

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

Plaintiff,

V.

NORTHRIDGE HOLDINGS, LTD., ET AL.,

Defendants.

Civil Action No. 19-cv-05957

Hon. John Z. Lee

Magistrate Judge Susan E. Cox

**RECEIVER'S COMBINED (A) FOURTH INTERIM FEE APPLICATION AND
MOTION FOR COURT APPROVAL OF PAYMENT OF FEES AND EXPENSES OF
COUNSEL FOR THE RECEIVER; AND (B) THIRD INTERIM FEE APPLICATION
AND MOTION FOR COURT APPROVAL OF PAYMENT OF FEES AND EXPENSES
OF RECEIVER'S NON-FOX SWIBEL PROFESSIONALS**

N. Neville Reid, not individually, but solely as the Court-appointed receiver (the “Receiver”) for the Estate of Defendant Northridge Holdings, Ltd. and its related entities and affiliates as more particularly set forth in the Receivership Order (as defined herein) (collectively, the “Receivership Defendants,” and their assets as more particularly identified therein, the “Receivership Assets,” and such estate, the “Receivership Estate,” and such administration, the “Receivership”), and pursuant to the powers vested in him by the *Order Appointing Receiver* entered by the Court on September 12, 2019 [Dkt. No. 22] and as amended by the Court on February 4, 2020 [Dkt. 102] (the “Receivership Order”)¹ respectfully submits this combined (a) *Fourth Interim Application* for counsel for the Receiver – Fox Swibel Levin & Carroll, LLP (“Fox Swibel”), and (b) *Third Interim Application* for the Receiver’s non-Fox Swibel professionals — Kutchins, Robbins & Diamond Ltd. (“KRD”), AlixPartners, LLP

1 Capitalized terms not defined herein shall be given the same meaning ascribed to such terms in the Receivership Order.

(“AlixPartners”), Dickler, Kahn, Slowikowski, & Zavell, Ltd. (“Dickler Kahn”)² and Plante Moran, PLLC (“PM”)³ (collectively, the “Application”) and hereby respectfully moves the Court, (the “Motion”) for an order approving payment of the fees and expenses of Fox Swibel, KRD, AlixPartners and Dickler Kahn. In support of the Application and Motion, the Receiver states as follows:

I. INTRODUCTION

1. The Application covers the period from April 1, 2020 to and including June 30, 2020 (the “Application Period”).

2. Fees and expenses (i) previously requested, approved, and paid, or (ii) presently requested, are summarized as follows:

Previously Approved/Paid:

Professional	Month/Year	Fees & Costs Requested	Fees & Costs Approved	Fees & Costs Paid
Fox Swibel	September & October 2019	\$114,779.88	\$114,779.88	\$114,779.88
Fox Swibel	November & December 2019	\$68,045.66	\$68,045.66	\$68,045.66
Fox Swibel	January 2020-March 2020	\$146,712.17	\$146,712.17	\$146,712.17
KRD	October 2019 – December 2019	\$3,767.50	\$3,767.50	\$3,767.50

² This is the first request for compensation and reimbursement for fees and expenses on behalf of Dickler Kahn.

³ As described more fully below, the Receiver does not seek compensation and reimbursement for fees and expenses on behalf of PM in this Application, as PM did not provide services during this Application Period. The Receiver, however, does include PM in this Application in order to comprehensively set forth the fees and expenses incurred and compensation and reimbursement to date.

KRD	January 2020-March 2020	\$3,978.71	\$3,978.71	\$3,978.71
AlixPartners	November 2019 – December 2019	\$143,130.16	\$143,130.16	\$143,130.16
AlixPartners	January 2020-March 2020	\$598,630.51	\$598,630.51	\$598,630.51
PM	November 2019 – December 2019	\$5,487.50	\$5,487.50	\$5,487.50
PM	January 2020-March 2020	\$3,326.00	\$3,326.00	\$3,326.00
<u>Grand Total</u>		\$1,087,858.09	\$1,087,858.09	\$1,087,858.09

Fees and costs requested in this Application for the Application Period:

Professional	Month/Year	Fees & Costs Charged	Proposed Holdback	Fees & Costs Requested
Fox Swibel	April 2020 – June 2020	\$182,623.01	\$0.00	\$182,623.01
KRD	April 2020 – June 2020	\$2,175.00	\$0.00	\$2,175.00
AlixPartners	April 2020 – June 2020	\$559,439.59 ⁴	\$139,697.50	\$419,742.09
PM	April 2020 – June 2020	\$0.00	\$0.00	\$0.00
Dickler Kahn	April 2020 – June 2020	\$960.00	\$0.00	\$960.00
<u>Grand Total</u>				<u>\$ 605,500.10</u>

⁴ This invoiced total incorporates an additional \$100,000.00 **reduction** (over and above the hourly fee cap reduction) as agreed upon by AlixPartners. Additionally, AlixPartners has agreed to a holdback of 25% of the reduced fees which it agrees will be only be paid upon approval of a final fee application at the closing of this case.

3. In summary, the total amount of money requested for approval and payment in the instant Application is \$605,500.10, which is broken down by professional as follows: (a) Fox Swibel: \$182,623.01; (b) KRD: \$2,175.00; (c) AlixPartners: \$419,742.09; (d) PM: \$0.00; and (e) Dickler Kahn: \$960.00.

II. BACKGROUND

4. On September 5, 2019, the United States Securities and Exchange Commission (the “SEC”) filed (a) a *Complaint* [Dkt. No. 1] (the “Complaint”) against the defendants as identified therein (collectively, the “Defendants”)⁵ alleging violations of federal securities laws, and (b) *Plaintiff’s Emergency Motion for a Temporary Restraining Order to Prevent Violations of the Federal Securities Laws, to Appoint Receiver, and to Provide for Other Ancillary Relief* [Dkt. No. 3] (the “TRO and Receivership Motion”), requesting a temporary restraining order to prevent violations of federal securities laws, to appoint a receiver and to provide for other ancillary relief set forth therein.

5. In its Complaint, the SEC alleged that: (a) the Defendants violated (i) Sections 5(a), 5(c) and 17(a) of the Securities Act of 1933 (the “Securities Act”) [15 U.S.C. § 77e(a), (e)(c), and q(a)], and (ii) Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) [15 U.S.C. § 78j(b)], Rule 10b-5(a) and (c) [17 C.F.R. § 240.10b-5(a), (c)]; and (b) Northridge Holdings, Ltd. (“Northridge”) and Glenn C. Mueller (“Mr. Mueller”) violated Rule 10b-5(b) [17 C.F.R. § 240.10b-5(a), (c)].

6. The Complaint further alleges that the Defendants operated a Ponzi scheme, raising at least \$41.6 million (between May 2014 through April 2019) from more than 300

⁵ The following Defendants are identified in the Complaint: Northridge Holdings, Ltd., Southridge Holdings, Ltd., Eastridge Holdings, Ltd., Brookstone Investment Group, Ltd., Guardian Investment Group, Ltd., Unity Investment Group, Ltd., Amberwood Holdings L.P., and Glenn C. Mueller.

investors across 32 states by, among other things, fraudulently offering and selling promissory notes in unregistered transactions to investors, many of whom were unsophisticated and/or unaccredited and of retirement age. *See* Complaint, ¶¶ 1–8, 27–62, 63–76. Further, the Complaint alleges that Mr. Mueller and Northridge misled certain of such investors to believe certain of their promissory notes were secured or equivalently “backed” by properties owned by the Receivership Defendants when in fact they were not. *Id.* at ¶ 72.

7. On September 9, 2019, the Court held a hearing on the TRO and Receivership Motions. On September 12, 2019, the Court entered the Receivership Order.

8. Under the Receivership Order, the Receiver is authorized to engage and employ professionals (in his discretion) to assist him in carrying out the duties and responsibilities set forth therein. Receivership Order, ¶¶ 8K, 50. In accordance therewith, the Receiver engaged Fox Swibel as counsel for the Receiver.

9. On September 12, 2019, the Receiver filed the *Motion for Court Approval of the Rates to be Charged by Receiver’s Counsel* [Dkt. No. 29] (the “Fox Swibel Rate Motion”). On September 24, 2019, the Court entered a minute entry Order [Dkt. No. 43] granting the Fox Swibel Rate Motion.

10. On October 30, 2019, the Receiver filed the *Motion for Court Approval of the Rates to be Charged by Receiver’s Accountant* [Dkt. No. 58] (the “KRD Rate Motion”). On November 6, 2020, the Court entered a minute entry Order [Dkt. No. 66] granting the KRD Rate Motion.

11. On October 30, 2019, the Receiver filed the *Motion for Court Approval of the Rates to be Charged by Receiver’s Forensic Accountant* [Dkt. No. 67] (the “AlixPartners Rate”).

Motion”). On December 10, 2019, the Court entered a minute entry Order [Dkt. No. 79] granting the AlixPartners Rate Motion.

12. On October 30, 2019, the Receiver filed the *Motion for Court Approval of the Rates to be Charged by Receiver’s Accountant* [Dkt. No. 70] (the “PM Rate Motion”). On January 6, 2020, the Court entered a minute entry Order [Dkt. No. 92] granting the PM Rate Motion.

13. On April 16, 2020, the Receiver filed the *Motion for Approval of Rates to be Charged by Dickler Kahn*⁶ [Dkt. 134-135] (the “Dickler Kahn Rate Motion”). On May 22, 2020, the Court entered an Order granting the Dickler Kahn Rate Motion. [Dkt. 149.]

14. Pursuant to the Receivership Order, and subject to Court approval, the Receiver and his professionals are entitled to “reasonable compensation and expense reimbursement” from the Receivership Estate, in compliance with the *Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission* (the “Billing Instructions”) promulgated by the SEC, which are binding upon the Receiver. *Id.* at ¶ 65.

III. FOX SWIBEL FOURTH INTERIM APPLICATION

15. Pursuant to (and in accordance with) the Billing Instructions and the Receivership Order, the Receiver provides the following information regarding the Application.

16. ***First***, the Application covers the period from April 1, 2020 to and including June 30, 2020.

⁶ For clarity, the Receiver notes that this motion was a combined motion that also sought approval of a settlement agreement unrelated the matters addressed in this Application.

17. **Second**, as set forth above, the Receiver retained Fox Swibel as counsel for the Receiver. On September 24, 2019, the Court entered an order granting the Fox Swibel Rate Motion. [Dkt. No. 43.]

18. **Third**, the *Certification of Fox Swibel in Support of the Application* is attached hereto as **Exhibit A** and incorporated herein by reference.

19. **Fourth**, the names and hourly rates of all Fox Swibel professionals and paraprofessionals who billed time on this matter during the Application Period are attached hereto as **Exhibit B** and incorporated herein by reference.

20. **Fifth**, the Application constitutes the Receiver's fourth interim application for compensation for the fees and expenses of Fox Swibel. The Receiver's first interim application for the firm sought compensation for fees and expenses incurred from the inception of the Receivership through October 31, 2019 in the amount of \$114,779.88; all such fees and costs were approved by the Court and subsequently paid to Fox Swibel. [See Dkt. Nos. 76 and 93.] The Receiver's second interim application for Fox Swibel sought compensation for fees and expenses incurred from November 1, 2019 through December 31, 2019 in the amount of \$68,045.66; all such fees and costs were approved by the Court and subsequently paid to Fox Swibel. [See Dkt. Nos. 118, 125, 132, 137 and 147.] The Receiver's third interim application for Fox Swibel sought compensation for fees and expenses incurred from January 1, 2020 through March 31, 2020 in the amount of \$146,712.17; all such fees and costs were approved by the Court and subsequently paid to Fox Swibel. [See Dkt. Nos. 161-163, 171, 173.]

IV. NON-FOX SWIBEL PROFESSIONALS' THIRD INTERIM APPLICATION

21. Pursuant to (and in accordance with) the Billing Instructions and the Receivership Order, the Receiver provides the following information regarding the Application as it relates to the non-Fox Swibel professionals.

A. **KRD**

22. ***First***, the Application covers the period from April 1, 2020 to and including June 30, 2020.

23. ***Second***, the Receiver retained KRD as accountant for the Receivership to provide accounting, tax, payroll and related services for the Receivership and the Receivership Defendants. During the Application Period, KRD continued to work to defend an audit and to prepare and file federal tax returns for certain of the Receivership Defendants and related entities for tax year 2018. The Receiver also utilized KRD's services to carry out accounting obligations in connection with the Receivership Defendants' business operations and management of the Receivership Estate's property.

24. ***Third***, the *Certification of KRD in Support of the Application* is attached hereto as **Exhibit C** and incorporated herein by reference.

25. ***Fourth***, Lois West was the only KRD professional or paraprofessional who billed time on this matter during the Application Period and her hourly rate is \$275.00.

26. ***Fifth***, the Application constitutes the Receiver's third interim application for compensation for the fees and expenses of KRD. The Receiver's first interim application for compensation for KRD covered fees and expenses incurred from October 1, 2019 through December 31, 2019 in the amount of \$3,767.50; all such fees and costs were approved by the Court and subsequently paid to KRD. [See Dkt. Nos. 118, 125, 132, 137 and 147.] The

Receiver's second interim application for compensation for KRD covered fees and expenses incurred from January 1, 2020 through March 31, 2020 in the amount of \$3,978.71; all such fees and costs were approved by the Court and subsequently paid to KRD. [See Dkt. Nos. 161-163, 171, 173.]

B. AlixPartners

27. *First*, the Application covers the period from April 1, 2020 to and including June 30, 2020.

28. *Second*, the Receiver retained AlixPartners as forensic accountant for the Receivership to, among other things, determine the: (i) amount and validity of claims of the investors/creditors of the Receivership Defendants and (ii) legal and equitable rights of such parties in respect of the funds marshalled in this case. Additionally, the Receiver engaged AlixPartners to perform, among other things, the following services: (a) tracing money in/ money out at the investor level; (b) tracing funds between the Receivership Defendants (i.e., intercompany), including determining the amount of intercompany receivables and/or whether or not the Receivership Defendants' finances are hopelessly commingled; (c) assisting with discovery; (d) identifying receivable claims, "finder" claims, insider claims, potential claw-back targets, fraudulent conveyances or transfers (e.g., undisclosed insider transfers, suspicious transactions generally, etc.), professional liability targets and breach of fiduciary duty claims; (e) assisting in the design and implementation of a claims process (for investors and general creditors), including verifying claim amounts and identifying potential objections; (f) modeling potential distribution plans based on different distribution methods (e.g., pro rata, rising tide, etc.); and (g) supporting motions filed by the Receiver (e.g., motion(s) to approve a distribution plan). During this Application Period, AlixPartners specifically focused its efforts on, among

other things, the following work: (x) determining the amount and validity of potential claims of the investors/creditors of the Receivership Defendants; (y) assisting the Receiver in designing the claims process; and (z) identifying potential claims of the Receivership Estate against third parties, including receivable claims, “finder” claims, “net winner” claims and insider claims.

29. **Third**, the *Certification of AlixPartners in Support of the Application* is attached hereto as **Exhibit D** and incorporated herein by reference.

30. **Fourth**, the names and hourly rates of all of AlixPartners’ professionals and paraprofessionals who billed time on this matter during the Application Period are attached hereto as **Exhibit E** and incorporated herein by reference.

31. **Fifth**, the Application constitutes the Receiver’s third interim application for compensation for the fees and expenses of AlixPartners. The Receiver’s first interim application for compensation for AlixPartners covered fees and expenses from November 1, 2019 through December 31, 2019 in the amount of \$143,130.16; all such fees and costs were approved by the Court and subsequently paid to AlixPartners. [See Dkt. Nos. 118, 125, 132, 137 and 147.] The Receiver’s second interim application for compensation for AlixPartners covered fees and expenses from January 1, 2020 through March 31, 2020 in the amount of \$598,630.51; all such fees and costs were approved by the Court and subsequently paid to AlixPartners. [See Dkt. Nos. 161-163, 171, 173.]

32. With respect to AlixPartners, AlixPartners voluntarily agreed to reduce the amount of fees requested by \$100,000.00 collectively for the Application Period. Further, AlixPartners has agreed that for this Application and going forward, a 25% holdback will be applied to its reduced fees incurred, which will be subject to approval and payment pursuant to a final fee application at the close of this case.

C. PM

33. ***First***, the Application covers the period from April 1, 2020 to and including June 30, 2020.

34. ***Second***, the Receiver retained PM as accountant for the Receivership to among other things: (a) review and analyze prior tax returns filed by the Receivership Defendants in order to opine on: (i) whether or not any amendments to such returns are required, and (ii) whether or not any of the Receivership Defendants are entitled to any unclaimed tax refund(s); (b) provide advice related to minimizing the tax burden of the Receivership including, but not limited to, advice related to the sale of the Receivership Defendants' real estate assets; and (c) provide advice related to Section 468B of the Internal Revenue Code and related treasury regulations so that the Receiver can maintain the Receivership Estate's status as a "Settlement Fund" as required under the Receivership Order. PM did not provide any services during this Application Period; thus this Application does not seek compensation or reimbursement for PM.

35. ***Third***, although this Application does not seek compensation and reimbursement for PM as PM did not provide services during this Application Period, for comprehensiveness, the Receiver summarizes prior fees and expenses sought for PM and approved by the Court. The Receiver's first interim application for compensation for PM covered the period November 1, 2019 through December 31, 2019 in the amount of \$5,487.50; all such fees and costs were approved by the Court and subsequently paid to PM. [See Dkt. Nos. 118, 125, 132, 137 and 147.] The Receiver's second interim application for compensation for the fees and expenses of PM covered the period of January 1, 2020 through March 31, 2020 in the amount of \$3,326.00; all such fees and costs were approved by the Court and subsequently paid to PM. [See Dkt. Nos. 161-163, 171, and 173.]

C. Dickler Kahn

36. ***First***, the Application covers the period from April 1, 2020 to and including June 30, 2020.

37. ***Second***, the Receiver retained Dickler Kahn as counsel for the turnover of control of condominiums from the developer to a board of managers comprised of a majority of unit owners at the properties located at (1) 486 N. Lakeshore Drive, Palatine, IL 60067; and (2) 106 Surrey Drive, Glen Ellyn, IL 60137 (the “Surrey Property”).⁷ During the Application Period, Dickler Kahn focused its efforts on work related to the turnover of control of the Surrey Property.

38. ***Third***, the *Certification of Dickler Kahn in Support of the Application* is attached hereto **Exhibit F** and incorporated herein by reference.

39. ***Fourth***, James A. Slowikowski was the only Dickler Kahn professional or paraprofessional who billed time on this matter during the Application Period, and his hourly rate is \$300.00

40. ***Fifth***, the Application constitutes the first interim application for the fees and expenses of Dickler Kahn.

V. Case Status

41. Pursuant to the Billing Instructions, the Receiver must provide information regarding the services performed and activities undertaken by Fox Swibel, KRD, AlixPartners, Dickler Kahn and PM during the Application Period. In support of the Application and Motion, the Receiver incorporates by reference the Receiver’s Report for the Period of April 1, 2020

⁷ The Receiver’s general counsel does not practice in the area of condominium and homeowner association law thus rendering the engagement of additional counsel necessary in order to ensure the efficient and proper execution of the turnover process in accordance with all statutory requirements.

through June 30, 2020 (the “Third Receiver Report”), including the Amended Liquidation Plan attached to the Third Receiver Report. [Dkt. No. 164.] The Third Receiver Report and Amended Liquidation Plan contain a description of the work performed by Fox Swibel, KRD, AlixPartners Dickler Kahn and PM during the Application Period and attach the Receiver’s Standardized Fund Accounting Report (“SFAR”) for the Application Period. Moreover, the Third Receiver Report sets forth the relevant balances of the Operating Accounts as of June 30, 2020.

42. As of June 30, 2020, the balance in the Receivership accounts, including Operating Accounts, was approximately \$11,646,880.39.

VI. BILLING ADDRESSED IN THIS APPLICATION

43. Pursuant to the Billing Instructions, the Receiver provides the following information regarding current billing:

a. Total Compensation and Expenses Requested.

44. In connection with the legal services provided to the Receiver by Fox Swibel, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$182,623.01 for the Application Period. The fees requested during the Application Period total \$177,259.00 and the expenses for the Application Period total \$5,364.01. True and correct copies of Fox Swibel’s invoices for the Application Period are attached hereto as **Exhibit G**. A summary of the requested expenses and true and correct copies of invoices and other documents substantiating the requested expenses are attached hereto as group **Exhibit H**.

45. In connection with the accounting services provided to the Receiver by KRD, the Receiver and KRD respectfully request compensation for services rendered, along with reimbursement of expenses, totaling \$2,175.00 for the Application Period. The fees requested

during the Application Period total \$2,175.00. True and correct copies of KRD's invoices for the Application Period are attached hereto as **Exhibit I**. No expenses are requested.

46. In connection with the accounting services provided to the Receiver by AlixPartners, the Receiver and AlixPartners respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$419,742.09⁸ for the Application Period. The fees requested during the Application Period total \$419,092.50 and the expenses for the Application Period total \$649.59.⁹ True and correct copies of AlixPartners' invoices for the Application Period are attached hereto as **Exhibit J**.

47. In connection with the accounting services provided to the Receiver by Dickler Kahn, the Receiver and Dickler Kahn respectfully request compensation for services rendered, along with reimbursement of expenses, totaling \$960.00 for the Application Period. The fees requested during the Application Period total \$960.00. A true and correct copy of Dickler Kahn's invoice for the Application Period is attached hereto as **Exhibit K**.¹⁰ No expenses are requested.

48. In total, the Receiver is requesting authority to pay a total of \$605,500.10 (\$599,630.50 in fees and \$6,013.60 in expenses) to Fox Swibel, KRD, AlixPartners, and Dickler Kahn for services rendered and expenses incurred during the Application Period.

49. b. Source of Funds for Requested Compensation and Expenses. The Receiver requests payment of the foregoing fees and expenses from the Receiver's accounts at

⁸ The fees sought in connection with forensic accounting services provided to the Receiver by AlixPartners reflect a service value adjustment of \$100,000.00.

⁹ The Receiver has reviewed and confirmed the validity of all expenses requested by AlixPartners for the Application Period.

¹⁰ May was the only month in this Application Period during which Dickler Kahn billed time to this matter. Accordingly, Exhibit K includes a May invoice only.

the Receiver's reasonable discretion. As of June 30, 2020, the cash on hand was approximately \$11,995,753.21. [See Dkt. No. 164 (Third Receiver Report) at 8.] As of September 30, 2020, the amount on hand in the Receivership Accounts was \$12,512,507.84.

c. Previous Application for Payment of Professional Fees and Expenses. With respect to Fox Swibel, this is the fourth interim fee application. In the first application, \$114,779.88 in fees and costs was sought, and \$114,779.88 in fees and costs was approved by the Court and such amount has since been paid to Fox Swibel. [See Dkt. Nos. 76 and 93.]; in the second application \$68,045.66 in fees and costs was sought, and all such fees and costs were approved by the Court and subsequently paid to Fox Swibel; in the third application \$146,712.17 in fees and costs was sought, and all such fees and costs were approved by the Court and subsequently paid to Fox Swibel. [See Dkt. Nos. 118, 125, 132, 137, 147, 161-163, and 173.] With respect to the non-Fox Swibel professionals, this is the Receiver's third interim fee application. In the first application \$3,767.50; \$143,130.16; and \$5,487.50 in fees and costs were sought for KRD, AlixPartners and PM, respectively, and all such fees and costs were approved by the Court and subsequently paid to the aforementioned professionals; in the second application \$3,978.71; \$598,630.51; and \$3,326.00 were sought for KRD, AlixPartners and PM, respectively, and all such fees and costs were approved by the court and subsequently paid to the aforementioned professionals. [See Dkt. Nos. 118, 125, 132, 137, 147, 161-163, and 173.] No fees and costs have been sought for Dickler Kahn prior to this Application.

d. Summary of Activity. A “Summary of Activity” providing the total hours billed and the amount of billing for each person who billed time during the Application Period precedes each of the professionals’ invoices (*see* **Exhibits H and J**).¹¹

VII. NO OBJECTION BY THE SEC

50. Counsel for the SEC has indicated that the SEC has reviewed and approved the fees and costs requested herein.

VIII. CONCLUSION

WHEREFORE, for the foregoing reasons, the Receiver respectfully requests that the Court approve the Application as follows:

- a. finding the fees and expenses of counsel for the Receiver at Fox Swibel (as set forth in Exhibit G and Exhibit H) to be reasonable and necessary to the Receivership;
- b. finding the fees of KRD as accountant for the Receiver (as set forth in Exhibit I) to be reasonable and necessary to the Receivership;
- c. finding the fees and expenses of AlixPartners as forensic accountant for the Receiver (as set forth in Exhibit J) to be reasonable and necessary to the Receivership;
- d. finding the fees of Dickler Kahn as counsel to the Receiver (as set forth in Exhibit K) to be reasonable and necessary to the Receivership; and
- f. granting all other or further relief that is just or proper.

¹¹ Because KRD and Dickler Kahn each had just one professional bill time during this Application Period, Summaries of Activity related to their work are not included as exhibits.

Dated: October 6, 2020

N. Neville Reid, Receiver

By: /s/ Ryan T. Schultz_____

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