

JUNE 26, 2015 @ 9am

DISTRICT COURT FOR OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

MAY - 1 2015

TIM RHODES
COURT CLERK

Oklahoma Department of Securities)
ex rel. Irving L. Faught, Administrator,)
)
)
 Plaintiff,)

v.)

Case No. CJ-2014-4515

Seabrooke Investments, LLC, an Oklahoma)
limited liability company;)
Seabrooke Realty LLC, an Oklahoma)
limited liability company;)
Oakbrooke Homes LLC, an Oklahoma)
limited liability company;)
Bricktown Capital LLC, an Oklahoma)
limited liability company;)
KAT Properties, LLC, an Oklahoma)
limited liability company;)
Cherry Hill LLC, an Oklahoma limited liability)
Company doing business as Cherry Hill Apartments;)
Tom W. Seabrooke, individually and as trustee of)
Tom Seabrooke 2007 Revocable Trust and)
J. Karyn Seabrooke 2007 Revocable Trust; and)
Judith Karyn Seabrooke, individually and as trustee)
of Tom Seabrooke 2007 Revocable Trust and)
J. Karyn Seabrooke 2007 Revocable Trust,)
)
)
 Defendants.)

**INTERIM APPLICATION FOR ORDER APPROVING
RECEIVER'S FEES AND EXPENSES FOR THE PERIOD OF
MARCH 1, 2015 THROUGH MARCH 31, 2015**

Receiver, Ryan Leonard, respectfully applies to this Court for entry of an Order approving his interim application for Receiver's fees and expenses for the period of March 1, 2015 through March 31, 2015, including fees of the Attorney and Accountant approved by this Court to assist the Receiver.

1. On August 11, 2014 the Plaintiff, Oklahoma Department of Securities (“Plaintiff”), filed its verified Petition for Permanent Injunction and other Relief (“Verified Petition”) and Application for Temporary Restraining Order, Order Freezing Assets, Order Appointing Receiver, Order for Accounting and Temporary Injunction (“Application”) pursuant to the Oklahoma Uniform Securities Act of 2004 (“Act”), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011). On that same day the Court entered a temporary restraining order in this matter and appointed Ryan Leonard as Receiver for Defendants.

2. On September 5, 2014 the Court entered an order granting a Temporary Injunction and Ancillary Relief and ordered that Ryan Leonard should remain as Receiver. The Receiver was given directions and authority to accomplish the following with regard to Defendants:

- a. To take immediate custody, possession and control of any and all Assets, as well as any records or documents relating in any way to the Assets;
- b. to retain or employ attorneys, accountants, consultants, management firms, and other persons as may be advisable or necessary to exercise the duties of the Receiver and to compensate such persons, all subject to approval by the Court;
- c. to manage the business activities of Defendants, their affiliates, subsidiaries, and any related entities existing at the time of the filing of the Petition, and to conserve, hold and protect the Assets, pending further action by this Court;
- d. to market the Assets of the Defendants for sale, including the retention of listing agents, realtors and brokers, and to evaluate all offers to purchase received. All sales of the Assets shall be subject to approval by the Court;

e. to release bank and financial accounts from the freeze as may, in the Receiver's opinion, be necessary or proper for the protection, maintenance, or preservation of the Assets or the carrying out of the terms of this Order;

f. to retain any employee of the Defendants, as may be advisable or necessary, including any individual Defendant, in control of, management of, participation in the affairs of, or on the premises of, the Defendants; and/or to dismiss any employee of the Defendants as may be advisable or necessary, including any individual Defendant, from control of, management of, or participation in the affairs of, or from the premises of the Defendants.

g. to receive and collect any and all sums of money due or owing to the Defendants at the time of the filing of the Petition; to collect the revenue and income generated by the maintenance and operation of the Assets whether the same are due or shall be necessary and advisable for the preservation of the Assets and as may be necessary and advisable to discharging his duties as Receiver;

h. to open bank and financial accounts in the name of the Receiver; to change the name of any Assets and/or the signing authority for any Asset, in order to reflect that the Asset is held in the name of the Receiver pursuant to this Order and/or to reflect that the Receiver is the only person authorized to deal with such Asset, including if necessary, instructing banks and financial institutions that the Receiver is the only person authorized to make withdrawals or transfers from any of the Defendants' bank and financial accounts existing at the time of the filing of the Petition. Any bank or financial institution shall be entitled to rely on this Order to open and make changes to such accounts as requested by Receiver.

i. to open and inspect any and all mail or deliveries addressed to Defendants to determine if same relate to the existence, location, identity or collection, preservation, maintenance or operation of the Assets, and to notify the United States Postal Service to effect the forward delivery of any email addressed to Defendants to a mail depository under the control of the Receiver; and to return personal mail to Defendants Tom W. Seabrooke and J. Karyn Seabrooke;

j. to institute, prosecute and defend, compromise, adjust, intervene in or become a party to such actions or proceedings in any state court, federal court, or United States bankruptcy court as may, in the Receiver's opinion, be necessary or proper for the protection, maintenance, or preservation of the Assets, or the carrying out of the terms of this Order, and likewise to defend, compromise, adjust, or otherwise dispose of any or all actions or proceedings now pending in any court by or against Defendants where such prosecution, defense, or other disposition of such actions or proceedings is in the judgment of the Receiver, advisable or proper for the protection of the Assets; and

k. to exercise those powers necessary to implement the orders and directives of this Court.

3. As part of the order granting Temporary Injunction and Ancillary Relief, the Court ordered that the Receiver may apply to the Court for payment of fees, from time to time, in a reasonable sum to be determined by the Court and from such sources as approved by the Court and for reimbursement of reasonable expenses incurred in connection with his duties as Receiver. The Court previously approved the retention of Robert D. Edinger as legal counsel to the Receiver and the employment of an accountant. The Court determined that the Receiver's hourly fee shall be billed at the rate of \$265 per hour. Finally, the Court determined that payment of the fees and

expenses of the Receiver shall have priority over any other claims made against the Defendants or the receivership estate.

4. The Receiver seeks interim compensation at his hourly rate approved by the Court for work performed, plus reimbursement of Receiver's actual and necessary expenses, for the period of March 1, 2014 through March 31, 2015. The Receiver further seeks compensation for the services of Attorney Robert D. Edinger and Accountant Barbara A. Ley, P.C. for the period March 1, 2015 through March 31, 2015. Edinger and Ley assisted the Receiver in the exercise of his duties, and the retention of their services by the Receiver was previously authorized by the Court.

5. The amount of the compensation of receivers and their attorneys rests in the sound discretion of the court in which the proceedings are pending. *Keenan v. Clark*, 188 P.2 219 (Okla. 1947).

6. During the period March 1, 2015 through March 31, 2015, the Receiver and his employees expended a total of 105.7 hours at hourly rates ranging from \$80 to \$265 per hour for a total fee of \$19,038.00. The Receiver also incurred \$435.36 in expenses and advances, making the total amount due \$19,473.36. Exhibit "A" details the hours spent rendering services, a description of the services rendered, and the expenses incurred. The Receiver and his employees have expended the time set forth in this application in the execution of the Receiver's duties to the preclusion of other employment, and the charges set forth herein were reasonable and necessary.

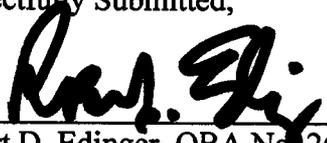
7. During the period March 1, 2015 through March 31, 2015, Attorney Robert D. Edinger expended a total of 25.3 hours at an hourly rate of \$295 per hour for a total fee of \$7,463.50. Exhibit "B" details the hours spent rendering services and a description of the services

rendered. Attorney Robert D. Edinger has expended the time set forth in this application in the assistance of the Receiver to the preclusion of other employment, and the charges set forth herein were reasonable and necessary.

8. During the period of March 1, 2015 through March 31, 2015, the Accountant Barbara A. Ley, P.C. expended a total of 31.5 hours at hourly rates ranging from \$85 to \$275 per hour for a total fee of \$5,037.50. Ley also incurred \$9.92 in expenses and advances, making the total amount due \$5,047.42. Exhibit "C" details the hours spent rendering services and a description of the services rendered. Accountant Ley has expended the time set forth in this application in the assistance of the Receiver to the preclusion of other employment, and the charges set forth herein were reasonable and necessary.

WHEREFORE, premises considered, Receiver Ryan Leonard respectfully request this Court approve payment of interim compensation to Receiver in the amount of \$19,473.36, to Attorney Robert Edinger in the amount of \$7,463.50, and to Accountant Barbara A. Ley, P.C. in the amount of \$5,047.42 for the period of March 1, 2015 through March 31, 2015.

Respectfully Submitted,



Robert D. Edinger, OBA No. 2619
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ATTORNEY FOR THE RECEIVER,
RYAN LEONARD

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 1st day of May, 2015, a true and correct copy of this pleading was served via First Class Mail, postage prepaid, or by Email to:

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Jennifer Shaw
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blewis@edmondlawoffice.com

A handwritten signature in black ink, appearing to read "Robert Edinger", written over a horizontal line.

Robert Edinger

MEYER & LEONARD, PLLC

116 E. SHERIDAN
SUITE 207
OKLAHOMA CITY OK 73104
405-702-9900

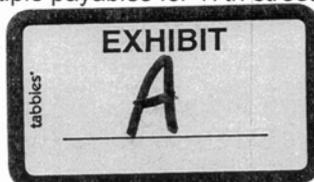
Seabrooke et al. Receivership

Statement Date: April 30, 2015
Statement No. 3111
Account No. 1392.01
Page: 1

RE: Oklahoma County Case # CJ-2014-4515

Payments received after 04/30/2015 are not included on this statement.

			Hours	
	Previous Balance			\$61,966.56
		Fees		
03/02/2015	NJ	Review correspondence re payables and bank account status.	0.50	40.00
03/03/2015	RTL	Multiple follow-up re: sale of 17th street properties, A. Holtlander motion, consideration of possible extension of contract in light of Holtlander objection; Follow-up correspondence and conferences with P. LaBarthe, N. Jacobsen, K. Seabrooke re: Seabrooke bank records; Review defendants' Objection to Application for fees and follow-up with counsel re: same.	1.10	291.50
	NJ	Research and correspondence re bank statements; update payables status and documentation; review and update claimant process; review and catalog returned claimant forms.	4.50	360.00
03/04/2015	RTL	Multiple correspondence with A. Fugitt, Bank SNB re: Cherry Hill payables; Multiple correspondence re: access to Bank SNB accounts for accountants; Follow-up conference with K. Seabrooke re: bank account information, possible extension on contract for 17th street properties; Review extended correspondence from K. Dulin, counsel for A. Holtlander re: response to escrow proposal, review Order and docket hearing on Holtlander motion; Follow-up conference with P. LaBarthe, J. Shaw re: Holtlander mortgages, Seabrooke bank records, coordination of proof of claim process; Follow-up with Bank of the West re: online review of Seabrooke bank statements, coordinate same with A. Fugitt, additional follow-up with local branch manager re: online access; Correspond with D. Nunn, A. Fugitt re: coordinating mortgage payments to FNB Weatherford; Follow-up correspondence with D. Nunn re: sales contract on Briargate Plaza; Follow-up correspondence with K. Seabrooke, all counsel re: status of 425 NW 11th, on-going utilities; Respond to correspondence from S. Studd on behalf of F. McDonald re: status of escrow agreement to allow sale of 17th street properties, remaining issues; Multiple follow-up with Bank of the West re: obtaining requested bank account information; Review and approve multiple payables for 17th street properties,		



		Hours		
		115 NW 21st, Briargate Plaza, 425 NW 11th; Multiple follow-up correspondence with H. Lashar, A. Fugitt re: coordination of payments; Review breakdown of Seabrooke payments to Holtslanders provided by Department; Additional follow-up re: coordination of tax payments on all properties.	4.00	1,060.00
	NJ	Correspondence re bank accounts, payables, and updates on investor packets and completed proof of claim forms.	2.10	168.00
03/05/2015	RTL	Meet at accountant's office re: further review and execution of checks for payables; Confirm compliance with publication of Notice to Creditors/Claimants; Follow-up with Bank of the West re: bank statements; Conferences with prospective buyer on 17th street properties re: status of possible sale; Follow-up with K. Seabrooke re: same; Follow-up with P. LaBarthe re: Holtslander mortgages; Additional follow-up re: payment of taxes on Receiver properties; Review and execute extension on contract on 17th street properties; Review and follow-up re: additional Seabrooke Realty payables; Meet with N. Jacobsen re: status of proof of claims, responding to inquiries from claimants; Follow-up with A. Fugitt re: status of payments on 17th street properties; Correspond with bank's counsel re: same; Review of rent collections on Briargate Plaza, 17th street properties.	3.70	980.50
	NJ	Correspondence with investors/counsel re proof of claim forms; update payables correspondence; correspondence with K Seabrooke, update bank records status; review and update investor information; review and update Holtslander documentation.	4.10	328.00
03/06/2015	RTL	Review owner statement reports for all Seabrooke properties (rents and payables); Follow-up correspondence with FNB Weatherford counsel re: mortgage payments; Conference with M. Robertson re: hearing on Receiver's fee application; Follow-up conference with Judge's bailiff re: same; Follow-up conference with Bank of the West re: obtaining Seabrooke bank records; Meet at local bank branch to obtain records; Deliver records to Securities Department; Conference with K. Seabrooke re: insurance extension on 17th street properties, coordination of same; Follow-up correspondence re: insurance extension; Address BankSNB fees with accountant and status of accounts; Meet with J. Shaw at Securities Department re: bank records; Multiple conferences and correspondence with BankSNB re: consolidation of accounts; Additional follow-up re: review of owner reports for all properties since inception of receivership, analysis of same.	4.40	1,166.00
03/09/2015	RTL	Multiple follow-up correspondence with Bank SNB re: management and consolidation of accounts; Multiple follow-up with A. Fugitt re: same; Multiple Follow-up correspondence with prospective buyer on 17th street properties re: status; Follow-up conference with M. Robertson re: fee hearing; Strategy conference with R. Edinger re: response to Holtslander motion; Correspond with K. Seabrooke re: Oakbrooke and Ronbrooke Homes checks; Respond to investor inquiry re: proof of claim; Review Cobb subpoenas.	2.10	556.50
	NJ	Update claimant documentation; correspondence re investor		

		Hours	
		2.50	200.00
03/10/2015	RTL		
		3.40	901.00
	NJ	1.50	120.00
03/11/2015	RTL		
		3.00	795.00
	NJ	2.20	176.00
03/12/2015	RTL		

			Hours	
		with P. LaBarthe re: same.	1.50	397.50
	NJ	Correspondence with investors/claimants/legal counsel re questions/updates on claims process, forms; update payables; update property records; update claimant forms, documentation; update investor documentation.	4.50	360.00
03/19/2015	RTL	Review Joint Motion for Interpleader and follow-up correspondence with counsel re: same.	0.30	79.50
03/20/2015	RTL	Multiple follow-up with title company re: mortgage releases and escrow agreements; Follow-up with K. Dulin re: same.	0.40	106.00
03/23/2015	RTL	Review and coordinate property valuations of 17th street properties to determine amounts to escrow on sale of five properties, correspond with K. Seabrooke re: same; Conference with P. LaBarthe re: Department's position on escrow of funds for various secured creditors; Review extended correspondence from title company re: remaining items to address for all five properties prior to closing; Prepare escrow agreements for 1507 NW 17th, 1419 NW 17th; Multiple follow-up with K. Dulin re: Hoftsanders mortgage release; Multiple follow-up with A. Powell at title company re: obtaining mortgage releases and escrow agreements; Strategy conference with R. Edinger re: all pending legal issues (response to FCB motion, joint motion for interpleader, W. Doyle motion for release of funds, Agreed Order for sale of 17th street properties, etc.); Receive and review Letters Testamentary of Donald Hoftslander and Letters of Administration for Pamela Hoftslander; Follow-up conference with K. Dulin re: coordination of Agreed Order, releases, payment of mortgages, final closing arrangements with Hoftslanders, multiple follow-up correspondence with K. Dulin re: same; Follow-up with T. Kordelski re: finalize HPJ position on mortgage releases; Multiple follow-up with title company counsel re: McDonald quit claim deed to Receiver; Follow-up with K. Seabrooke re: property valuations; Revise Quitclaim deed from McDonald to Receiver and multiple follow-up with Title Company counsel re: same; Prepare Receiver's Agreement with McDonald with consent of Department; Conference with S. Studd on behalf of McDonalds re: terms of agreement; Correspondence and follow-up conference with S. Studd re: execution of Quit claim deed, agreement with Receiver; Coordinate obtaining Kramer and Curtis Releases of mortgage with their counsel; Review proposed release by Kramer counsel, S. Elliott and correspond with title company counsel re: same; Prepare Agreed Order for Sale of 17th street properties, conference with counsel re: same; Receive call and conference with broker on 425 NW 11th street re: survey of property in advance of offer; Follow-up correspondence with prospective buyer on 17th street properties re: closing; Additional follow-up with HPJ counsel re: status of mortgages; Follow-up correspondence with D. Curtis counsel re: release of mortgage.	6.50	1,722.50
03/24/2015	RTL	Additional follow-up with Department re: proposed language for Order on sale of 17th street properties, further coordination of		

		Hours		
		same; Follow-up with counsel for P. Kramer re: proposed language; Continue preparation of proposed Agreed Order for Sale of 1405, 1409, 1413, 1419 and 1507 17th street properties, language relating to attachment of secured interests and escrow of proceeds; Multiple follow-up with S. Studd re: Frances McDonald title; Follow-up with title company re: closing; Conference with T. Kordelski, counsel for HPJ re: obtaining releases from P. Johnston on 17th street properties, coordinate preparation of same with title company; Review and approve multiple receivership payables; Follow-up conferences with prospective buyer, K. Seabrooke re: closing; Receive and respond to correspondence from investor/claimant re: inquiry into proof of claim process; Strategy conference with R. Edinger re: language of Agreed Order.	3.50	927.50
	NJ	Correspondence with investors/claimants/counsel re proof of claim forms and process and updating documentation; updating claim forms formatting; review documents, correspondence with credit service re Cherry Hill.	3.90	312.00
03/25/2015	RTL	Multiple follow-up correspondence and conference with title company counsel re: status of releases, HPJ not on title commitment, remaining items to close on five 17th street properties, status of quitclaim deed from F. McDonald; Conferences with N. Jacobsen re: responses to investor inquiries on proofs of claim submissions; Continue draft and edits to Agreed Order on Sale of 17th Street properties; Multiple follow-up re: scheduling of closing; Conference with B. Dolan, broker re: potential offer on 425 NW 11th, question of existence of easement; Correspond with FNB Weatherford counsel re: Briargate Plaza mortgage; Additional follow-up re: same; Review of comments and proposed edits of Department to Agreed Order; Follow-up conference call with P. LaBarthe, J. Shaw re: same.	4.00	1,060.00
	NJ	Continuing correspondence with claimants/counsel re claims process and documentation; update claimant documentation; update property status documentation.	4.10	328.00
03/26/2015	RTL	Further revisions to draft Agreed Order on sale of 17th street properties; Follow-up with counsel and Department re: same; Multiple follow-up re: Briargate Plaza and other pending mortgages with FNB Weatherford; Multiple follow-up correspondence with A. Fugitt (Receiver accountant), H. Lashar re: coordination of outstanding payables of receivership; Additional multiple follow-up with FNB Weatherford, accountants re: loan maturity notices.	2.30	609.50
	NJ	Continuing correspondence with claimants/counsel/financial institutions re claims process, forms, updates; preparing analysis of completed claim forms; correspondence, updates re Cherry Hill documents; update property status.	2.70	216.00
03/29/2015	RTL	Multiple correspondence with N. Jacobsen re: additional claimants/sending claim forms; Multiple correspondence with H. Lashar, A. Fugitt re: coordinating receivership payables; Multiple follow-up correspondence with N. Jacobsen re: proof of claim forms to banks; Correspond with R. Edinger re: proof of claim to		

		Hours	
		1.20	318.00
03/30/2015	RTL	Window World, claimant against Briargate Plaza; Follow-up correspondence re: payment of FNB Weatherford mortgages; Follow-up correspondence with counsel for D. Curtis re: release of mortgage; Review proposed Agreed Order for Permanent Injunction against Defendants, Stipulation and Consent to Order.	
		3.40	901.00
03/31/2015	RTL	Review correspondence for counsel for P. Johnston re: claim for secured interest, supporting mortgages; Meet at accountant's office to approve payables; Strategy conference with R. Edinger re: proof of claims process, handling of non-investor creditors/claimants; Follow-up with Department re: revisions to proposed Order on sale of 17th street properties; Review Department's Response to First Commercial's Application for Fees; Review correspondence re: 17th street rent rolls, handling of security deposits at closing; Follow-up correspondence with K. Seabrooke, A. Fugitt re: same 17th street security deposits; Strategy conference with counsel re: proposed Order regarding injunction of Defendants, Receiver's position on same; Follow up re: response to financial claimant of Seabrookes who had loan on hotel, submission of proof of claim; Correspondence with A. Fugitt re: closing Sky Operating account, conference with K. Seabrooke re: same; Multiple follow-up correspondence re: resolution of Sky funds in receivership, closing of account and accounting of funds; Follow-up conference with K. Dulin, counsel for A. Holtslander re: confirmation of mortgage releases, proposed Agreed Order; Review Department's edits to proposed Agreed Order; Circulate proposed Agreed Order to all counsel.	
		3.00	795.00
	NJ	Follow-up conferences re: finalizing agreed Order (conference with S. Studd re: Frances McDonald approval of Order); Receive call from P. Fleming, Window World re: lien against Briargate, filing proof of claim; Review and approve utility payables; Additional follow-up re: Graybar Financial Services proof of claim; Additional follow-up correspondence re: approval of Seabrooke payables; Correspond with S. Luzaich, counsel for D. Curtis re: respond to inquiries on proposed Order, details of same; Assist with preparation of response to First Commercial's application for fees, multiple correspondence with R. Edinger re: same; Multiple follow-up correspondence with S. Luzaich, D. Curtis counsel re: approval of Agreed Order; Follow-up with S. Elliott, counsel for P. Kramer re: proposed Agreed Order; Conference with Judge Parrish's bailiff re: approval of Agreed Order.	
		4.20	336.00
		<u>105.70</u>	<u>19,038.00</u>
For Current Services Rendered			

		Recap		
<u>Timekeeper</u>		<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Nicole Jacobsen		48.50	\$80.00	\$3,880.00
Ryan T. Leonard		57.20	265.00	15,158.00

Advances

02/13/2015	The Journal Record - Notice to Creditors - Invoice # 742022085	209.38
03/06/2015	Bank of the West - Copies of Records	50.00
03/06/2015	Travel expense Ryan Leonard - Parking at Courthouse (pd cash)	16.00
03/06/2015	Processor fee Oklahoma Judicial Process Servers - Invoice # 625	<u>159.98</u>
	Total Advances	435.36
	Total Current Work	19,473.36

Payments

03/12/2015	Payment, thank you. - J Karyn Seabrooke ck# 902	-15,801.62
03/12/2015	Payment, thank you. - J Karyn Seabrooke ck# 902	-25,184.33
04/29/2015	Payment, thank you. - J Karyn Seabrooke 2007 Rev Trust ck# 904	<u>-20,980.61</u>
	Total Payments	-61,966.56
	Balance Due	<u>\$19,473.36</u>

ROBERT EDINGER PLLC
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 Oklahoma City, OK 73104

Statement

Date 4/29/2015

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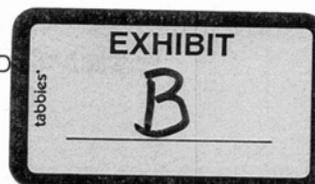
Ryan Leonard, Receiver
 116 E. Sheridan, Suite 207
 Oklahoma City, OK 73104

In Reference To:

Seabrooke Receivership

				AMOUNT DUE	\$7,463.50
DATE	DESCRIPTION	HRS/QTY	RATE	AMOUNT	
02/28/2015	Balance forward			29,382.00	
03/03/2015	RDE: Review Defendant's Objection to Receiver's Fees and Expenses and email to R. Leonard regarding same (.6).	0.6	295.00	177.00	
03/04/2015	RDE: Conf. with R. Leonard regarding Holtslander motion and pending hearing (.2); Review letter from Holtslander attorney and Holtslander Motion for Emergency Disposition of 17th Street properties (.8).	1	295.00	295.00	
03/06/2015	RDE: Prepare Receiver's Proof of Publication of Notice to Creditors (.7); Begin draft of Subpoena to Cobbs (.7).	1.4	295.00	413.00	
03/09/2015	RDE: Draft Subpoenas to Gregory Cobbs and G.L. Cobbs & Company LLC (.7); Tel. and email exchange with process servers for service of subpoenas (.4); Email to S. Haynes regarding extension of time for Receiver to respond to FCB's Application for Cherry Hill escrow funds (.2).	1.3	295.00	383.50	
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
7,463.50	0.00	0.00	0.00	0.00	\$7,463.50

Robert Edinger PLLC ID



ROBERT EDINGER PLLC
116 E. Sheridan, Suite 207
Oklahoma City, OK 73104

Statement

Date 4/29/2015

(405) 702-9900

Ryan Leonard, Receiver
 116 E. Sheridan, Suite 207
 Oklahoma City, OK 73104

In Reference To:

Seabrooke Receivership

				AMOUNT DUE	\$7,463.50
DATE	DESCRIPTION	HRS/QTY	RATE	AMOUNT	
03/10/2015	RDE: Tel. and email exchange concerning service of subpoena on G. Cobbs.	0.3	295.00	88.50	
03/11/2015	RDE: Email Court Order on Receiver's Fees & Expenses for period Dec. 1, 2014 thru Jan. 31, 2015 (.2); Review Holtslander draft settlement agreement on mortgages and email to R. Leonard regarding same (.7); Revise and email Joint Interpleader Application to Counsel regarding Bricktown Hotel sale proceeds (.6).	1.5	295.00	442.50	
03/11/2015	PMT #901			-22,051.25	
03/12/2015	RDE: Conf. with R. Leonard regarding settlement with Holtslander and resolution of upcoming motion and hearing.	0.3	295.00	88.50	
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
7,463.50	0.00	0.00	0.00	0.00	\$7,463.50

ROBERT EDINGER PLLC
116 E. Sheridan, Suite 207
Oklahoma City, OK 73104

Statement

Date 4/29/2015

(405) 702-9900

Ryan Leonard, Receiver
 116 E. Sheridan, Suite 207
 Oklahoma City, OK 73104

In Reference To:

Seabrooke Receivership

				AMOUNT DUE	\$7,463.50
DATE	DESCRIPTION	HRS/QTY	RATE	AMOUNT	
03/13/2015	RDE: Conf. with R. Leonard regarding settlement agreement on Holtslander pending application and motion (.3); Email to K. Dulin regarding withdrawal of Holtslander Application/Motions and striking of hearing (.3); Conf. with R. Leonard regarding court approval of Holtslander agreement and review email to K. Dulin regarding same (.4).	1	295.00	295.00	
03/17/2015	RDE: Tel. with J. Shaw regarding striking of hearing on Motions by Holtslander and draft email to K. Dulin regardng same (.6); Tel. with B. Lewis regarding interpleader motion with W. Doyle and briefing schedule (.2).	0.7	295.00	206.50	
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
7,463.50	0.00	0.00	0.00	0.00	\$7,463.50

ROBERT EDINGER PLLC
116 E. Sheridan, Suite 207
Oklahoma City, OK 73104

Statement

Date 4/29/2015

(405) 702-9900

Ryan Leonard, Receiver
 116 E. Sheridan, Suite 207
 Oklahoma City, OK 73104

In Reference To:

Seabrooke Receivership

				AMOUNT DUE	\$7,463.50
DATE	DESCRIPTION	HRS/QTY	RATE	AMOUNT	
03/18/2015	RDE: Tel. and exchange email with K. Dulin regarding agreement between Holtslander and Receiver and procedure for court approval of same (.5); Conf. with N. Jacobsen regarding proof of claim process (.4); Prepare Receiver's Application for Fees & Expenses for Period Ending Feb. 28, 2015 (1.5).	2.4	295.00	708.00	
03/19/2015	RDE: Exchange email with B. Lewis and M. Robertson regarding Joint Interpleader Motion, file Motion and send email to counsel regarding same (.5); File Receiver's Application for Fees & Expenses for Period Ending Feb. 28, 2015 and send notice of hearing to counsel (.5).	1	295.00	295.00	
03/20/2015	RDE: Review FCB Application for Order to Disburse Escrow Fees and legal research regarding same (2); Email with N. Jacobsen regarding D. Nunn request for electronic proof of claim (.1).	2.1	295.00	619.50	
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
7,463.50	0.00	0.00	0.00	0.00	\$7,463.50

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				AMOUNT DUE	\$7,463.50
DATE	DESCRIPTION	HRS/QTY	RATE	AMOUNT	
03/24/2015	RDE: Review proposed order regarding P. Kramer mortgage claim to property to be sold by Receiver and conf. with R. Leonard regarding same (.7); Email to S. Haynes regarding deadline extension for Receiver to respond to FCB Application for Escrow Funds (.1).	0.8	295.00	236.00	
03/25/2015	RDE: Tel. conf. with R. Leonard, P. Labarthe and J. Shaw regarding possible order approving sale of 17th Street properties.	0.5	295.00	147.50	
03/26/2015	RDE: Conf. with N. Jacobsen regarding analysis of proof of claims submitted by creditors (.4); Tel. with P. Fleming regarding lien claim on Briargate and email proof of claim to him (.5); Review Department's Response to FCB Application for Escrow Funds (.3).	1.2	295.00	354.00	
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
7,463.50	0.00	0.00	0.00	0.00	\$7,463.50

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Seabrooke Receivership

			AMOUNT DUE	\$7,463.50	
DATE	DESCRIPTION	HRS/QTY	RATE	AMOUNT	
03/27/2015	RDE: Tel. with S. Soesbe regarding her proof of claim filing (.4); Review letter from attorneys for P. Johnston and HPJ Limited Partnership regarding claims of fraudulent mortgage release (.5).	0.9	295.00	265.50	
03/30/2015	RDE: Review proposed Order granting injunctive relief against Defendants, conf. with R. Leonard regarding same, and email to P. Labarthe approving same as to form (.5); Legal research for Objection to FCB Motion for Escrow Funds (3.8).	4.3	295.00	1,268.50	
03/31/2015	RDE: Prepare Objection to FCB Motion for Escrow Funds (4).	4	295.00	1,180.00	
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
7,463.50	0.00	0.00	0.00	0.00	\$7,463.50

BARBARA A. LEY
 A PROFESSIONAL CORPORATION
 CERTIFIED PUBLIC ACCOUNTANT
 6305 Waterford Boulevard
 Suite 450
 Oklahoma City, Oklahoma 73118
 (405) 848-0255
 FAX (405) 848-0148

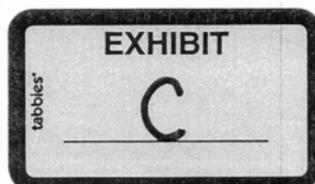
04/27/2015

Ryan Leonard Receivership
 116 E. Sheridan, Suite 207
 Oklahoma City, OK 73104

Invoice Number: 19134

Professional services rendered through March 31, 2015 in connection with:

<u>Date</u>	<u>Hours</u>	<u>Fees</u>	<u>Person</u>	<u>Memo</u>
03/02/2015	2.90	\$ 507.50	Fugitt	Correspondence with Bank SNB personnel trying to get online access setup; reviewing and organizing documents received from Receiver; pulling invoices to be paid, coordinating to get deposit made, and Cherry Hill checks picked up;
03/04/2015	4.40	770.00	Fugitt	Multiple telephone calls with Receiver and Bank of the West personnel attempting to set-up online banking to make copies of bank statements; correspondence with Bank SNB personnel regarding online access for Receiver and emails with other attorneys regarding check for mortgage payment on Seabrooke Realty building; cut checks regarding same;
03/04/2015	1.00	85.00	Maker	Multiple discussions regarding setting up books for new checking accounts not already set-up; prepare checks for Seabrooke Realty Operating account; prepare check from Seabrooke Trust account; discussion regarding another check from personal account;
03/05/2015	3.80	665.00	Fugitt	Preparing checks for Receiver to sign and review with Receiver; reviewing online banking activity; responding to multiple emails and phone calls related to Receivership items and mailing checks;



03/05/2015	0.75	63.75	Maker	Void previous check to FNB & Trust Weatherford to change amount due; scan all checks being sent for payment from all entities; update mail log;
03/06/2015	2.70	472.50	Fugitt	Correspondence regarding Receivership items; telephone calls with Bank SNB personnel regarding account items, and follow-up with Receiver regarding same;
03/06/2015	0.25	21.25	Maker	Prepare and print check from Seabrooke Realty Operating account; ANPAC insurance payment;
03/07/2015	0.80	140.00	Fugitt	Saving bank statements from Bank SNB website for accounts that were closed;
03/09/2015	0.80	140.00	Fugitt	Correspondence with Bank SNB personnel regarding account status, and discussions with staff on closing out the accounts;
03/10/2015	2.20	385.00	Fugitt	Correspondence regarding Bank SNB accounts; telephone call with Receiver and transfers to zero-out the accounts; reviewing old correspondence and documenting files;
03/10/2015	0.25	21.25	Maker	Prepare four checks for payment of Gresly Printing invoices;
03/11/2015	1.80	315.00	Fugitt	Preparation of checks for Receiver to sign per order of the court regarding fees; getting check prepared for Receiver to sign regarding money in Sky account; multiple emails from Bank SNB personnel;
03/11/2015	0.25	21.25	Maker	Discussion regarding preparation of two checks for Receiver to sign; set-up new checking account; record and prepare two checks;
03/13/2015	0.30	52.50	Fugitt	Correspondence regarding Sky checks and account at Bank SNB;
03/16/2015	0.10	17.50	Fugitt	Getting mail scanned;
03/17/2015	0.40	70.00	Fugitt	Working to set-up Barbara A. Ley, P.C. office personnel to start reconciling bank statements and bank accounts in QuickBooks;

03/17/2015	0.25	21.25	Maker	Discussions regarding bank statements to scan and reconcile, and documents to scan and file;
03/18/2015	0.75	63.75	Maker	Scan various copies of checks, online print-out, and statements;
03/19/2015	0.30	52.50	Fugitt	Working to get bookkeeping updated and bank accounts reconciled;
03/19/2015	1.50	127.50	Maker	Determine accounts for which access is available via QuickBooks online; reconcile all accounts possible; determine what accounts for which we need additional statements;
03/21/2015	0.30	52.50	Fugitt	Work on bookkeeping items and reconciliations;
03/25/2015	0.20	35.00	Fugitt	Reviewing correspondence from attorneys regarding Briargate mortgage;
03/26/2015	0.20	55.00	Ley	Review of correspondence regarding Briargate closing and payments due;
03/26/2015	2.90	507.50	Fugitt	Correspondence and reviewing old files regarding payment of mortgages (including Briargate); responding to Receiver regarding maturity notices and payments due; corresponding with Receiver and bank attorney regarding scheduled payoffs; coordinating bill payments;
03/27/2015	0.20	35.00	Fugitt	Reviewing bookkeeping items;
03/27/2015	0.25	21.25	Maker	Prepare check for ANPAC Insurance;
03/30/2015	0.90	157.50	Fugitt	Correspondence regarding closing accounts and coordinating getting check picked up to closeout Sky account; emails with Bank SNB employees to close Sky account and emails regarding security deposits at Briargate;
03/30/2015	0.25	21.25	Maker	Scan signed check and mail payment to ANPAC;
03/31/2015	0.80	140.00	Fugitt	Sending copies of ANPAC check; sending out QuickBooks invitation to new CPA for Seabrooke;

Barbara A. Ley, A Professional Corporation
Invoice Number: 19134

Page 4

03/05/2015 9.92

Reproduction and postage expenses;

Current Amount Due \$ 5,047.42

Invoices are due and payable upon receipt.