

1 **RAINES FELDMAN LITTRELL LLP**  
Kathy Bazoian Phelps (State Bar No. 155564)  
2 *kphelps@raineslaw.com*  
1900 Avenue of the Stars, 19th Floor  
3 Los Angeles, California 90067  
Telephone: (310) 440-4100  
4 Facsimile: (310) 691-1943  
5 *Counsel for Bradley D. Sharp,*  
*Permanent Receiver*  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION – LOS ANGELES**

11 SECURITIES AND EXCHANGE  
COMMISSION,

12  
13 Plaintiff,

14 v.  
15

16 DIRECT LENDING INVESTMENTS  
LLC,

17  
18 Defendant.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No.: 2:19-cv-02188-DSF-MBKx

**TWENTY-EIGHTH STATUS  
REPORT OF PERMANENT  
RECEIVER BRADLEY D. SHARP  
[OCTOBER 1, 2025 TO  
DECEMBER 31, 2025] WITH  
EXHIBITS**

1 Bradley D. Sharp, the Court-appointed permanent receiver (the  
2 “Receiver”) for the estate of Direct Lending Investments, LLC (“DLI”), Direct  
3 Lending Income Fund, L.P., Direct Lending Income Feeder Fund, Ltd.  
4 (“DLIFF”), DLI Capital, Inc., DLI Lending Agent, LLC, DLI Assets Bravo LLC,  
5 and their successors, subsidiaries and affiliated entities (collectively, the  
6 “Receivership Entities”), pursuant to the Preliminary Injunction Order and Order  
7 Appointing Permanent Receiver issued April 1, 2019 (“Receiver Order”) (Doc.  
8 No. 10), hereby submits his Twenty-Eighth Status Report generally covering the  
9 period from October 1, 2025 through December 31, 2025.

10 **I. Summary Overview**

11 The Receiver is submitting his Twenty-Eighth Status Report to update the  
12 Court and interested parties of the recent activities that took place in the fourth  
13 quarter 2025.

14 **A. Highlights of Activity During the Fourth Quarter 2025**

15 A summary of the more significant activities during this period is as  
16 follows:

17 **Loan Portfolios**

18 The Receiver has continued to pursue collection efforts on the two  
19 remaining individual loans and is negotiating a cash settlement with the  
20 counterparty for Investment N held by the Receivership Entities.

21 **Litigation**

22 The Receiver has concluded all litigation in this case.

23 **Miscellaneous Assets**

24 The Receiver only continues to hold an interest in the following assets  
25 which he is in the process of seeking to liquidate

- 26 1. Interest in Investment N.

27  
28

- 1           2.     Two individual loans related to the QuarterSpot portfolio.
- 2           3.     A note secured by a gas station in the principal amount of \$1.4
- 3 million.
- 4           4.     Interests held in the investments that were transferred to the
- 5 Receiver pursuant to the settlement with Brendan Ross.
- 6           5.     Claim in the VoIP Guardian bankruptcy case.

7           **B. Summary of Cash Position**

8           As of December 31, 2025, the Receiver had cash on hand of approximately

9 \$38.4 million, of which approximately \$2.8 million has been reserved as

10 holdbacks for professional fees, and \$0.7 million related to uncashed distribution

11 checks and distribution reserves. The remaining \$35 million in cash will be held

12 in reserve until either 2029 or until the taxing authorities indicate no objection to

13 the previous tax filings, whichever occurs first. Once that occurs, the Receiver

14 intends to distribute the remaining funds to DLIF investors and the DLIFF estate.

15           As of December 31, 2025, the Receiver has recovered approximately \$252

16 million in portfolio collections. The Receiver is preparing to finalize his

17 administration of the estate by liquidating the last remaining assets but does not

18 anticipate a significant change in the cash position of the estate.

19           The portfolio investments held by the Receivership Entities as of the date

20 of the receivership were valued at par (*i.e.*, face value amount outstanding) by

21 DLI at \$789.6 million dollars as of March 31, 2019. The Receiver and his team

22 estimate a low range of return on the liquidation of the investments of \$215

23 million (or about 27% of the March 31, 2019 par value) and a high range of \$265

24 million (or about 34%). The balance actually collected has been \$252 million. Of

25 course, these are only the best estimates available and are not certain.

26           The ultimate return to investors will be increased by the \$31.7 million in

27 cash on hand at the time of the appointment of the Receiver and any proceeds of

28

1 litigation, including the proceeds of the net winner claims, the settlement with the  
2 Deloitte Entities, the SAI Settlement, the settlements with EisnerAmper and Duff  
3 & Phelps, the settlements with the directors and officers and Ross, and the other  
4 miscellaneous assets, reduced by operating costs, administrative fees, and  
5 expenses, and impacted by allowed non-investor claims.

6 **C. Update on Operational Issues**

7 1. Employees:

8 The Receiver has continued to operate with a reduced staff of one DLI  
9 employee during this past quarter. Given the expected reduction in activity in  
10 2026 and beyond, the Receiver terminated the employment of the one remaining  
11 DLI employee during the last quarter, so DLI will no longer have any employees.

12 2. Budget:

13 The Receiver has attached hereto as Exhibit “1” the actual v. budget for  
14 the three-month period ending December 31, 2025. Exhibit “2” is the Receiver’s  
15 Standardized Fund Accounting Report for the Reporting Period of October 1,  
16 2025 through December 31, 2025. Exhibit “3” is the Investment Portfolio  
17 Summary as of December 31, 2025. The budget for the first six months of 2026  
18 was included as the Twenty-Seventh Status Report as Exhibit “5.” The Receiver  
19 anticipates that expenses in the first quarter of 2026 will be approximately 60%  
20 lower than those budgeted for the fourth quarter of 2025, and second-quarter  
21 expenses will be about 70% lower. This reduction reflects the continued wind-  
22 down of case activity. The Receiver also expects that interest earned on the  
23 remaining cash will be sufficient to cover all expenses budgeted for the first and  
24 second quarters of 2026, and for the remainder of the case.

25 **D. Ordinary Course Settlement Update:**

26 Pursuant to the authority and powers of the Receiver set forth in the Court’s  
27 order granting the Receiver’s Motion for Instructions re Scope of Receivership  
28

1 (Doc. No. 57), the Receiver is authorized to make compromises of claims and  
2 accept discounts of \$100,000 or less. Based on that order, the Receiver has  
3 obtained settlements or payments related to approximately two dozen claims in  
4 connection with the loan portfolios. The settlements include discounted payoffs  
5 and negotiated structured repayment agreements as the Receiver endeavors to  
6 maximize recoveries on loans in default. The settlements typically involve  
7 ongoing monthly payments on the loans potentially with reduced or waiver of  
8 interest. In the third quarter of 2025, the Receiver collected approximately \$1  
9 thousand in connection with such settlements.

10 **II. Remaining Assets**

11 **A. Loan Portfolios**

12 When the Receiver was initially appointed on April 1, 2019, the estate had  
13 cash on hand of \$31.7 million. Since the Receiver's appointment through  
14 September 30, 2025, the Receiver has recovered approximately an additional  
15 \$252 million in portfolio collections (including interest recovery but excluding  
16 funds collected on behalf of and either reserved for or remitted to third parties).

17 **1. Investment N**

18 The uncollected balance on Investment N as of December 31, 2025 is  
19 \$68.8 million. However, as noted in prior reports, the remaining loan/investment  
20 portfolio has a number of issues that make recovery of all or a large portion of  
21 the outstanding balance challenging. The Receiver and his team are currently  
22 negotiating a cash settlement with the counterparty for Investment N.

23 As in the prior report, the Receiver is maintaining confidential the identity  
24 of the specific borrowers on the list of loan/investment portfolios. Attached to  
25 this Twenty-Eight Status Report as Exhibit "3" is an updated list identifying the  
26 status of the remaining investment and the uncollected amounts for the remaining  
27 loans/investments (the "Loan/Investment Schedule"). The Loan/Investment  
28

1 Schedule includes the March 31, 2019 par dollar amount of the estate’s interest  
2 in those portfolios as reflected on the books and records of the Receivership  
3 Entities, collections on those portfolios obtained since the commencement of the  
4 receivership, and a general summary of the loan/investment portfolio.

5 2. Remaining Two QuarterSpot Loans

6 The Receiver has focused on resolving two non-performing loans through  
7 negotiated payouts. The Receiver is also actively marketing these two loans to  
8 potential buyers.

9 3. Note Secured by a Gas Station

10 The Receiver and his team plan to complete the review and resolution of a  
11 note secured by a gas station, a property previously tied to one of DLI’s  
12 investment counterparts. The property has changed hands and undergone notable  
13 improvements since 2019, and the Receiver is assessing the potential for a modest  
14 cash recovery and actively seeking confirmation of net proceeds after fees and  
15 reconciling prior to DLI advances. The Receiver anticipates final resolution of  
16 this matter by early to mid-2026.

17 4. Equity Interests Transferred from B. Ross

18 As part of the settlement with Brendan Ross, the Receivership Estate  
19 received four equity investments originally made by Strawberry Peak Trust. The  
20 value of these assets has not yet been determined. Depending on each asset’s  
21 stage and performance, the Receiver will either hold the investment through its  
22 distribution cycle – such as the LP interest in a venture capital fund – or sell the  
23 position when appropriate. The Receiver has spoken with several groups  
24 regarding a possible sale of the estate’s interest and is continuing to pursue  
25 options for liquidation of these investments.

26 5. VoIP Guardian

27 Although the March 31, 2019 par value of the VoIP loan on the  
28

1 Receivership Entities' book is approximately \$202.6 million, the Receiver is not  
2 expecting a recovery of nearly the amount of the outstanding balance, as there  
3 are substantial questions and concerns regarding collection of the underlying  
4 foreign telecommunications accounts receivable. VoIP is in a Chapter 7  
5 bankruptcy, which fact alone reflects the challenges in collection. In addition, the  
6 collection of approximately \$22 million from VoIP receivables continues to  
7 depend on the outcome of proceedings in the VoIP case. The settlement with  
8 authorities in the Netherlands was approved. The VoIP trustee continues to  
9 pursue other litigation claims. The Receiver and his team have worked with the  
10 Trustee's counsel to provide certain documentary information requested by the  
11 Trustee to assist in the recovery efforts. The Receiver continued to communicate  
12 with the VoIP Trustee regarding pending litigation claims against former insiders  
13 of VoIP.

14 **B. Litigation Claims**

15 The Receiver has resolved all litigation claims. The litigation claims  
16 resulted in recoveries to the estate in the following amounts:

- 17 1. DLIF Net Winner Claims: \$28,638,901.73 in cash payments and  
18 offset distributions pursuant to other settlement agreements.
- 19 2. DLIF Commission Claims: \$1,016,848.21 in cash payments and  
20 offset distributions pursuant to other settlement agreements.
- 21 3. Brendon Ross and Strawberry Peak: \$6.1 million in cash and  
22 recovery of investments of unknown value.
- 23 4. Deloitte & Touche: \$18,299,383.76 to 888 DLIF investors, and  
24 DLIFF separately received a total of \$8,050,616.24.
- 25 5. EisnerAmper: \$10 million. The unrepresented investors received  
26 a total of \$3,500,000. DLIF investors received \$2,367,883 and  
27 the DLIFF Cayman liquidators received \$1,132,117.

28

1                   6. Kroll & Associates: \$6.9 million. The unrepresented investors  
2                   received a total of \$2,415,000. DLIF investors received  
3                   \$1,633,839 and the DLIFF Cayman liquidators received  
4                   \$781,161.

5                   7. Director and Officer Claims: The unrepresented investors  
6                   received a total of \$4,450,000. DLIF investors received  
7                   \$3,090,408, and the DLIFF Cayman liquidators received  
8                   \$1,359,592.

9                   **III. Court Filings October 1, 2025 through December 31, 2025**

10                  **A. Motions Concerning Administration of the Estate**

11                  The Receiver filed a motion for approval and payment of fees of the  
12                  Receiver and his professionals on December 9, 2025, for the period from July 1,  
13                  2025 to September 30, 2025 (Doc. No. 1046). The Court approved the motion by  
14                  order entered on January 5, 2026 (Doc No. 1048).

15                  **B. Anticipated Motions**

16                  The Receiver does not anticipate filing a motion to make another  
17                  distribution at this time. As stated in this report, the Receiver will retain the  
18                  remaining \$35 million in cash as a reserve until either 2029 or until the taxing  
19                  authorities indicate no objection to the previous tax filings, whichever occurs  
20                  first. Once that occurs, the Receiver intends to distribute the remaining funds to  
21                  DLIF investors and the DLIFF estate. Additionally, the Receiver will most likely  
22                  file a motion for authority to sell the remaining remnant assets of the estate.

23                  The Receiver also anticipates filing future fee applications.

24                  **IV. Status of Implementation of Distribution Plan**

25                  The Receiver’s motion to approve a Distribution Plan, among other things,  
26                  was approved by Order entered on December 14, 2020 (Doc No. 321), which  
27                  provided for the following relief: 1) approval of the Distribution Plan; 2) approval  
28

1 of rising tide distribution methodology with respect to DLIF investor claims; and  
2 3) approval of an interim \$150 million distribution. A total of 1,180 claims were  
3 submitted to the Receiver.

4 Since the Distribution Plan (Doc. No. 321) was approved by the Court on  
5 December 14, 2020 (Doc. No. 337), the Receiver has made three interim  
6 distributions after which the Rising Tide distribution level now sits at 48.13%.  
7 The Receiver has also made separate distributions of litigation settlement sums  
8 from Deloitte & Touche, EisnerAmper, Kroll, and the Directors and Officers,  
9 which did not impact the rising tide calculations and were made to all investors.

10 **V. Communications with Investors**

11 A. Investor Inquiries: The Receiver continues to track investor  
12 inquiries received directly by the Receiver’s agents and by counsel, as well as  
13 responses to the inquiries. The Receiver continues to review and respond to  
14 investor inquiries, written and oral, and the Receiver’s website for the case:  
15 <https://cases.stretto.com/dli> includes copies of case filings and other materials of  
16 interest to keep investors informed regarding the status of the case and the  
17 Receiver’s activities. The Receiver continues to actively engage certain investor  
18 groups in response to their inquiries for updates on the case status, assets, and  
19 litigation.

20 B. FAQs: The Receiver’s website for the case also includes a series of  
21 “Frequently Asked Questions” and responsive information regarding the impact  
22 of the receivership on DLI and the investors’ funds, the status of the receivership,  
23 and the Receiver’s activities, the claims process in a receivership, and other  
24 similar information. The Receiver continues to periodically update the FAQs to  
25 address new issues or actions that may be of interest to investors as the case  
26 progresses.

27  
28

1 **VI. Pending Litigation by Investors**

2 A. *Forefront Partners, LLC v. Rodney Omanoff, et al., and Counterclaims,*  
3 Index No. 650973/2017 (N.Y. Sup. Ct., N.Y. County) (“Forefront  
4 Partners Action”)

5 On June 19, 2019, the Plaintiff in the Forefront Partners Action filed a  
6 motion in this Court to lift the stay of actions under the Receiver Oder. (Doc. No.  
7 81.) The Court denied that motion by its order entered July 17, 2019 (Doc. No.  
8 96). The parties to the Forefront Partners Action entered into a stipulation  
9 approved by the New York Court that stays the Forefront Partners Action as to  
10 the claims, cross claims and claims against Brendan Ross, DLI TC, LLC, Direct  
11 Lending Investments, LLC, Direct Lending Income Fund, L.P., VoIP Guardian  
12 Partners I, LLC until such time as the receivership and/or the VoIP bankruptcy  
13 are resolved.

14 B. *Alfred Jackson, et al. v. Deloitte & Touche, LLP, Deloitte Tax, LLP,*  
15 *and Opus Fund Services (USA) LLC*, Case No. 20GDCV00419 (Cal.  
16 Sup. Ct., Los Angeles) (“Jackson Action”)

17 On April 28, 2020, a group of investors filed suit in Los Angeles Superior  
18 Court against Deloitte & Touche, LLP, Deloitte Tax, LLP, and Opus Fund  
19 Services (USA) LLC (“Opus”) alleging claims for misrepresentation. Opus  
20 removed the case to the Central District of California and filed a motion to  
21 compel arbitration. On July 31, 2020, the Receivership Court issued an order  
22 denying the motion to compel arbitration and remanding the case to state court.  
23 In connection with the global settlement with the Deloitte Entities, the claims  
24 against Deloitte & Touche in this proceeding have now been resolved, narrowing  
25 the claims and defendants in this case. Opus Fund continues to seek to prosecute  
26 its cross claims in connection with this case.

27  
28

1 **VII. Cayman Activities**

2 The Receiver and his professionals continued to spend time coordinating  
3 with counsel and Cayman Island professionals to monitor the liquidation of  
4 DLIFF. They worked closely with Cayman Island professionals to research and  
5 evaluate information and documents and prepare material in connection with  
6 investor requests, claims review, distributions and bank accounts. Any time spent  
7 by the Receiver in his role as a Joint Official Liquidator is being charged to the  
8 DLIFF Cayman Liquidation. The compensation requested as a Joint Official  
9 Liquidator is subject to the approval process in the Cayman courts.

10  
11 DATED: February 23, 2026 RAINES FELDMAN LITTRELL LLP

12 By: /s/ Kathy Bazoian Phelps  
13 Kathy Bazoian Phelps  
14 Counsel for Bradley D. Sharp  
15 Permanent Receiver  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# EXHIBIT 1

**Consolidated Direct Lending Investments Receivership Domestic Entities** <sup>[1]</sup>

**Three Month Actual v. Budget: DOMESTIC ENTITIES**

\$ in 000's

	10.1.25 - 12.31.25			
	Actual	Budget	Favorable (Unfavorable)	
			\$ Var	% Var
<b>Receipts</b>				
Net Portfolio Collections	\$ 1	\$ -	\$ 1	NM
Money Market Interest Income	143	-	143	NM
Total Net Portfolio Collections (see schedule on pg. 2)	144	-	144	NM
Other Receipts	-	-	-	NM
Total Other Receipts	-	-	-	NM
Total Receipts	144	-	144	NM
<b>Disbursements:</b>				
Payroll	124	100	(24)	(24%)
Other Operating (see schedule on pg. 3)	20	39	19	48%
OCP Services (see schedule on pg. 4)	10	26	16	60%
Operating Disbursements	154	165	11	6%
Professionals: <sup>[2]</sup>				
Bradley D. Sharp / DSI - General	94	80	(14)	(17%)
Bradley D. Sharp / DSI - DLIF	18	15	(3)	(22%)
Raines Feldman Littrell LLP - General	24	15	(9)	(57%)
Raines Feldman Littrell LLP - DLIF	0	15	15	98%
BRG	11	5	(6)	(111%)
Stretto	11	17	6	34%
Goldberg Kohn	11	-	(11)	(100%)
Total Professionals	169	147	(22)	(15%)
<b>Total Operating Disbursements</b>	<b>323</b>	<b>312</b>	<b>(11)</b>	<b>(4%)</b>
EA + D&P Settlement DLIF Investor Claim Distributions <sup>[3]</sup>	761	-	(761)	NM
Tax Payments <sup>[4]</sup>	2,272	-	(2,272)	NM
Total Disbursements	3,357	312	(3,045)	NA
<b>Net Cash Flow</b>	<b>\$ (3,213)</b>	<b>\$ (312)</b>	<b>\$ (2,901)</b>	<b>NM</b>
Cash, Beginning Balance (Book)	\$ 38,388	\$ 43,369	\$ (4,981)	NM
Net Cash Flow	(3,213)	(312)	(2,901)	NM
<b>Cash, Ending Balance (Book)</b>	<b>\$ 35,175</b>	<b>\$ 43,057</b>	<b>\$ (7,882)</b>	<b>NM</b>

Note: Variances may be due to timing differences.

[1] Direct Lending Investments, LLC, Direct Lending Income Fund, L.P., DLI Capital, Inc., DLI Lending Agent, LLC, DLI Assets Bravo, LLC, and their successors, subsidiaries and affiliated entities have been consolidated and are collectively referred to in this report as the "Consolidated Direct Lending Investments Receivership Domestic Entities."

[2] Budgeted Professional fees and expenses are subject to court approval. Actual fees and expenses are presented on an actual and accrual basis and are subject to change based upon receipt of invoices.

[3] Budget amount represents funding of bank accounts used solely for holding EisnerAmper + Duff & Phelps Settlement proceeds. Actual amount represents Class 4B DLIF Claim Distributions to non-party investors.

[4] Tax payments include an IRS payment of \$1,730,214 and a California FTB payment of \$542,135, both related to 2025 taxes.

**Consolidated Direct Lending Investments Receivership Domestic Entities**

**Summary of Total Portfolio Collections**

*\$ in 000's*

	<b>4.1.19 - 9.30.25</b>	<b>10.1.25 - 12.31.25</b>	<b>Total</b>
<b>Money Market Interest</b>	\$ 5,215	\$ 143	\$ 5,358
<b>Normal Course Interest Payments</b>	37,518	-	37,518
<b>Full/Partial Payoff - Principal, Interest and Penalties</b>			
Total Full/Partial Payoff - Principal, Interest and Penalties	249,934	-	249,934
Remittance to Third Party <sup>[1]</sup>	(30,597)	-	(30,597)
<b>Net Full/Partial Payoff - Principal, Interest and Penalties</b>	219,338	-	219,338
Wholly Owned Loan - Principal & Interest	12,238	1	12,239
Remittance to Third Party <sup>[2]</sup>	(3,298)	-	(3,298)
<b>Net Wholly Owned Loan - Principal &amp; Interest</b>	8,941	1	8,942
<b>Total Net Portfolio Collections</b>	<b>\$ 271,011</b>	<b>\$ 144</b>	<b>\$ 271,155</b>

[1] Net Cash Principal & Interest remittances to Quanta related to \$0.904M for Investment S, and to DLG related to \$12.600M for Investment S, \$10.708M for Investment T, and \$6.385M for FastPay Partners.

[2] Net Cash remittance of \$919K to Pier Asset Management in connection with the Dealstruck sale, and \$2.371M of Principal & Interest to DLG for Quarterspot receipts (3/2019-1/2022), and \$8K paid to Titan Asset Purchasing LLC for pass through of Interest on Quarterspot loans purchased in 2021.

Consolidated Direct Lending Investments Receivership Domestic Entities  
Actual v. Budget: Other Operating Disbursements

	10.1.25 - 12.31.25			
	Actual	Budget	Favorable (Unfavorable)	
			\$ Var	% Var
<b>GP</b>				
<b>General &amp; Administrative</b>				
BizFilings	\$ -	\$ 500	\$ 500	100%
<b>IT Services &amp; Software</b>				
Adobe	144	225	81	36%
Advanced Networks Solutions	9,888	10,200	312	3%
Atlassian	10	36	26	72%
AWS	304	960	656	68%
Broadvoice	220	225	5	2%
Corodata	226	225	(1)	(%)
Dropbox	240	360	120	33%
Send2fax.com	36	45	9	20%
<b>Total GP</b>	<b>11,068</b>	<b>12,776</b>	<b>1,708</b>	<b>13%</b>
<b>Fund</b>				
<b>General &amp; Administrative</b>				
BizFilings	-	1,000	1,000	100%
<b>Other Operating Expenses</b>				
Independent Consultants – Loan Recovery Services	-	11,000	11,000	100%
Lien Solutions	-	7,500	7,500	100%
<b>Total Fund</b>	<b>-</b>	<b>19,500</b>	<b>19,500</b>	<b>100%</b>
<b>Other <sup>[1]</sup></b>	<b>9,020</b>	<b>6,000</b>	<b>(3,020)</b>	<b>(50%)</b>
<b>Total Other Operating Disbursements</b>	<b>\$ 20,088</b>	<b>\$ 38,276</b>	<b>\$ 18,188</b>	<b>48%</b>

Note: Variances may be due to timing differences.

[1] Other disbursements include bank fees, domain name subscription fe

**Consolidated Direct Lending Investments Receivership Domestic Entities**

**Actual v. Budget: OCP Services Disbursements**

\$ in 000's

	10.1.25 - 12.31.25			
	Actual	Budget	Favorable (Unfavorable) \$ Var	% Var
<b>Fund</b>				
Inspira Financial	\$ -	\$ 1	\$ 1	100%
Parker, Simon & Kokolis, LLC <sup>[1]</sup>	-	3	3	100%
	-	4	4	100%
<b>GP</b>				
Lucas, Horsfall, Murphy & Pindroh, LLP	1	1	0	28%
Elite Discovery	10	21	11	54%
	10	22	12	53%
<b>Total OCP Services Disbursements</b>	<b>\$ 10</b>	<b>\$ 26</b>	<b>\$ 16</b>	<b>60%</b>

Note: Variances may be due to timing differences.

[1] Budgeted amounts include out-of-pocket expenses and contingency collections fees.

**Consolidated Direct Lending Investments Receivership Domestic Entities**  
**Accrued Professional Fees/Bank Cash Reconciliation**  
 Month Ending December 31, 2025

Cash Balance per Cumulative Actual (Book)	\$ 35,174,723
Add: Accrued and Unpaid Professional Fees <sup>[1]</sup>	
Receiver - DSI (April 2019 through December 2025)	1,497,669
Receiver - DSI - DLIF (January 2021 through December 2025)	218,000
DSI - Investment T (July 2020 through December 2025)	528,977
Raines Feldman Littrell - General (April 2021 through December 2025)	268,950
Raines Feldman Littrell - Litigation (April 2023 through December 2025)	21,930
Raines Feldman Littrell - DLIF (April 2021 through December 2025)	4,343
Raines Feldman Littrell - Investment T (August 2021 through December 2025)	58,113
Berkeley Research Group (April 2019 through December 2025)	105,809
Stretto - (October 2020 through December 2025)	27,352
Goldberg Kohn LTD (December 2019 through December 2025)	446,185
Total	3,177,329
Actual Bank Cash Balance	\$ 38,352,053

[1] Actual Professional fees and expenses are accrued and shown in the disbursements category as available or as estimated. Such fees and expenses are subject to court approval.

**Consolidated Direct Lending Investments Receivership Domestic Entities**

**Bank Cash Balance**

As of December 31, 2025

<b>Account #</b>	<b>Bank Name</b>	<b>Entity</b>	<b>Balance</b>
<u>Pre- Receivership Bank Accounts</u>			
x1602	Wells Fargo DLI Assets Bravo Operating (MM)	DLI Assets Bravo, LLC	143,807
			<u>143,807</u>
<u>Metropolitan Bank Accounts</u>			
x4164	Metropolitan Bank	DLI Assets Bravo, LLC	483,376
x4229	Metropolitan Bank	DLI Assets Bravo, LLC	4,680
ICS-Accts	Metropolitan Bank / Western Alliance Bank	DLI Assets Bravo, LLC	32,010,571
ICS x4202	Metropolitan Bank	Direct Lending Income Fund, L.P.	2,056,787
ICS x4752	Metropolitan Bank (D&O Settlement Funds)	DLI Receivership	456,748
ICS x5176	Metropolitan Bank (EA + D&P Settlement Funds)	DLI Receivership	35,079
ICS x2479	Metropolitan Bank (Claims Distr.)	DLI Receivership	190,067
ICS-Accts	Western Alliance Bank (Prof Fees Holdbacks)	DLI Receivership	2,845,986
x4156	Metropolitan Bank - GP Operating	Direct Lending Investments, LLC	124,952
			<u>38,208,246</u>
	<b>Total Cash</b> <sup>[1]</sup>		<u><b>38,352,053</b></u>

[1] Excludes DLIFF bank account balance.

# EXHIBIT 2

Bradley D. Sharp, Receiver  
Development Specialists, Inc.  
333 South Grand Avenue Suite 4100  
Los Angeles, CA 90071  
(213) 617-2717

# STANDARDIZED FUND ACCOUNTING REPORT

CIVIL - RECEIVERSHIP FUND

---

Consolidated Direct Lending Investments Receivership Entities <sup>1</sup>

Civil Court Docket No. 2:19-cv-02188-DSF-MRW

Reporting Period 10/01/2025 to 12/31/2025

**Note 1:** Direct Lending Investments, LLC, Direct Lending Income Fund, L.P., Direct Lending Income Feeder Fund, Ltd., DLI Capital, Inc., DLI Lending Agent, LLC, DLI Assets Bravo, LLC, and their successors, subsidiaries and affiliated entities have been consolidated and are collectively referred to in this report as the “Consolidated Direct Lending Investments Receivership Entities.”

STANDARDIZED FUND ACCOUNTING REPORT for Consolidated Direct Lending Investments Receivership Domestic Entities - Cash Basis  
 Receivership; Civil Court Docket No. 2:19-cv-02188-DSF-MRW  
 Reporting Period 10/01/2025 to 12/31/2025

<b>Fund Accounting (See Instructions):</b>			
	<u>Detail</u>	<u>Subtotal</u>	<u>Grand Total</u>
<b>Line 1</b>	<b>Beginning Balance (As of 10/1/2025):</b>		\$ 41,486,638
	<i>Increases in Fund Balance:</i>		
<b>Line 2</b>	<b>Business Income</b>	960	
<b>Line 3</b>	<b>Cash and Securities</b>	-	
<b>Line 4</b>	<b>Interest/Dividend Income</b>	143,095	
<b>Line 5</b>	<b>Business Asset Liquidation</b>	-	
<b>Line 6</b>	<b>Personal Asset Liquidation</b>	-	
<b>Line 7</b>	<b>Third-Party Litigation Income</b>	-	
<b>Line 8</b>	<b>Miscellaneous - Other</b>	-	
	<b>Total Funds Available (Lines 1 - 8):</b>	144,055	41,630,692
	<i>Decreases in Fund Balance:</i>		
<b>Line 9</b>	<b>Disbursements to Investors</b>	761,207	761,207
<b>Line 10</b>	<b>Disbursements for Receivership Operations:</b>		
<i>Line 10a</i>	<i>Disbursements to Receiver or Other Professionals</i>	90,407	
<i>Line 10b</i>	<i>Business Asset Expenses</i>	154,676	
<i>Line 10c</i>	<i>Personal Asset Expenses</i>	-	
<i>Line 10d</i>	<i>Investment Expenses</i>	-	
<i>Line 10e</i>	<i>Third-Party Litigation Expenses</i>		
	1. Attorney Fees	-	
	2. Litigation Expenses	-	
	<i>Total Third-Party Litigation Expenses</i>	-	
<i>Line 10f</i>	<i>Tax Administrator Fees and Bonds</i>	-	
<i>Line 10g</i>	<i>Federal and State Tax Payments</i>	2,272,349	
	<b>Total Disbursements for Receivership Operations</b>	2,517,433	
<b>Line 11</b>	<b>Disbursements for Distribution Expenses Paid by the Fund:<sup>(1)</sup></b>		
<i>Line 11a</i>	<i>Distribution Plan Development Expenses:</i>		
	1. Fees:		
	Fund Administrator	-	
	Independent Distribution Consultant (IDC)	-	
	Distribution Agent	-	
	Consultants	-	
	Legal Advisers	-	
	Tax Advisers	-	
	2. Administrative Expenses	-	
	3. Miscellaneous	-	
	<i>Total Plan Development Expenses</i>	-	
<i>Line 11b</i>	<i>Distribution Plan Implementation Expenses:</i>		
	1. Fees:		
	Fund Administrator	-	
	IDC	-	
	Distribution Agent	-	
	Consultants	-	
	Legal Advisers	-	
	Tax Advisers	-	
	2. Administrative Expenses	-	
	3. Investor Identification:		
	Notice/Publishing Approved Plan	-	
	Claimant Identification	-	
	Claims Processing	-	
	Web Site Maintenance/Call Center	-	
	4. Fund Administrator Bond	-	
	5. Miscellaneous	-	
	6. Fed Acct. for Investor Restitution (FAIR) Reporting Expense	-	
	<i>Total Plan Implementation Expenses</i>	-	
	<b>Total Disbursements for Distribution Expenses Paid by the Fund</b>	-	
<b>Line 12</b>	<b>Disbursements to Court/Other:</b>		
<i>Line 12a</i>	<i>Investment Expenses/Court Registry Investment System (CRIS) Fees</i>	-	
<i>Line 12b</i>	<i>Federal Tax Payments</i>	-	
	<b>Total Disbursements to Court/Other</b>	-	
	<b>Total Funds Disbursed (Line 9 - 12)</b>		\$ 3,278,640
<b>Line 13</b>	<b>Ending Balance (As of 12/31/2025):</b>		\$ 38,352,053

Note: This report excludes all cash activity for Direct Lending Income Feeder Fund, Ltd ("DLIFF"). Transfers between the accounts of the consolidated entities on this report are not included in the schedules contained herein.

STANDARDIZED FUND ACCOUNTING REPORT for Consolidated Direct Lending Investments Receivership Domestic Entities - Cash Basis  
 Receivership; Civil Court Docket No. 2:19-cv-02188-DSF-MRW  
 Reporting Period 10/01/2025 to 12/31/2025

	<u>Detail</u>	<u>Subtotal</u>	<u>Grand Total</u>
<b>Line 14</b>	<b>Ending Balance of Fund - Net Assets:</b>		
<i>Line 14a</i>	Cash & Cash Equivalents		\$ 38,352,053
<i>Line 14b</i>	Investments		TBD
<i>Line 14c</i>	Other Assets or Uncleared Funds		TBD
	<b>Total Ending Balance of Fund - Net Assets</b>		<b>\$ 38,352,053</b>

<b>OTHER SUPPLEMENTAL INFORMATION:</b>			
	<u>Detail</u>	<u>Subtotal</u>	<u>Grand Total</u>
	<i>Report of Items NOT To Be Paid by the Fund:</i>		
<b>Line 15</b>	<b>Disbursements for Plan Administration Expenses Not Paid by the Fund:</b>		
<i>Line 15a</i>	<i>Plan Development Expenses Not Paid by the Fund:</i>		
	1. Fees:		
	Fund Administrator		
	IDC		
	Distribution Agent		
	Consultants		
	Legal Advisers		
	Tax Advisers		
	2. Administrative Expenses		
	3. Miscellaneous		
	<i>Total Plan Development Expenses Not Paid by the Fund</i>		
<i>Line 15b</i>	<i>Plan Implementation Expenses Not Paid by the Fund:</i>		
	1. Fees:		
	Fund Administrator		
	IDC		
	Distribution Agent		
	Consultants		
	Legal Advisers		
	Tax Advisers		
	2. Administrative Expenses		
	3. Investor Identification:		
	Notice/Publishing Approved Plan		
	Claimant Identification		
	Claims Processing		
	Web Site Maintenance/Call Center		
	4. Fund Administrator Bond		
	5. Miscellaneous		
	6. FAIR Reporting Expenses		
	<i>Total Plan Implementation Expenses Not Paid by the Fund</i>		
<i>Line 15c</i>	<i>Tax Administrator Fees &amp; Bonds Not Paid by the Fund</i>		
	<b>Total Disbursements for Plan Administration Expenses Not Paid by the Fund</b>		
<b>Line 16</b>	<b>Disbursements to Court/Other Not Paid by the Fund:</b>		
<i>Line 16a</i>	<i>Investment Expenses/CRIS Fees</i>		
<i>Line 16b</i>	<i>Federal Tax Payments</i>		
	<b>Total Disbursements to Court/Other Not Paid by the Fund</b>		
<b>Line 17</b>	<b>DC &amp; State Tax Payments</b>		
<b>Line 18</b>	<b>No. of Claims:</b>		
<i>Line 18a</i>	# of Claims Received This Reporting Period <sup>[2]</sup>		0
<i>Line 18b</i>	# of Claims Received Since Inception of Fund <sup>[2]</sup>		1,204
<b>Line 19</b>			
<i>Line 19a</i>	# of Claimants/Investors Paid This Reporting Period		552
<i>Line 19b</i>	# of Claimants/Investors Paid Since Inception of Fund		891

[1] Costs are reflected in Line 10 (Disbursements for Receivership Operations). Breaking out fees and expenses associated with the distribution plan specifically would be burdensome and can be provided upon request or gleaned from the fee applications of the Professionals.

[2] Does not include claims filed in the Cayman Liquidation.

STANDARDIZED FUND ACCOUNTING REPORT for Consolidated Direct Lending Investments Receivership Domestic Entities - Cash Basis  
Receivership; Civil Court Docket No. 2:19-cv-02188-DSF-MRW  
Reporting Period 10/01/2025 to 12/31/2025

Receiver:

By:   
(Signature)

Bradley D. Sharp  
(Printed Name)

Receiver  
(Title)

Date: February 6, 2026

# EXHIBIT 3

**Investment Portfolio Summary (Positions as of 12/31/2025)**

(\$ in millions)

					A	B	C	D	E = A + B + D	
#	Investment	Form of Investment	Collateral	Initial Inv. Date	Maturity Date	3/31/2019 Par Debt Amount	Net Advances / (Collections) - Principal	Net Advances / (Collections) - Interest	Principal Adjustments <sup>[1]</sup>	9/30/2025 Uncollected Balance
4	Investment N	Asset-Based Facility	Accounts receivable, purchase order finance and movie film finance	9/1/2015	3/14/2023	\$69.3	(\$0.5)	(\$24.2)	-	\$68.8
5	All Other Investments					\$720.3	(\$207.3)	(\$19.9)	(\$513.0)	-
<b>Total</b>						<b>\$789.6</b>	<b>(\$207.9)</b>	<b>(\$44.1)</b>	<b>(\$513.0)</b>	<b>\$68.8</b>

[1] Includes adjustments for full and partial write-downs of asset values in connection with discounted payoffs, debt to equity conversions and the Receiver's estimation of uncollectible amounts.

1 **RAINES FELDMAN LITTRELL LLP**  
Kathy Bazoian Phelps (State Bar No. 155564)  
2 *kphelps@raineslaw.com*  
1900 Avenue of the Stars, Suite 1900  
3 Los Angeles, California 90067  
Telephone: (310) 440-4100  
4 Facsimile: (310) 691-1943  
5 *Counsel for Bradley D. Sharp,*  
*Permanent Receiver*

6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION – LOS ANGELES**

11 SECURITIES AND EXCHANGE  
COMMISSION,

Case No.:2:19-cv-02188-DSF-MBKx

12  
13 Plaintiff,

**PROOF OF SERVICE**

14  
15 v.

16 DIRECT LENDING INVESTMENTS  
LLC,

17  
18 Defendant.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

I hereby declare under penalty of perjury pursuant to the laws of the state of California that I am a citizen of the United States, over the age of eighteen years and not a party to the within-entitled action. My business address is 1900 Avenue of the Stars, Suite 1900, Los Angeles, CA 90067; hchoi@raineslaw.com. On **February 23, 2026**, I served a copy of the within document(s):

- **TWENTY-EIGHTH STATUS REPORT OF PERMANENT RECEIVER BRADLEY D. SHARP [OCTOBER 1, 2025 TO DECEMBER 31, 2025] WITH EXHIBITS**

**X SERVED VIA ELECTRONIC TRANSMISSION/EMAIL:** On **February 23, 2026**, I served the following persons and/or entities at the by transmitting via electronic mail the document(s) listed above to the addresses set forth below:

- Daniel Prince, danielprince@paulhastings.com
- Matthew Dors, Esq., matthew.dors@collascrill.com
- Rupert Stanning, Esq., rupert.stanning@collascrill.com
- Christopher D. Johnson, cdj@cjacayman.com
- Jill Zadny, jz@cjacayman.com
- Karen Scott, ks@cjacayman.com
- Jacob A. Johnson, Alston & Bird LLP, jacob.johnson@alston.com
- Will Sugden, Alston & Bird LLP, will.sugden@alston.com
- Mark Rosenbaum, mrosenbaum@wrslawyers.com
- Howard J. Weg, hweg@hjadvisor.com
- Gavin Masuda, gmasuda@deloitte.com
- Michael Paris, mparis@nbparis.com
- Tyler Meade, tyler@meadefirm.com
- Michael Reiser, michael@reiserlaw.com
- Jeffrey Schneider, jcs@lklsg.com

- 1 Jason Kellogg, jk@lklsg.com
- 2 Lawrence Eigel, eigel@bespc.com
- 3 David E. Azar, dazar@milberg.com
- 4 Henry J. Kelston, hkelston@ahdootwolfson.com
- 5 Craig Holden, craig.holden@lewisbrisbois.com
- 6 Scott M. Ahmad, sahmad@winston.com
- 7 Antonia M. Apps, aapps@milbank.com
- 8 Evan C. Borges, [eborges@ggtriallaw.com](mailto:eborges@ggtriallaw.com)
- 9 Brian J. Hennigan, bhennigan@hueston.com
- 10 Vicki Chou, vchou@hueston.com
- 11 Peter I. Altman, paltman@akingump.com

12 **X TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC**  
 13 **FILING (NEF):** On February 23, 2026, Pursuant to L.R. 5-3.2.1, the document  
 14 listed above will be served by the court via NEF and hyperlink to the document  
 15 which effects electronic service on counsel who are registered with the CM/ECF  
 16 system.

17 I am readily familiar with the firm's practice of collection and processing  
 18 correspondence for mailing. Under that practice it would be deposited with the  
 19 U.S. Postal Service on that same day with postage thereon fully prepaid in the  
 20 ordinary course of business. I am aware that on motion of the party served,  
 21 service is presumed invalid if postal cancellation date or postage meter date is  
 22 more than one day after date of deposit for mailing in affidavit.

23 I declare under penalty of perjury under the laws of the state of  
 24 California that the above is true and correct. Executed on **February 23,**  
 25 **2026,** at Los Angeles, California.

*/s/ Helen Choi*  
 Helen Choi

26  
 27  
 28

1 **RAINES FELDMAN LITTRELL LLP**  
Kathy Bazoian Phelps (State Bar No. 155564)  
2 *kphelps@raineslaw.com*  
1900 Avenue of the Stars, Suite 1900  
3 Los Angeles, California 90067  
Telephone: (310) 440-4100  
4 Facsimile: (310) 691-1943  
5 *Counsel for Bradley D. Sharp,*  
*Permanent Receiver*  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION – LOS ANGELES**

11 SECURITIES AND EXCHANGE  
COMMISSION,

12  
13 Plaintiff,

14 v.

15  
16 DIRECT LENDING INVESTMENTS  
LLC,

17  
18 Defendant.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No.:2:19-cv-02188-DSF-MBKx

**MEMORANDUM OF POINTS  
AND AUTHORITIES IN  
SUPPORT OF MOTION OF  
RECEIVER FOR (A) APPROVAL  
AND PAYMENT OF FEES AND  
EXPENSES FOR OCTOBER 1,  
2025 THROUGH DECEMBER 31,  
2025 OF:**  
**(1) RECEIVER BRADLEY D.  
SHARP;**  
**(2) RAINES FELDMAN  
LITTRELL LLP;**  
**(3) DEVELOPMENT  
SPECIALISTS, INC.;**  
**(4) BERKELEY RESEARCH  
GROUP;**  
**(5) GOLDBERG KOHN LTD;**  
**(6) BANKRUPTCY  
MANAGEMENT  
SOLUTIONS DBA  
STRETTO; AND**  
**(B) FOR APPROVAL OF FORM  
AND/OR LIMITATION OF**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**NOTICE UNDER LOCAL CIVIL  
RULE 66-7**

*MOTION, ORDER AND  
SUPPORTING DECLARATIONS  
FILED HEREWITH*

Date: March 30, 2026  
Time: 1:30 p.m.  
Dept.: Courtroom 7D  
Place: United States District Court  
Western Division  
350 West 1st Street  
Los Angeles, CA 90012

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**TABLE OF CONTENTS**

Page

**I. INTRODUCTION AND RELEVANT FACTUAL BACKGROUND** ..... 1

**II. SUMMARY OF RECEIVER’S AND PROFESSIONALS’ SERVICES AND ACTIVITIES DURING THE EXPENSE PERIOD**..... 4

**A. Summary of Services of Receiver and DSI** ..... 4

**1. Case Administration** ..... 4

**2. Management of Business Operations** ..... 5

**3. Cayman Activities** ..... 5

**4. Analysis of Assets and Recovery** ..... 5

**5. Receivership Reporting** ..... 7

**6. Creditor Communication and Claims Analysis** ..... 8

**7. DLIF Investor Claims, Analysis, Communication and Distributions**..... 8

**8. Litigation and Discovery** ..... 9

**9. Reimbursable Expenses** ..... 9

**B. Summary of Services of Receiver’s General Counsel Raines Feldman**..... 10

**1. 4664-001: Case and Asset Administration** ..... 10

**2. 4664-004: DLIF Investor Matters**..... 12

**C. Summary of Services of Tax Accountants BRG** ..... 12

**D. Summary of Services of Goldberg Kohn Ltd.** ..... 12

**E. Summary of Services of Claims Agent Bankruptcy Management Solutions DBA Stretto as Claims Agent**..... 13

**III. THE FEES AND EXPENSES OF THE RECEIVER AND HIS PROFESSIONALS DURING THE EXPENSE PERIOD SHOULD BE APPROVED** ..... 14

**A. The Services Provided Were Reasonable, Necessary, and Appropriate** ..... 14

**IV. NOTICE OF THE HEARING ON THIS MOTION SHOULD BE DEEMED APPROPRIATE AND SUFFICIENT** ..... 17

**V. CONCLUSION** ..... 18

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

TABLE OF AUTHORITIES

**Cases**

*CFTC v. Topworth Int’l, Ltd.*,  
205 F.3d 1107 (9th Cir. 1999) ..... 15

*Federal Trade Commission v. Capital Acquisitions & Management Corp.*,  
2005 U.S. Dist. LEXIS 18504 (N.D. Ill. August 26, 2005)..... 16

*In re First Alliance Mortgage Co.*,  
269 B.R. 428 (C.D. Cal. 2001) ..... 17

*In re San Vicente Medical Partners Ltd.*,  
962 F. 2d 1402 (9th Cir. 1992) ..... 16

*SEC v. Capital Consultants, LLC*,  
397 F.3d 733 (9<sup>th</sup> Cir. 2005)..... 14, 15

*SEC v. Hardy*,  
803 F. 2d 1034 (9<sup>th</sup> Cir. 1986)..... 14

*Securities and Exchange Commission v. Elliott*,  
953 F. 2d 1560 (11<sup>th</sup> Cir. 1992) ..... 15, 16

**Treatises**

*A Treatise on the Law and Practice of Receivers*  
§ 637, p. 1052 (3<sup>rd</sup> ed. 1992) ..... 15

**Regulations**

11 U.S.C. section 102(1)(A) ..... 17

Local Civil Rule 66-8 ..... 17

F.R. Civ. P. 5(a) and (c)..... 17

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION AND RELEVANT FACTUAL BACKGROUND**

Bradley D. Sharp (“Receiver”) as permanent receiver for the estate of defendant Direct Lending Investments LLC (“DLI”), and Direct Lending Income Fund, L.P. (“DLIF”), Direct Lending Income Feeder Fund, Ltd. (“DLIFF”), DLI Capital, Inc., DLI Lending Agent, LLC, and DLI Assets Bravo LLC and their successors, subsidiaries and affiliated entities (the “Receivership Entities”) through this Motion seeks approval for his twenty-seventh fee motion for the payment of fees of the Receiver and his professionals. The Motion covers the services rendered by the Receiver’s professionals for the three-month period from October 1, 2025 through December 31, 2025 (“Expense Period”).

Through counsel, the Receiver has confirmed through counsel for the SEC that the SEC does not have any opposition to the Motion.

On May 14, 2019, the Court granted the Receiver’s motion to employ Diamond McCarthy LLP (“Diamond McCarthy”) as his general counsel, Development Specialists, Inc. (“DSI”) as his accountants and deputies, and Berkeley Research Group (“BRG”) as his tax accountants, with compensation to be made upon application after notice and a hearing pursuant to Section XI of the Receiver Order. (Doc. No. 44). On June 21, 2021, the Court issued an order granting the Receiver’s motion to substitute in Raines Feldman LLP (“Raines Feldman”) as his general counsel (Doc. No. 649). On November 9, 2022, the Court issued an order granting substitution of Sullivan, Blackburn & Pratt in the limited litigation matters being handled by Diamond McCarthy. (Doc No. 858). On May 23, 2023, the Court issued an order granting the substitution of Raines Feldman LLP in the limited matters being handled by Sullivan Blackburn & Pratt (“SBP”) (Doc No. 893).

Some of the highlights of the activity of the Receiver and his professionals

1 during the Expense Period are summarized as follows and more fully described  
2 below and in the declarations filed in support of this Motion:

3 1. The process of distributing the settlement proceeds from  
4 EisnerAmper and Duff & Phelps was completed.

5 2. The Receiver obtained final approval of the settlement agreement  
6 with the directors and officers and the plaintiff groups and made the distribution  
7 of the settlement proceeds.

8 3. The Receiver collected the settlement funds from the settlement  
9 with Brendan Ross and his family and related entities (the “Ross Parties”)  
10 regarding litigation pending against the Strawberry Peak Trust and other alleged  
11 fraudulent transfer claims against the Ross Parties.

12 4. Since the Distribution Plan (Doc. No. 321) was approved by the  
13 Court on December 14, 2020 (Doc. No. 337), the Receiver has made three interim  
14 distributions after which the Rising Tide distribution level now sits at 48.13%.  
15 The Receiver has also made an additional \$18,299,383.76 to 888 DLIF investors  
16 and \$8,050,616.24 to DLIFF in connection with the special Deloitte settlement  
17 distribution pursuant to the order approving the settlement with DLI’s former  
18 auditors, Deloitte & Touche, LLP entered on October 14, 2022 (Doc No. 854).  
19 The Receiver also made the special distribution of the Duff & Phelps,  
20 EisnerAmper and D&O settlement sums.

21 5. The Receiver has continued to field calls and email inquiries from  
22 investors regarding distribution matters.<sup>1</sup>

23 6. The Receiver filed his Twenty-Seventh Status Report on December  
24 9, 2025 (Doc No. 1045), keeping the investors apprised of the status in the case.  
25 The report provided summaries of DLI’s business and lists of the Receivership

26 \_\_\_\_\_  
27 <sup>1</sup> The time spent on matters relating solely to DLIF has been segregated and  
28 allowed fees and costs in this category will be paid from DLIF’s portion of  
distributions.

1 Entities’ loan and investment portfolios, their status, and the balances  
 2 outstanding, in addition to detailing the efforts the Receiver has made with  
 3 respect to working to collect outstanding loans, liquidate assets, settle disputes,  
 4 pursue financing and restructuring of portfolio positions, and pursue litigation  
 5 claims in order to maximize recovery for investors and creditors of the  
 6 receivership estate.

7 7. The aggregate estimated budget for Receiver and professional fees  
 8 and expenses for those professionals subject to this Motion for the Expense  
 9 Period was approximately \$147,000 subject to a variance of ten percent (10%) in  
 10 the overall budget. The actual fees and expenses incurred by the Receiver and his  
 11 professionals during the Expense Period for which the Receiver seeks approval  
 12 total \$169,898.07 in fees and \$340.06 in costs summarized as follows:

Professional	Fees	Expenses
Receiver	\$2,760.00	-0-
DSI	\$109,258.15 (\$18,257.57 of which to be paid in Class 4A)	\$52.42
Stretto	\$12,614.50	\$27.93
Raines Feldman	\$23,525.90 (\$323.00 of which to be paid in Class 4A)	\$259.71
BRG	\$10,536.50	-0-
Goldberg Kohn	\$11,183.02	-0-
<b>Total</b>	<b>\$169,898.07</b>	<b>\$340.06</b>

1 Thus, the professional fees for this period were well below the budgeted amount.  
2 Given the broad scope of activities and extensive work performed by the Receiver  
3 and his professionals during the three-month period, the fees and expenses  
4 requested are reasonable.

5 **II. SUMMARY OF RECEIVER’S AND PROFESSIONALS’ SERVICES**  
6 **AND ACTIVITIES DURING THE EXPENSE PERIOD**

7 The fees and expenses for which the Receiver seeks approval, and the  
8 services rendered by the Receiver and his professionals during this Expense  
9 Period, are summarized below and described in detail in the billing records  
10 attached to the declarations filed in support of this Motion.

11 **A. Summary of Services of Receiver and DSI**

12 For the Receiver, this motion seeks approval of his fees in the amount of  
13 \$2,760.00, and an order authorizing payment of 80% of his approved fees, with  
14 the balance of unpaid fees payable through the final fee motion, unless otherwise  
15 ordered by the Court.

16 For DSI, the Receiver’s accountants and deputies, the motion seeks  
17 approval of its fees in the amount of \$109,258.15, and costs in the amount of  
18 \$52.42, and an order authorizing payment of 100% of its approved fees and 100%  
19 of its approved costs.

20 Without limiting the detail of the Receiver’s and DSI’s services, the  
21 following are summary descriptions of the services provided during the Expense  
22 Period:

23 **1. Case Administration**

24 The Receiver and DSI continued to coordinate and participate in numerous  
25 telephone calls with DLI employees, counsel, retained professionals, vendors,  
26 individual investors, investor groups and other parties to discuss case matters,  
27 court and investor reporting, distribution matters, tax reserve, cash and reporting  
28

1 matters and other outstanding case issues. DSI continued to prepare information,  
2 analyses and documents for counsel, for internal purposes and for other needs in  
3 addition to administrative tasks necessary to properly manage the case. The  
4 Receiver and DSI also evaluated various court documents and coordinated with  
5 numerous professionals to discuss case matters.

6 **2. Management of Business Operations**

7 The Receiver and DSI continued to work with the one remaining DLI  
8 employee cash collections, accounting and financial reporting, vendor and  
9 professional service payments, investor relations, the third interim distribution,  
10 and other special distributions. As the business of DLI is wound down, the  
11 Receiver determined to terminate the last employee during the fourth quarter.

12 **3. Cayman Activities**

13 The Receiver and his deputies at DSI continued to spend time coordinating  
14 with counsel and Cayman Island professionals to manage the liquidation of  
15 DLIFF. The Receiver and DSI worked closely with Cayman Island professionals  
16 to research and evaluate information and documents and prepare material in  
17 connection with investor requests, portfolio matters, distributions, bank accounts  
18 and third-party litigation efforts.

19 Any time spent by the Receiver in his role as a Joint Official Liquidator is  
20 being charged to the DLIFF Cayman Liquidation. The compensation requested as  
21 a Joint Official Liquidator is subject to the approval process in the Cayman courts.

22 **4. Analysis of Assets and Recovery**

23 The Receiver and his professionals are actively seeking to liquidate the  
24 remaining assets and maximize the value of those assets. When the Receiver was  
25 initially appointed on April 1, 2019, the estate had cash on hand of \$31.7 million.  
26 Since the Receiver's appointment through September 30, 2025, the Receiver has  
27 recovered approximately an additional \$252 million in portfolio collections  
28

1 (including interest recovery but excluding funds collected on behalf of and either  
2 reserved for or remitted to third parties) and has collected millions of dollars in  
3 settlement of litigation claims. The remaining assets are summarized as follows:

4 a. Investment N

5 The uncollected balance on Investment N as of September 30, 2025 is  
6 \$68.8 million. However, as noted in the prior report, the remaining  
7 loan/investment portfolio has a number of issues that make recovery of all or a  
8 large portion of the outstanding balance challenging. The Receiver and his team  
9 continued to negotiate a cash settlement with the counterparty for Investment N  
10 and the parties reached terms, subject to documentation. The Receiver utilized  
11 the services of Goldberg Kohn to assist in the documentation of the settlement  
12 agreement, which is not yet finalized. The Receiver continues to maintain  
13 confidential the identity of the specific borrowers on the list of loan/investment  
14 portfolios.

15 b. Remaining Two QuarterSpot Loans

16 The Receiver has focused on resolving two non-performing loans through  
17 negotiated payouts. The Receiver is actively marketing these two loans to  
18 potential buyers.

19 c. Note Secured by a Gas Station

20 The Receiver and his team plan to complete the review and resolution of a  
21 note secured by a gas station, a property previously tied to one of DLI's  
22 investment counterparts. The property has changed hands and undergone notable  
23 improvements since 2019, and the Receiver is assessing the potential for a modest  
24 cash recovery. The next steps include confirming net proceeds after fees and  
25 reconciling prior DLI advances. The Receiver anticipates final resolution of this  
26 matter by early to mid-2026.

27 d. Equity Interests Transferred from B. Ross

28

1 As part of the settlement with Brendan Ross, the Receivership Estate  
2 received four equity investments originally made by Strawberry Peak Trust. The  
3 value of these assets has not yet been determined. Depending on each asset’s  
4 stage and performance, the Receiver will either hold the investment through its  
5 distribution cycle – such as the LP interest in a venture capital fund – or sell the  
6 position when appropriate.

7 e. VoIP Guardian

8 Although the March 31, 2019 par value of the VoIP loan on the  
9 Receivership Entities’ book is approximately \$202.6 million, the Receiver is not  
10 expecting a recovery of nearly the amount of the outstanding balance, as there  
11 are substantial questions and concerns regarding collection of the underlying  
12 foreign telecommunications accounts receivable. VoIP is in a Chapter 7  
13 bankruptcy, which fact alone reflects the challenges in collection. In addition, the  
14 collection of approximately \$22 million from VoIP receivables continues to  
15 depend on the outcome of proceedings in the VoIP case. The settlement with  
16 authorities in the Netherlands was approved. The VoIP trustee continues to  
17 pursue other litigation claims. The Receiver and his team have worked with the  
18 Trustee’s counsel to provide certain documentary information requested by the  
19 Trustee to assist in the recovery efforts. The Receiver continued to communicate  
20 with the VoIP Trustee regarding pending litigation claims against former insiders  
21 of VoIP.

22 **5. Receivership Reporting**

23 DSI spent time preparing monthly, quarterly and semi-annual operational  
24 and financial reports, including the investment portfolio collections, summary  
25 and analysis, Standardized Fund Accounting Report, Cash Receipts and  
26 Disbursements Reports, Budgets and Actual vs. Budget analyses. Additional time  
27 was spent preparing numerous supporting schedules in connection with claims,  
28

1 distributions, professional fees and causes of action. Time was also spent on  
2 compiling, reviewing and reporting on investor and creditor inquiries. Further  
3 time was spent on preparing status reports, including research and analysis.

4 **6. Creditor Communication and Claims Analysis**

5 DSI continued to prepare reconciling schedules in connection with creditor  
6 claims filed with the Receivership estate. DSI continued to monitor creditor  
7 inquiries to address the status of DLI’s claims review and conclusions.

8 DSI also maintained the FAQ section on the Receiver’s website, which  
9 provides information on DLI, the status of the loan portfolio, the status of the  
10 receivership, the claims process in a receivership, distributions, non-portfolio  
11 recovery efforts, tax filings and other similar information.

12 **7. DLIF Investor Claims, Analysis, Communication and**  
13 **Distributions**

14 DSI evaluated various investment records of the Receivership Entity to  
15 confirm investors’ corresponding information, such as their history of  
16 subscriptions, redemptions and distributions and transfers. Additionally, DSI  
17 performed multiple reviews and reconciliations of investor account information  
18 such as custodian changes, contact information and other related data in  
19 connection with communication and distribution efforts for investors.

20 DSI spent time communicating with investors regarding the claims  
21 distribution methodology and distribution calculations.

22 DSI continued to track investor inquiries pertaining to the status of DLI  
23 and the timing and procedures for payment of claims, including information on  
24 distribution calculations. Responses were provided to investors through the  
25 Receiver’s website, email and phone calls. DSI and the Receiver also held phone  
26 calls with investor groups to discuss the status of the investment portfolio, claims  
27 and distribution matters and other pending receivership matters.

1 The Receiver and DSI are billing all work related to DLIF Investors  
2 separately and will charge such fees directly to DLIF.

3 **8. Litigation and Discovery**

4 The Receiver finalized the last settlements of the litigation claims. All  
5 litigation has been concluded. The litigation claims resulted in recoveries to the  
6 estate in the following amounts:

- 7 a. DLIF Net Winner Claims: \$28,638,901.73 in cash payments and  
8 offset distributions pursuant to other settlement agreements.
- 9 b. DLIF Commission Claims: \$1,016,848.21 in cash payments and  
10 offset distributions pursuant to other settlement agreements.
- 11 c. Brendon Ross and Strawberry Peak: \$6.1 million in cash and  
12 recovery of investments of unknown value.
- 13 d. Deloitte & Touche: \$18,299,383.76 to 888 DLIF investors, and  
14 DLIFF separately received a total of \$8,050,616.24.
- 15 e. EisnerAmper: \$10 million. The unrepresented investors received  
16 a total of \$3,500,000. DLIF investors received \$2,367,883 and  
17 the DLIFF Cayman liquidators received \$1,132,117.
- 18 f. Kroll & Associates: \$6.9 million. The unrepresented investors  
19 received a total of \$2,415,000. DLIF investors received  
20 \$1,633,839 and the DLIFF Cayman liquidators received  
21 \$781,161.
- 22 g. Director and Officer Claims: The unrepresented investors  
23 received a total of \$4,450,000. DLIF investors received  
24 \$3,090,408, and the DLIFF Cayman liquidators received  
25 \$1,359,592.

26 **9. Reimbursable Expenses**

27 DSI's incurred expenses included FedEx and photocopy charges. These  
28

1 expenses were incurred in connection with general receivership assistance, cash  
2 recoveries and portfolio and counterparties.

3 **B. Summary of Services of Receiver’s General Counsel Raines**  
4 **Feldman**

5 1. For Raines Feldman, this motion seeks approval of its fees in the  
6 amount of \$23,525.90, and costs in the amount of \$259.71 and an order  
7 authorizing payment of 100% of the approved fees, with the balance of unpaid  
8 fees payable through the final fee motion, unless otherwise ordered by the Court.

9 The services of Raines Feldman are detailed in the billing records  
10 appended to the Declaration of Kathy Bazoian Phelps in support of this Motion.  
11 As the Receiver’s general counsel during the Expense Period, Raines Feldman  
12 has assisted the Receiver in addressing issues relating to the general  
13 administration of the estate including legal assistance with the continued  
14 implementation of the first, second and third interim distributions, the special  
15 Deloitte & Touche distribution, and the prosecution and settlement of certain  
16 litigation claims.

17 The fees incurred by Raines Feldman have been divided in two categories:  
18 4664-001: Case and Asset Administration \$ 23,332.10  
19 4664-004: DLIF Investor Matters \$ 193.80  
20 Costs: \$ 259.71

21 Without limiting the detail of Raines Feldman’s performed services, the  
22 following are summary descriptions of the services provided during the Expense  
23 Period:

24 **1. 4664-001: Case and Asset Administration**

25 During the Expense Period, Raines Feldman performed a number of  
26 necessary tasks. Since its substitution as General Counsel and Contingency  
27 Litigation Counsel, which the court approved on June 21, 2021 (Doc. No. 649),  
28

1 Raines Feldman has continued to monitor the distribution process and numerous  
2 calls and emails from investors pertaining to distributions and claim calculations.

3 Raines Feldman substituted in as counsel on certain other matters that were  
4 previously been handled by Diamond McCarthy and Sullivan Blackburn and  
5 Pratt pursuant to the orders entered on February 21, 2023 and May 23, 2023.

6 Raines Feldman has continued to work with the Receiver and his team to  
7 obtain court approval of, and to consummate the settlements relating to claims  
8 against third party claims, including claims against Brendan Ross and related  
9 parties and the directors and officers. The firm continued to monitor the status  
10 of Ross's criminal suits.

11 In addition to its communications with the Receiver and the investors,  
12 Raines Feldman has kept the SEC apprised of proposed motions and met and  
13 conferred with the SEC on its position relating to a variety of matters.

14 On December 9, 2025, the Receiver filed his Twenty-Seventh Status  
15 Report covering the period of July 1, 2025 to September 30, 2025 [Doc. No.  
16 1045].

17 The Receiver filed a motion for approval and payment of fees of the  
18 Receiver and his professionals on December 9, 2025, for the period from July 1,  
19 2025 to September 30, 2025 (Doc. No. 1046). The Court approved the motion by  
20 order entered on January 5, 2026 (Doc No. 1048).

21 The firm has also continued to monitor the VoIP bankruptcy case and  
22 reported to the Receiver regarding the status.

23 The firm also worked with Receiver team in connection with the  
24 negotiations over Investment N and to prepare draft papers to obtain court  
25 approval of a settlement.

26  
27  
28

1                                   **2.     4664-004: DLIF Investor Matters**<sup>2</sup>

2             Raines Feldman communicated with several investors who had inquiries  
3 relating to the distribution of the Duff & Phelps, EisnerAmper settlement and  
4 Director & Officers settlement proceeds. The firm responded to investors by  
5 responding to emails and phone calls. Raines Feldman has responded to  
6 individual investor inquiries and provided appropriate information to keep  
7 investors informed about the progress of the case.

8                                   **C.     Summary of Services of Tax Accountants BRG**

9             The services performed by BRG regarding the tax accounting matters are  
10 detailed in the billing statements attached to the Declaration of Vernon L. Calder  
11 as Exhibit “1.” This Motion seeks approval of BRG’s fees in the amount of  
12 \$10,536.50, and an order authorizing payment of 100% of its approved fees.

13             During this Expense Period, BRG prepared 2024 returns for the pre-  
14 receivership entities and submitted the completed returns to the proper taxing  
15 authorities. BRG analyzed 2024 financial activity of DLI Receivership, prepared  
16 supporting tax workpaper files and the 2024 federal and state income tax returns  
17 for DLI Receivership. BRG also evaluated 2025 estimated taxes.

18                                   **D.     Summary of Services of Goldberg Kohn Ltd.**

19             The services performed by the law firm of Goldberg Kohn Ltd. (“Goldberg  
20 Kohn”) are detailed in the billing statements attached to the Declaration of  
21 Dimitri G. Karcazes filed herewith and summarized in the Karcazes declaration.  
22 Goldberg Kohn’s engagement as the Receiver’s special creditors’ rights counsel  
23 commenced on September 5, 2019, when the Receiver filed a motion to authorize  
24 its employment from that date, which was subsequently authorized by the Court’s  
25 order issued October 2, 2019 (Doc. No. 142).

26 \_\_\_\_\_  
27 <sup>2</sup> 4664-004 will be billed to Class 4A from DLIF’s claim distribution and will not  
28 be charged to Class 3 in the pro rata division between DLIFF in Class 3 and  
DLIF in Class 4.

1 By this Motion, Goldberg Kohn seeks approval of its fees in the amount of  
2 \$11,183.02, and an order authorizing payment of 100% of its approved fees. The  
3 fees requested by Goldberg Kohn in this application relate to its assistance in  
4 documenting a settlement relating to Investment N.

5 The services performed by Goldberg Kohn during the Expense Period are  
6 outlined in the invoices appended to the Garrett Declaration as Exhibit “1.”

7 **E. Summary of Services of Claims Agent Bankruptcy Management**  
8 **Solutions DBA Stretto as Claims Agent**

9 The services performed by Bankruptcy Management Solutions dba Stretto  
10 (“Stretto”) as claims agent for the Receiver are detailed in the billing statements  
11 attached to the Receiver’s Declaration as Exhibit “3.” On June 18, 2019, the  
12 Court authorized the Receiver to employ Stretto effective as of April 9, 2019, to  
13 be compensated from the assets of the receivership estate. (Doc. No. 79).

14 By this Motion, Stretto requests reimbursement of \$12,614.50 in fees and  
15 \$27.93 in costs incurred during this reporting period.

16 Stretto has continued to assist the Receiver in his tasks by performing a  
17 number of services, including maintaining the receivership website and  
18 performing updates so that the Receiver can promptly and cost effectively keep  
19 investors and creditors advised of the status of the case. Stretto continues to  
20 process incoming creditor inquiries and provide noticing and service of process  
21 assistance to the Receiver.

22 The Receiver is advised that the administrative review of the court docket  
23 charged by Stretto serves a number of purposes including:

- 24 • Stretto reviews each pleading to identify documents that cause  
25 changes to the claims register (e.g., Notices of Transfer, Claim  
26 Objections, Stipulations, etc.), changes to the creditor matrix (e.g.,  
27 creditor changes of address), or changes to the core/2002 service list

- 1 • Stretto standardizes the pleading titles for easier public usage
- 2 • Stretto monitors newly filed documents to determine if any
- 3 additional noticing is required
- 4 • Confirmation of completeness of the court docket as presented on
- 5 Stretto’s public facing case website. This includes inspecting the
- 6 PDF to ensure that pleadings were downloaded and assembled
- 7 correctly

8 The Receiver believes that the time spent on administrative review is  
9 reasonable and appropriate given the complex nature of the case, the large  
10 number of filings in the case, and the large number of investors who rely on the  
11 Receiver’s website for information.

12 **III. THE FEES AND EXPENSES OF THE RECEIVER AND HIS**  
13 **PROFESSIONALS DURING THE EXPENSE PERIOD SHOULD BE**  
14 **APPROVED**

15 **A. The Services Provided Were Reasonable, Necessary, and**  
16 **Appropriate**

17 The “primary purpose of equity receiverships is to promote orderly and  
18 efficient administration of the estate by the district court for the benefit of  
19 creditors.” *SEC v. Hardy*, 803 F.2d 1034, 1038 (9<sup>th</sup> Cir. 1986). To that end,  
20 district courts have broad powers to determine what is necessary for the  
21 administration and supervision of an equity receivership. *See SEC v. Capital*  
22 *Consultants, LLC*, 397 F.3d 733, 738 (9<sup>th</sup> Cir. 2005) . As the Ninth Circuit  
23 explained:

24 A district court’s power to supervise an equity  
25 receivership and to determine the appropriate action  
26 to be taken in the administration of the receivership  
27 is extremely broad. The district court has broad  
28 powers and wide discretion to determine the  
appropriate relief in an equity receivership.

1 *Id.* (emphasis added; citations omitted); *see also CFTC v. Topworth Int’l, Ltd.*,  
2 205 F.3d 1107, 1115 (9th Cir. 1999) (“This court affords ‘broad deference’ to the  
3 [district] court’s supervisory role and ‘we generally uphold reasonable  
4 procedures instituted by the district court that serve th[e] purpose’ of orderly and  
5 efficient administration of the receivership for the benefit of creditors.”).

6 It is a fundamental tenet of receivership law that expenses of  
7 administration incurred by the receiver, including those of the receiver, its  
8 counsel and others employed by the receiver, constitute priority expenses for  
9 which compensation should be paid from the assets of the receivership. As  
10 explained in a leading treatise, *Clark on Receivers*:

11 The obligations and expenses which the court creates in  
12 its administration of the property are necessarily burdens  
13 on the property taken possession of, and this,  
14 irrespective of the question who may be the ultimate  
15 owner, or who may have the preferred lien, or who may  
16 invoke the receivership. The appointing court pledges its  
good faith that all duly authorized obligations incurred  
during the receivership shall be paid.

17 2 Clark, Ralph Ewing, *A Treatise on the Law and Practice of Receivers* § 637, p.  
18 1052 (3<sup>rd</sup> ed. 1992).

19 The Receiver is an officer of the Court charged with myriad duties under  
20 the Receiver Order, many of which have no relationship to recovery of assets or  
21 increasing the funds available for distribution to creditors. Because of the nature  
22 of the administrative and other services required in receiverships, the benefit a  
23 receiver confers on receivership property cannot be determined based solely on  
24 the increase or decrease in the value of property in the receiver’s possession. As  
25 the Court explained in *Securities and Exchange Commission v. Elliott*, 953 F.2d  
26 1560, 1577 (11th Cir. 1992)

27 [I]t is sometimes difficult to ascertain what type of  
28

1 benefits a receiver has bestowed on receivership  
2 property. . . . [A] benefit to a secured party may take  
3 more subtle forms than a bare increase in monetary  
4 value. Even though a receiver may not have increased,  
5 or prevented a decrease in, the value of the collateral, if  
6 a receiver reasonably and diligently discharges his  
duties, he is entitled to compensation. [Citations  
omitted.]

7 *Securities and Exchange Commission v. Elliott*, 953 F.2d at 1577.

8 The Court has broad discretion in determining the reasonableness of fees  
9 to be awarded to a receiver. *See In re San Vicente Medical Partners Ltd.*, 962  
10 F.2d 1402, 1409-10 (9th Cir. 1992). The Court may evaluate the time and effort  
11 expended by the Receiver with respect to specific projects and aspects of the  
12 administration of the estate and may look to a number of different factors under  
13 the case law in approving receiver's and counsel's fees. *Id.*

14 The Motion establishes that the Receiver and his professionals rendered  
15 extensive services and obtained significant and excellent results for the  
16 receivership estate during the Expense Period. *See Federal Trade Commission v.*  
17 *Capital Acquisitions & Management Corp.*, 2005 U.S. Dist. LEXIS 18504 (N.D.  
18 Ill. August 26, 2005). This Motion is the Receiver's ninth fee motion covering  
19 services rendered during the Expense Period, a period during which the Receiver,  
20 his accountants, counsel, and tax professionals continued to address numerous  
21 administrative issues and responsibilities as well as pursue litigation claims.

22 The efforts of the Receiver and his professionals during the Expense Period  
23 as set forth in this Motion have significantly benefited the estate, investors, and  
24 creditors. The Receiver and the professionals performed these services efficiently  
25 and successfully. The fees and expenses requested are reasonable, appropriate,  
26 and should be approved and authorized to be paid as requested.

27  
28

1 **IV. NOTICE OF THE HEARING ON THIS MOTION SHOULD BE**  
2 **DEEMED APPROPRIATE AND SUFFICIENT**

3 The Receiver has (a) served notice of the hearing on this Motion on the  
4 parties and by mail to the known non-investor creditors of the Receivership  
5 Entity; and (b) posted the notice of hearing and the Motion on the Receiver's  
6 website (<https://cases.stretto.com/dli>). The Receiver has also directed Stretto to  
7 email the notice of hearing to all investors within one business day following the  
8 filing of the Motion. This notice complies with the provisions of Local Civil Rule  
9 66-7 to the extent that notice to investors is required. The Receiver requests that  
10 the Court approve this form of notice as reasonable, appropriate, and the most  
11 cost-effective means of providing notice of the hearing under the circumstances,  
12 as there are approximately 975 investors both in the United States and overseas,  
13 and to the extent necessary, to approve the notice given as reasonable, limited  
14 notice appropriate under the circumstances and in the interests of time and cost.  
15 As a court of equity supervising the receivership estate, the Court may make  
16 appropriate administrative orders governing the receivership, including  
17 limitations on and changes in notice and other procedures. *See* F.R. Civ. P. 5(a)  
18 and (c) (authorizing the court to modify service procedures when numerous  
19 defendants are involved in litigation). Local Civil Rule 66-8 directs a receiver to  
20 administer receivership estates in a manner similar to estates in bankruptcy,  
21 where orders limiting notice are routinely granted. *See In re First Alliance*  
22 *Mortgage Co.*, 269 B.R. 428, 442 (C.D. Cal. 2001) (referencing in *dicta* in the  
23 court's recitation of facts the bankruptcy court's order limiting notice issued in  
24 that case); 11 U.S.C. section 102(1)(A) ("after notice and a hearing" means "after  
25 such notice as is appropriate in the particular circumstances, and such opportunity  
26 for hearing as is appropriate in the particular circumstances").

27  
28

1 **V. CONCLUSION**

2 For the foregoing reasons, the Receiver respectfully requests that this  
3 Court grant the relief as requested in the Motion and all other appropriate relief.

4  
5 DATED: February 23, 2026 RAINES FELDMAN LITTRELL LLP

6  
7 By: /s/ Kathy Bazoian Phelps  
8 Kathy Bazoian Phelps  
9 Counsel for Bradley D. Sharp  
10 Permanent Receiver  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **RAINES FELDMAN LITTRELL LLP**  
Kathy Bazoian Phelps (State Bar No. 155564)  
2 *kphelps@raineslaw.com*  
1900 Avenue of the Stars, Suite 1900  
3 Los Angeles, California 90067  
Telephone: (310) 440-4100  
4 Facsimile: (310) 691-1943

5 *Counsel for Bradley D. Sharp,*  
*Permanent Receiver*  
6

7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION – LOS ANGELES**

11 SECURITIES AND EXCHANGE  
COMMISSION,

12  
13 Plaintiff,

14 v.  
15

16 DIRECT LENDING INVESTMENTS  
LLC,

17  
18 Defendant.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No.:2:19-cv-02188-DSF-MBKx

**DECLARATION OF BRADLEY  
D. SHARP IN SUPPORT OF  
MOTION OF RECEIVER FOR  
(A) APPROVAL AND PAYMENT  
OF FEES AND EXPENSES FOR  
OCTOBER 1, 2025 THROUGH  
DECEMBER 31, 2025 OF:**

- (1) RECEIVER BRADLEY D. SHARP;**
- (2) RAINES FELDMAN LITTRELL LLP;**
- (3) DEVELOPMENT SPECIALISTS, INC.;**
- (4) BERKELEY RESEARCH GROUP;**
- (5) GOLDBERG KOHN LTD;**
- (6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; AND**

**(B) FOR APPROVAL OF FORM  
AND/OR LIMITATION OF  
NOTICE UNDER LOCAL CIVIL**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**RULE 66-7**

Date: March 30, 2026  
Time: 1:30 p.m.  
Dept.: Courtroom 7D  
Place: United States District Court  
Western Division  
350 West 1st Street  
Los Angeles, CA 90012

1 I, Bradley D. Sharp, declare:

2 1. I am the Permanent Receiver appointed by this Court for the estate  
3 of Direct Lending Investments LLC, Direct Lending Income Fund, L.P., Direct  
4 Lending Income Feeder Fund, Ltd., DLI Capital, Inc., DLI Lending Agent, LLC,  
5 and DLI Assets Bravo, LLC, and their successors, subsidiaries, and affiliated  
6 entities (“Receivership Entities”) pursuant to the Preliminary Injunction and  
7 Permanent Receiver Order entered on April 1, 2019.

8 2. This declaration is submitted in support of the Motion of Receiver  
9 for (A) Approval and Payment of Fees and Expenses for October 1, 2025 through  
10 December 31, 2025 incurred by the Receiver and his professionals; and (B)  
11 Approval of Form and/or Limitation of Notice Under Local Civil Rule 66-7  
12 (“Motion”).

13 3. I have personal knowledge of the facts set forth below, and if called  
14 to testify, could competently testify thereto.

15 4. Through my counsel, I have conferred with counsel for the SEC and  
16 have confirmed that the SEC does not have any opposition to the Motion.

17 5. Attached as Exhibit “1” hereto is a true and correct copy of the  
18 billing statements itemizing the services rendered by me in my capacity as  
19 Receiver for general receivership matters other than DLIF investor matters in the  
20 amount of \$2,760.00 for the period of October 1, 2025 through December 31,  
21 2025 (“Expense Period”). I have performed services in the total amount of  
22 \$2,760.00 during the Expense Period. The fee amount reflects a 20% discount.

23 6. Attached as Exhibit “2-1” hereto is a true and correct copy of the  
24 billing statements itemizing the services rendered and costs incurred by my  
25 accountants and deputies at my company Development Specialists, Inc. (“DSI”)  
26 during the Expense Period with respect to DLIF investor matters in the amount  
27 of \$18,257.57. Attached as Exhibit “2-2” is a true and correct copy of the billing  
28

1 statements reflecting services performed by DSI on all other matters related to  
2 the Receivership Entity in the amount of \$91,000.58 and costs of \$52.42. In total,  
3 DSI seeks fees in the amount of \$109,258.15 (reflects 15% discount) and costs  
4 in the amount of \$52.42. DSI incurred nominal expenses in the course of its  
5 duties, including FedEx and copying charges.

6 7. As detailed in my previous declaration in support of my motion for  
7 an order authorizing DSI's employment (Dkt. No. 17-1), DSI agreed to discount  
8 its rates for its professionals by 15%.

9 8. I supervise and direct the professionals and staff of DSI with respect  
10 to the work they have performed, as detailed more fully in the billing statements  
11 and this declaration.

12 9. All of my time records and the time recorded by employees of DSI  
13 reflect time recorded in the regular and ordinary course of administering the  
14 receivership estate contemporaneously with the services provided.

15 10. I have read the Motion and the billing statements attached to this  
16 declaration. To the best of my knowledge, information, and belief formed after  
17 reasonable inquiry, the Motion and all the fees and expenses requested in the  
18 attached billing statements are true, accurate, and comply with the Billing  
19 Instructions for Receivers in Civil Actions Commenced by the U.S. Securities  
20 and Exchange Commission.

21 11. The fees that DSI and I have charged are reasonable, necessary, and  
22 commensurate with the skill and experience required for the activity performed.  
23 Neither DSI nor I have expended time unnecessarily, and we have rendered  
24 efficient and effective services.

25 12. As elaborated below, the issues involved in this case are extremely  
26 complex. DSI and I have had to address a multitude of difficult issues. As  
27

28

1 Receiver, I understand, and DSI understands, our duty to provide the best and  
2 most efficient service for the benefit of the estate, its creditors, and investors.

3 13. DSI has not included in the amount for which reimbursement is  
4 sought the amortization of the cost of any investment, equipment, or capital  
5 outlay. DSI and I are not making a profit on any reimbursable service.

6 14. As reflected in the Motion and the billing statements attached  
7 hereto, both DSI and I performed reasonable services for the benefit of the estate.  
8 The personnel at DSI, acting under my direction, perform accounting services  
9 and also services as my deputies in administering the estate and assisting me with  
10 a broad range of matters that have arisen in the receivership. Given the  
11 complexity of this case and the breadth of issues involved, it is impossible for me  
12 to perform all the required services by myself.

13 15. DSI and I continued to coordinate and participate in numerous  
14 telephone calls with DLI employees, counsel, retained professionals, individual  
15 investors, investor groups and other parties to discuss case matters, court and  
16 investor reporting, investment portfolio matters, tax matters and other  
17 outstanding case issues. DSI continued to prepare information, analyses, and  
18 documents for counsel, for internal purposes and for other needs in addition to  
19 administrative tasks necessary to properly manage the case. The DSI team and I  
20 also evaluated various court pleadings and coordinated with numerous  
21 professionals to discuss case matters.

22 16. DSI and I continued to work with the one remaining DLI employee  
23 cash collections, accounting and financial reporting, vendor and professional  
24 service payments, investor relations, the third interim distribution, and other  
25 special distributions. As the business of DLI is wound down, I elected to  
26 terminate the last employee during the fourth quarter.

27 17. The DSI team and I continued to spend time coordinating with  
28

1 counsel and Cayman Island professionals to manage the liquidation of DLIFF.  
2 DSI and I worked with Cayman Island professionals to continue to prepare  
3 material in connection with investor requests, portfolio matters, distributions,  
4 bank accounts and third-party litigation efforts. Any time spent in my role as a  
5 Joint Official Liquidator is being charged to the DLIFF Cayman Liquidation.  
6 The compensation requested as a Joint Official Liquidator is subject to the  
7 approval process in the Cayman courts.

8 18. DSI and I continued our efforts to maximize the value of the loan  
9 portfolio and evaluated counterparty and borrower proposals, financial reporting  
10 and projections and certain underlying collateral to manage investment positions  
11 to support the collection and maximization of value from the loan portfolio. I  
12 continued to direct efforts in recovering loans and continued to pursue  
13 settlements of various non-performing loans through negotiated payment terms.

14 19. I focused on resolving two non-performing loans through negotiated  
15 payouts, and I am actively marketing these two loans to potential buyers.

16 20. My team and I plan to complete the review and resolution of a note  
17 secured by a gas station, a property previously tied to one of DLI's investment  
18 counterparts. The property has changed hands and undergone notable  
19 improvements since 2019, and the Receiver is assessing the potential for a modest  
20 cash recovery. The next steps include confirming net proceeds after fees and  
21 reconciling prior DLI advances. I anticipate final resolution of this matter by  
22 early to mid-2026.

23 21. As part of the settlement with Brendan Ross, the Receivership Estate  
24 received four equity investments originally made by Strawberry Peak Trust. The  
25 value of these assets has not yet been determined. Depending on each asset's  
26 stage and performance, I will either hold the investment through its distribution  
27 cycle – such as the LP interest in a venture capital fund – or sell the position when  
28

1 appropriate.

2 22. Although the March 31, 2019 par value of the VoIP loan on the  
3 Receivership Entities' book is approximately \$202.6 million, I am not expecting  
4 a recovery of nearly the amount of the outstanding balance, as there are  
5 substantial questions and concerns regarding collection of the underlying foreign  
6 telecommunications accounts receivable. VoIP is in a Chapter 7 bankruptcy,  
7 which fact alone reflects the challenges in collection. In addition, the collection  
8 of approximately \$22 million from VoIP receivables continues to depend on the  
9 outcome of proceedings in the VoIP case. The settlement with authorities in the  
10 Netherlands was approved. The VoIP trustee continues to pursue other litigation  
11 claims. My team and I have worked with the Trustee's counsel to provide certain  
12 documentary information requested by the Trustee to assist in the recovery  
13 efforts. I continued to communicate with the VoIP Trustee regarding pending  
14 litigation claims against former insiders of VoIP.

15 23. DSI continued to evaluate options to protect DLI's interests in  
16 Investment N. Full recovery is not expected as one of the largest potential sources  
17 of repayment has resulted in significant litigation involving the borrower and  
18 another lender for which any potential recovery is unknown. The uncollected  
19 balance on Investment N as of September 30, 2025 is \$68.8 million. However, as  
20 noted in the prior report, the remaining loan/investment portfolio has a number  
21 of issues that make recovery of all or a large portion of the outstanding balance  
22 challenging. My team and I continued to negotiate a cash settlement with the  
23 counterparty for Investment N and the parties reached terms, subject to  
24 documentation. I utilized the services of Goldberg Kohn to assist in the  
25 documentation of the settlement agreement, which is not yet finalized. I continue  
26 to maintain confidential the identity of the specific borrowers on the list of  
27 loan/investment portfolios.

28



1 Receiver’s website, email and phone calls. DSI and I also held phone calls with  
2 investor groups to discuss the status of the investment portfolio, claims and  
3 distribution matters and other pending receivership matters.

4 30. I have recovered approximately \$29.6 million in cash from net  
5 winner investors and broker dealers and finders as of September 30, 2024.

6 31. DSI and I are billing all work related to DLIF Investors separately  
7 and will charge such fees directly to DLIF.

8 32. DSI and I continued to monitor the settlements of the litigation  
9 claims, including receipts and disbursements of settlement funds.

10 33. Time was spent in communicating with counsel and reviewing  
11 support information relating to these third parties’ claims.

12 34. My counsel and I continued discussions with the various involved  
13 parties, including participating in numerous conference calls and documenting  
14 settlement proposals.

15 35. Attached as Exhibit “3” hereto are true and correct copies of the  
16 invoices received from Bankruptcy Management Solutions dba Stretto, my  
17 claims agent for services performed during the Expense Period. I have reviewed  
18 the bills provided by Stretto and have no objection thereto. Stretto performed  
19 services in the total amount of \$12,614.50 and incurred costs in the amount of  
20 \$27.93 during the Expense Period.

21 36. Stretto has assisted me in performing a number of important tasks.  
22 Stretto maintains the receivership website and performs updates on the website  
23 so that I can promptly and cost-effectively keep investors and creditors advised  
24 of the status of the case. Stretto also processes incoming creditor and non-creditor  
25 investor inquiries, responds to creditors and non-creditor investors, and during  
26 the Expense Period disbursed distributions. Stretto also provides noticing and  
27 service of process assistance to me.

28

1 37. I am advised that the administrative review of the court docket  
2 charged by Stretto serves a number of purposes including:

- 3 • Stretto reviews each pleading to identify documents that cause changes  
4 to the claims register (e.g., Notices of Transfer, Claim Objections,  
5 Stipulations, etc.), changes to the creditor matrix (e.g., creditor changes  
6 of address), or changes to the core/2002 service list
- 7 • Stretto standardizes the pleading titles for easier public usage
- 8 • Stretto monitors newly filed documents to determine if any additional  
9 noticing is required
- 10 • Confirmation of completeness of the court docket as presented on  
11 Stretto’s public facing case website
  - 12 ○ This includes inspecting the PDF to ensure that pleadings were  
13 downloaded and assembled correctly

14 38. Stretto customarily provides these types of services in connection  
15 with its claims noticing services and believes that are required to ensure that the  
16 dockets is accurately maintained and accessible to the thousands of claimants in  
17 this case. I believe that the time spent on administrative review is reasonable and  
18 appropriate given the complex nature of the case, the large number of filings in  
19 the case, and the large number of investors who rely on the Receiver’s website  
20 for information.

21 39. Raines Feldman Littrell LLP (“Raines Feldman”) has performed  
22 general counsel services for me as Receiver in the case, assisting me in both  
23 administrative matters and in evaluating and handling certain litigation claims.  
24 The scope of the services provided by Raines Feldman are set forth in the invoices  
25 appended to the Declaration of Kathy Bazoian Phelps as Exhibit “1.” Raines  
26 Feldman’s billing statements reflect the 15% discount as applied to their regular  
27 rates.

1 40. Raines Feldman performed services in the total amount of  
2 \$23,525.90 and costs in the amount of \$259.71 during the Expense Period. I have  
3 reviewed the bills provided by Raines Feldman and have no objection thereto.

4 41. BRG is engaged as my tax advisor and the services performed  
5 during the Expense Period are outlined in the invoices appended to the Vernon  
6 Calder declaration as Exhibit "1." BRG performed services in the total amount  
7 of \$10,536.50 during the Expense Period. I have reviewed the bills provided by  
8 BRG and have no objection thereto.

9 42. Goldberg Kohn Ltd. ("Goldberg Kohn") performed a broad scope  
10 of services during the Expense Period as outlined in the invoices appended to the  
11 Declaration of Dimitri G. Karcazes as Exhibit "1." Goldberg Kohn's billing  
12 statements reflect the 15% discount as applied to their regular rates. Goldberg  
13 Kohn performed services in the total amount of \$11,183.02 during the Expense  
14 Period. I have reviewed the bills provided by Goldberg Kohn and have no  
15 objection thereto.

16 43. There are approximately 975 investors in the Receivership Entity  
17 both in the United States and overseas. I have a website for investors to obtain  
18 information regarding the receivership (<https://case.stretto.com/dli>).  
19 Additionally, I have directed Stretto to send by email the notice of hearing on this  
20 Motion to all investors.

21 I declare under penalty of perjury under the laws of the United States of  
22 America that the foregoing is true and correct. Executed on February 20, 2026 in  
23 South China Sea, ~~California~~.

24  
25   
26 Bradley D. Sharp

# EXHIBIT 1



REMIT TO:  
10 South LaSalle Street, Suite 3300, Chicago, IL 60603-1026  
Telephone: 312.263.4141 Telecopier: 312.263.1180

Date: 2/6/2025

Direct Lending Investments, LLC  
c/o Development Specialists, Inc.  
333 South Grand Avenue, Suite 4100  
Los Angeles, CA 90071

F.E.I.N. 36-2967476

Description of Services and Disbursements	Fees	Disbursements	Credits	Balance
For professional services rendered by Bradley D. Sharp from October 1, 2025 through December 31, 2025:				
Fees per attached category summary: 4.60 hours @ \$750.00 (an hour) 20% discount	\$3,450.00 (690.00) <u>\$2,760.00</u>			
Total				\$2,760.00
TIMELY PAYMENT OF INVOICES IS ALWAYS APPRECIATED.				PAY AMOUNT ABOVE

Direct Lending Investments, LLC  
 c/o Development Specialists, Inc.  
 333 South Grand Avenue  
 Suite 4100  
 Los Angeles CA 90071

			HOURS
11/03/2025	BDS	Virtual meeting with Kathy Phelps and Dan Ungheanu regarding remaining assets and timing of case closing, follow-up call with Dan Ungheanu regarding same.	0.80
	BDS	Correspondence with Mark Iammartino regarding update for the investors.	0.10
11/04/2025	BDS	Correspondence with Dan Ungheanu and Kathy Phelps regarding professional fee holdbacks.	0.20
11/06/2025	BDS	Correspondence with Dan Ungheanu and Maria Larsen regarding cash transfers.	0.10
11/12/2025	BDS	Emails with Mark Iammartino regarding [REDACTED] and [REDACTED]	0.20
	BDS	Review and approve invoices for payment.	0.10
	BDS	Review and approve fee application for filing.	0.20
11/19/2025	BDS	Correspondence with Dan Ungheanu and Kathy Phelps regarding final distribution and related investor FAQ language.	0.30
11/26/2025	BDS	Review and approve invoices for payment.	0.10
12/02/2025	BDS	Video call with Dan Ungheanu regarding cash management.	0.40
12/03/2025	BDS	Emails with Mark Iammartino regarding the Capstone settlement.	0.20
12/04/2025	BDS	Correspondence with Kathy Phelps and Mark Iammartino regarding the [REDACTED] settlement.	0.20
12/09/2025	BDS	Correspondence with Dan Ungheanu regarding the separation agreement draft.	0.20
	BDS	Review the draft separation agreement.	0.20
12/10/2025	BDS	Correspondence with Dan Ungheanu regarding release agreement.	0.20
	BDS	Review and approve invoices for payment.	0.10
12/11/2025	BDS	Correspondence with Dan Ungheanu regarding release agreement.	0.20
12/12/2025	BDS	Correspondence with Dan Ungheanu regarding release agreement.	0.20
	BDS	Correspondence with [REDACTED] regarding closing bank accounts.	0.10
12/19/2025	BDS	Review and approve invoices for payment, correspondence with Dan Ungheanu regarding same.	0.10

Direct Lending Investments, LLC

Page: 2  
02/06/2026

			HOURS	
12/22/2025	BDS	Correspondence with Kathy Phelps regarding status with VoIP.	0.10	
12/29/2025	BDS	Review and approve termination of employee benefits, correspondence with [REDACTED] regarding same.	0.10	
12/30/2025	BDS	Correspondence with Mandy Yedidsion regarding Bill.com payments.	0.20	
		FOR THE FOREGOING PROFESSIONAL SERVICES RENDERED:	4.60	<u>3,450.00</u>

## RECAPITULATION

<u>CONSULTANT</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
B. D. Sharp	4.60	\$750.00	\$3,450.00

TOTAL CURRENT WORK	3,450.00
--------------------	----------

BALANCE DUE	<u>\$3,450.00</u>
-------------	-------------------

# EXHIBIT 2-1



REMIT TO:  
10 South LaSalle Street, Suite 3300, Chicago, IL 60603-1026  
Telephone: 312.263.4141 Telecopier: 312.263.1180

Date: 2/6/2026

Direct Lending Investments, LLC  
c/o Development Specialists, Inc.  
333 South Grand Avenue, Suite 4100  
Los Angeles, CA 90071

F.E.I.N. 36-2967476

Description of Services and Disbursements	Fees	Disbursements	Credits	Balance
For professional services rendered from October 1, 2025 through December 31, 2025 in connection with the DLIF matter:				
Fees per attached category summary: 15% discount	\$21,479.50 (3,221.93) \$18,257.57			
Total				\$18,257.57
TIMELY PAYMENT OF INVOICES IS ALWAYS APPRECIATED.				PAY AMOUNT ABOVE

Direct Lending Investments, LLC  
 c/o Development Specialists, Inc.  
 333 South Grand Avenue  
 Suite 4100  
 Los Angeles CA 90071

			HOURS
10/13/2025	DU	Telephone call with investor regarding distribution matter.	0.40
10/14/2025	DU	Evaluate status of directors and officers distribution; correspondence with the DLI team regarding same.	0.50
10/16/2025	DU	Prepare preliminary rising tide distribution analysis in connection with final distribution.	4.20
10/17/2025	DU	Review changes to the claims register.	0.20
10/24/2025	DU	Evaluate status of directors and officers checks.	0.80
	DU	Work on updates to preliminary financial rising tide distribution analysis and supporting schedules.	3.50
	DU	Telephone call with investor regarding information request; work on preparing documents and cash schedules.	1.80
10/29/2025	DU	Telephone call with investor regarding information request; prepare request package in connection with same.	1.10
10/31/2025	DU	Work on revisions to draft rising tide distribution analysis and supporting schedules.	3.50
	DU	Telephone call with investor regarding treatment of claim and rising tide scenario analysis.	0.80
11/03/2025	DU	Evaluate status of distribution checks; reconcile transaction schedule to distribution analysis.	1.80
11/12/2025	DU	Evaluate updates to distribution checks status.	0.30
	DU	Telephone call with investor regarding treatment of claim and recovery analysis.	0.80
11/14/2025	MY	E-mail correspondence with DLI Team regarding uncashed checks in connection with DLIF Investors.	0.20
11/17/2025	DU	Gather proof of claim documents and supporting investment documents in connection with claim review.	1.00
	DU	Research investor inquiry in connection with cash transactions.	0.40
11/18/2025	MY	E-mail correspondence with the DLI team regarding uncashed distribution checks.	0.20
	DU	Correspondence with the DLI team regarding issues with changing beneficiaries and reissue of distribution checks.	0.40
	DU	Work on draft final distribution analysis and supporting schedules.	3.20
11/19/2025	MY	TLO search in order to retrieve contact information	

Direct Lending Investments, LLC

Page: 2  
 02/06/2026

			HOURS
		for Howard Sobel, telephone call with Dr. Howard Sobel regarding his distribution check, and follow-up e-mail to DLI team.	0.50
MY		TLO search in order to retrieve contact information for Stephen Cucci; email and telephone call with same.	0.50
MY		Telephone call with the DLI team regarding Dr. Sobel's distribution check, follow-up e-mail to Dr. Sobel.	0.30
DU		Correspondence with Bradley Sharp and Kathy Phelps regarding final distribution and related investor FAQ language.	0.30
DU		Correspondence with the DLI team regarding check stops and reissue of distribution checks.	0.20
11/21/2025	DU	Review claims register for changes.	0.30
	DU	Telephone call with investor regarding distribution calculations.	0.40
	DU	Telephone call with investor regarding distribution calculations.	0.40
11/24/2025	DU	Review claims register for changes.	0.30
12/02/2025	DU	Telephone call with investor regarding status of case and distributions.	0.50
12/03/2025	DU	Evaluate status of investor checks; prepare updates to internal tracker and path to reaching out to investors with uncashed checks.	1.20
12/05/2025	DU	Work on final distribution analysis and supporting schedules.	2.00
12/08/2025	DU	Work on investor relations and documentation matter; correspondence with the DLI team regarding same.	1.50
	DU	Work on investor inquiries and information requests.	1.10
12/10/2025	DU	Work with the DLI team on investor inquiries and updates to FAQs.	2.20
	DU	Evaluate distribution check reissues and communicate with investors regarding calculations and reissues.	1.10
12/11/2025	DU	Work on updates to distribution deposit schedule and reconcile to bank activity; prepare list of outstanding checks for reissues.	1.80
	DU	Update distribution analysis in connection with claims information; prepare notes in connection with same.	1.50
12/12/2025	DU	Work on revisions to final distribution analysis and supporting schedules.	3.00
12/15/2025	DU	Correspondence with the DLI team and Mandy Yedidsion regarding check reissues.	0.30
	DU	Work on distribution check reissue schedule and reconcile to distribution tracker.	1.10
12/22/2025	DU	Evaluate status of distribution checks and reconcile to tracker.	0.80
12/23/2025	DU	Work on distribution analysis update and supporting schedules.	3.80

Direct Lending Investments, LLC

Page: 3  
02/06/2026

			HOURS	
12/30/2025	DU	Work on investor data request, including cash flow accounting and distribution calculations.	1.10	
	DU	Updated distribution analysis and corresponding schedules.	1.40	
FOR THE FOREGOING PROFESSIONAL SERVICES RENDERED:			<u>52.70</u>	<u>21,479.50</u>

## RECAPITULATION

<u>CONSULTANT</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
D. Ungheanu	51.00	\$415.00	\$21,165.00
M. Yedidsion	1.70	185.00	314.50

TOTAL CURRENT WORK	21,479.50
--------------------	-----------

BALANCE DUE	<u>\$21,479.50</u>
-------------	--------------------

# EXHIBIT 2-2



REMIT TO:  
10 South LaSalle Street, Suite 3300, Chicago, IL 60603-1026  
Telephone: 312.263.4141 Telecopier: 312.263.1180

Date: 2/6/2026

Direct Lending Investments, LLC  
c/o Development Specialists, Inc.  
333 South Grand Avenue, Suite 4100  
Los Angeles, CA 90071

F.E.I.N. 36-2967476

Description of Services and Disbursements	Fees	Disbursements	Credits	Balance
For professional services rendered from October 1, 2025 through December 31, 2025				
Fees per attached category summary: 15% discount	\$107,059.50 <u>(16,058.92)</u> \$91,000.58			
Administrative costs: Messenger/Overnight Services Photocopies Miscellaneous Charges		\$21.90 5.25 <u>25.27</u> \$52.42		
Total				\$91,053.00
TIMELY PAYMENT OF INVOICES IS ALWAYS APPRECIATED.				PAY AMOUNT ABOVE

Direct Lending Investments, LLC  
 c/o Development Specialists, Inc.  
 333 South Grand Avenue  
 Suite 4100  
 Los Angeles CA 90071

			HOURS
10/01/2025	DU	Telephone call with BRG and the DLI team to discuss tax filings.	1.00
10/07/2025	RDH	Conversation with Dan Ungheanu to discuss next steps with data preservation.	0.20
10/08/2025	RDH	Sent email to Terry Reeves to determine next steps to process data into cold storage.	0.10
10/12/2025	DU	Correspondence with the DLI team regarding custodian fee payments.	0.30
	DU	Research assets transferred to DLI; prepare notes in connection with same.	3.80
10/13/2025	MTI	Reschedule DLIF investor call and review monthly reporting.	0.20
	DU	Work on DLIFF inquiries and information request.	0.80
10/14/2025	MTI	Emails with ██████████ of ██████████ regarding status.	0.20
	DU	Evaluate counterparty receipts report and summary of portfolio; prepare notes and supporting analysis in connection with same.	1.80
	DU	Evaluate cash activity and balances.	0.30
	DU	Correspondence with the DLI team and Stretto team regarding FAQs and changes to website.	0.30
	DU	Review cash reconciliation report and supporting schedules; prepare notes and summary schedule.	1.10
	DU	Work on revisions to reimbursement schedules; correspondence with the DLI team regarding same.	0.80
	DU	Prepare analysis and supporting schedules in connection with DLIFF requests.	0.80
	DU	Correspondence with Elite Discovery and Bradley Sharp regarding data storage handling and case closure.	0.40
	DU	Correspondence with Mark Iammartino regarding status of counterparty settlement.	0.20
	10/15/2025	DU	Video call with Bradley Sharp to discuss outstanding items in connection with case closure.
DU		Research contact information for principals associated with transferred assets.	0.80
DU		Review payroll for approval.	0.10
DU		Correspondence with Jill Zadny regarding status report.	0.20
DU		Correspondence with the DLI team regarding investor inquiries.	0.80
DU		Work on tax reserve preliminary information and analysis.	3.80
DU		Work on case closing matters, including preparing cash analysis, vendor cancellation analysis, final recovery analysis and other supporting schedules.	3.20

Direct Lending Investments, LLC

Page: 2  
 02/06/2026

			HOURS	
10/16/2025	DU	Review case professional invoices and reconcile to budget.	1.50	
	DU	Telephone call with potential buyer of QuarterSpot loans.	0.80	
	DU	Telephone call with the DLI team regarding cash matter.	0.80	
	DU	Review status of borrower payments and disposition of assets.	1.50	
	DU	Correspondence with investors regarding sale of asset.	0.80	
10/17/2025	MTI	Conference call with B. Sharp, D. Ungheanu and H. Pontak regarding final disposition of assets.	0.50	
	MTI	Follow-up emails with [REDACTED] on [REDACTED].	0.20	
	DU	Call with Bradley Sharp, Mark Iammartino, and Henry Pontak to discuss strategy for the distribution.	0.50	
	DU	Telephone call with the DLI team regarding directors and officers cash settlement and allocation of funds.	0.50	
	DU	Review settlement agreement and motion in connection with director and officers settlement.	0.80	
	DU	Telephone call with the DLI team to discuss tax matters.	0.50	
10/20/2025	MTI	Research Toms River NJ property for Biz2Credit facility; emails regarding same with B. Sharp.	0.70	
	DU	Correspondence with potential buyer of QuarterSpot loans	0.40	
	DU	Review draft settlement income schedules; correspondence with the DLI team regarding same.	1.10	
	DU	Correspondence with Mark Iammartino and Bradley Sharp regarding gas station collateral; research updates to sale of asset.	0.80	
	DU	Correspondence with the BRG team regarding tax matter; prepare notes in connection with same.	0.50	
	DU	Review updates to budget to actual report and prepare revisions to summary and supporting schedules; prepare case notes in connection with same.	2.80	
	DU	Work on revisions to the SFAR report.	1.80	
	DU	Review summary of portfolio schedule.	0.20	
10/21/2025	MY	Review e-mail request from Dan Ungheanu regarding 3rdQ expenses, prepare summary, forward to same.	0.40	n/c
	DU	Telephone call with the DLI team and the BRG team regarding tax reserves.	0.50	
	DU	Telephone call with the DLI team regarding 2025 tax reporting in connection with asset recovery.	0.50	
	DU	Telephone call with the DLI team to discuss tax reserves, loan tape and other pending matters.	0.80	
	DU	Review updated draft of settlement income positions; telephone call with the DLI team regarding same.	1.50	
	DU	Telephone call with the DLI team to discuss sale of QuarterSpot loans.	0.50	
	DU	Telephone call with the DLI team regarding draft 2025 tax estimates and payment; review supporting analysis in connection with same.	1.80	
	DU	Review court documents in connection with professional invoices; correspondence with the DLI team regarding same.	0.30	
	DU	Review time entries and prepare revisions.	1.80	n/c
	DU	Telephone call with the DLI team to discuss cash		

Direct Lending Investments, LLC

Page: 3  
 02/06/2026

			HOURS	
		allocation and reporting.	0.40	
	DU	Review internal transfer request; correspondence with the DLI team regarding same.	0.40	
	DU	Review and revise tax forecast and supporting assumption schedules.	3.50	
10/22/2025	MTI	Emails with DLI Team regarding portfolio updates.	0.20	
	DU	Telephone call with the DLI team to discuss cash transfers and loan tape preparation.	0.50	
	DU	Correspondence with the DLI team and Stretto team regarding bank cash transfer and payment of invoices.	0.80	
	DU	Review payroll for approval.	0.10	
	DU	Telephone call with the DLI team to discuss loan tape preparation.	0.40	
	DU	Review loan tape schedules and evaluate settlement documents related to loans.	1.50	
	DU	Telephone call with Mark Iammartino to discuss remaining assets and case closure.	0.50	
	DU	Telephone call with Bradley Sharp to discuss remaining assets and case closure.	0.30	
	DU	Work on further revision to time entries and narrative.	2.40	n/c
	DU	Correspondence with the DLI team regarding sale of QuarterSpot loans and potential buyers; correspondence with G. Burrola regarding same.	1.10	
	DU	Correspondence with principal and trustee regarding transfer of asset.	0.20	
10/23/2025	DU	Correspondence with potential buyers regarding QuarterSpot loans and other DLI assets.	1.10	
	DU	Prepare informational documents in connection with asset sale.	2.20	
	DU	Review professional fee holdback schedule and prepare notes.	0.50	
	DU	Review and edit cash receipts and disbursements report; reconcile activity to bank accounts.	3.20	
	DU	Review loan tape and situation analysis in connection with remaining QuarterSpot loans.	0.50	
	DU	Correspondence with potential buyer regarding information request.	0.40	
10/24/2025	DU	Correspondence with Jill Zadny regarding cash use.	0.20	
	DU	Work on finalizing financial reporting deliverables, including budget to actual and cash receipts and disbursement reports.	3.80	
	DU	Telephone call with the DLI team regarding financial reporting matters.	0.50	
10/27/2025	DU	Work on Receiver invoices.	0.50	n/c
	DU	Review invoices for payment.	0.50	
	DU	Telephone call with potential buyer regarding remaining assets.	0.80	
	DU	Evaluate status of cash reserves and balances.	0.40	
	DU	Evaluate revised budget-to-actual and reconcile professional fees to invoices provided.	1.10	
	DU	Evaluate updated schedule of professional fee holdbacks and prepare notes in connection with same.	0.50	
	DU	Evaluate BRG's tax reserve analysis and reconcile to internal analysis.	1.80	
	DU	E-mail interest parties regarding remaining assets.	0.50	
	DU	Evaluate updated cash reconciliation report and		

Direct Lending Investments, LLC

Page: 4  
 02/06/2026

			HOURS
		prepare supporting notes and edits.	1.20
10/28/2025	DU	Telephone call with BRG and the DLI team regarding tax reserve analysis.	1.00
	DU	Review 2025 tax forecast analysis; telephone call with the DLI team regarding same.	2.20
	DU	Telephone calls with the DLI team regarding tax filings and license expiration.	1.10
	DU	Research annual assessment of license requirements and compliance; research and review past filings documents and prepare for current filings.	2.20
	DU	Review updated reserve schedule from BRG; correspondence with BRG regarding further analysis.	0.50
	DU	Telephone calls with Bradley Sharp to discuss tax reserve analysis.	0.20
	DU	Evaluate draft status report and provide edits.	1.10
10/29/2025	MTI	Follow-up with B2C regarding gas station collateral and emails with B. Sharp regarding same.	0.20
	DU	Correspondence with DSI team regarding status of information gather for remaining assets.	0.40
	DU	Review payroll for approval.	0.10
	DU	Correspondence with the DLI team and Stretto team regarding cash transfers and payment of estimated taxes; review payment schedule in connection with same.	0.80
	DU	Review custodian fees for payment.	0.20
	DU	Correspondence with potential buyers of remaining assets; prepare responses to questions in connection with same.	1.10
	DU	Telephone call with the DLI team regarding financial reporting.	0.80
10/30/2025	DU	Review BRG's tax reserve analysis; prepare notes and questions in connection with same.	1.10
	DU	Work on internal summary analysis of tax reserve and forecast; prepare scenario analysis in connection with same.	2.80
	DU	Work on researching principal contact information regarding transferred assets.	0.80
	DU	Research updates and potential values for transferred assets.	2.20
	DU	Prepare memo of remaining assets; prepare supporting notes and analysis in connection with same.	3.00
10/31/2025	MTI	Follow-up with B2C regarding gas station collateral and emails with B. Sharp regarding same; research of B2C credit documents on Egnyte.	1.10
	DU	Telephone call with BRG team to discuss tax reserve analysis updates.	0.50
	DU	Video call with Bradley Sharp regarding tax reserve analysis and asset monetization.	0.50
	DU	Review changes to claims register.	0.20
	DU	Telephone call with the DLI team regarding tax analysis and financial reporting matters.	0.80
	DU	Evaluate status of case closing; prepare updates to tracker.	0.50
11/03/2025	MTI	Emails with DLIF group about investor call.	0.20
	DU	Video call with Bradley Sharp and Kathy Phelps to discuss remaining case actions.	0.80
	DU	Correspondence with the DLI team regarding tax	

Direct Lending Investments, LLC

Page: 5  
 02/06/2026

			HOURS
		filings and estimated payments.	0.50
	DU	Telephone call with the DLI team to discuss tax analysis.	0.80
	DU	Evaluate DLI holdback schedule; reconcile invoices to schedule.	1.10
	DU	Work on tax reserve analysis and informational summary.	2.50
11/04/2025	DU	Telephone call with the DLI team to discuss 2026 budget, vendor termination and other pending matters.	1.20
	DU	Review 2026 budget and prepare notes in connection with vendor cancellation and cost savings analysis.	1.80
	DU	Correspondence with the DLI team regarding changes to the budget.	0.30
	DU	Evaluate and revise holdback schedule; discussion with the DLI team regarding same.	0.50
	DU	Review case professional invoices and prepare notes for required services in connection with case closing.	1.20
11/05/2025	RDH	Reviewed invoice from Advanced Networks and emailed Dan Ungheanu and DLI Team requesting call to discuss options to reduce monthly costs. Conversation with DLI Team and reviewed Advanced Networks invoice together to discuss how to cut costs; Reached out to Dan Ungheanu to discuss next steps prior to call with Advanced networks on 11/10/25.	0.60
	DU	Work on revisions to 2026 budget and supporting notes for case closure process and costs.	3.20
	DU	Telephone calls with the DLI team to discuss data storage, budget and other pending matters.	1.50
	DU	Telephone call with Rick Houston regarding data storage transfer.	0.30
	DU	Work on status report; prepare notes in connection with remaining assets and cash analysis.	2.20
	DU	Telephone call with the DLI team regarding cash reserves and accounting matters.	0.50
	DU	Review payroll for approval.	0.10
	DU	Telephone call and e-mail correspondence with the DLI team regarding vendor service cancellations.	0.30
	DU	Review vendor invoices and agreement for cancellation policy; discuss with the DLI team and vendor.	1.10
11/06/2025	TLK	Telephone call with Daniel Ungheanu regarding transition of duties.	0.30
11/10/2025	RDH	Telephone call with DLI Team, Daniel Ungheanu and Nate Keshmiri to discuss cost reduction for provided services and winding down accounts.	0.30
	DU	Video call with Rick Houston, the DLI team and Advance Network team to discuss vendor cancellation and handling of data.	0.40
11/12/2025	MTI	Emails with J. Ingrassia regarding Capstone settlement and with B. Sharp regarding Capstone and Toms River.	0.20
	DU	Correspondence with the DLI team regarding IT services.	0.40
	DU	Correspondence with the DLI team regarding bank account closure and transfers and distribution	

Direct Lending Investments, LLC

Page: 6  
 02/06/2026

			HOURS
		matters.	0.80
	DU	Review invoices for payment.	0.30
	DU	Work on revisions to status report.	1.00
	DU	Video call with AFI Capital Partners to discuss asset and monetization matter.	0.80
	DU	Correspondence with the DLI team regarding cash and financial reporting.	0.50
	DU	Correspondence with the DLI team regarding account closures.	0.30
	DU	Review payroll for approval.	0.10
	DU	Work on reviewing and revising fee application motion and exhibits.	1.10
11/13/2025	DU	Research alternative options for IT and data storage.	0.50
	DU	Telephone call with investor regarding asset sale.	0.80
	DU	Telephone call with counterparty regarding asset ownership and sale of asset; evaluate financial statements and documents in connection with same.	2.50
11/14/2025	MTI	Emails with [REDACTED] and review of movie reports.	0.40
	DU	Video call with Tania Kingsbury and the DLI team regarding transitioning responsibilities.	0.80
11/17/2025	DU	Review e-mail in connection with offboarding employee and sample separation agreement.	0.50
	DU	Work on case closing matters, such as investor communications, claims reconciliation and reporting matters.	3.80
11/18/2025	DU	Review case professional invoices and reconcile to budget.	0.80
	DU	Work on tax return review and financial reporting matters.	2.20
11/19/2025	DU	Correspondence with the DLI team regarding transition matters; evaluate schedules and prepare notes in connection with same.	1.10
	DU	Correspondence with the DLI team regarding updates to FAQs.	0.50
	DU	Review transition tracker; provide additions and correspond with the DLI team regarding same.	1.00
	DU	Review payroll for approval.	0.10
	DU	Correspondence with the DLI team regarding bank account access and transfers; review bank accounts and conduct consolidation analysis.	0.80
	DU	Telephone call with the DLI team regarding FAQ updates; correspondence with the DLI team and Stretto team regarding same.	0.80
11/21/2025	DU	Work on research and support documents in connection with remaining assets.	2.80
11/24/2025	DU	Correspondence with the DLI team regarding transition responsibilities and documents management.	0.50
	DU	Review invoices for approval.	0.50
	DU	Review payroll for approval.	0.10
	DU	Work on transition matters, including bank account consolidation review, investor relations transition and other matters.	1.80

Direct Lending Investments, LLC

Page: 7  
 02/06/2026

			HOURS
11/25/2025	TLK	Training with DLI Team.	2.00
12/01/2025	MTI	Attend DLIF investor call.	0.60
	DU	Work on DLI transition and case closing matters, including IT and documents transition, financial reporting filings and other pending items.	2.80
	DU	Telephone call with the DLI team regarding bank account access and wind down of operations.	0.80
	DU	Correspondence with the DLI team and Stretto team regarding bank account closure and cash transfers.	0.30
	DU	Evaluate options to transfer case data to digital storage source; correspondence with Advance Data vendor regarding same.	1.20
12/02/2025	MTI	Emails with [REDACTED] and B. Sharp regarding Capstone settlement.	0.20
	DU	Video call with Bradley Sharp regarding cash management; correspondence with Jill Zadny regarding same.	0.40
	DU	Telephone calls with the DLI team regarding bank account consolidation and cash management.	0.80
	DU	Review Egnyte user schedules; correspondence with the DLI team regarding deactivation.	0.40
	DU	Review vendor invoices for payment.	0.30
	DU	Telephone call with the DLI team to discuss wind down of operations.	0.80
	DU	Correspondence with the DLI team regarding status of transfer of data and other wind down actions.	0.50
	DU	Correspondence with the DLI team regarding collection of loans and disposition of assets.	0.40
	DU	Work on wind down activities, including vendor termination, data transfers, financial reporting transition preparation and other activities.	3.20
	12/03/2025	DU	Review payroll for approval.
DU		Telephone call with Tania Kingsbury regarding DLI responsibilities transition; telephone call with the DLI team regarding same.	0.50
DU		Correspondence with the DLI team and Stretto team regarding bank access and account changes.	0.50
DU		Evaluate updated financial reports, including budget to actual, SFAR and cash activity reports; prepare revisions in connection with transition of responsibilities.	3.80
DU		Telephone calls with the DLI team regarding status of investor distribution and preparation of final distribution.	0.80
12/04/2025	MTI	Emails with K. Phelps and [REDACTED] regarding the Capstone settlement.	0.30
	RDH	Conversation with Daniel Ungheanu regarding backup of Egnyte environment and retiring tenant after 12/31/25.	0.30
	DU	Telephone call with Rick Houston regarding transfer and storage of data.	0.30
	DU	Evaluate cash reconciliation report and bank accounts consolidation schedules; prepare notes in connection with same.	0.80
	DU	Work on vendor cancellation and data transform form in connection with data storage; telephone calls with representative regarding same.	1.00

Direct Lending Investments, LLC

Page: 8  
 02/06/2026

			HOURS
12/05/2025	RDH	Conversation with DLI Team regarding retiring of Egnyte and sharing files with Tania Kingsbury and Mandy Yedidsion; Followed up with Advanced Networks regarding cancellation of services; Confirmed access to Egnyte to start download of data.	1.00
	DU	Work on dissolution of legacy entities; prepare notes in connection with final reports and filings.	0.80
12/08/2025	MTI	Emails with K. Phelps regarding Biz2Credit and further research on documentation.	0.50
	MTI	Emails with K. Phelps of Raines regarding Capstone and further research on documentation.	1.10
	RDH	Telephone call with Taylor Caruso, Louis Burke and Mark Iammartino regarding backing up of data; Researched hard drive options for backup of data.	0.60
	TLK	Training with DLI Team.	3.00
	DU	Work with the DLI team on transition matters, including reporting and vendors matter.	1.20
	DU	Work on schedule of investor distribution status; prepare bank reconciliation in connection with same.	2.80
12/09/2025	MTI	Follow-up emails with K. Phelps regarding B2C and suggested edits to letter.	0.50
	DU	Correspondence with Stretto team regarding cash management; research various options in connection with same.	1.80
	DU	Work with the DLI team on bank account consolidation cash transfers; prepare notes in connection with same.	2.00
	DU	Work on separation agreement draft; correspondence with Bradley Sharp regarding same.	0.80
	DU	Correspondence with the DLI team regarding payment of vendors; review final payments in connection with same.	0.50
	DU	Work on documents storage and transfer of digital files.	1.40
12/10/2025	RDH	Worked with DLI Team to add users to Egnyte; Started backup of entire Egnyte platform and monitored progress.	1.50
	MY	Telephone call with DLI team to discuss transferring work related to investor inquiries.	0.80
	DU	Work with the DLI team and Stretto team on bank account transfers and account closures.	0.80
	DU	Telephone calls with the DLI team to discuss transition and outstanding tasks.	1.00
	DU	Evaluate Egnyte user base and documents stored; discuss with Rick Houston and the DLI team.	0.50
	DU	Evaluate payroll for approval.	0.10
	DU	Correspondence with Bradley Sharp regarding release agreement.	0.20
	DU	Telephone call with the DLI team regarding reporting matter.	0.40
	DU	Evaluate vendor invoices and payment schedule for approval.	0.30
	DU	Review claims report and preparing transition notes in connection with same.	1.00
12/11/2025	RDH	Checked tracking on external hard drives and updated Louis Burke with tracking information.	0.10
	TLK	Prepare accounting reports.	4.00

Direct Lending Investments, LLC

Page: 9  
 02/06/2026

			HOURS
	DU	Work on bank closure matter.	0.50
	DU	Work on revisions to release agreement and supporting payment schedules.	1.50
	DU	Telephone calls with the DLI team regarding account consolidations and cash reserves.	0.80
	DU	Correspondence with Bradley Sharp regarding release agreement.	0.30
	DU	Correspondence with the DLI team regarding vendor service cancellation and transfer of digital documents.	0.40
12/12/2025	DU	Telephone call with the DLI team regarding release agreement, pending transition items, and tax matter.	1.10
	DU	Work on finalizing bank consolidation review and transfer schedule, create instructional schedules in connection with bank closures.	2.00
	DU	Correspondence with Bradley Sharp regarding release agreement; correspondence with Kathy Phelps regarding same.	0.20
12/15/2025	MTI	Telephone call with D. Karcazes regarding [REDACTED] settlement.	0.30
	TLK	Prepare the October and November 2025 accounting reports.	5.00
	DU	Telephone call with the DLI team to discuss cancellation of vendor services and transition status.	0.80
	DU	Review updated budget and prepare notes.	0.50
	DU	Telephone call with the DLI team regarding dissolution of legacy entities.	0.50
12/16/2025	TLK	Training with DLI Team.	2.50
	DU	Correspondence with Kathy Phelps regarding separation and release agreement; correspondence with the DLI team regarding same.	0.40
	DU	Evaluate cash position and money market interest income received; prepare notes in connection with cash planning.	0.50
	DU	Telephone call with the DLI team regarding asset manager invoices; evaluate invoices in connection with same.	0.70
	DU	Evaluate digital database related to loans and corporate documents; prepare tracker in connection with same.	2.20
	DU	Prepare recovery analysis in connection with litigation and asset sales and collections.	1.10
	DU	Telephone call with custodian in connection with information request; research and prepare supporting notes in connection with same.	0.80
	DU	Prepare updated summary analysis in connection tax treatment of legal settlements and portfolio company recovery.	2.50
12/17/2025	MTI	Emails with K. Phelps of Raines and D. Karcazes of Goldberg Kohn regarding Capstone agreement drafting; review draft and provide to [REDACTED]	1.00
	DU	Evaluate payroll for processing.	0.10
12/18/2025	RDH	Followed up with DLI Team and Dan Ungheanu regarding email forwarding.	0.20
	DU	Telephone call with Tania Kingsbury to discuss financial reporting and transition of	

Direct Lending Investments, LLC

Page: 10  
 02/06/2026

			HOURS
		responsibilities.	0.40
12/19/2025	DU	Evaluate status of counterparty payment; correspondence with the DLI team regarding same.	0.80
	DU	Correspondence with the DLI team regarding Accounts Payable matter and transition of responsibilities.	0.40
	DU	Evaluate quarterly tax assessment and supporting financial records; prepare notes in connection with same.	1.80
	DU	Telephone call with BizFilings representative regarding cancellation of services, required filings and dissolution of entities.	1.00
	DU	Review case professional invoices and reconcile to budget.	1.10
12/22/2025	TLK	DLI training with DLI Team.	2.00
	TLK	Prepare accounting reports.	2.00
	DU	Work on data storage matter, including identifying digital data transfers and login user cancellations.	1.50
	DU	Telephone calls with the DLI team regarding transition of responsibilities and updates to tax reporting.	1.10
	DU	Work on financial reporting analysis, including updated budget to actual and cash receipts and disbursements reports.	2.80
12/23/2025	DJP	Phone call with Dan Ungheanu regarding financial reporting tasks.	0.10
	DJP	Coordinate training meeting for financial reporting.	0.10
	TLK	Training with DLI Team.	2.00
	DU	Telephone calls (3x) with the DLI team to discuss transition and investor communications.	1.50
12/24/2025	MY	Telephone call with DLI team regarding transferring work related to bill payments, 1099s and other accounting matters, review documents and e-mail templates.	1.70
12/29/2025	MTI	Follow-up on ██████████ settlement.	0.20
	MY	Telephone call with the DLI team regarding training in connection with wire templates and professional fees tracking schedules, work on analyzing spreadsheets regarding same.	2.30
	DJP	Video call with DLI Team to discuss financial reporting operations.	1.80
	DJP	Review historical financial reporting workbooks.	1.10
	RDH	Started final backup of Egnyte; Worked with Nate Keshmiri regarding Egnyte account termination; Followed up with DLI Team regarding access issues; Reached out to Dan Ungheanu regarding issues with early termination of Egnyte.	2.50
	DU	Work on finalizing financial reporting deliverables, including budget-to-actual and cash receipts and disbursement assessment.	3.50
12/30/2025	MY	Review invoices, login to Bill.com, prepare and process payments, follow-up e-mail to Tania Kingsbury and Brad Sharp.	0.40
	DJP	Video call with DLI Team to discuss financial reporting operations.	0.70
	DJP	Coordinate access to books and records.	0.60
	RDH	Prepped computer for DLI Team to access with Egnyte	

Direct Lending Investments, LLC

Page: 11  
02/06/2026

		HOURS
	backup data; Configured Splashtop access and walked DLI Team through installation and access of remote machine; Followed up with Nate Keshmiri regarding restoration of Egnyte account.	2.50
DU	Work on transition matters, including financial reporting and portfolio accounting matters.	2.80
DU	Telephone call with the DLI team regarding finalizing transition of responsibilities and data storage.	1.20
DU	Telephone call with Tania Kingsbury regarding transition of responsibilities.	0.50
12/31/2025	DJP Telephone call with Dan Ungheanu regarding reporting requirements and transition of tasks.	0.20
	FOR THE FOREGOING PROFESSIONAL SERVICES RENDERED:	266.60    107,059.50

RECAPITULATION

<u>CONSULTANT</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
M. T. Iammartino	8.80	\$675.00	\$5,940.00
D. Ungheanu	215.30	415.00	89,349.50
D. J. Parker	4.60	275.00	1,265.00
T. L. Kingsbury	22.80	310.00	7,068.00
M. Yedidsion	5.20	185.00	962.00
R. D. Houston	9.90	250.00	2,475.00

TOTAL CURRENT WORK 107,059.50

BALANCE DUE \$107,059.50

**Development Specialists, Inc. Expense Detail**  
**DLI - October through December 2025**  
**Reimbursable Expenses**

	<b>Date</b>	<b>Description</b>	<b>Amount</b>
<b>Delivery Charges</b>			
	10/17/2025	Delivery Charges - FedEx - L. Larsen	\$10.95
	10/17/2025	Delivery Charges - FedEx - E-Banking	<u>10.95</u>
			<u>\$21.90</u>
<b>Photocopy Charges</b>			
	10/31/2025	Photocopy Charges - LA (35 @.15)	5.25
<b>Miscellaneous Charges</b>			
	12/02/2025	Other miscellaneous charges - TLO	<u>25.27</u>
			<u><u>\$52.42</u></u>

# EXHIBIT 3



410 Exchange, Ste 100  
Irvine, CA 92602  
855.812.6112

**Invoice:** 17133  
**Date:** 11/15/2025  
**Due Date:** 12/15/2025  
**Terms:** Net 30

**Bill To:**  
Receivership for Direct Lending Investments, LLC  
333 South Grand Ave, Ste 4100  
Los Angeles CA 90071  
United States

Item	Quantity	Unit Price	Amount
October 2025 Invoice			
Hourly Fees			\$14,895.00
Printing	30	\$0.10	\$3.00
Postage			\$7.02
Envelopes and Packaging – See Noticing Summary for details			\$1.80
Expense Exhibit (See Attachment)			\$11.25
Client Courtesy Discount			(\$4,000.00)
<b>TOTAL DUE</b>			\$10,918.07
			THANK YOU.
<b>TOTAL ACCOUNT BALANCE DUE</b>			\$27,091.10

**For wire/ACH payments:**

Bank Name – Banc of California  
Bank Address – 110 West A Street,  
Suite 100, San Diego, CA 92101  
Account No – 1000681781  
ABA - 122238200  
Beneficiary - Stretto



**Case Name:** Receivership for Direct Lending Investments, LLC  
**Case No.:** 19-02188

## Summary of Hourly Fees

**Date Range:** 10/01/2025 - 10/31/2025

<b>Role</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Analyst	0.4	\$0.00	\$0.00
Associate I	1.4	\$70.00	\$98.00
Associate III	0.1	\$150.00	\$15.00
Director	0.3	\$220.00	\$66.00
Managing Director I	0.1	\$235.00	\$23.50
Managing Director III	1.7	\$250.00	\$425.00
Senior Associate	19.0	\$200.00	\$3,800.00
Specialized Associate	0.3	\$475.00	\$142.50
Specialized Director	0.8	\$550.00	\$440.00
Specialized Managing Director	3.2	\$625.00	\$2,000.00
Specialized Senior Associate	16.6	\$475.00	\$7,885.00
		<b>Total</b>	<b>\$14,895.00</b>



**Case Name:** Receivership for Direct Lending Investments, LLC

**Case No.:** 19-02188

## Time Detail

**Date Range:** 10/01/2025 - 10/31/2025

Date	Employee Name	Role	Task	Description	Hours
10/01/2025	Jenice Alduenda	Specialized Director	Distributions	Connect with the client on the phone to discuss next steps for a check mailing before proceeding and send the instructions to our team for processing	0.4
10/01/2025	Justin Uy	Associate	Distributions	Generate service of 2025.10.01 Direct Lending Investments LLC - Check Reissues (2) mailing including printing and fulfillment	0.2
10/01/2025	Micheal Hale	Specialized Senior Associate	Distributions	Review of returned check correspondence	0.1
10/01/2025	Micheal Hale	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.1
10/01/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Coordinate check production and submission of print request	0.8
10/01/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Submission of check to production	0.3
10/01/2025	Ryan Moreau	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.3
10/01/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
10/01/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.3
<b>Subtotal 10/01/2025</b>					<b>2.6</b>

Date	Employee Name	Role	Task	Description	Hours
10/02/2025	Aimee Marshall	Specialized Associate	Distributions	Generate service of 2025.10.01 Direct Lending Investments LLC - Check Reissues (2) mailing including printing and fulfillment	0.2
10/02/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Administrative review of court docket	0.2
10/02/2025	Jeff Demma	Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: Distributions	0.2
10/02/2025	Jeff Demma	Senior Associate	Noticing	Update investor contact information	0.2
10/02/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.3
10/02/2025	Naomi Rodriguez	Associate	Distributions	Review of mailing details, including image counts, party lists, and postage verification	0.1

Date	Employee Name	Role	Task	Description	Hours
10/02/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Coordinate check distribution	1.1
10/02/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Communication with team via email re: check release confirmation	0.1
10/02/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
10/02/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.2
<b>Subtotal 10/02/2025</b>					<b>2.7</b>

Date	Employee Name	Role	Task	Description	Hours
10/03/2025	Jason Bouzos	Specialized Senior Associate	Distributions	Provide deposit slip to DLI team	0.4
10/03/2025	Jeff Demma	Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: distributions	0.2
10/03/2025	Jeff Demma	Senior Associate	Noticing	Update beneficiary for deceased investor	0.2
10/03/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.3
10/03/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
10/03/2025	Justin Uy	Associate	Distributions	Generate service of 2025.10.03 Direct Lending Investments, LLC - Check Reissues (1) mailing including printing and fulfillment	0.1
10/03/2025	Naomi Rodriguez	Associate	Distributions	Review of mailing details, including image counts, party lists, and postage verification	0.1
10/03/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Coordinate check production and submission of print request	1.2
10/03/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Submission of check to production	0.5
10/03/2025	Ruben Guevara	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.2
10/03/2025	Ryan Moreau	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.2
10/03/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
10/03/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.4
<b>Subtotal 10/03/2025</b>					<b>4.8</b>

Date	Employee Name	Role	Task	Description	Hours
10/06/2025	Alberto Romero	Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates	0.1
10/06/2025	Jeff Demma	Senior Associate	Noticing	Update investor beneficiary	0.3

Date	Employee Name	Role	Task	Description	Hours
10/06/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per	1.1
10/06/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Update case website	0.6
10/06/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Administrative review of court docket	0.2
10/06/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 10/06/2025</b>					<b>2.4</b>

Date	Employee Name	Role	Task	Description	Hours
10/07/2025	Jeff Demma	Senior Associate	Noticing	Update investor contact information	0.2
10/07/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.5
10/07/2025	Jenice Alduenda	Specialized Director	Distributions	Connect with the client on a request to the bank to update check details and follow up with their response	0.4
10/07/2025	Lisette Minera	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
10/07/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Coordinate check production and submission of print request	1.7
10/07/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Initiate stop payments on checks	0.1
10/07/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Communication with team via email; checks review	0.3
10/07/2025	Ruben Guevara	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.2
10/07/2025	Ryan Moreau	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.2
10/07/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
10/07/2025	Stephanie Morales	Analyst	Distributions	Record and track undeliverable mail re: Distribution Checks	0.1
10/07/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.4
<b>Subtotal 10/07/2025</b>					<b>4.4</b>

Date	Employee Name	Role	Task	Description	Hours
10/08/2025	Jeff Demma	Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: distributions	0.2
10/08/2025	Jose Cruz	Associate	Distributions	Review distribution request and format data for check production	0.3
10/08/2025	Justin Uy	Associate	Distributions	Generate service of 2025.10.08 Direct Lending Investments, LLC - Check Reissues (2) mailing including printing and fulfillment	0.1

Date	Employee Name	Role	Task	Description	Hours
10/08/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Submission of checks to production	0.3
<b>Subtotal 10/08/2025</b>					<b>0.9</b>

Date	Employee Name	Role	Task	Description	Hours
10/09/2025	Naomi Rodriguez	Associate	Distributions	Review of mailing details, including image counts, party lists, and postage verification	0.1
10/09/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Communication with team via email re: checks mailed confirmation	0.2
10/09/2025	Stephen Cady	Specialized Managing Director	Distributions	Coordinate banking activity	0.2
<b>Subtotal 10/09/2025</b>					<b>0.5</b>

Date	Employee Name	Role	Task	Description	Hours
10/10/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.4
10/10/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.6
10/10/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Administrative review of court docket	0.2
10/10/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
10/10/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 10/10/2025</b>					<b>2.1</b>

Date	Employee Name	Role	Task	Description	Hours
10/13/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Update case website	0.4
<b>Subtotal 10/13/2025</b>					<b>0.4</b>

Date	Employee Name	Role	Task	Description	Hours
10/14/2025	Jeff Demma	Senior Associate	Noticing	Update investor contact information	0.2
10/14/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.2
10/14/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
10/14/2025	Naomi Rodriguez	Associate	Distributions	Review of mailing details, including image counts, party lists, and postage verification	0.1
10/14/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Coordinate check production and submission of print request	0.8
10/14/2025	Ryan Moreau	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.1
10/14/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1

Date	Employee Name	Role	Task	Description	Hours
10/14/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.2
<b>Subtotal 10/14/2025</b>					<b>2.5</b>
Date	Employee Name	Role	Task	Description	Hours
10/15/2025	Jason Bouzos	Specialized Senior Associate	Distributions	Provide Monthly statements to DLI Team	0.8
10/15/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.4
10/15/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.5
10/15/2025	Justin Uy	Associate	Distributions	Generate service of 2025.10.15 Direct Lending Investments LLC - Check Reissue (1) mailing including printing and fulfillment	0.1
10/15/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Submission of check to production	0.3
10/15/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Coordinate check distribution	1.4
10/15/2025	Ruben Guevara	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.1
10/15/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
10/15/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.4
<b>Subtotal 10/15/2025</b>					<b>4.2</b>
Date	Employee Name	Role	Task	Description	Hours
10/16/2025	Aimee Marshall	Specialized Associate	Distributions	Generate service of 2025.10.16 Direct Lending Investments LLC - Check Reissue (1) mailing including printing and fulfillment	0.1
10/16/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.3
10/16/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.4
10/16/2025	Lisette Minera	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
10/16/2025	Melissa Membrino	Director	Noticing	Review of mailing details, including image counts, party lists, and postage verification	0.1
10/16/2025	Micheal Hale	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.1
10/16/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Generate and format data for ledger detail report	0.7
10/16/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Coordinate check production and submission to print request	0.6
10/16/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Coordinate check production and submission to print request	0.9

Date	Employee Name	Role	Task	Description	Hours
10/16/2025	Ruben Guevara	Specialized Senior Associate	Distributions	Reconcile account and produce ledger report	0.2
10/16/2025	Ruben Guevara	Specialized Senior Associate	Distributions	Coordinate check stop and reissue	0.3
10/16/2025	Ryan Moreau	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.2
10/16/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
10/16/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.4
<b>Subtotal 10/16/2025</b>					<b>4.6</b>
Date	Employee Name	Role	Task	Description	Hours
10/17/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.2
10/17/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.4
10/17/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
10/17/2025	Justin Uy	Associate	Distributions	Generate service of 2025.10.17 Direct Lending Investments - Check Reissue (2) mailing including printing and fulfillment	0.1
10/17/2025	Ruben Guevara	Specialized Senior Associate	Distributions	Coordinate check production, including quality control of checks and submission of print request	0.1
10/17/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 10/17/2025</b>					<b>1.7</b>
Date	Employee Name	Role	Task	Description	Hours
10/20/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
10/20/2025	Melissa Membrino	Director	Noticing	Review of mailing details, including image counts, party lists, and postage verification	0.1
<b>Subtotal 10/20/2025</b>					<b>0.9</b>
Date	Employee Name	Role	Task	Description	Hours
10/21/2025	Melissa Membrino	Director	Noticing	Review of mailing details, including image counts, party lists, and postage verification	0.1
<b>Subtotal 10/21/2025</b>					<b>0.1</b>
Date	Employee Name	Role	Task	Description	Hours
10/22/2025	Jason Bouzos	Specialized Senior Associate	Distributions	Coordinate ICS transfer	0.7
10/22/2025	Stephanie Morales	Analyst	Undeliverable Mail	Record and track undeliverable mail re: various mailings	0.1

Date	Employee Name	Role	Task	Description	Hours
10/22/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.1
<b>Subtotal 10/22/2025</b>					<b>0.9</b>

Date	Employee Name	Role	Task	Description	Hours
10/23/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.4
10/23/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.6
10/23/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.9
10/23/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 10/23/2025</b>					<b>2.0</b>

Date	Employee Name	Role	Task	Description	Hours
10/24/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
10/24/2025	Ruben Guevara	Specialized Senior Associate	Distributions	Research positive pay notification for distribution decisioning	0.7
10/24/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
10/24/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.1
<b>Subtotal 10/24/2025</b>					<b>1.7</b>

Date	Employee Name	Role	Task	Description	Hours
10/27/2025	Jason Bouzos	Specialized Senior Associate	Distributions	Coordinate banking activity	0.3
10/27/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
10/27/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.4
10/27/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.6
10/27/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
10/27/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.1
<b>Subtotal 10/27/2025</b>					<b>2.3</b>

Date	Employee Name	Role	Task	Description	Hours
10/28/2025	Ricardo Tejada	Managing Director	Creditor Correspondence	Review creditor inquiries submitted to restructuring call center and direct to case team for action	0.1
<b>Subtotal 10/28/2025</b>					<b>0.1</b>

Date	Employee Name	Role	Task	Description	Hours
10/29/2025	Justin Uy	Associate	Distributions	Generate service of 2025.10.29 Dli Check mailing including printing and fulfillment	0.1
10/29/2025	Stephen Cady	Specialized Managing Director	Distributions	Coordinate banking activity	0.2
<b>Subtotal 10/29/2025</b>					<b>0.3</b>

Date	Employee Name	Role	Task	Description	Hours
10/30/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.3
10/30/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.5
10/30/2025	Stephen Cady	Specialized Managing Director	Distributions	Coordinate banking activity	0.2
<b>Subtotal 10/30/2025</b>					<b>1.0</b>

Date	Employee Name	Role	Task	Description	Hours
10/31/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
<b>Subtotal 10/31/2025</b>					<b>0.8</b>

**Total 10/01/2025 - 10/31/2025 43.9**



**Noticing Detail**

<b>Date of Service</b>	<b>Document(s) or Mailing Description</b>	<b>Number of Recipients</b>	<b>Method(s) of Service</b>
10/2/2025	2025.10.01 Direct Lending Investments LLC - Check Reissues (2)	2	First Class Mail
10/3/2025	2025.10.03 Direct Lending Investments, LLC - Check Reissues (1)	1	First Class Mail
10/8/2025	2025.10.08 Direct Lending Investments, LLC - Check Reissues (2)	2	First Class Mail
10/15/2025	2025.10.15 Direct Lending Investments LLC - Check Reissue (1)	1	First Class Mail
10/16/2025	2025.10.16 Direct Lending Investments LLC - Check Reissue (1)	1	First Class Mail
10/17/2025	2025.10.17 Direct Lending Investments - Check Reissue (2)	2	First Class Mail



**Case Name:** Receivership for Direct Lending Investments, LLC

**Case No.:** 19-02188

## Summary of Expenses

**Date Range:** 10/01/2025 - 10/31/2025

Description	Quantity	Rate	Total	Total Charges
Large document binding and misc. noticing expenses - See Noticing Detail for additional information			\$11.25	\$11.25
			<b>Total</b>	<b>\$11.25</b>



410 Exchange, Ste 100  
Irvine, CA 92602  
855.812.6112

**Invoice:** 17455  
**Date:** 12/15/2025  
**Due Date:** 01/14/2026  
**Terms:** Net 30

**Bill To:**  
Receivership for Direct Lending Investments, LLC  
333 South Grand Ave, Ste 4100  
Los Angeles CA 90071  
United States

Item	Quantity	Unit Price	Amount
November 2025 Invoice			
Hourly Fees			\$5,480.00
Printing	8	\$0.10	\$0.80
Postage			\$1.56
Expense Exhibit (See Attachment)			\$2.50
Client Courtesy Discount			(\$4,000.00)
<b>TOTAL DUE</b>			\$1,484.86
			THANK YOU.
<b>TOTAL ACCOUNT BALANCE DUE</b>			\$28,575.96

**For wire/ACH payments:**

Bank Name – Banc of California  
Bank Address – 110 West A Street,  
Suite 100, San Diego, CA 92101  
Account No – 1000681781  
ABA - 122238200  
Beneficiary - Stretto



**Case Name:** Receivership for Direct Lending Investments, LLC

**Case No.:** 19-02188

## Summary of Hourly Fees

**Date Range:** 11/01/2025 - 11/30/2025

<b>Role</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Associate I	0.4	\$70.00	\$28.00
Associate III	0.4	\$150.00	\$60.00
Managing Director I	0.2	\$235.00	\$47.00
Managing Director III	1.1	\$250.00	\$275.00
Senior Associate	15.4	\$200.00	\$3,080.00
Specialized Managing Director	0.6	\$625.00	\$375.00
Specialized Senior Associate	3.4	\$475.00	\$1,615.00
		<b>Total</b>	<b>\$5,480.00</b>



**Case Name:** Receivership for Direct Lending Investments, LLC  
**Case No.:** 19-02188

## Time Detail

**Date Range:** 11/01/2025 - 11/30/2025

Date	Employee Name	Role	Task	Description	Hours
11/03/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
<b>Subtotal 11/03/2025</b>					<b>0.8</b>
11/04/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.4
<b>Subtotal 11/04/2025</b>					<b>0.4</b>
11/05/2025	Alberto Romero	Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates	0.1
11/05/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.5
11/05/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.6
11/05/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 11/05/2025</b>					<b>1.3</b>
11/06/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Review distribution request, format data for check production and submission to print request	1.5
11/06/2025	Ryan Moreau	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.1
11/06/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
11/06/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.3
<b>Subtotal 11/06/2025</b>					<b>2.0</b>
11/07/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8

Date	Employee Name	Role	Task	Description	Hours
11/07/2025	Justin Uy	Associate	Distributions	Generate service of 2025.11.07 Direct Lending Investment - Check Reissue (2) mailing including printing and fulfillment	0.1
11/07/2025	Micheal Hale	Specialized Senior Associate	Distributions	Review check images for quality control and fraud mitigations	0.1
11/07/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Coordinate check distribution	0.4
11/07/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Submission of checks to production	0.3
11/07/2025	Ricky Quang	Associate	Distributions	Generate service of 2025.11.07 Direct Lending Investment - Check Reissue (2) mailing including printing and fulfillment	0.2
11/07/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
11/07/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.2
<b>Subtotal 11/07/2025</b>					<b>2.2</b>

Date	Employee Name	Role	Task	Description	Hours
11/10/2025	Alberto Romero	Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.2
11/10/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.4
11/10/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
11/10/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Communication with via email re: check release confirmation	0.2
11/10/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 11/10/2025</b>					<b>1.7</b>

Date	Employee Name	Role	Task	Description	Hours
11/11/2025	Jeff Demma	Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via phone re: case update	0.2
<b>Subtotal 11/11/2025</b>					<b>0.2</b>

Date	Employee Name	Role	Task	Description	Hours
11/12/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.4
11/12/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.7
11/12/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 11/12/2025</b>					<b>1.2</b>

Date	Employee Name	Role	Task	Description	Hours
------	---------------	------	------	-------------	-------

Date	Employee Name	Role	Task	Description	Hours
11/13/2025	Pete Danpongchareon	Specialized Senior Associate	Distributions	Review positive pay on checks	0.6
11/13/2025	Stephen Cady	Specialized Managing Director	Distributions	Review distributions related communication and activity, and advise team re: same	0.1
<b>Subtotal 11/13/2025</b>					<b>0.7</b>

Date	Employee Name	Role	Task	Description	Hours
11/14/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.3
11/14/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.4
11/14/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
11/14/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 11/14/2025</b>					<b>1.6</b>

Date	Employee Name	Role	Task	Description	Hours
11/17/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.5
11/17/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
11/17/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 11/17/2025</b>					<b>1.4</b>

Date	Employee Name	Role	Task	Description	Hours
11/18/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.3
11/18/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.5
11/18/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.2
11/18/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 11/18/2025</b>					<b>1.1</b>

Date	Employee Name	Role	Task	Description	Hours
11/19/2025	Ricardo Tejada	Managing Director	Creditor Correspondence	Review creditor inquiries submitted to restructuring call center and direct to case team for action	0.1
11/19/2025	Ryan Moreau	Specialized Senior Associate	Distributions	Initiate stop payments on checks per client	0.2
<b>Subtotal 11/19/2025</b>					<b>0.3</b>

Date	Employee Name	Role	Task	Description	Hours
11/20/2025	Carlos Salas	Associate	Noticing	Administrative quality control review of submitted mailings for accuracy and completeness	0.1

Date	Employee Name	Role	Task	Description	Hours
11/20/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Update FAQs on case website	1.2
11/20/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.3
11/20/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.5
11/20/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 11/20/2025</b>					<b>2.2</b>

Date	Employee Name	Role	Task	Description	Hours
11/21/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
<b>Subtotal 11/21/2025</b>					<b>0.8</b>

Date	Employee Name	Role	Task	Description	Hours
11/24/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
11/24/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Administrative review of court docket	0.2
11/24/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 11/24/2025</b>					<b>1.1</b>

Date	Employee Name	Role	Task	Description	Hours
11/25/2025	Alberto Romero	Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates	0.1
11/25/2025	Jeff Demma	Senior Associate	Creditor Correspondence	Respond to creditor inquiry (2) via email re: custodian update	0.4
11/25/2025	Jeff Demma	Senior Associate	Noticing	Update custodian for various investores	0.4
11/25/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.6
11/25/2025	Ricardo Tejada	Managing Director	Creditor Correspondence	Review creditor inquiries submitted to restructuring call center and direct to case team for action	0.1
11/25/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 11/25/2025</b>					<b>1.7</b>

Date	Employee Name	Role	Task	Description	Hours
11/28/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
<b>Subtotal 11/28/2025</b>					<b>0.8</b>

**Total 11/01/2025 - 11/30/2025 21.5**



**Noticing Detail**

<b>Date of Service</b>	<b>Document(s) or Mailing Description</b>	<b>Number of Recipients</b>	<b>Method(s) of Service</b>
11/7/2025	2025.11.07 Direct Lending Investment - Check Reissue (2)	2	First Class Mail



**Case Name:** Receivership for Direct Lending Investments, LLC

**Case No.:** 19-02188

## Summary of Expenses

**Date Range:** 11/01/2025 - 11/30/2025

Description	Quantity	Rate	Total	Total Charges
Large document binding and misc. noticing expenses - See Noticing Detail for additional information			\$2.50	\$2.50
			<b>Total</b>	<b>\$2.50</b>



410 Exchange, Ste 100  
Irvine, CA 92602  
855.812.6112

**Invoice:** 17819  
**Date:** 01/15/2026  
**Due Date:** 02/14/2026  
**Terms:** Net 30

**Bill To:**  
Receivership for Direct Lending Investments, LLC  
333 South Grand Ave, Ste 4100  
Los Angeles CA 90071  
United States

Item	Quantity	Unit Price	Amount
December 2025 Invoice			
Hourly Fees			\$4,239.50
Client Courtesy Discount			(\$4,000.00)
<b>TOTAL DUE</b>			\$239.50
			THANK YOU.
<b>TOTAL ACCOUNT BALANCE DUE</b>			\$12,642.53

[Click Here to Pay Now](#)

**For wire/ACH payments:**

Bank Name – Banc of California  
Bank Address – 110 West A Street,  
Suite 100, San Diego, CA 92101  
Account No – 1000681781  
ABA - 122238200  
Beneficiary - Stretto



**Case Name:** Receivership for Direct Lending Investments, LLC

**Case No.:** 19-02188

## Summary of Hourly Fees

**Date Range:** 12/01/2025 - 12/31/2025

<b>Role</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Analyst	0.9	\$0.00	\$0.00
Associate I	0.1	\$70.00	\$7.00
Associate III	0.2	\$150.00	\$30.00
Director	0.2	\$220.00	\$44.00
Managing Director I	0.1	\$235.00	\$23.50
Managing Director III	1.0	\$250.00	\$250.00
Senior Associate	16.2	\$200.00	\$3,240.00
Specialized Managing Director	0.5	\$625.00	\$312.50
Specialized Senior Associate	0.7	\$475.00	\$332.50
		<b>Total</b>	<b>\$4,239.50</b>



**Case Name:** Receivership for Direct Lending Investments, LLC

**Case No.:** 19-02188

## Time Detail

**Date Range:** 12/01/2025 - 12/31/2025

Date	Employee Name	Role	Task	Description	Hours
12/01/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
12/01/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Administrative review of court docket	0.2
12/01/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 12/01/2025</b>					<b>1.1</b>

Date	Employee Name	Role	Task	Description	Hours
12/02/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.5
12/02/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.7
12/02/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 12/02/2025</b>					<b>1.3</b>

Date	Employee Name	Role	Task	Description	Hours
12/05/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
<b>Subtotal 12/05/2025</b>					<b>0.8</b>

Date	Employee Name	Role	Task	Description	Hours
12/08/2025	Alberto Romero	Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates	0.1
12/08/2025	Jeff Demma	Senior Associate	Case Management	Call with DLI team and A. Facciano re: case wind down	0.4
<b>Subtotal 12/08/2025</b>					<b>0.5</b>

Date	Employee Name	Role	Task	Description	Hours
12/09/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.4
12/09/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.5
12/09/2025	Jeff Demma	Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via phone and email re: distribution	0.4
12/09/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Administrative review of court docket	0.2

Date	Employee Name	Role	Task	Description	Hours
12/09/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 12/09/2025</b>					<b>1.6</b>

Date	Employee Name	Role	Task	Description	Hours
12/11/2025	Ryan Moreau	Specialized Senior Associate	Distributions	Communication with banking partner regarding online portal access	0.4
<b>Subtotal 12/11/2025</b>					<b>0.4</b>

Date	Employee Name	Role	Task	Description	Hours
12/12/2025	Jeff Demma	Senior Associate	Noticing	Update investor custodian	0.3
12/12/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.5
12/12/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.8
12/12/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Update case website	0.7
12/12/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
12/12/2025	Ricardo Tejeda	Managing Director	Creditor Correspondence	Review creditor inquiries submitted to restructuring call center and direct to case team for action	0.1
12/12/2025	Ryan Moreau	Specialized Senior Associate	Distributions	Communication with banking partner regarding online portal access	0.3
12/12/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
12/12/2025	Stephen Cady	Specialized Managing Director	Distributions	Review banking related communication and activity, and advise team re: same	0.5
<b>Subtotal 12/12/2025</b>					<b>4.2</b>

Date	Employee Name	Role	Task	Description	Hours
12/15/2025	Jeff Demma	Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: custodian update	0.2
<b>Subtotal 12/15/2025</b>					<b>0.2</b>

Date	Employee Name	Role	Task	Description	Hours
12/16/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Administrative review of court docket	0.2
<b>Subtotal 12/16/2025</b>					<b>0.2</b>

Date	Employee Name	Role	Task	Description	Hours
12/17/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.4
12/17/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.6

Date	Employee Name	Role	Task	Description	Hours
12/17/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 12/17/2025</b>					<b>1.1</b>

Date	Employee Name	Role	Task	Description	Hours
12/18/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
12/18/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Update case website	0.3
12/18/2025	Laura Tondreault	Analyst	Document Processing	Prepare and organize general case documents for accuracy and completeness	0.5
12/18/2025	Melissa Membrino	Director	Document Processing	Manage and oversee organization of general case documents for accuracy and completeness	0.2
12/18/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 12/18/2025</b>					<b>1.9</b>

Date	Employee Name	Role	Task	Description	Hours
12/19/2025	Carlos Salas	Associate	Noticing	Generate service of 12.19.25 Voyager - 7 Day Letter - 12.19.25 Voyager 7 Day Letter mailing including printing and fulfillment	0.1
12/19/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8
12/19/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.4
12/19/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.6
12/19/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 12/19/2025</b>					<b>2.0</b>

Date	Employee Name	Role	Task	Description	Hours
12/22/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
12/22/2025	Jeff Demma	Senior Associate	Website Updates and Maintenance	Update case website	0.7
12/22/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 12/22/2025</b>					<b>1.6</b>

Date	Employee Name	Role	Task	Description	Hours
12/26/2025	Alberto Romero	Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates	0.1
12/26/2025	Jeff Demma	Senior Associate	Noticing	Update contact information for various investors	0.3
12/26/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Update current claim register	0.5
12/26/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register per DLI Team	0.8

Date	Employee Name	Role	Task	Description	Hours
12/26/2025	Sheryl Betance	Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
<b>Subtotal 12/26/2025</b>					<b>1.8</b>
Date	Employee Name	Role	Task	Description	Hours
12/29/2025	Jeff Demma	Senior Associate	Claims Register Maintenance	Prepare current claim register	0.8
<b>Subtotal 12/29/2025</b>					<b>0.8</b>
Date	Employee Name	Role	Task	Description	Hours
12/30/2025	Staphany Alcantar	Analyst	Document Processing	Correspondence with Stretto team re: processing correspondence	0.1
12/30/2025	Staphany Alcantar	Analyst	Document Processing	Case file case related documents	0.3
<b>Subtotal 12/30/2025</b>					<b>0.4</b>
<b>Total 12/01/2025 - 12/31/2025</b>					<b>19.9</b>

1 **RAINES FELDMAN LITTRELL LLP**  
Kathy Bazoian Phelps (State Bar No. 155564)  
2 *kphelps@raineslaw.com*  
1900 Avenue of the Stars, Suite 1900  
3 Los Angeles, California 90067  
Telephone: (310) 440-4100  
4 Facsimile: (310) 691-1943

5 *Counsel for Bradley D. Sharp,*  
*Permanent Receiver*  
6

7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION – LOS ANGELES**

11 SECURITIES AND EXCHANGE  
COMMISSION,

12  
13 Plaintiff,

14 v.

15  
16 DIRECT LENDING INVESTMENTS  
LLC,

17  
18 Defendant.

Case No.:2:19-cv-02188-DSF-MBKx

**DECLARATION OF KATHY  
BAZOIAN PHELPS IN SUPPORT  
OF MOTION OF RECEIVER  
FOR (A) APPROVAL AND  
PAYMENT OF FEES AND  
EXPENSES FOR OCTOBER 1,  
2025 THROUGH DECEMBER 31,  
2025 OF:**

- (1) RECEIVER BRADLEY D. SHARP;**
- (2) RAINES FELDMAN LITTRELL LLP;**
- (3) DEVELOPMENT SPECIALISTS, INC.;**
- (4) BERKELEY RESEARCH GROUP;**
- (5) GOLDBERG KOHN LTD;**
- (6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; AND**

**(B) FOR APPROVAL OF FORM  
AND/OR LIMITATION OF**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**NOTICE UNDER LOCAL CIVIL  
RULE 66-7**

Date: March 30, 2026  
Time: 1:30 p.m.  
Dept.: Courtroom 7D  
Place: United States District Court  
Western Division  
350 West 1st Street  
Los Angeles, CA 90012

1 I, Kathy Bazoian Phelps, declare:

2 1. I am a partner at the law firm of Raines Feldman Littrell LLP  
3 (“Raines Feldman”), counsel of record for Bradley D. Sharp in his capacity at the  
4 Court-appointed Receiver for defendant Direct Lending Investments LLC  
5 (“DLI”), Direct Lending Income Fund, L.P.(“DLIF”), Direct Lending Income  
6 Feeder Fund, Ltd., DLI Capital, Inc., DLI Lending Agent, LLC, and DLI Assets  
7 Bravo LLC, and their successors, subsidiaries, and affiliated entities (the  
8 “Receivership Entities”).

9 2. This declaration is submitted in support of the Motion of Receiver  
10 for Approval and Payment of Fees and Expenses for October 1, 2025 through  
11 December 31, 2025 incurred by the Receiver and his professionals and Approval  
12 of Form and/or Limitation of Notice Under Local Civil Rule 66-7 (“Motion”).

13 3. I have personal knowledge of the facts set forth below, and if, called  
14 to testify, could competently testify thereto.

15 4. I have conferred with the Securities and Exchange Commission  
16 regarding the Motion, and I am advised that the SEC does not have any  
17 opposition to the Motion.

18 5. The court approved Raines Feldman’s motion for substitution as  
19 General Counsel and Contingency Litigation Counsel on June 21, 2021 (Doc.  
20 No. 649). Additionally, on May 23, 2023, the Court issued an order granting the  
21 substitution of Raines Feldman LLP in the limited matters being handled by  
22 Sullivan Blackburn & Pratt (Doc No. 893).

23 6. I am the attorney principally responsible for Raines Feldman’s  
24 representation of the Receiver, and I work directly with and supervise the  
25 professionals and staff of Raines Feldman with respect to this representation.

26 7. Raines Feldman is the Receiver’s general counsel and has assumed  
27 the duties of the Receiver’s primary counsel in the receivership case.

28



1 and commensurate with the skill and experience required for the activities  
2 performed. Raines Feldman’s services and time expenditures are reasonable in  
3 light of the labor required for the matters for which Raines Feldman was retained  
4 and the different types of services required in a complex case like this so as to  
5 provide efficient, competent and cost-effective representation for the Receiver.  
6 Raines Feldman respectfully submits that it has not expended time unnecessarily  
7 and that it has rendered efficient and effective services.

8 13. Many of the issues involved in this case are extremely complex.  
9 Raines Feldman understands its duty to provide the best and most efficient  
10 service for the benefit of the Receiver, the estate, its creditors, and investors.  
11 Multiple Raines Feldman attorneys have performed different and unique services  
12 for the estate, utilizing appropriate billing levels on various tasks and recognizing  
13 that different attorneys at the firm have specific expertise, background, and  
14 knowledge.

15 14. As detailed in the declaration of Kathy Bazoian Phelps in support of  
16 the Receiver’s motion for an order authorizing Raines Feldman’s employment  
17 (Doc. No. 649), in the interests of the estate, Raines Feldman agreed to reduce its  
18 regular hourly rates by 15%.

19 15. The billing statements for Matter Numbers 4664-001, -004 reflect  
20 the 15% reduction in the regular 2023 fees for each attorney and paraprofessional,  
21 and Matter Number -008 reflects the agreed upon discount for that litigation  
22 matter.

23 16. Raines Feldman performed the following hours of services and  
24 incurred the following fees and costs during the Expense Period:

- 25 • **October 2025**: Hours: 7.2; Fees: \$ 4,651.20; Costs: \$ 0
- 26 • **November 2025**: Hours: 7.6; Fees: \$ 4,785.20; Costs: \$ 133.96
- 27 • **December 2025**: Hours: 25.8; Fees: \$ 14,089.50; Costs: \$ 125.75

28

1           17. In seeking reimbursement of services for which Raines Feldman  
2 purchased or contracted for from a third party, it has only requested  
3 reimbursement for the amount billed to Raines Feldman by the third-party vendor  
4 and paid to the vendor by Raines Feldman. Raines Feldman has not included in  
5 the amount for which reimbursement is sought the amortization of the cost of any  
6 investment, equipment, or capital outlay.

7           18. Without limiting the detail of Raines Feldman’s performed services,  
8 the following are summary descriptions of the services provided during the  
9 Expense Period.

10 Case and Asset Administration (4664-001)

11           19. Raines Feldman advised the Receiver on the evaluation, assignment  
12 and monitoring of investor claims and preparation of status reports. Raines  
13 Feldman reviewed information pertaining to distributions and spoke with  
14 investors regarding distributions.

15           20. During the Expense Period, Raines Feldman performed a number of  
16 necessary tasks.

17           21. The firm worked with the Receiver to update the information and  
18 accounting in the report to best advise the Court and the investors of the activities  
19 undertaken during the quarter.

20           22. Raines Feldman provided services to consummate the settlement  
21 agreements with both Brendan Ross and with the D&Os. The firm supervised the  
22 process of distributing the D&O settlement proceeds to the various settlement  
23 parties, and also worked with the escrow holder in Hungary and with Ross’s  
24 counsel to finalize the settlement with Ross.

25           23. In addition to its communications with the Receiver and his team,  
26 Raines Feldman has kept the SEC apprised of proposed motions and met and  
27 conferred with the SEC on its position relating to a variety of matters.

28



# EXHIBIT 1

**RAINES**

**Raines Feldman Littrell LLP**  
 1900 Avenue of the Stars, 19th Floor  
 Los Angeles, CA 90067  
 (310) 440-4100  
 www.raineslaw.com  
 Federal Tax ID: 20-4515337

**Invoice Date: 11/6/2025**  
**Invoice Number: 140836**

Bradley D. Sharp  
 Receiver  
 333 S. Grand Avenue, Suite 400  
 Los Angeles, CA 90071

**4664-001 / Direct Lending Investment LLC Receiver**

<b>Professional Services</b>				<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
10/13/2025	KBP	B110	Review email re status of distributions	0.10	646.00	64.60
10/14/2025	KBP	B110	Review and respond to email re archiving records	0.10	646.00	64.60
10/14/2025	KBP	B110	Review email re insider claims	0.10	646.00	64.60
10/15/2025	KBP	B110	Draft email to Receiver re invoices needed	0.10	646.00	64.60
10/15/2025	KBP	B110	Emails with J. Raissi re release of claims by insiders	0.20	646.00	129.20
10/16/2025	KBP	B110	Meeting with Receiver re status, distribution motion	0.40	646.00	258.40
10/17/2025	KBP	B110	Draft distribution motion re fourth interim	1.70	646.00	1,098.20
10/21/2025	KBP	B110	Emails re declarations of professionals	0.30	646.00	193.80
10/21/2025	KBP	B110	Review order, draft email to Receiver re payment to professionals	0.10	646.00	64.60
10/21/2025	KBP	B110	Review and send emails re interest in AFI Capital	0.20	646.00	129.20
10/23/2025	KBP	B110	Review email from J. Raissi re contact for investment	0.10	646.00	64.60
10/27/2025	KBP	B110	Emails with Receiver re invoices, status report	0.20	646.00	129.20
10/28/2025	KBP	B110	Draft Status report, review exhibits from Receiver	2.60	646.00	1,679.60
10/29/2025	KBP	B110	Draft follow up email to J. Raissi re release of claims	0.10	646.00	64.60
10/29/2025	KBP	B110	Review and respond to email re Ross investments	0.10	646.00	64.60

10/29/2025	KBP	B110	Review and respond to email with N. Van Brunt re J. Jasen claims	0.20	646.00	129.20
------------	-----	------	--	------	--------	--------

10/31/2025	KBP	B120	Review emails and memo re remaining assets	0.40	646.00	258.40
------------	-----	------	--	------	--------	--------

Sub-total Fees:                      \$4,522.00

**Expenses**

10/01/2025	First Legal Network: Pick-Up from: Raines Feldman Littrell LLP; Deliver to: USDC-LOS ANGELES; PDF COURTESY DEL.-RUSH; Job Date: 09/17/2025; Ctrl No: 17454265; Inv. #11165192				118.25
------------	---	--	--	--	--------

Sub-total Expenses:                      \$118.25

Total Current Billing: **\$4,640.25**

Previous Balance Due: \$263,951.24

Total Payments:                      (\$18,816.80)

**Total Now Due: \$249,774.69**

**Rate Summary**

Kathy B. Phelps	7.00 hours at \$646.00/hr	\$4,522.00
	<u>Total hours: 7.00</u>	<u>\$4,522.00</u>

**Payments**

10/23/2025	Payment	WIRE: DLI RECEIVERSHIP	18,816.80
			Sub-total Payments: <u>                    </u> \$18,816.80

**Payment Terms: Due Upon Receipt****Payment Options:****Pay Online:****Bill.com:** <https://app.bill.com/p/rainesfeldmanllp>**Credit Card:** <https://secure.lawpay.com/pages/rainesfeldman/operating>**Pay by Wire/ACH:**

Wells Fargo Bank, N.A.

Routing No.: 121000248

Account No.: 4941981821

BIC/Swift Code: WFBIUS6S

Account Title: Raines Feldman Littrell LLP

Client Name &amp; Invoice #

**Pay by Check via Mail:**

Raines Feldman Littrell LLP

PO Box 848574

Los Angeles, CA 90084-8574

**RAINES**

**Raines Feldman Littrell LLP**  
 1900 Avenue of the Stars, 19th Floor  
 Los Angeles, CA 90067  
 (310) 440-4100  
 www.raineslaw.com  
 Federal Tax ID: 20-4515337

**Invoice Date: 12/15/2025****Invoice Number: 142763**

Bradley D. Sharp  
 Receiver  
 333 S. Grand Avenue, Suite 400  
 Los Angeles, CA 90071

**4664-001 / Direct Lending Investment LLC Receiver**

<b>Professional Services</b>				<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
11/01/2025	AA	B110	Review relevant rules, calculate deadlines, and calendar [1037] Order Taking Motion Off-Calendar and Under Submission regarding [1034]	0.40	335.00	134.00
11/01/2025	KBP	B110	Draft fourth interim distribution motion	1.70	646.00	1,098.20
11/01/2025	KBP	B110	Review email from DLI re status of distributions	0.10	646.00	64.60
11/03/2025	KBP	B110	Meeting with Receiver and D. Ungheanu re status, remaining assets, distribution	0.80	646.00	516.80
11/04/2025	KBP	B110	Review email from Receiver and team re holdbacks	0.10	646.00	64.60
11/04/2025	KBP	B110	Emails re disbursements from escrow for D&Os	0.20	646.00	129.20
11/07/2025	KBP	B110	Review status re distributions	0.10	646.00	64.60
11/11/2025	KBP	B110	Review and respond to email re payment from escrow re D&O	0.10	646.00	64.60
11/11/2025	KBP	B110	Draft follow up email to N, Van Brunt re release of claims	0.10	646.00	64.60
11/12/2025	KBP	B110	Review email from EWB re D&O escrow	0.10	646.00	64.60
11/12/2025	KBP	B110	Finalize Q3 status report, update exhibits	1.80	646.00	1,162.80
11/12/2025	KBP	B110	Review memo re DLIFF claims ruling	0.20	646.00	129.20
11/12/2025	KBP	B110	Emails with D. Ungheanu, further revisions to status report	0.50	646.00	323.00
11/12/2025	KBP	B110	Emails with client and SEC re status report and fee application	0.20	646.00	129.20
11/13/2025	KBP	B110	Draft email to D. Ungheanu re reserved claims	0.10	646.00	64.60

11/18/2025	KBP	B110	Review claims and subscription agreements, forward to N. Van Brunt re Jasen claims	0.40	646.00	258.40
11/19/2025	KBP	B110	Review and respond to emails re status of distributions, final distribution	0.40	646.00	258.40
11/26/2025	KBP	B120	Review email from Mark Immartino re gas station sale	0.20	646.00	129.20

Sub-total Fees: \$4,720.60

**Expenses**

05/13/2025 FedEx: 20250507, Delivered JANOS DR. GOBI - HU-1022 BUDAPEST, BIMBO UT 7. 2. EM;  
 Invoice # 238447184 133.96

Sub-total Expenses: \$133.96

Total Current Billing: **\$4,854.56**

Previous Balance Due: \$249,774.69

**Total Now Due: \$254,629.25**

**Rate Summary**

Asha Alexander	0.40 hours at \$335.00/hr	\$134.00
Kathy B. Phelps	7.10 hours at \$646.00/hr	\$4,586.60
<u>Total hours:</u>	<u>7.50</u>	<u>\$4,720.60</u>

**Payment Terms: Due Upon Receipt****Payment Options:****Pay Online:****Bill.com:** <https://app.bill.com/p/rainesfeldmanllp>**Credit Card:** <https://secure.lawpay.com/pages/rainesfeldman/operating>**Pay by Wire/ACH:**

Wells Fargo Bank, N.A.

Routing No.: 121000248

Account No.: 4941981821

BIC/Swift Code: WFBIUS6S

Account Title: Raines Feldman Littrell LLP

Client Name &amp; Invoice #

**Pay by Check via Mail:**

Raines Feldman Littrell LLP

PO Box 848574

Los Angeles, CA 90084-8574

**RAINES**

**Raines Feldman Littrell LLP**  
 1900 Avenue of the Stars, 19th Floor  
 Los Angeles, CA 90067  
 (310) 440-4100  
 www.raineslaw.com  
 Federal Tax ID: 20-4515337

**Invoice Date: 1/7/2026**  
**Invoice Number: 143254**

Bradley D. Sharp  
 Receiver  
 333 S. Grand Avenue, Suite 400  
 Los Angeles, CA 90071

**4664-001 / Direct Lending Investment LLC Receiver**

<b>Professional Services</b>				<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
12/01/2025	KBP	B110	Draft followup email to N Van Brunt re claims	0.10	646.00	64.60
12/02/2025	KBP	B110	Review and respond to email re status of D&O reserves	0.20	646.00	129.20
12/04/2025	KBP	B110	Review [REDACTED] motion, draft memo to C. McPhaul re settlement motion	0.50	646.00	323.00
12/08/2025	KBP	B110	Draft follow up email re status report	0.10	646.00	64.60
12/08/2025	KBP	B110	Emails re finalizing Q3 status report	0.20	646.00	129.20
12/09/2025	KBP	B110	Review email and phone call with investor re claim	0.20	646.00	129.20
12/12/2025	KBP	B110	Review termination agreement re employment, email to employment counsel	0.40	646.00	258.40
12/15/2025	LJK	B110	Review separation agreement and provide comments on same.	0.30	775.00	232.50
12/16/2025	KBP	B110	Emails re employment termination	0.20	646.00	129.20
12/17/2025	KBP	B110	Review employment contract revisions, email to Receiver team	0.30	646.00	193.80
12/18/2025	LJK	B110	Revisions to separation agreement.	0.20	775.00	155.00
12/03/2025	KBP	B120	Review email and documents re [REDACTED] settlement	0.30	646.00	193.80
12/04/2025	KBP	B120	Review email from M. Immartino re Biz2Credit gas station, review documents, draft letter re sale	1.20	646.00	775.20
12/05/2025	CRM	B120	Review prior [REDACTED] settlement motion for background; draft motion to approve new [REDACTED] settlement and supporting documents	4.80	467.50	2,244.00



12/15/2025 First Legal Network: Pick-Up from: Raines Feldman Littrell LLP; Deliver to: USDC-LOS ANGELES; PDF COURTESY DEL.-RUSH; Job Date: 12/09/2025; Ctrl No: 17573974; Inv. #11223678 125.75

Sub-total Expenses: \$125.75

Total Current Billing: **\$14,215.25**

Previous Balance Due: \$254,629.25

**Total Now Due: \$268,844.50**

**Rate Summary**

Lauren J. Katunich	0.50 hours at \$775.00/hr	\$387.50
Christina McPhaul	14.80 hours at \$467.50/hr	\$6,919.00
Kathy B. Phelps	10.50 hours at \$646.00/hr	\$6,783.00
	<u>Total hours: 25.80</u>	<u>\$14,089.50</u>

**Payment Terms: Due Upon Receipt**

**Payment Options:**

**Pay Online:**

**Bill.com:** <https://app.bill.com/p/rainesfeldmanllp>

**Credit Card:** <https://secure.lawpay.com/pages/rainesfeldman/operating>

**Pay by Wire/ACH:**

Wells Fargo Bank, N.A.  
Routing No.: 121000248  
Account No.: 4941981821  
BIC/Swift Code: WFBIUS6S  
Account Title: Raines Feldman Littrell LLP  
Client Name & Invoice #

**Pay by Check via Mail:**

Raines Feldman Littrell LLP  
PO Box 848574  
Los Angeles, CA 90084-8574

# EXHIBIT 2

**RAINES**

**Raines Feldman Littrell LLP**  
 1900 Avenue of the Stars, 19th Floor  
 Los Angeles, CA 90067  
 (310) 440-4100  
 www.raineslaw.com  
 Federal Tax ID: 20-4515337

**Invoice Date: 11/6/2025**  
**Invoice Number: 140837**

Bradley D. Sharp  
 Receiver  
 333 S. Grand Avenue, Suite 400  
 Los Angeles, CA 90071

**4664-004 / DLIF Matters Only**

Professional Services			Hours	Rate	Amount
10/10/2025	KBP	Review and respond to investor inquiry re distribution	0.10	646.00	64.60
10/27/2025	KBP	Review email re D&O distribution	0.10	646.00	64.60

Sub-total Fees: \$129.20

Total Current Billing: **\$129.20**

Previous Balance Due: \$4,648.41

Total Payments: (\$258.40)

**Total Now Due: \$4,519.21**

**Rate Summary**

Kathy B. Phelps	0.20 hours at \$646.00/hr	\$129.20
Total hours:	0.20	<u>\$129.20</u>

**Payments**

10/23/2025 Payment	WIRE: DLI RECEIVERSHIP	258.40
Sub-total Payments:		<u>\$258.40</u>

**Payment Terms: Due Upon Receipt****Payment Options:****Pay Online:****Bill.com:** <https://app.bill.com/p/rainesfeldmanllp>**Credit Card:** <https://secure.lawpay.com/pages/rainesfeldman/operating>**Pay by Wire/ACH:**

Wells Fargo Bank, N.A.

Routing No.: 121000248

Account No.: 4941981821

BIC/Swift Code: WFBIUS6S

Account Title: Raines Feldman Littrell LLP

Client Name &amp; Invoice #

**Pay by Check via Mail:**

Raines Feldman Littrell LLP

PO Box 848574

Los Angeles, CA 90084-8574

**RAINES**

**Raines Feldman Littrell LLP**  
 1900 Avenue of the Stars, 19th Floor  
 Los Angeles, CA 90067  
 (310) 440-4100  
 www.raineslaw.com  
 Federal Tax ID: 20-4515337

**Invoice Date: 12/15/2025**  
**Invoice Number: 142764**

Bradley D. Sharp  
 Receiver  
 333 S. Grand Avenue, Suite 400  
 Los Angeles, CA 90071

**4664-004 / DLIF Matters Only**

<b>Professional Services</b>			<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
11/14/2025	KBP	Review email re D&O settlement distribution	0.10	646.00	64.60
Sub-total Fees:					\$64.60
Total Current Billing:					<b>\$64.60</b>
Previous Balance Due:					\$4,519.21
<b>Total Now Due:</b>					<b>\$4,583.81</b>

**Rate Summary**

Kathy B. Phelps	0.10 hours at \$646.00/hr	\$64.60
Total hours:	0.10	\$64.60

**Payment Terms: Due Upon Receipt****Payment Options:****Pay Online:****Bill.com:** <https://app.bill.com/p/rainesfeldmanllp>**Credit Card:** <https://secure.lawpay.com/pages/rainesfeldman/operating>**Pay by Wire/ACH:**

Wells Fargo Bank, N.A.

Routing No.: 121000248

Account No.: 4941981821

BIC/Swift Code: WFBIUS6S

Account Title: Raines Feldman Littrell LLP

Client Name &amp; Invoice #

**Pay by Check via Mail:**

Raines Feldman Littrell LLP

PO Box 848574

Los Angeles, CA 90084-8574

1 **RAINES FELDMAN LITTRELL LLP**  
Kathy Bazoian Phelps (State Bar No. 155564)  
2 *kphelps@raineslaw.com*  
1900 Avenue of the Stars, Suite 1900  
3 Los Angeles, California 90067  
Telephone: (310) 440-4100  
4 Facsimile: (310) 691-1943  
5 *Counsel for Bradley D. Sharp,*  
*Permanent Receiver*  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION – LOS ANGELES**

11 SECURITIES AND EXCHANGE  
COMMISSION,

12  
13 Plaintiff,

14 v.

15  
16 DIRECT LENDING INVESTMENTS  
LLC,

17  
18 Defendant.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No.:2:19-cv-02188-DSF-MBKx

**DECLARATION OF LEIF M. LARSEN IN SUPPORT OF MOTION OF RECEIVER FOR (A) APPROVAL AND PAYMENT OF FEES AND EXPENSES FOR OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025 OF:**  
**(1) RECEIVER BRADLEY D. SHARP;**  
**(2) RAINES FELDMAN LITTRELL LLP;**  
**(3) DEVELOPMENT SPECIALISTS, INC.;**  
**(4) BERKELEY RESEARCH GROUP;**  
**(5) GOLDBERG KOHN LTD;**  
**(6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; AND**  
**(B) FOR APPROVAL OF FORM AND/OR LIMITATION OF NOTICE UNDER LOCAL CIVIL**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**RULE 66-7**

Date: March 30, 2026  
Time: 1:30 p.m.  
Dept.: Courtroom 7D  
Place: United States District Court  
Western Division  
350 West 1st Street  
Los Angeles, CA 90012

1 I, Leif M. Larsen, declare:

2 1. I am a Certified Public Accountant, a Certified Insolvency and  
3 Reorganization Advisor, and an Associate Director at Berkeley Research Group  
4 (“BRG”), tax accountants of record for Bradley D. Sharp, the Court-appointed  
5 permanent receiver (“Receiver”). I have personal knowledge of the matters set  
6 forth below and if called as a witness, I would and could testify competently to  
7 the matters stated herein.

8 2. This declaration is submitted in support of the Motion of Receiver  
9 approving and authorizing payment of fees and costs incurred by the Receiver  
10 and his professionals for the period from October 1, 2025 through December 31,  
11 2025 (“Expense Period”) and approving form and/or limitation of notice under  
12 Local Civil Rule 66-7 (the “Motion”).

13 3. On May 14, 2019, the Court entered an order authorizing the  
14 Receiver to employ BRG as his tax accountants (Dkt. No. 44). Pursuant to said  
15 order, I am one of the tax accountants at BRG principally responsible for  
16 providing services to the Receiver and I directly supervise the professionals and  
17 staff of BRG with respect to this representation.

18 4. Attached as Exhibit “1” hereto are true and correct copies of BRG’s  
19 billing statements itemizing the services rendered and costs incurred by BRG for  
20 the Expense Period.

21 5. All of BRG’s time records were recorded in the regular and ordinary  
22 course of business contemporaneously with the services provided.

23 6. In total, BRG seeks approval of fees in the amount of \$10,536.50  
24 incurred during the Expense Period.

25 7. I have read the Motion and the billing statements attached to this  
26 declaration. To the best of my knowledge, information and belief formed after  
27 reasonable inquiry, the Motion and all the fees and expenses requested in the  
28

1 attached billing statements are true, accurate and comply with the Billing  
2 Instructions for Receivers in Civil Actions Commenced by the U.S. Securities  
3 and Exchange Commission.

4 8. The fees that BRG has charged are reasonable, necessary, and  
5 commensurate with the skill and experience required for the activity performed.  
6 BRG respectfully submits that it has not expended time unnecessarily and that it  
7 has rendered efficient and effective services.

8 9. In seeking reimbursement of services for which BRG purchased or  
9 contracted from a third party, it has only requested reimbursement for the amount  
10 billed to BRG by the third-party vendor and paid to the vendor by BRG. BRG  
11 has not included in the amount for which reimbursement is sought the  
12 amortization of the cost of any investment, equipment, or capital outlay.

13 10. As detailed in my previous declaration in support of the Receiver's  
14 motion for an order authorizing BRG's employment (Dkt. No. 17-3), in order to  
15 keep fees low, BRG agreed to reduce its regular billing rates by 5%. The billing  
16 statements attached to this declaration reflect that 5% reduction in billing rates.

17 11. During this Expense Period, BRG prepared 2024 federal and state  
18 income tax returns for the DLI Receivership for the Receiver's review and  
19 signature. BRG reviewed, signed and submitted the completed 2024 income  
20 tax returns to the proper taxing authorities.

21 12. BRG performed an in-depth analysis of tax years 2022 through 2025  
22 to identify potential tax liabilities. BRG prepared multiple tax liability reserve  
23 calculations to determine the proper amounts to reserve for potential tax  
24 ramifications related to various transactions. BRG prepared schedules outlining  
25 potential taxable transactions and corresponding tax liabilities. The completed  
26 worksheets were reviewed for completeness and accuracy. Updates were made  
27 as was required. BRG consulted with the receiver's office to outline various tax  
28

1 issues related to the DLI Receivership.

2 I declare under penalty of perjury under the laws of the United States of  
3 America that the foregoing is true and correct. Executed in Salt Lake City, Utah,  
4 on February 18, 2026.

5  \_\_\_\_\_

6 Leif M. Larsen

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# EXHIBIT 1



To: Bradley Sharp Development Specialists, Inc.  
c/o: Bradley Sharp, Receiver for Direct Lending Investments, LLC  
RE: Accountants to Receiver for Direct Lending Investments, LLC

Page 3 of 6  
Invoice # 10032928  
Client-Project: 017259-027341

Services Rendered From October 1, 2025 Through October 31, 2025

**PROFESSIONAL SERVICES**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
<b>Managing Director</b>			
Vernon Calder	680.00	1.30	884.00
<b>Associate Director</b>			
Leif Larsen	499.00	19.10	9,530.90
<b>Case Assistant</b>			
Kellee Calder	152.00	0.80	121.60
<b>Total Professional Services</b>		<b>21.20</b>	<b>10,536.50</b>



INVOICE

To: Bradley Sharp Development Specialists, Inc.  
c/o: Bradley Sharp, Receiver for Direct Lending Investments, LLC  
RE: Accountants to Receiver for Direct Lending Investments, LLC

Page 4 of 6  
Invoice # 10032928  
Client-Project: 017259-027341

**SUMMARY BY TASK CODE**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	General Tax Compliance	15.40	7,443.20
03	Tax Return Preparation	4.30	2,145.70
04	Meetings	1.10	748.00
05	Billing	0.40	199.60
<b>Total Professional Services</b>		<b>21.20</b>	<b>10,536.50</b>



To: Bradley Sharp Development Specialists, Inc.  
 c/o: Bradley Sharp, Receiver for Direct Lending Investments, LLC  
 RE: Accountants to Receiver for Direct Lending Investments, LLC

Page 5 of 6  
 Invoice # 10032928  
 Client-Project: 017259-027341

Services Rendered From October 1, 2025 Through October 31, 2025

**DETAIL OF PROFESSIONAL SERVICES**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Task Code: 01 - General Tax Compliance</b>					
10/03/25	Kellee Calder	Prepared tax returns for the Trustee's review and required signatures for 2024.	0.60	152.00	91.20
10/14/25	Kellee Calder	Prepared tax returns for the Receiver's review and required signatures for 2024.	0.20	152.00	30.40
10/21/25	Leif Larsen	Prepared for and participated in conference call regarding estimated tax reserves.	0.80	499.00	399.20
10/24/25	Leif Larsen	Analyzed 2025 financial information and tax reserve analysis schedules.	1.20	499.00	598.80
10/27/25	Leif Larsen	Analyzed tax reserve analysis schedules and prepared tax reserve calculations for 2025 for the IRS and the FTB.	1.10	499.00	548.90
10/27/25	Leif Larsen	Analyzed tax reserve analysis schedules and prepared tax reserve calculations for 2024 for the IRS and the FTB.	1.40	499.00	698.60
10/27/25	Leif Larsen	Analyzed tax reserve analysis schedules and prepared tax reserve calculations for 2023 for the IRS and the FTB.	1.80	499.00	898.20
10/27/25	Leif Larsen	Analyzed tax reserve analysis schedules and prepared tax reserve calculations for 2022 for the IRS and the FTB.	2.10	499.00	1,047.90
10/28/25	Vernon Calder	Reviewed computation of potential tax liability.	0.20	680.00	136.00
10/28/25	Leif Larsen	Made revisions to tax reserve calculations for 2022 through 2025 for the IRS and the FTB.	2.20	499.00	1,097.80
10/30/25	Leif Larsen	Prepared additional scenarios to the tax reserve calculations for 2022 through 2025 for the IRS and the FTB.	3.50	499.00	1,746.50
10/31/25	Leif Larsen	Teams meeting with DSI to review tax reserve calculations.	0.30	499.00	149.70
<b>Total for Task Code 01</b>			<b>15.40</b>		<b>7,443.20</b>
<b>Task Code: 03 - Tax Return Preparation</b>					
10/01/25	Leif Larsen	Finalized the 2024 federal and state income tax returns.	1.80	499.00	898.20



To: Bradley Sharp Development Specialists, Inc.  
 c/o: Bradley Sharp, Receiver for Direct Lending Investments, LLC  
 RE: Accountants to Receiver for Direct Lending Investments, LLC

Page 6 of 6  
 Invoice # 10032928  
 Client-Project: 017259-027341

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Task Code: 03 - Tax Return Preparation</b>					
10/01/25	Leif Larsen	Prepared for and participated in conference call to resolve 2024 tax issues.	1.20	499.00	598.80
10/03/25	Leif Larsen	Reviewed the 2024 receivership income tax returns for accuracy and completeness.	1.10	499.00	548.90
10/10/25	Leif Larsen	Reviewed and signed the 2024 DLI receivership income tax returns.	0.20	499.00	99.80
<b>Total for Task Code 03</b>			<b>4.30</b>		<b>2,145.70</b>
<b>Task Code: 04 - Meetings</b>					
10/21/25	Vernon Calder	Prepared for and participated in Teams meeting regarding need to determine potential tax reserves.	0.70	680.00	476.00
10/28/25	Vernon Calder	Teams meeting with Receiver's accountants regarding potential tax liabilities.	0.40	680.00	272.00
<b>Total for Task Code 04</b>			<b>1.10</b>		<b>748.00</b>
<b>Task Code: 05 - Billing</b>					
10/21/25	Leif Larsen	Reviewed and updated Declaration to be included with 26th fee application.	0.40	499.00	199.60
<b>Total for Task Code 05</b>			<b>0.40</b>		<b>199.60</b>
<b>Professional Services</b>			<b>21.20</b>		<b>10,536.50</b>

1 **RAINES FELDMAN LITTRELL LLP**  
Kathy Bazoian Phelps (State Bar No. 155564)  
2 *kphelps@raineslaw.com*  
1900 Avenue of the Stars, Suite 1900  
3 Los Angeles, California 90067  
Telephone: (310) 440-4100  
4 Facsimile: (310) 691-1943  
5 *Counsel for Bradley D. Sharp,*  
*Permanent Receiver*  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION – LOS ANGELES**

11 SECURITIES AND EXCHANGE  
COMMISSION,  
12  
13 Plaintiff,  
14  
15 v.  
16 DIRECT LENDING INVESTMENTS  
LLC,  
17  
18 Defendant.

Case No.: 2:19-cv-02188-DSF-MRW

**DECLARATION OF DIMITRI G. KARCAZES IN SUPPORT OF MOTION OF RECEIVER FOR (A) APPROVAL AND PAYMENT OF FEES AND EXPENSES FOR OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025 OF:**  
**(1) RECEIVER BRADLEY D. SHARP;**  
**(2) RAINES FELDMAN LITTRELL LLP;**  
**(3) DEVELOPMENT SPECIALISTS, INC.;**  
**(4) BERKELEY RESEARCH GROUP;**  
**(5) GOLDBERG KOHN LTD;**  
**(6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; AND**  
**(B) FOR APPROVAL OF FORM AND/OR LIMITATION OF NOTICE UNDER LOCAL CIVIL**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**RULE 66-7**

Date: March 30, 2026  
Time: 1:30 p.m.  
Dept.: Courtroom 7D  
Place: United States District Court  
Western Division  
350 West 1st Street  
Los Angeles, CA 90012

1 I, Dimitri G. Karcazes, declare:

2 1. I am an attorney duly licensed to practice in the State of Illinois. I  
3 am a principal at the firm of Goldberg Kohn Ltd. (“Goldberg Kohn”), and a  
4 member of Goldberg Kohn's Bankruptcy and Creditors' Rights practice group.

5 2. I have personal knowledge of the matters set forth below and if  
6 called as a witness, I would and could testify competently to the matters stated  
7 herein.

8 3. This declaration is submitted in support of the Motion of Receiver  
9 approving and authorizing payment of fees and costs incurred by the Receiver  
10 and his professionals for the period from October 1, 2025 through December 31,  
11 2025 (“Expense Period”) and approving form and/or limitation of notice under  
12 Local Civil Rule 66-7 (the “Motion”).

13 4. On October 3, 2019, the Court entered an order authorizing the  
14 Receiver to employ Goldberg Kohn as special creditors' rights counsel to the  
15 Receiver effective as of September 5, 2019 (Doc. No. 142). Pursuant to said  
16 order, and the underlying Motion, I am one of the attorneys at Goldberg Kohn  
17 principally responsible for assisting the Receiver in his negotiation and  
18 preparation of transaction documents on key portfolio positions held by the  
19 estate, and to provide advice and representation regarding potential significant  
20 collection or enforcement actions against counterparties where consensual  
21 restructuring or refinancing efforts cannot be achieved.

22 5. Attached as Exhibit “1” hereto are true and correct copies of billing  
23 statements itemizing the services rendered and costs incurred by Goldberg Kohn  
24 for the period of October 1, 2025 through December 31, 2025 (“Expense  
25 Period”). The billing statements list the services performed chronologically for  
26 each key portfolio position and also contain a disbursement recap of the expenses  
27 incurred.

28

1           6. All of Goldberg Kohn’s time records were recorded in the regular  
2 and ordinary course of business contemporaneously with the services provided.

3           7. I have read the Motion and the billing statements attached to this  
4 declaration. To the best of my knowledge, information and belief formed after  
5 reasonable inquiry, the Motion, and all the fees and expenses requested in the  
6 attached billing statements are true, accurate, and comply with the Billing  
7 Instructions for Receivers in Civil Actions Commenced by the U.S. Securities  
8 and Exchange Commission.

9           8. The fees that Goldberg Kohn has charged are reasonable, necessary,  
10 and commensurate with the skill and experience required for the activity  
11 performed. Goldberg Kohn’s services and time expenditures are reasonable in  
12 light of the labor required for the matters for which Goldberg Kohn was retained  
13 and the balancing act that must be performed to efficiently and effectively assist  
14 the Receiver. Goldberg Kohn respectfully submits that it has not expended time  
15 unnecessarily, and that it has rendered efficient and effective services.

16           9. The services provided relate to just one of the remaining  
17 investments, identified as Investment N. Goldberg Kohn assisted the Receiver in  
18 evaluating and documenting a potential settlement agreement, which has not yet  
19 been finalized.

20           10. As detailed in my previous declaration in support of the Receiver’s  
21 motion for an order authorizing Goldberg Kohn’s employment (Doc. No. 120-4),  
22 in the interests of the estate, Goldberg Kohn agreed to reduce its regular hourly  
23 rates by 15%. The billing statements attached to this declaration reflect that 15%  
24 reduction in fees for each attorney and paraprofessional.

25           11. As detailed in the billing statements attached hereto as Exhibit “1,”  
26 Goldberg Kohn seeks approval of \$11,183.02.

27           12. As is evident from the Motion and the billing statements attached,  
28

1 for the benefit of the estate, Goldberg Kohn’s services in the case have lessened  
2 over time and the firm continues to assist the Receiver in resolving issues on the  
3 remaining open portfolio positions.  
4

5 I declare under penalty of perjury under the laws of the United States of  
6 America that the foregoing is true and correct. Executed in Chicago, Illinois, on  
7 February 16, 2026.

8   
9  
10

11 Dimitri G. Karcazes  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# EXHIBIT 1



GOLDBERG KOHN LTD

TEL 312.201.4000 FAX 312.332.2196 WEB WWW.GOLDBERGMKOHNS.COM  
55 EAST MONROE STREET SUITE 3300 CHICAGO ILLINOIS 60603-5792

F.E.I.N. 36-2863762

DIRECT LENDING INVESTMENTS, LLC  
 Attn: Bradley D. Sharp  
 Court-Appointed Permanent Receiver  
 333 S. Grand Avenue  
 Suite 4100  
 Los Angeles, CA 90071

JANUARY 15, 2026

08024.0008/321068

PAGE 1

REGARDING: [REDACTED]**Time Detail**

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/12/2025	YNK	Call with DGK re new matter, next steps	0.20	855.00	171.00
12/12/2025	DGK	Call with M. Iammartino re proposed assignment agreement/issues re same and follow-up teleconference with YNK re same	0.50	1,500.00	750.00
12/13/2025	YNK	Review background materials re assignment agreement	0.40	855.00	342.00
12/13/2025	DGK	Email to YNK re proposed revisions to assignment agreement and notes re same	0.30	1,500.00	450.00
12/14/2025	YNK	Call with DGK re assignment agreement drafting	0.20	855.00	171.00
12/14/2025	DGK	Teleconference with YNK re revisions to draft assignment agreement and related issues	0.30	1,500.00	450.00
12/15/2025	YNK	Draft assignment agreement and ancillary documents and review file in connection with same	5.10	855.00	4,360.50
12/16/2025	YNK	Revise assignment agreement, including to address agency resignation provisions and review loan documents in connection with same	2.80	855.00	2,394.00
12/16/2025	DGK	Review and revise draft assignment agreement (0.7); conference with YNK re proposed changes (0.1); review proposed release related to potential loan assignment and emails to and from YNK re same (0.3); review and revise updated draft assignment agreement and email to M. Iammartino re same (0.4)	1.50	1,500.00	2,250.00
12/17/2025	YNK	Revise assignment draft and correspondence with client re same	1.50	855.00	1,282.50



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION – LOS ANGELES**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIRECT LENDING INVESTMENTS  
LLC,

Defendant.

Case No.:2:19-cv-02188-DSF-MBKx

**[PROPOSED] ORDER  
GRANTING MOTION OF  
RECEIVER FOR (A) APPROVAL  
AND PAYMENT OF FEES AND  
EXPENSES FOR OCTOBER 1,  
2025 THROUGH DECEMBER 31,  
2025 OF:**

- (1) RECEIVER BRADLEY D. SHARP;**
- (2) RAINES FELDMAN LITTRELL LLP;**
- (3) DEVELOPMENT SPECIALISTS, INC.;**
- (4) BERKELEY RESEARCH GROUP;**
- (5) GOLDBERG KOHN LTD;**
- (6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO;**
- (B) FOR RELEASE OF HOLDBACKS; AND  
FOR APPROVAL OF FORM**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**AND/OR LIMITATION OF  
NOTICE UNDER LOCAL CIVIL  
RULE 66-7**

Date: March 30, 2026  
Time: 1:30 p.m.  
Dept.: Courtroom 7D  
Place: United States District Court  
Western Division  
350 West 1st Street  
Los Angeles, CA 90012

1 The Motion of Receiver for: (A) Approval and Payment of Fees and  
2 Expenses from October 1, 2025 through December 31, 2025 of Bradley D. Sharp;  
3 Raines Feldman Littrell LLP; Development Specialists, Inc.; Berkeley Research  
4 Group; Bankruptcy Management Solutions dba Stretto; (B) For Approval of  
5 Form and/or Limitation of Notice Under Local Civil Rule 66-7 (“Motion”)  
6 (Docket No. \_\_\_ ) came on for hearing at the above-referenced date, time, and  
7 place before the Honorable Dale S. Fischer, United States District Judge  
8 presiding. Appearances were as noted on the record. The Court, having reviewed  
9 and considered the Motion and all pleadings and papers filed in support thereof,  
10 and oppositions or responses to the Motion, if any, and good cause appearing  
11 therefor,

12 IT IS ORDERED that:

- 13 1. The Motion and the relief sought therein is granted;
- 14 2. Fees incurred by the Receiver and his professionals and billed to  
15 DLIF investor matters (the “DLIF Fees”) will be paid separately from Class 4A  
16 from DLIF’s claim distribution as set forth herein;
- 17 3. The Receiver’s fees in the amount of \$2,760.00 is approved, and the  
18 Receiver is authorized to pay 80% of the approved fees (\$2,208.00), with the  
19 balance of unpaid fees to be paid subject to further order of the Court;
- 20 4. Development Specialists, Inc.’s (“DSI”) fees, the Receiver’s  
21 accountants and deputies’ fees in the amount of \$109,258.15 and costs in the  
22 amount of \$52.42 are approved, and the Receiver is authorized to pay 100% of  
23 DSI’s approved fees and 100% of its approved costs. From that amount, the  
24 Receiver shall pay \$18,257.57 of on account of DSI’s DLIF Fees from Class 4A  
25 funds;
- 26 5. Raines Feldman Littrell, the Receiver’s general counsel’s fees in the  
27 amount of \$23,525.90, and \$259.71 in costs, are approved and the Receiver is  
28

1 authorized to pay 100% of the approved fees and 100% of its approved costs.  
2 From that amount, the Receiver shall pay \$193.80 on account of Raines  
3 Feldman’s DLIF Fees from Class 4A funds;

4 6. Goldberg Kohn Ltd., the Receiver’s corporate counsel’s fees in the  
5 amount of \$11,183.02 are approved, and the Receiver is authorized to pay  
6 Goldberg Kohn Ltd, 100% of its approved fees;

7 7. Berkeley Research Group’s (“BRG”), the Receiver’s tax  
8 accountant’s fees in the amount of \$10,536.50, and the Receiver is authorized to  
9 pay BRG 100% of its approved fees and 100% of its approved costs;

10 8. Bankruptcy Management Solutions dba Stretto (“Stretto”), the  
11 Receiver’s claims agent’s fees in the amount of \$12,614.50, and costs in the  
12 amount of \$27.93 are approved, and the Receiver is authorized to pay Stretto,  
13 100% of its approved fees and 100% of its approved costs;

14 9. The form of notice on the Motion provided to interested parties,  
15 creditors, and investors, who are potential creditors of the estate, by the Receiver  
16 (a) serving the Motion and related moving papers on all parties to the action; (b)  
17 serving by mail a notice of hearing on the Motion to all known creditors pursuant  
18 to Local Civil Rule 66-7; (c) posting a copy of the Motion on the Receiver’s  
19 website for the case at <https://cases.stretto.com/dli>; and (d) causing Bankruptcy  
20 Management Solutions dba Stretto to provide by email a copy of the notice of  
21 hearing on the Motion to all known investors through its email service regularly  
22 used to provide notices and documents to investors pursuant to the applicable  
23 governing documents for Direct Lending Income Fund, L.P. and Direct Lending  
24 Income Feeder Fund, Ltd., is hereby approved and deemed sufficient notice and  
25  
26  
27  
28

1 opportunity for hearing on the Motion under the circumstances.

2

3 DATED:

4

\_\_\_\_\_  
DALE S. FISCHER  
United States District Judge

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 **RAINES FELDMAN LITTRELL LLP**  
Kathy Bazoian Phelps (State Bar No. 155564)  
2 *kphelps@raineslaw.com*  
1900 Avenue of the Stars, Suite 1900  
3 Los Angeles, California 90067  
Telephone: (310) 440-4100  
4 Facsimile: (310) 691-1943  
5 *Counsel for Bradley D. Sharp,*  
*Permanent Receiver*  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION – LOS ANGELES**

11 SECURITIES AND EXCHANGE  
COMMISSION,

Case No.:2:19-cv-02188-DSF-MBKx

12  
13 Plaintiff,

**PROOF OF SERVICE**

14 v.

Date: March 30, 2026  
Time: 1:30 p.m.  
Dept.: Courtroom 7D  
Place: United States District Court  
Western Division  
350 West 1st Street  
Los Angeles, CA 90012

16 DIRECT LENDING INVESTMENTS  
LLC,

17  
18 Defendant.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

I hereby declare under penalty of perjury pursuant to the laws of the state of California that I am a citizen of the United States, over the age of eighteen years and not a party to the within-entitled action. My business address is 1900 Avenue of the Stars, Suite 1900, Los Angeles, CA 90067; hchoi@raineslaw.com. On **February 23, 2026**, I served a copy of the within document(s):

- **NOTICE MOTION AND MOTION OF RECEIVER FOR (A) APPROVAL AND PAYMENT OF FEES AND EXPENSES FOR OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025 OF: (1) RECEIVER BRADLEY D. SHARP; (2) RAINES FELDMAN LITRELL LLP; (3) DEVELOPMENT SPECIALISTS, INC.; (4) BERKELEY RESEARCH GROUP; (5) GOLDBERG KOHN LTD; (6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; (B) FOR APPROVAL OF FORM AND/OR LIMITATION OF NOTICE UNDER LOCAL CIVIL RULE 66-7**
  
- **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION OF RECEIVER FOR (A) APPROVAL AND PAYMENT OF FEES AND EXPENSES FOR OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025 OF: (1) RECEIVER BRADLEY D. SHARP; (2) RAINES FELDMAN LITRELL LLP; (3) DEVELOPMENT SPECIALISTS, INC.; (4) BERKELEY RESEARCH GROUP; (5) GOLDBERG KOHN LTD; (6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; (B) FOR APPROVAL OF FORM AND/OR LIMITATION OF NOTICE UNDER LOCAL CIVIL RULE 66-7**
  
- **DECLARATION OF BRADLEY D. SHARP IN SUPPORT OF MOTION OF RECEIVER FOR (A) APPROVAL AND PAYMENT OF FEES AND EXPENSES FOR OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025 OF: (1) RECEIVER BRADLEY D. SHARP; (2) RAINES FELDMAN LITRELL LLP; (3) DEVELOPMENT SPECIALISTS, INC.; (4) BERKELEY RESEARCH GROUP; (5) GOLDBERG KOHN LTD; (6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; (B) FOR APPROVAL OF FORM AND/OR LIMITATION OF NOTICE UNDER LOCAL CIVIL RULE 66-7**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

- **DECLARATION OF KATHY BAZOIAN PHELPS IN SUPPORT OF MOTION OF RECEIVER FOR (A) APPROVAL AND PAYMENT OF FEES AND EXPENSES FOR OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025 OF: (1) RECEIVER BRADLEY D. SHARP; (2) RAINES FELDMAN LITTRELL LLP; (3) DEVELOPMENT SPECIALISTS, INC.; (4) BERKELEY RESEARCH GROUP; (5) GOLDBERG KOHN LTD; (6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; (B) FOR APPROVAL OF FORM AND/OR LIMITATION OF NOTICE UNDER LOCAL CIVIL RULE 66-7**
  
- **DECLARATION OF VERNON L. CALDER IN SUPPORT OF MOTION OF RECEIVER FOR (A) APPROVAL AND PAYMENT OF FEES AND EXPENSES FOR OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025 OF: (1) RECEIVER BRADLEY D. SHARP; (2) RAINES FELDMAN LITTRELL LLP; (3) DEVELOPMENT SPECIALISTS, INC.; (4) BERKELEY RESEARCH GROUP; (5) GOLDBERG KOHN LTD; (6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; (B) FOR APPROVAL OF FORM AND/OR LIMITATION OF NOTICE UNDER LOCAL CIVIL RULE 66-7**
  
- **DECLARATION OF DIMITRI G. KARCAZES IN SUPPORT OF MOTION OF RECEIVER FOR (A) APPROVAL AND PAYMENT OF FEES AND EXPENSES FOR OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025 OF: (1) RECEIVER BRADLEY D. SHARP; (2) RAINES FELDMAN LITTRELL LLP; (3) DEVELOPMENT SPECIALISTS, INC.; (4) BERKELEY RESEARCH GROUP; (5) GOLDBERG KOHN LTD; (6) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; (B) FOR APPROVAL OF FORM AND/OR LIMITATION OF NOTICE UNDER LOCAL CIVIL RULE 66-7**
  
- **[PROPOSED] ORDER GRANTING MOTION OF RECEIVER FOR (A) APPROVAL AND PAYMENT OF FEES AND EXPENSES FOR JULY 1, 2025 THROUGH SEPTEMBER 30, 2025 OF: (1) RECEIVER BRADLEY D. SHARP; (2) RAINES FELDMAN LITTRELL LLP; (3) DEVELOPMENT SPECIALISTS, INC.; (4) BERKELEY RESEARCH GROUP; (5) BANKRUPTCY MANAGEMENT SOLUTIONS DBA STRETTO; (B) FOR APPROVAL OF FORM AND/OR**

1                   **LIMITATION OF NOTICE UNDER LOCAL CIVIL RULE 66-7**

2  
3       **X     SERVED VIA ELECTRONIC TRANSMISSION/EMAIL:** On  
4       **February 23, 2026**, I served the following persons and/or entities at the by  
5       transmitting via electronic mail the document(s) listed above to the addresses set  
6       forth below:

7               Daniel Prince, danielprince@paulhastings.com

8               Matthew Dors, Esq., matthew.dors@collascrill.com

9               Rupert Stanning, Esq., rupert.stanning@collascrill.com

10              Christopher D. Johnson, cdj@cjacayman.com

11              Jill Zadny, jz@cjacayman.com

12              Karen Scott, ks@cjacayman.com

13              Jacob A. Johnson, Alston & Bird LLP, jacob.johnson@alston.com

14              Will Sugden, Alston & Bird LLP, will.sugden@alston.com

15              Mark Rosenbaum, mrosenbaum@wrslawyers.com

16              Howard J. Weg, hweg@hjewadvisor.com

17              Gavin Masuda, gmasuda@deloitte.com

18              Michael Paris, mparis@nbparis.com

19              Tyler Meade, tyler@meadefirm.com

20              Michael Reiser, michael@reiserlaw.com

21              Jeffrey Schneider, jcs@lklsg.com

22              Jason Kellogg, jk@lklsg.com

23              Lawrence Eigel, eigel@bespc.com

24              David E. Azar, dazar@milberg.com

25              Henry J. Kelston, hkelston@ahdootwolfson.com

26              Craig Holden, craig.holden@lewisbrisbois.com

27              Scott M. Ahmad, sahmad@winston.com

28              Antonia M. Apps, aapps@milbank.com

1 Evan C. Borges, eborges@ggtriallaw.com  
2 Brian J. Hennigan, bhennigan@hueston.com  
3 Vicki Chou, vchou@hueston.com  
4 Peter I. Altman, paltman@akingump.com  
5

6 **X TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC**

7 **FILING (NEF):** On **February 23, 2026**, Pursuant to L.R. 5-3.2.1, the document  
8 listed above will be served by the court via NEF and hyperlink to the document  
9 which effects electronic service on counsel who are registered with the CM/ECF  
10 system.

11 I am readily familiar with the firm's practice of collection and processing  
12 correspondence for mailing. Under that practice it would be deposited with the  
13 U.S. Postal Service on that same day with postage thereon fully prepaid in the  
14 ordinary course of business. I am aware that on motion of the party served,  
15 service is presumed invalid if postal cancellation date or postage meter date is  
16 more than one day after date of deposit for mailing in affidavit.

17 I declare under penalty of perjury under the laws of the state  
18 of California that the above is true and correct. Executed on **February**  
19 **23, 2026**, at Los Angeles, California.

20  
21 /s/ Helen Choi  
22 Helen Choi  
23  
24  
25  
26  
27  
28