 Dated: March 19, 2020


Janac O'Connor