

RAYBURN COOPER & DURHAM, P.A.
227 West Trade Street, Suite 1200
Charlotte, NC 28202-1672
Telephone (704) 334-0891 Fax (704) 377-1897
FEDERAL I.D. #: 56-1597966

09/22/09

Underwriters Funding Group, LLC;
Diversified Lending Grp; and ReProp Fin. Mtg. Investors, LLC
c/o Glenn Goldan (ReProp Financial)
555H Street
Eureka CA 95501

Our file number 4390-001/GKH/GKH
Invoice number 29362

Re: Motion to Enjoin Foreclosure Sale

Balance Forward \$131,513.62

Atty	Services Rendered	Hours
08/07/09	GKH Exchange e-mails with J. Miller regarding transcript of hearing and whether to order same; review e-mail from and to clients regarding same; review e-mails between G. Goldan and J. Miller regarding Judge's thoughts on value; review order entered by Judge Hodges; review e-mails between J. Miller and G. Goldan regarding adequate protection payments	0.60
08/07/09	RRF Telephone conference with Linda from S. Robinson's office regarding clean up calendar notice from court and defendants' answers; review pleadings binders regarding answers; telephone call to Linda from S. Robinson's office regarding answers; conference with D. Finegan regarding call from S. Robinson's office regarding clean up calendar notice (NO CHARGE)	0.00
08/10/09	JRM Correspondence to and from clients regarding obtaining transcript of stay relief hearing	0.20
08/10/09	JRM Review order on stay relief procedure and correspondence to clients regarding same	0.20
08/11/09	DJF Meeting with K. Hardyman regarding clean up calendar and response to TCA	0.30

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Re: Motion to Enjoin Foreclosure Sale

	Atty	Services Rendered	Hours
08/11/09	GKH	Review clean up calendar notice; review e-mail from J. Miller to appraiser regarding September hearing; conference with D. Finegan regarding dealing with clean up calendar notice; telephone conference with C. Loeb sack regarding dealing with clean up calendar notice	0.50
08/12/09	JRM	Review accounting sent by Glen Goldan; correspondence from and to Chuck Salas	0.40
08/12/09	JRM	Correspondence to Linda Simpson and Jimmy Summerlin regarding changes and payment information and monthly reports	0.10
08/13/09	DJF	Review e-mail and motion to dismiss from Secor defendants; review pleadings status regarding entry of default against Linville Falls I defendant; meeting with R. Fulton regarding defendants in bankruptcy	0.40
08/13/09	GKH	Review proof of claim filed by A. Foodman and e-mails from J. Miller and R. Fulton regarding same; review motion to dismiss State Court action and e-mail from C. Loeb sack regarding same; e-mail to D. Finegan regarding dealing with issue of clean up calendar and possible motion for entry of default and default judgment; review e-mail from J. Miller to clients regarding proofs of claim	0.50
08/13/09	JRM	Review claims filed by Jim Kunevicius, Ashley Tison, Soterian	0.10
08/13/09	JRM	Correspondence with clients regarding amended plan	0.10
08/13/09	JRM	Draft proofs of claim in CVG case, including review of CVG loan documents to determine nature of Underwriters'	

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Atty	Services Rendered	Hours
	claim against the debtor; correspondence to clients regarding same	1.60
08/14/09 GKH	E-mail from G. Goldan regarding approval of proof of claim; conference with T. Lindsay regarding status of plan; review letter from C. Loeb sack with file-stamped motion to dismiss; exchange e-mails with T. Lindsay regarding plan or reorganization	0.40
08/17/09 DJF	Review pleadings and draft default letter notice to S. Robinson	0.50
08/17/09 GKH	Review plan of reorganization filed by debtor; exchange e-mails with J. Miller regarding same	0.70
08/17/09 JRM	Review amended plan; correspondence to working group and to K. Hardymon regarding same	0.40
08/17/09 JRM	Correspondence with C. Salas regarding plan and proofs of claim	0.10
08/18/09 GKH	Exchange e-mails with DLG regarding application for fees; exchange e-mails with K. Godin and J. Miller regarding providing information to G. Schulman and K. Phelps for purposes of fee application; draft summary of litigation activity (NO CHARGE)	0.00
08/18/09 JRM	Correspondence regarding preliminary RC&D fee application in DLG case (NO CHARGE)	0.00
08/18/09 JRM	Further work on proofs of claim including office conference with R. Fulton; correspondence to C. Salas; review and revise proofs of claim	0.70

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	Atty	Services Rendered	Hours
08/18/09	RRF	Conference with J. Miller regarding exit fee as secured claim	0.20
08/19/09	GKH	Exchange e-mails with K. Godin regarding providing information to DLG for court approval of engagement; telephone conference with K. Godin regarding same; review e-mails between J. Miller and K. Godin regarding status; review e-mail from K. Godin to DLG regarding information requested (NO CHARGE)	0.00
08/19/09	JRM	Finalize claims for filing including obtaining exhibits; revising DLG claim for Danning, Gill attorneys fees (NO CHARGE)	0.00
08/19/09	JRM	Draft narrative for RC&D portion of receivership fee application; office conference with S. Manning regarding outstanding fee information (NO CHARGE)	0.00
08/19/09	RRF	Review description of services provided (NO CHARGE)	0.00
08/20/09	DJF	Conference with E. Vincent regarding sending letter; follow up letter with e-mail to W. Robinson	0.20
08/20/09	GKH	E-mail from G. Schulman regarding plan of reorganization; review e-mails between J. Miller and S. Arnot regarding objection to disclosure statement; review and revise narrative of work performed; e-mail from G. Schulman regarding approval of objection to disclosure statement	0.60
08/20/09	JRM	Draft objection to disclosure statement; coordinate filing and service of same	0.50
08/20/09	JRM	Research; prepare and draft objection to	

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	Atty	Services Rendered	Hours
		plan	1.70
08/20/09	JRM	Correspondence to Richard Marlow regarding CVG transcript; continue hearing and availability	0.10
08/21/09	GKH	Review e-mail from J. Miller regarding change in Judge for hearing on motion for relief from stay and order from Judge Whitley regarding disclosure statement, balloting and motion for relief from stay; review e-mails between C. Salas and J. Miller regarding plan filed by debtor; review e-mail from J. Miller regarding objections to same; e-mail from J. Miller regarding hearing transcript; review letter from K. Tenfelde and answer of Linville Holdings, LLC	0.75
08/21/09	JRM	Correspondence from L. Beyer regarding Judge Hodges and Judge Whitley; amended procedures order	0.10
08/21/09	JRM	Review amended procedures order; correspondence to clients regarding same	0.30
08/21/09	JRM	Continue research; preparation for drafting objection to plan; correspondence to S. Arnot regarding same	2.10
08/23/09	DJF	Review e-mail from opposing counsel regarding status of pleading	0.10
08/24/09	DJF	Review answer, motions to dismiss and status of case for clean up calendar	0.40
08/24/09	GKH	Review e-mail from J. Miller to S. Arnot regarding plan objection; e-mail from S. Arnot regarding objection to plan; exchange e-mails with J. Miller regarding research on same	0.40

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	Atty	Services Rendered	Hours
08/24/09	JRM	Correspondence from S. Arnot and to K. Hardymon regarding CVG plan objection; brief office conference with A. Durham regarding same	0.20
08/25/09	GKH	E-mail from J. Miller regarding research project for M. Anderson	0.20
08/26/09	DJF	Draft letter to J. Presnell regarding clean up calendar and attachments showing responses; meeting with E. Vincent regarding delivery to J. Presnell	0.40
08/26/09	JRM	Office conference with A. Durham regarding status, Judge Hodges comments and strategy going forward	0.30
08/30/09	JRM	Review and analysis of stay relief hearing transcript	1.00
08/31/09	GKH	Telephone conference with M. Stein regarding status of bankruptcy proceedings an issues arising as a result of plan and balloting; conference with J. Miller regarding same	0.30
08/31/09	JRM	Brief office conference with K. Hardymon regarding Stein question and transcript review	0.10

			17.75

		Total fees	\$4,577.50

	Costs Advanced	Amount
08/06/09	LEXIS - Computerized Legal Research for this billing period:	282.75
08/13/09	Patricia Basham: Expedited hearing transcript - 7/29/09 hearing	866.75

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Costs Advanced	Amount
08/13/09 Total "in house" photocopy expense for this billing period:	10.50
08/20/09 Total postage expense for this billing period:	5.28
08/24/09 Total Federal Express expense for this billing period:	23.30
08/25/09 Refund from Patricia Basham regarding expedited hearing transcript for 7/29/09 hearing	187.80CR
08/26/09 Total telecopy expenses for this billing period:	20.00
08/27/09 Total telephone expense for this billing period:	6.60
Total costs advanced	----- \$1,027.38
Total current fees/costs advanced	----- \$5,604.88
Please pay this amount	----- \$137,118.50 =====

30 Days \$42,163.50
 60 Days \$89,350.12

 Payment is due upon receipt of invoice

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555H Street
Eureka CA 95501

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Re: Motion to Enjoin Foreclosure Sale

Balance Forward \$136,091.12

Atty	Services Rendered	Hours
09/01/09	GKH Conference with J. Miller regarding research project and operating reports; review e-mail from J. Miller to J. Summerlin requesting information not found in operating reports; review May and June operating reports and e-mail from J. Miller to client regarding same; review e-mails between C. Salas and J. Miller regarding analysis of reports	0.80
09/01/09	JRM Review revised disclosure statement	0.20
09/01/09	JRM Review Stein Trustee claim, treatment in bankruptcy schedules; telephone conference with Stein regarding same	0.50
09/01/09	JRM Finish review of transcript from 7/29 hearing	1.00
09/01/09	JRM Review monthly reports for May and June as filed by Debtor; correspondence to Jimmy Summerlin and clients regarding same; brief office conference with A. Durham regarding same	0.50
09/01/09	JRM Research and draft objection to CVG II plan and disclosure statement	3.10
09/01/09	JRM Extensive correspondence with C. Salas; review power point presentation regarding financing, lot sales program	0.50
09/01/09	JRM Office conference with J. Domby	

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	Atty	Services Rendered	Hours
		regarding research issues for plan objection, background of case, etc.	0.40
09/01/09	JWD	Discussing assignment with J. Miller	0.50
09/02/09	GKH	Review e-mails between J. Miller and C. Salas regarding misuse of funds, condition of course and dispute between M. Nedrow and J. Kunevicius; briefly review powerpoint from C. Salas; exchange e-mails with J. Miller and J. Kunevicius regarding possible subpoena to J. Kunevicius	1.00
09/02/09	JWD	Legal research regarding allowability of claims for default interest, legal fees, and other charges under Section 506(b) of the Code	7.75
09/03/09	GKH	Review debtor's monthly operating reports	1.80
09/03/09	JRM	Brief office conference with J. Domby regarding loan documents	0.10
09/03/09	JWD	Legal research regarding allowability of claims for default interest, legal fees, and other charges under Section 506(b) of the code	0.50
09/04/09	JRM	Correspondence from Salas regarding Nedrow	0.10
09/07/09	JRM	Review status of plan objection and correspondence to J. Domby regarding research	0.10
09/08/09	JRM	Review J. Domby memo on secured creditor fees, etc.	0.20
09/08/09	JRM	Review J. Domby memo on 1129(a)(2) issue	0.10
09/08/09	JRM	Review and revise objection to Coastal	

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	Atty	Services Rendered	Hours
		Ventures plan and disclosure statement	2.90
09/08/09	JRM	Brief office conference with A. Durham regarding plan objection	0.10
09/08/09	JWD	Legal research regarding allowability of claims for default interest, legal fees, and other charges under Section 506(b) of the code; legal research regarding applicability of Section 1129(a)(2) of the Code; draft analysis of research results	3.50
09/09/09	AFD	Conference with K. Hardymon and J. Miller regarding options for hearing on stay relief	0.40
09/09/09	GKH	E-mail from J. Miller to J. Summerlin inquiring about update to information on monthly operating reports; review e-mails from G. Goldan and S. Arnot regarding conference call prior to hearing; review draft objection to plan and disclosure statement; exchange e-mails with J. Miller regarding teleconference on Friday to discuss next week's hearing; conference with J. Miller regarding hearing strategy and summarizing transcript of prior hearing; conference with K. Godin regarding hearing transcript	1.40
09/09/09	JRM	Correspondence from G. Goldan regarding CVG; review and revise objection to plan	1.30
09/09/09	JRM	Correspondence from J. Summerlin regarding CVG, to clients regarding same	0.20
09/09/09	JRM	Correspondence with S. Arnot regarding plan objection	0.10
09/09/09	JRM	Further review and revise plan objection	0.40

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09/09/09	JRM	Office conference with K. Hardyman and A. Durham regarding preparation for plan and stay relief hearing	0.30
09/10/09	GKH	Review powerpoint presentation obtained from M. Collier regarding bankruptcy strategy for debtor; e-mails to M. Anderson regarding summary of prior hearing transcript; review C. Salas' comments to objection to plan and disclosure statement; review e-mail from J. Summerlin regarding operating cash, golf course operations and status of take-out funding; review S. Arnot's comments to plan objection; review comments by G. Schulman; review e-mails between J. Miller and C. Salas regarding revisions to plan objection	4.50
09/10/09	JRM	Various correspondence with working group regarding response and conference call	0.20
09/11/09	GKH	E-mail from G. Goldan regarding conference call; review and revise draft objection to plan and disclosure statement; telephone conference with client and J. Miller regarding objection and issues to address at hearing; exchange e-mails with M. Anderson regarding summary of prior hearing	1.90
09/11/09	JRM	Correspondence regarding conference call	0.10
09/11/09	JRM	Review and revise objection to Coastal Ventures plan	1.30
09/11/09	JRM	Prepare Coastal Ventures objection for filing	0.20
09/11/09	JRM	Correspondence to Richard Marlow regarding CVG hearing and Hinds appraisal	0.10

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09/11/09	JRM	Telephone conference with working group regarding strategy for hearing	0.80
09/11/09	JRM	Review ballots and plan objections as filed	0.30
09/13/09	MAA	Draft summary/outline of transcript of the motion for relief from stay hearing	3.20
09/14/09	GKH	Exchange e-mails with M. Anderson regarding summary of hearing transcript; e-mail to K. Godin and J. Miller regarding same; review ballot of RDH Union rejecting the plan; review e-mail from J. Miller regarding availability of R. Marlow to view course prior to hearing; review e-mail from G. Goldan regarding I. Ferguson; review information on I. Ferguson from Mr. Goldan and K. Godin in preparation for cross examination; review financial statement of course from June 1st to September 11th from debtor's attorney; review e-mail from J. Summerlin and pro forma for Linville Falls Golf Club; e-mails from C. Salas and G. Schulman reacting to pro forma; review and revise outlines for J. Kunevicius and M. Nedrow; e-mail from C. Salas regarding review of transcript; conference with J. Miller regarding strategy for hearing	4.50
09/14/09	JRM	Review Kellam & Pettit objection to plan confirmation	0.10
09/14/09	JRM	Correspondence to and from Richard Marlow	0.20
09/14/09	JRM	Correspondence to working group regarding course condition testimony	0.10
09/14/09	JRM	Preparation for hearing including review of arguments, transcript summaries,	

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Atty	Services Rendered	Hours
	drafting argument outline; review insider claims; office conference with K. Hardyman, outline of cross for Advisco representative	6.00
09/14/09 JRM	Review motion for 2004 exam of Kellam and Pettit	0.10
09/14/09 JRM	Review Linville P&L statement	0.20
09/15/09 GKH	Review J. Miller's legal argument; e-mail comments to J. Miller; review and revise outline for D. Harrell testimony; e-mail from J. Miller regarding legal argument; exchange e-mails with J. Miller and K. Godin regarding exhibits; telephone conference with M. Collier regarding course condition and hearing tomorrow; review objections filed by Kellem & Pettit and architect; review and revise Kunevicius outline; conference with J. Miller regarding revisions to outlines for hearing and strategy at hearing; review and revise Nedrow outline	8.20
09/15/09 JRM	Correspondence from Richard Marlow regarding reinspection	0.10
09/15/09 JRM	Review revised Harrell deposition	0.10
09/15/09 JRM	Review and revise legal argument	0.10
09/15/09 JRM	Review detail on Linville Falls GC P&L and correspondence to working group regarding same	0.10
09/15/09 JRM	Continue to prepare for hearing, including review of new P&L information; revised proposal letter; correspondence with clients; review and revise of argument	2.70

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	Atty	Services Rendered	Hours
09/15/09	RRF	Conference with K. Hardymon regarding hearing preparation	0.10
09/16/09	GKH	Review comments from J. Miller regarding Advisco and incorporated same into outline; review outline of questions for possible appearance of Advisco representative; review comments on P&L statement and incorporated same into outline; e-mail from Bankruptcy Administrator regarding position on plan; e-mail from J. Summerlin regarding new letter of intent; review e-mails between J. Miller and J. Summerlin regarding Advisco not testifying at hearing and our objection to same; prepare for and attend hearing; review purchase and sale agreement produced at hearing; conference with J. Miller regarding subpoena to Epoch trust; review e-mails between J. Miller and clients regarding results of hearing and conference call to discuss strategy; review e-mail from C. Salas to M. Evans regarding review of course prior to continued hearing	4.40
09/16/09	JRM	Prepare for hearing	0.60
09/16/09	JRM	Meet with Richard Marlow regarding valuation evidence	0.70
09/16/09	JRM	Attend hearing on plan and stay relief	1.00
09/16/09	JRM	Subsequent office conference with K. Hardymon and A. Durham regarding results; telephone call to C. Salas regarding results; correspondence to working group regarding same	0.40
09/16/09	JRM	Review Epoch sale contract; develop list of documents needed from Epoch; office	

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Atty	Services Rendered	Hours
	conference with K. Hardymon regarding strategy	0.90
09/16/09 JRM	Telephone conference with working group regarding next steps	0.50
09/16/09 JRM	Office conference with R. Fulton regarding preparation of subpoenas and document requests; correspondence to K. Hardymon regarding same	0.40
09/16/09 RRF	Conference with J. Miller regarding subpoena for hearing; legal research regarding Bankruptcy Court subpoenas; e-mail K. Godin regarding instructions for subpoenas; review purchase contract for CVG property	0.70
09/17/09 GKH	Exchange e-mails with R. Fulton and J. Miller regarding subpoenas to trust and J. Kunevicius; e-mail to K. Godin regarding preparation of witness file for trust; e-mail from J. Miller to J. Summerlin regarding service address for J. Kunevicius; review information on J. Kunevicius from K. Godin; e-mail to C. Salas and J. Miller regarding same	1.70
09/17/09 JRM	Correspondence regarding Kunevicius and Shipman subpoenas; correspondence to Summerlin regarding same	0.20
09/17/09 RRF	Exchange e-mails with K. Hardymon regarding subpoenas for next hearing	0.10
09/21/09 GKH	E-mail from C. Salas regarding S. Shipman; e-mail to Mr. Salas regarding same; review information on Mr. Shipman; e-mail from C. Salas regarding information on S. Shipman; meeting with R. Fulton regarding information on S. Shipman, A. Steele and the Epoch Trust;	

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Atty	Services Rendered	Hours
	review information obtained by R. Fulton; e-mail to client regarding same; conference with R. Fulton regarding tax protect group associated with S. Shipman; e-mail from C. Salas regarding tax fraud; exchange e-mails with R. Fulton and J. Miller regarding trust and preparation of summary for clients; e-mail from R. Fulton with summary of findings on tax fraud trust; e-mail same to clients	2.10
09/21/09	JRM Office conference with R. Fulton regarding Sheldon Shipman order regarding tax issue	0.10
09/21/09	JRM Review Epoch Trust documents and complaint by IRS against Shipman alleging tax fraud; office conferences with R. Fulton regarding same	0.60
09/21/09	RRF Draft document requests to Epoch Trust; review public records regarding additional information about Epoch Trust and its trustee and grantor; conference with K. Hardymon and J. Miller regarding Epoch Trust, trustee and grantor; e-mail K. Hardymon regarding summary of Epoch Trust records; legal research regarding Epoch Trust trustee's tax litigation	4.20
09/22/09	GKH Exchange e-mails with R. Fulton regarding service of subpoenas and witness fees; e-mail from C. Salas regarding Ambassador program; review document obtained by Mr. Collier; e-mail from J. Miller to C. Salas regarding Ambassador program	0.75
09/22/09	RRF Review e-mails from K. Hardymon regarding response to buyer's contract; legal research regarding information and	

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Atty	Services Rendered	Hours
	case law regarding group purportedly purchasing property; conference with K. Hardyman regarding additional information on purported purchasers	2.90
09/23/09 GKH	Exchange e-mails with client and counsel regarding possibility of early hearing based on information obtained about trust; e-mail from G. Goldan regarding information on S. Shipman; e-mail to R. Fulton regarding same; e-mail from G. Schulman regarding whether to seek emergency hearing and use of information uncovered by R. Fulton; telephone conference with C. Salas regarding emergency hearing; e-mail to C. Salas regarding Ambassador program; conference with R. Fulton regarding tax protest group at issue	1.20
09/23/09 JRM	Correspondence among working group regarding Shipman/Epoch	0.10
09/23/09 JRM	Correspondence regarding subpoena issuance	0.10
09/23/09 JRM	Correspondence regarding lot sale program	0.40
09/23/09 JRM	Review document request	0.10
09/23/09 RRF	Exchange e-mails with K. Hardyman and J. Miller regarding subpoena service, fees, notice; review service and notice rules for subpoenas; conference with J. Miller regarding service of subpoenas from Bankruptcy Court	0.40
09/24/09 GKH	Exchange e-mails with R. Fulton and J. Miller regarding service of subpoenas to parties in interest; review proposed document request on trust subpoena; exchange e-mails with counsel regarding	

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	same; exchange e-mails with G. Goldan regarding whether to subpoena Advisco; e-mail from J. Miller regarding service of subpoenas; exchange e-mails with G. Goldan regarding whether to depose Advisco	0.90
09/24/09	JRM Correspondence regarding Advisco and subpoenas	0.10
09/24/09	JRM Office conference with R. Fulton regarding information regarding Epoch Trust	0.30
09/24/09	RRF Review e-mails from K. Hardyman and J. Miller regarding service of subpoenas; legal research regarding service of subpoenas; e-mail K. Godin regarding preparation of subpoenas for service	0.40
09/25/09	JRM Office conference with A. Durham regarding hearing strategy	0.30
09/25/09	JRM Review subpoenas; draft correspondence to Jimmy Summerlin and Jim Henderson	0.30
09/25/09	RRF Exchange e-mails with K. Godin regarding service of subpoenas; review and revise subpoenas and document requests	0.25
09/28/09	JRM Correspondence regarding Ambassador Club and review pictures from Mayo	0.20
09/28/09	JRM Review Ambassador information and respond to request for a call	0.50
09/29/09	GKH E-mail from C. Salas regarding Ambassador program; review program materials; review e-mails between J. Miller, S. Arnot and clients regarding same	1.60

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09/29/09	JRM	Correspondence to G. Goldan regarding upcoming hearing; correspondence from various parties regarding same	0.30
09/30/09	GKH	Review notice of hearing on motion for fees filed by Mitchell and Culp	0.20
10/01/09	GKH	Meeting with J. Miller regarding conference call with client and preparation for hearing; participated in conference call with client and counsel regarding preparation for hearing; exchange e-mails with J. Miller and R. Fulton regarding service of subpoenas; review photos of golf course taken by M. Collier; review e-mail from C. Salas to M. Evans regarding review of golf course and testimony at hearing; review e-mail from C. Salas to M. Collier regarding hearing	1.80
10/01/09	JRM	Correspondence regarding service of subpoenas	0.10
10/01/09	JRM	Office conference with K. Hardymon regarding strategy	0.20
10/01/09	JRM	Research regarding appeal rights from stay relief denial	0.30
10/01/09	JRM	Prepare for strategy call with K. Hardymon and clients	0.40
10/01/09	JRM	Telephone conference with K. Hardymon and clients	0.70
10/01/09	RRF	Exchange e-mails with J. Miller regarding subpoenas to Epoch Trust principals; e-mail K. Godin regarding alternate service to Epoch Trust; conference with J. Miller regarding deposition subpoena to third party	

RAYBURN COOPER & DURHAM, P.A.

11/03/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29503

Re: Motion to Enjoin Foreclosure Sale

Atty	Services Rendered	Hours
	sending loan proposal to CVG; exchange e-mails with K. Hardymon and K. Godin regarding service of subpoenas by sheriff	0.50
10/05/09	GKH Telephone conference with M. Evans regarding testimony regarding condition of golf course; conference with J. Miller regarding same; e-mail from C. Salas regarding notes M. Collier took at meeting of HOA; review notes and updated witnesses files	0.70
10/05/09	JRM Review Mayo Collier notes and Kunevicius statement from property owners' association meeting; office conference with K. Hardymon regarding Mick Evans site visit and information from Mayo Collier	0.40
10/05/09	JRM Brief review of revised disclosure statement	0.20
10/06/09	GKH Review e-mails from C. Salas and written statement of J. Kunevicius for HOA	0.20
10/08/09	GKH Review e-mails from C. Salas and G. Goldan regarding telephone conversation with P. Newman; exchange e-mails with J. Miller regarding affidavit for C. Salas	0.50
10/08/09	JRM Correspondence from C. Salas and G. Goldan regarding call with Advisco	0.10
10/08/09	JRM Review return of service on J. Kunevicius	0.10
10/08/09	JRM Review files regarding outstanding issues	0.10
10/08/09	RRE Conference with J. Miller regarding service of subpoenas; telephone conference with Sheriff's office regarding service of subpoenas	0.30

RAYBURN COOPER & DURHAM, P.A.

11/03/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29503

Re: Motion to Enjoin Foreclosure Sale

	Atty	Services Rendered	Hours
10/09/09	RRF	E-mails to J. Miller regarding subpoenas; conference with K. Godin regarding proof of service of subpoenas from Sheriff; conference with J. Miller regarding service of subpoenas	0.30
10/12/09	JRM	Telephone conference with G. Goldan regarding strategy	0.20
10/13/09	GKH	Review e-mail from M. Collier with updated information; e-mail from G. Goldan regarding service of subpoenas and plan for hearing; review draft motion regarding testimony at evidentiary hearing; exchange e-mails with J. Miller regarding same; review and revise draft affidavit of C. Salas; e-mail to J. Miller regarding draft affidavit; conference with J. Miller regarding meeting with G. Goldan and preparation for hearing	1.50
10/13/09	JRM	Draft notice of request for presence of witnesses; office conference with R. Fulton regarding Epoch Trust, service of subpoenas, etc.; correspondence with K. Hardyman regarding same	1.20
10/13/09	JRM	Brief office conference with K. Hardyman regarding hearing preparation	0.10
10/13/09	JRM	Correspondence with Jimmy Summerlin regarding subpoenas	0.10
10/13/09	RRF	Review demand for appearance of witnesses; exchange e-mails with J. Miller regarding demand for appearance and service of subpoenas; exchange e-mails with K. Godin regarding status update from Sheriff's office on subpoena service; conference with J. Miller regarding service issues on witnesses;	

RAYBURN COOPER & DURHAM, P.A.

11/03/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29503

Re: Motion to Enjoin Foreclosure Sale

Atty	Services Rendered	Hours
	begin drafting outline for J. Miller on tax protester argument for hearing	1.10
10/14/09 GKH	E-mail from C. Salas regarding motion for attendance of witnesses; exchange e-mails with J. Miller regarding Salas affidavit; conference with J. Miller regarding revisions to same; revise draft affidavit and e-mailed same to C. Salas; e-mail to G. Schulman, C. Salas and G. Goldan regarding motion to dismiss pending in guaranty action; review e-mails between J. Summerlin, J. Henderson and J. Miller regarding offer to purchase by Epoch Trust and subpoenas regarding same; conference with J. Miller regarding same; review e-mail from J. Miller to client regarding Summerlin and Henderson position on offer to purchase and subpoenas; exchange e-mails with C. Salas regarding revisions to his affidavit; exchange e-mails with G. Goldan and C. Salas regarding motion to dismiss guaranty action; review e-mails between C. Salas and A. Secor regarding motion to dismiss; e-mail from C. Salas regarding agreement of A. Secor to file answer and withdraw motion; e-mail to D. Finegan regarding same; e-mail from J. Summerlin regarding Epoch Trust and inquiring about knowledge of purchasers of property; meeting with J. Miller regarding responding to e-mail and preparation for hearing	3.50
10/14/09 JRM	Review and revise Salas affidavit; office conference with K. Hardymon regarding same	0.60
10/14/09 JRM	Correspondence regarding subpoenas; office conferences with K. Hardymon and	

RAYBURN COOPER & DURHAM, P.A.

11/03/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29503

Re: Motion to Enjoin Foreclosure Sale

	Atty	Services Rendered	Hours
		R. Fulton regarding same	0.40
10/14/09	JRM	Correspondence from Jim Henderson regarding Epoch Trust	0.10
10/14/09	JRM	Correspondence regarding Secor motion to dismiss	0.10
10/14/09	JRM	Prepare request for appearance of witnesses for filing and service; office conferences with (multiple) with R. Fulton regarding Shipman/Steele information	0.70
10/14/09	JRM	Correspondence to Summerlin and Henderson; correspondence with C. Salas regarding same	0.30
10/14/09	JRM	Correspondence from J. Summerlin; office conference with K. Hardyman regarding strategy for hearing; correspondence to G. Goldan regarding Summerlin question and response	0.80
10/14/09	RRF	Exchange e-mails with J. Miller and K. Hardyman regarding subpoenas to Epoch Trust and J. Summerlin message; conference with J. Miller regarding same; finish drafting memorandum on tax protesters and organizing exhibits for hearing; follow up research on tax protesters and check for new or updated filings	3.70
10/15/09	GKH	Review e-mails between J. Miller, G. Goldan and C. Salas regarding potential purchasers; review e-mails between G. Goldan, C. Salas and J. Miller regarding water treatment issue; e-mail from G. Goldan regarding possible testimony regarding sale of property; exchange e-mails with R. Fulton regarding tax	

RAYBURN COOPER & DURHAM, P.A.

11/03/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29503

Re: Motion to Enjoin Foreclosure Sale

Atty	Services Rendered	Hours
	fraud issue; exchange e-mails with R. Fulton regarding tax fraud issue; exchange e-mails with R. Fulton and J. Miller regarding using R. Fulton to present tax fraud issues to court; review executed Salas affidavit; e-mail to J. Miller regarding Salas affidavit and due diligence issues with Epoch Trust; exchange e-mails with R. Fulton regarding cross examination of S. Shipman and A. Steele; e-mail from C. Salas regarding M. Collier testimony and amount due; prepare for hearing by revision of outlines and review of documents; meeting with client and M. Evans and J. Miller regarding hearing preparation	9.50
10/15/09	JRM Correspondence with K. Hardymon regarding hearing preparation	0.10
10/15/09	JRM Prepare Epoch Trust documents	0.20
10/15/09	JRM Correspondence regarding Epoch Trust documents; hearing strategy	0.10
10/15/09	JRM Prepare for hearing on plan confirmation, stay relief including preparation of Goldan, Collier and Evans direct testimony outline, additional to Kunevicius cross on Ambassador program and Epoch Trust	6.20
10/15/09	JRM Working dinner with K. Hardymon, M. Evans and G. Goldan	2.00
10/15/09	RRF Exchange e-mails with J. Miller and K. Hardymon regarding hearing and tax protesters; research on redemptionist movement for hearing tomorrow; review exhibits and outline; conference with K. Godin regarding Sheriff service of A.	

RAYBURN COOPER & DURHAM, P.A.

11/03/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29503

Re: Motion to Enjoin Foreclosure Sale

Atty	Services Rendered	Hours
	Steele subpoena; conference with K. Hardyman regarding redemptionist exhibits for hearing tomorrow; review and revise outline for hearing tomorrow	1.70
10/16/09 DJF	Office conference with R. Fulton regarding status of hearing and results (NO CHARGE)	0.00
10/16/09 GKH	Prepare for and participated in hearing on confirmation of plan and motion for relief from stay; meeting with client and counsel after hearing	6.00
10/16/09 JRM	Prepare for and attend hearing on confirmation, stay relief, subsequent office conference with clients	6.20
10/16/09 JRM	Office conference with A. Durham regarding drafting order	0.20
10/16/09 JRM	Correspondence with C. Salas regarding appeal periods	0.10
10/16/09 JRM	Draft order granting stay relief	0.30
10/16/09 JRM	Telephone call to M. Stein regarding foreclosure timing	0.10
10/16/09 RRF	Review memorandum on tax protestors, public records search for any additional information, and prepare for and attend hearing; conference with J. Miller regarding court order and appeal rights	2.40
10/17/09 JRM	Draft order granting stay relief	2.20
10/19/09 GKH	Exchange e-mails with K. Godin regarding trial exhibits; e-mail from J. Miller regarding proposed order; e-mail from G. Schulman regarding comments on same; review and revise draft order; review	.

RAYBURN COOPER & DURHAM, P.A.

11/03/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29503

Re: Motion to Enjoin Foreclosure Sale

Atty	Services Rendered	Hours
	e-mails between C. Salas and P. Carlino regarding trustee sale; review docket entry regarding hearing and e-mails between counsel and client regarding same; review e-mails between C. Salas and J. Miller regarding appeal rights and proposal of J. Kunevicius to turn over property; exchange e-mails with J. Miller regarding revisions to order; e-mail from G. Goldan regarding proposed order	1.80
10/19/09 JRM	Correspondence regarding draft order; review and revise same; telephone conferences with Keith Johnson and W. Pettit regarding language in order regarding foreclosure	1.00
10/20/09 DJF	Office conference with K. Hardymon regarding clean up calendar and resolving pending matters	0.20
10/20/09 GKH	Review e-mail from J. Miller to counsel tendering proposed order; e-mails from G. Tarr, J. Summerlin and Simpson approving draft order; e-mail from J. Miller regarding proposed order; review withdrawal of motion to dismiss and answer of A. Secor; conference with D. Finegan regarding confirmation of removal of motion from cleanup calendar; e-mail to client and counsel regarding withdrawal of motion to dismiss	0.90
10/20/09 JRM	Correspondence regarding proposed order	0.10
10/21/09 DJF	Draft letter to TCA regarding clean up calendar and forward withdrawal/answer	0.30
10/21/09 GKH	Review and organize material for file; conference with K. Godin regarding same	0.40

RAYBURN COOPER & DURHAM, P.A.

11/03/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29503

Re: Motion to Enjoin Foreclosure Sale

	Atty	Services Rendered	Hours
10/21/09	JRM	Finalize order for filing; telephone call to Judges chambers to alert that order is ready	0.20
10/22/09	GKH	E-mail from J. Henderson approving proposed order; review e-mail from J. Miller attaching order	0.20
10/22/09	JRM	Review order as entered, circulate to all; office conference with K. Hardyman regarding next steps	0.40
10/23/09	DJF	Check status of hearings	0.10
10/23/09	GKH	Review e-mails between J. Miller, G. Schulman and C. Salas regarding 2009 property taxes	0.20
10/26/09	GKH	Review clean up calendar notice; conference with D. Finegan regarding same; e-mail from C. Salas regarding date of sale	0.25
10/27/09	DJF	Multiple telephone calls to R. Lockard regarding hearing; telephone call to and e-mail exchange with C. Loeb sack regarding withdrawal of hearing	0.40
10/27/09	GKH	Review foreclosure notices from substitute trustee	0.20
10/28/09	GKH	Exchange e-mails with M. Stein regarding hearing scheduled in Superior Court and resolution of same	0.20
10/29/09	GKH	Review scheduling order	0.20

			160.50

		Total fees	\$42,630.75

RAYBURN COOPER & DURHAM, P.A.

11/03/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29503

Re: Motion to Enjoin Foreclosure Sale

	Costs Advanced	Amount
09/10/09	LEXIS - Computerized Legal Research for this billing period:	926.55
09/11/09	Total "in house" photocopy expense for this billing period:	1,419.25
09/11/09	Total postage expense for this billing period:	29.91
09/22/09	Photocopies of Documents (Off Premises):	5.00
09/25/09	Mecklenburg County, Sheriff: Process server fee for subpoena to Kunevicius	15.00
09/25/09	Mecklenburg County, Sheriff: Process server fee for subpoena to Shipman	15.00
09/25/09	Mecklenburg County, Sheriff: Process server fee for subpoena to Steele	15.00
09/25/09	Mecklenburg County, Sheriff: Process server fee for subpoena to Epoch Trust	15.00
09/25/09	Sheldon R. Shipman: Witness fee and mileage	53.75
09/25/09	James Kunevicius: Witness fee	41.10
09/25/09	Adrian L. Steele: Witness fee and mileage	48.25
09/30/09	Total telephone expense for this billing period:	7.01
10/16/09	PACER - Computerized Court Records Access Charges:	53.68
10/19/09	Genesys Conferencing: Conference calls placed on 9/16/09	49.90
10/19/09	Genesys Conferencing: Conference calls placed on 10/1/09	70.62
10/19/09	Genesys Conferencing: Conference calls	

RAYBURN COOPER & DURHAM, P.A.

11/03/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29503

Re: Motion to Enjoin Foreclosure Sale

Costs Advanced	Amount
placed on 9/11/09	80.14
10/21/09 Total telecopy expenses for this billing period:	20.00
Total costs advanced	\$2,865.16
Total current fees/costs advanced	\$45,495.91
Please pay this amount	<u>\$181,587.03</u>

30 Days \$4,577.50
60 Days \$21,931.00
90 Days \$109,582.62

Payment is due upon receipt of invoice

RAYBURN COOPER & DURHAM, P.A.
227 West Trade Street, Suite 1200
Charlotte, NC 28202-1672
Telephone (704) 334-0891 Fax (704) 377-1897
FEDERAL I.D. #: 56-1597966

12/04/09

Underwriters Funding Group, LLC;
Diversified Lending Grp; and ReProp Fin. Mtg. Investors, LLC
c/o Glenn Goldan (ReProp Financial)
555H Street
Eureka CA 95501

Our file number 4390-001/GKH/GKH
Invoice number 29638

Re: Motion to Enjoin Foreclosure Sale

Balance Forward \$181,587.03

	Atty	Services Rendered	Hours
11/05/09	JRM	Review motion to dismiss and send to clients	0.10
11/06/09	GKH	Review motion to dismiss Coastal Ventures bankruptcy case filed by Bankruptcy Administrator (NO CHARGE)	0.00
11/10/09	GKH	Exchange e-mails with C. Salas regarding trial exhibit requested by M. Collier (NO CHARGE)	0.00
11/11/09	GKH	Review notice of motion of bankruptcy administrator of hearing to dismiss Coastal Ventures case (NO CHARGE)	0.00
11/11/09	JRM	Review docket regarding status of case dismissal	0.10
11/12/09	GKH	Review e-mails between C. Salas and J. Miller regarding motion to dismiss bankruptcy case (NO CHARGE)	0.00
11/17/09	GKH	Review scheduling order; e-mail to client regarding same; review letter from S. Robinson regarding revisions to scheduling order; telephone conference with G. Goldan regarding peremptory setting request in State Court litigation; conference with D. Finegan regarding preparation of same	1.30
11/20/09	DJF	Locate and complete request for preemprory setting; telephone call to	

RAYBURN COOPER & DURHAM, P.A.

12/04/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29638

Re: Motion to Enjoin Foreclosure Sale

Atty	Services Rendered	Hours
	TCA regarding peremptory setting; office conference with K. Hardyman regarding specifics for trial	0.70
11/20/09	GKH Conference with D. Finegan regarding motion for pre-emptory setting; e-mail from J. Miller regarding motion to dismiss	0.30
11/23/09	GKH Review e-mails between C. Salas and Blue Ridge Realty regarding lots owned by J. Kunevicius that are not part of the collateral mix and may be subject to execution under personal guaranty; conference with D. Finegan regarding motion for preempratory setting	0.25
11/24/09	GKH Review order dismissing bankruptcy case; e-mail to G. Goldan and C. Salas inquiring about foreclosure sale; e-mail from G. Goldan regarding same (NO CHARGE)	0.00
11/24/09	JRM Review order dismissing bankruptcy case, send same to working group (NO CHARGE)	0.00
11/30/09	GKH E-mail from C. Loeb sack regarding plans for guaranty suit; e-mail to client regarding same	0.20

		2.95

	Total fees	\$772.50

Costs Advanced	Amount
11/09/09 LEXIS - Computerized Legal Research for this billing period:	78.03
11/20/09 Total "in house" photocopy expense for this billing period:	1.25

RAYBURN COOPER & DURHAM, P.A.

12/04/09

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29638

Re: Motion to Enjoin Foreclosure Sale

Costs Advanced	Amount
11/20/09 Total postage expense for this billing period:	0.88
11/20/09 Total telecopy expenses for this billing period:	6.00
Total costs advanced	----- \$86.16
Total current fees/costs advanced	----- \$858.66
Please pay this amount	=====
	\$182,445.69

30 Days \$45,495.91
60 Days \$4,577.50
90 Days \$21,931.00
120 Days \$109,582.62

Payment is due upon receipt of invoice

RAYBURN COOPER & DURHAM, P.A.
 227 West Trade Street, Suite 1200
 Charlotte, NC 28202-1672
 Telephone (704) 334-0891 Fax (704) 377-1897
 FEDERAL I.D. #: 56-1597966

01/08/10

Underwriters Funding Group, LLC;
 Diversified Lending Grp; and ReProp Fin. Mtg. Investors, LLC
 c/o Glenn Goldan (ReProp Financial)
 555H Street
 Eureka CA 95501

Our file number 4390-001/GKH/GKH
 Invoice number 29761

Re: Motion to Enjoin Foreclosure Sale

Balance Forward \$131,308.75

Atty	Services Rendered	Hours
12/14/09	GKH Review e-mails from G. Goldan, G. Schulman and C. Salas regarding e-mail from C. Loeb sack regarding guaranty action; responded to e-mail from Mr. Loeb sack; review order for alternative dispute resolution; review letters from potential mediators	0.70
12/18/09	GKH Review order for ADR; e-mail to clients regarding selector of mediator; exchange e-mails with C. Loeb sack regarding assistance of A. Secor in finding buyers for property and providing due diligence assistance	0.25
12/22/09	GKH E-mail from G. Golden regarding mediation; exchange e-mails with D. Delaney regarding mediators proposed by S. Robinson; e-mail to G. Goldan regarding same	0.25
12/28/09	GKH Telephone conference with G. Goldan regarding mediation and settlement strategy (NO CHARGE)	0.00
		----- 1.20 -----
	Total fees	\$348.00 -----

Costs Advanced	Amount
11/30/09 Total "in house" photocopy expense for	

RAYBURN COOPER & DURHAM, P.A.

01/08/10

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
Invoice number 29761

Re: Motion to Enjoin Foreclosure Sale

Costs Advanced	Amount
this billing period:	2.25
12/30/09 Total telephone expense for this billing period:	0.15
Total costs advanced	----- \$2.40
Total current fees/costs advanced	----- \$350.40
Please pay this amount	\$131,659.15 =====

30 Days	\$772.50
60 Days	\$42,630.75
90 Days	\$4,577.50
120 Days	\$21,931.00
150 Days	\$61,397.00

 Payment is due upon receipt of invoice

RAYBURN COOPER & DURHAM, P.A.
227 West Trade Street, Suite 1200
Charlotte, NC 28202-1672
Telephone (704) 334-0891 Fax (704) 377-1897
FEDERAL I.D. #: 56-1597966

02/09/10

Underwriters Funding Group, LLC;
Diversified Lending Grp; and ReProp Fin. Mtg. Investors, LLC
c/o Glenn Goldan (ReProp Financial)
555H Street
Eureka CA 95501

Our file number 4390-001/GKH/GKH
Invoice number 29895

Re: Motion to Enjoin Foreclosure Sale

Balance Forward \$131,659.15

Costs Advanced	Amount
01/27/10 PACER - Computerized Court Records Access Charges:	3.28

Total costs advanced	\$3.28

Total current fees/costs advanced	\$3.28

Please pay this amount	\$131,662.43
	=====

30 Days	\$350.40
60 Days	\$772.50
90 Days	\$42,630.75
120 Days	\$4,577.50
150 Days	\$0.00
180 Days	\$83,328.00

Payment is due upon receipt of invoice

RAYBURN COOPER & DURHAM, P.A.
227 West Trade Street, Suite 1200
Charlotte, NC 28202-1672
Telephone (704) 334-0891 Fax (704) 377-1897
FEDERAL I.D. #: 56-1597966

03/16/10

Underwriters Funding Group, LLC;
Diversified Lending Grp; and ReProp Fin. Mtg. Investors, LLC
c/o Glenn Goldan (ReProp Financial)
555H Street
Eureka CA 95501

Our file number 4390-001/GKH/GKH
Invoice number 30003

Re: Motion to Enjoin Foreclosure Sale

Balance Forward \$131,662.43

	Atty	Services Rendered	Hours
02/17/10	DJF	Office conference with K. Hardyman regarding status of case and discovery deadlines pending; review file and pleadings (NO CHARGE)	0.00
02/17/10	GKH	Conference with D. Finegan regarding discovery deadlines in guaranty case, strategy for settlement and related issues (NO CHARGE)	0.00
02/18/10	DJF	Review status of file and outline potential discovery; e-mail with K. Hardyman regarding status (NO CHARGE)	0.00
02/18/10	GKH	Exchange e-mails with D. Finegan regarding guaranty action	0.10
02/19/10	DJF	Draft e-mail to G. Goldan regarding handling of case	0.30
02/22/10	DJF	E-mail exchanges with client regarding moving forward with guaranty case; draft e-mail memorandum regarding expected costs	0.90
02/22/10	GKH	Review e-mails between D. Finegan and G. Goldan regarding how to proceed in the guaranty action; exchange e-mails with D. Finegan regarding cost estimate of guaranty action; e-mail from D. Gill regarding guaranty action	0.30
02/23/10	DJF	Review e-mails from client (NO CHARGE)	0.00

RAYBURN COOPER & DURHAM, P.A.

03/16/10

Underwriters Funding Group, LLC;

Our file number 4390-001/GKH/GKH
 Invoice number 30003

Re: Motion to Enjoin Foreclosure Sale

	Atty	Services Rendered	Hours
02/26/10	DJF	Draft e-mail memorandum responding to questions regarding defenses to claims and risks/benefits of voluntary dismissal of claims against guarantors	0.40
02/27/10	GKH	E-mail from G. Goldan to D. Finegan regarding guaranty action (NO CHARGE)	0.00
			----- 2.00 -----
		Total fees	\$440.00
		Total current fees/costs advanced	\$440.00

		Please pay this amount	\$132,102.43
			=====

30 Days	\$3.28
60 Days	\$350.40
90 Days	\$772.50
120 Days	\$42,630.75
150 Days	\$4,577.50
180 Days	\$83,328.00

 Payment is due upon receipt of invoice
