

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JULIA A. SU, ACTING SECRETARY OF U.S.)	
DEPARTMENT OF LABOR,)	
)	
Plaintiff,)	CASE NO. 2:24-CV-00104 (MJH)
)	
v.)	
)	
RIVERSEDGE ADVANCED RETIREMENT)	
SOLUTIONS, LLC a Pennsylvania Company,)	
PAUL PALGUTA, an individual,)	
)	
v.)	
)	
MID ATLANTIC TRUST COMPANY dba)	
AMERICAN TRUST CUSTODY, a)	
corporation, and CHARLES SCHWAB)	
TRUST BANK, a corporation, <i>solely as Rule 19</i>)	
<i>defendants</i>)	
Defendants.)	

INDEPENDENT FIDUCIARY’S SIXTH NOTICE OF FEE FILING

Receivership Management, Inc. (“RMI”), in its capacity as court-appointed Independent Fiduciary (“Independent Fiduciary”) to the “Mismanaged Plans” and the “Client Plans” as outlined in its Preliminary Injunction entered in this case on February 20, 2024, by its counsel, and pursuant to paragraph 6 of the Court’s Preliminary Injunction (ECF No. 40) hereby submits its Sixth Notice of Fee Filing and states as follows:

This filing constitutes RMI’s fee filing for the period from July 1, 2024 through July 31, 2024. Pursuant to the Court’s Preliminary Injunction, RMI is authorized to seek payment from the funds tendered to the Court to pay itself and its service providers reasonable and necessary fees and expenses from the Fund. Before making any such payment, RMI must file with the Court, with a copy to the Secretary of Labor, the RiversEdge Defendants, the Rule 19(a) Defendants and all Plans, a fee notice, which shall include a detailed invoice itemizing the

compensation, fees and expense to be paid. RMI shall not be required to file, service, or otherwise deliver the Fee Notice to any person or persons other than the Court, the Secretary, the RiversEdge Defendants, the Rule 19(a) Defendants and all Plans. If within fifteen (15) days after filing of a Fee Notice, no objection to the Fee Notice is made or payment by the Court of the compensation, fees, or expenses described therein is filed with this Court, such compensation, fees, and expenses shall be shall be paid by the Court from amounts submitted to the Court pursuant to paragraph 5 of the Preliminary Injunction (ECF No. 40). Itemized statements of work and applicable hourly rates for RMI and its service providers are attached as Exhibit 1 hereto and are summarized below. Fees and expenses for the period of July 1, 2024 to July 31, 2024 are as follows:

A. Receivership Management Inc.	\$ 7,096.32
\$ 7,094.40 / Contract Labor	
\$ 1.92 / Other Expenses	
B. Berry & Tudor PC-Legal	\$ 8,961.96
C. Strassburger McKenna Gutnick & Gefsky	\$ 121.50
D. Mike Mancour	\$ 60.00
Total:	\$ 16,239.78

Respectfully submitted,

**RECEIVERSHIP MANAGEMENT, INC., AS
COURT-APPOINTED INDEPENDENT
FIDUCIARY OF MISMANAGED PLANS AND
CLIENT PLANS OF RIVERSEDGE
ADVANCED RETIREMENT SOLUTIONS
LLC,**

/s/ Bynum E. Tudor III

Bynum Tudor III (TN Bar 012279)

Admitted Pro Hac Vice

Berry & Tudor PC

5123 Virginia Way

Suite B-23

Brentwood, Tennessee 37027

(615) 726-1000

(615) 370-0077 (fax)

Counsel for Receivership Management, Inc.

SUMMARY TIME SHEET- RMI
SERVICES PROVIDED FOR RIVERSEDGE
FOR THE PERIOD 7/1/24 THRU 7/31/24

Receivership Management Inc.

JULY 2024 FEES	<u>7,094.40</u>	7,094.40
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Strassburger McKenna Gutnick & Gefsky

JULY 2024 FEES	<u>121.50</u>	121.50
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Berry & Tudor, PC - Legal

JULY 2024 FEES	<u>8,961.96</u>	8,961.96
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Mike Mancour - Data Analyst

JULY 2024 FEES	<u>60.00</u>	60.00
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TOTAL FEES DUE:	\$	16,237.86
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TOTAL EXPENSES DUE:	\$	<u>1.92</u>
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GRAND TOTAL DUE:	\$	<u><u>16,239.78</u></u>
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Receivership Management, Inc.
510 Hospital Drive, Suite 490
Madison, TN 37115

Invoice for Professional Services

RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC

July 2024

7/1/2024	J. David Bennett	MATCHING ACCOUNTING REPORT ITEMS TO MY WORKPAPERS	2.6	\$156.00	\$405.60
7/1/2024	Lauren B. Garcia	RECEIPT OF 4TH FEE FILING, UPLOAD TO WEBSITE, PREPARE CHECK PAYMENT, PREPARE DEPOSIT, TRIP TO BANK	0.6	\$104.40	\$62.64
7/1/2024	Robert E. Moore, Jr.	REVIEW INFORMATION SUPPLIED BY SRT RE: PSEUDO ACCOUNTS, EXPUNGED STATUS, ADDITIONAL INFORMATION RE: SRT SYSTEM USE, FORWARD SAME TO B.TUDOR AND D.BENNETT, REVIEW RESPONSE FROM B.TUDOR, SCHEDULE MEETING WITH D.BENNETT .3	0.3	\$204.00	\$61.20
7/2/2024	J. David Bennett	MEETING WITH ROB ON SRT MATERIALS RECEIVED. SET-UP WORK PROGRAM.	1.7	\$156.00	\$265.20
7/2/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: FINAL REPORT, CLARIFICATIONS 1.7; EMAILS TO L.GARCIA RE: DATA INFORMATION UPDATE, WORKXPRESS .2; MEETING WITH D.BENNETT TO REVIEW SRT INFORMATION, REPORTING, REVISIONS TO REPORT AS A RESULT OF SAME 4.0	5.9	\$204.00	\$1,203.60
7/3/2024	J. David Bennett	STARTED REVIEW OF WORK RECEIVED	2.1	\$156.00	\$327.60
7/3/2024	Robert E. Moore, Jr.	FOLLOW UP EMAIL TO AND FROM S.REISS RE SRT PSEUDO ACCOUNTS .2	0.2	\$204.00	\$40.80
7/5/2024	Lauren B. Garcia	EMAIL TO B TUDOR, REQUEST FOR EMPLOYER PLAN DOCS, UPLOAD TO SHAREFILE, EMAIL, CALL FROM EMPLOYERS RE TRANSFER	0.5	\$104.40	\$52.20
7/5/2024	Robert E. Moore, Jr.	ISSUE CONFIRMATION EMAIL MEMO TO S.REISS RE: PSEUDO ACCOUNTS .3	0.3	\$204.00	\$61.20
7/8/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: UPDATE ON REPORT FILING .75	0.75	\$204.00	\$153.00
7/9/2024	Robert E. Moore, Jr.	REVIEW AND RESPOND TO EMAIL FROM B.TUDOR RE: ARC OF WABASH COUNTY .1	0.1	\$204.00	\$20.40

Thursday, August 22, 2024

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RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC**July 2024**

7/10/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: CONTINUED ISSUES WITH REPORT FILING .5; EMAILS TO AND FROM M.MANCOUR RE: WORKXPRESS DATA, REASONS IT WON'T WORK .3; EMAIL TO DOL COUNSEL RE: SAME .10; ADDITIONAL EMAILS FROM AND TO M.MANCOUR RE: DATA FROM WORKXPRESS .25	1.15	\$204.00	\$234.60
7/11/2024	J. David Bennett	REVIEW REPORT EMAIL AND STARTED TRACING OF SUB-SCHEDULES INCLUDED IN THE EMAIL BACK TO MY WORKPAPERS.	0.5	\$156.00	\$78.00
7/11/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: QUESTIONS ON GROUPS .8; FINAL UPDATE TO M.MANCOUR RE: WORKXPRESS DATA .10; COMPLETED REVISED DRAFT REPORT 2.25;	3.15	\$204.00	\$642.60
7/12/2024	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUALS	0.1	\$104.40	\$10.44
7/12/2024	Robert E. Moore, Jr.	CALL WITH D.BENNETT RE: REPORT ISSUES 1.0; CALL WITH B.TUDOR RE: UPDATE FROM D.BENNETT AND OTHER REPORT MATTERS 1.25; REVIEW AND RESPOND TO EMAIL FROM B.TUDOR RE: SAME .10; RESPOND TO EMAILS FROM DOL COUNSEL .2	2.55	\$204.00	\$520.20
7/14/2024	J. David Bennett	DRAFTED RESTATEMENTS AND MADE SUGGESTED EDITS ON DRAFT INFORMATION	1.2	\$156.00	\$187.20
7/14/2024	Robert E. Moore, Jr.	EMAIL FROM D.BENNETT RE: REPORT COMMENTS .2	0.2	\$204.00	\$40.80
7/15/2024	J. David Bennett	MADE COMMENTS ON SECTIONS OF REPORT RELATED TO ACCOUNTANCY AND CONTROL ELEMENTS IN THE REPORT ON PAST ADJUSTMENTS	1	\$156.00	\$156.00
7/15/2024	Robert E. Moore, Jr.	FINAL REVISIONS TO REPORT RECEIVED, FINAL DRAFT SUBMITTED TO COUNSEL FOR FILING 2.5	2.5	\$204.00	\$510.00
7/16/2024	J. David Bennett	PASSOVER READING OF FINAL REPORT	0.2	\$156.00	\$31.20
7/16/2024	Robert E. Moore, Jr.	CALL FROM D.BENNETT RE: UPDATE ON CASE INFORMATION .10; CALL WITH B.TUDOR RE CASE MATTERS .95	1.05	\$204.00	\$214.20
7/17/2024	Robert E. Moore, Jr.	UPDATE CALL FROM B.TUDOR .10	0.1	\$204.00	\$20.40
7/19/2024	J. David Bennett	DISCUSSION OF SUPPOSED SECURITY PROTOCOLS DISCLOSED IN RMI REPORT,	0.8	\$156.00	\$124.80
7/19/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: REPORT AND REMAINING EMPLOYERS .3, CALL WITH D.BENNETT RE: RESPONSES TO REPORT .5; NUMEROUS EMAILS RE: SAME .3	1.1	\$204.00	\$224.40

Thursday, August 22, 2024**Page 2 of 3**

RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC						July 2024
7/20/2024	Robert E. Moore, Jr.	UPDATE CALL FROM B.TUDOR .10	0.1	\$204.00	\$20.40	
7/22/2024	Lauren B. Garcia	EMAILS FROM PARTICIPANT, EMAIL FROM B TUDOR, EMAIL TO R.MOORE AND B TUDOR	0.6	\$104.40	\$62.64	
7/22/2024	Robert E. Moore, Jr.	CALL FROM B.TUDOR RE: UPDATES ON REPORT FILING, REPORTS FROM SRT .5; CALL WITH D.BENNETT RE: SAME 1.25; RESPOND TO EMAIL FROM L.GARCIA AND J.LAWSON RE: ACCOUNT REPORT INFORMATION .10	1.85	\$204.00	\$377.40	
7/23/2024	Lauren B. Garcia	PROCESS EMPLOYER DOCUMENT REQUEST, UPLOAD TO SHAREFILE	0.4	\$104.40	\$41.76	
7/23/2024	Robert E. Moore, Jr.	FOLLOW UP CALL FROM D.BENNETT RE: RESPONSES TO REPORT .3	0.3	\$204.00	\$61.20	
7/24/2024	Lauren B. Garcia	DRAFT FEE FILING AND EXHIBITS	0.3	\$104.40	\$31.32	
7/25/2024	Lauren B. Garcia	CONTINUE DRAFT OF FEE FILING & EXHIBITS, EMAIL FROM B TUDOR, POST TO WEBSITE	0.8	\$104.40	\$83.52	
7/25/2024	Robert E. Moore, Jr.	CONFERENCE CALL WITH DOL REPRESENTATIVES .5	0.5	\$204.00	\$102.00	
7/26/2024	Robert E. Moore, Jr.	CALL TO D.BENNETT RE: QUESTIONS ON TRANSACTIONAL INFORMATION .25; COMPLETE ACTIVITY REPORT .4; EMAILS TO A.LUBY, W.PORCELLO, AND B.TUDOR RE: FAILURE TO COMPLY WITH CONSENT ORDER, NEED TO UPDATE WEBSITE, REQUEST INFORMATION FROM DOL .5	1.15	\$204.00	\$234.60	
7/29/2024	Lauren B. Garcia	EDIT ACTIVITY REPORT, EMAILS W/ B TUDOR	0.4	\$104.40	\$41.76	
7/29/2024	Robert E. Moore, Jr.	CALL FROM B.TUDOR RE: INQUIRIES FROM DOL .45; EMAIL TO B.TUDOR RE: UPDATE ON SRT TRACKING OF DECONVERSIONS .25; RECEIPT AND REVIEW OF DOL MOTION TO APPROVE CONSENT ORDER, FORWARD SAME TO COUNSEL AND D.BENNETT, REVIEW OF SAME .3	1	\$204.00	\$204.00	
7/30/2024	Robert E. Moore, Jr.	CALL WITH DR. R. JARENICK RE: REPORTED LOSSES .5	0.5	\$204.00	\$102.00	
7/31/2024	Lauren B. Garcia	EMAIL FROM B GEORGE REQUESTING STATUS OF NON TRANSITIONED GROUPS, CALL WITH B TUDOR, RESPOND TO REQUEST, PROCESS DOCUMENT REQUEST FROM EMPLOYER	0.8	\$104.40	\$83.52	
Total					\$7,094.40	

Thursday, August 22, 2024

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Strassburger McKenna Gutnick & Gefsky

ATTORNEYS AT LAW SINCE 1919

Receivership Management, Inc.
Robert Moore
540 Hospital Dr.
Ste 490
Madison, TN 37115-5049

Matter ID: 19197-00001
Bill No: 135249
Billed Through: 7/31/2024
Bill Date: 8/8/2024

Matter Name: Su v. RiversEdge et al. - Local Counsel

PAYMENT HISTORY

Outstanding Accounts Receivable as of 07/12/2024	\$71.20
Payments received through 08/08/2024	0.00
PREVIOUS BALANCE	\$71.20

RETAINER INFORMATION

Retainer as of 8/8/2024	\$0.00
Retainer Received/Applied Through 08/08/2024	\$0.00
RETAINER BALANCE	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

Date	Prof		Hours	Rate	Amount
07/22/2024	ELL	Received and reviewed email from B. Tudor re exhibit confidentiality issue; Drafted email to B. Tudor re local rule 5.2 (d) and further discussion re removing exhibits from public view	0.30	405.00	121.50
Fee Subtotal					\$121.50

RATE SUMMARY

Professionals Name	Hours	Rate	Total
ELL - Erica L. Laughlin	0.30	\$405.00	121.50
Total Hours	0.30		\$121.50

Accounts Receivable Information	
0 - 30 Days	\$0.00
31 - 60 Days	\$71.20
61 - 90 Days	\$0.00
91 - 120 Days	\$0.00
Over 121 Days	\$0.00
Accrued Interest Included Above:	\$0.00

CURRENT FEES:	\$121.50
CURRENT EXPENSES:	\$0.00
CURRENT AMOUNT DUE:	\$121.50
PREVIOUS BALANCE:	\$71.20
RETAINER APPLICATION:	\$0.00
RETAINER REPLENISHMENT:	\$0.00
TOTAL AMOUNT DUE:	\$192.70

BERRY & TUDOR, P.C.*A Professional Corporation*

5123 Virginia Way
 Suite B-23
 Brentwood, Tennessee 37027-7598

Telephone: (615) 726-1000

Fax: (615) 370-0077

FEIN: 62-1525112

Mr. Rob Moore
 c/o Receivership Management, Inc.
 510 Hospital Drive, Suite 490
 Madison, TN 37115-5049

August 1, 2024

Client #: 1068

RE: RiversEdge Advanced Retirement Solutions, LLC

Invoice #: 22545

DATE	DESCRIPTION	HOURS	AMOUNT	
July-1-24	Emails from and to L. Garcia re: DOL's review of IF's 4 th Fee Report; email to R. Moore and D. Bennett re: SRT issues; finalize IF's 4 th Fee Report and attachments; file same with Court; emails to non-party Mismanaged Plans and R. Moore re: same, as filed; emails from and to U. Rengachary and W. Delany re: MATC's SOC report; email from L. Garcia re: website posting of 4 th Fee Report.	1.20	408.00	BET
July-1-24	Emails from and to R. Moore re: encrypted email on SRT system (NO CHARGE).	0.10	0.00	BET
July-2-24	Telephone conference with R. Moore re: SRT reports and RMI's analysis of same.	1.00	340.00	BET
July-3-24	Telephone conference and emails from and to N. Gregorio (Beaver County 457 Plan) re: copy of plan documents; email to R. Moore re: same.	0.20	68.00	BET
July-5-24	Emails from L. Garcia and N. Gregorio re: Beaver County plan documents; prepare 4 th Fee Motion, proposed order and certificate of service; email from R. Moore re: confirmation of SRT's informational statements on 6-21-24 call.	0.50	170.00	BET
July-8-24	Telephone conference with R. Moore re: email requesting confirmation by SRT and status of accounting report draft; emails from U. Rengachary	0.70	238.00	BET

Invoice 22545

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August 1, 2024

	and W. Delany and to R. Moore re: DOL's request for copy of MATC's SOC report; emails from J. Strawn and to R. Moore re: parties' conference call.			
July-9-24	Review and comment on S. Reiss's call confirmation email; email to R. Moore re: same; telephone conference with C. Burch (ARC of Wabash Co. advisor) re: DOL's interview request; email to R. Moore re: same; emails to R. Moore re: Palguta issues; emails from A. Luby and T. LaPlante re: access to WorkXpress; emails to R. Moore re: same.	0.50	170.00	BET
July-10-24	Emails from A. Luby and T. LaPlante re: access to WorkXpress; email from U. Rengachary re: status of IF's accounting report; emails to and from R. Moore re: same.	0.20	68.00	BET
July-11-24	Telephone conferences with R. Moore re: WorkXpress issues and accounting report; voicemails and telephone conferences with LCBC Church counsel re: accounting report status; email to R. Moore re: same.	0.90	306.00	BET
July-12-24	Emails from R. Moore re: WorkXpress access issues; review final draft of IF's accounting report; telephone conference with R. Moore re: same; emails from A. Luby, D. McLain and T. LaPlante re: corrupted WorkXpress files.	4.00	1,360.00	BET
July-13-24	Review final draft of IF's accounting report (cont.); email to R. Moore re: same.	2.00	680.00	BET
July-15-24	Emails from and to R. Moore re: D. Bennett's comments on draft IF's accounting report; review and comment on same; emails from and to R. Moore re: final draft; email to A. Luby re: same; emails from and to R. Moore re: D. Bennett's comments on final draft.	2.80	952.00	BET
July-16-24	Emails from and to U. Rengachary re: Exhibit 2 to IF's accounting report; emails to and from R. Moore re: 4 th Fee Report motion; emails from and to J. Strawn re: DOL call; telephone conferences with R. Moore re: changes to final draft of accounting report; Teams call with U. Rengachary and J. Strawn re: same; revise final draft per DOL comments; email to	1.60	544.00	BET

Invoice 22545

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August 1, 2024

R. Moore re: same.

July-17-24	Prepare Notice of Filing and Certificate of Service re: IF's accounting report; emails from and to and telephone conference with R. Moore re: final revisions to accounting report.	0.70	238.00	BET
July-18-24	Emails from and to R. Moore re: signed accounting report; review same and comment on additional changes needed.	0.50	170.00	BET
July-19-24	Email from R. Moore re: revised, signed accounting report; review same; emails from and to J. Tomevi re: accounting report; file accounting report via ECF; emails to R. Moore, J. Lawson and non-party Mismanaged Plans re: same.	0.80	272.00	BET
July-19-24	Emails from and to W. Delany and R. Moore re: MATC's demand to place its reports under seal.	0.30	102.00	BET
July-22-24	Phones E. McLaughlin's office; reviewed Local Rules and ECF Guide re: motions to seal; telephone conferences with Court Clerk and Courtroom Deputy re: motion to seal MATC exhibits; emails from and to Will Delany and R. Moore re: same; prepared corrected certificate of service for filing of IF's accounting report; file same via ECF; emails to R. Moore and non-party mismanaged plans re: same; prepare motion to seal and certificate of service for same; file same with court via ECF; emails to R. Moore and non-party mismanaged plans re: same; emails from ECF and to R. Moore re: proposed order; prepare and file proposed order; emails from and to E. Laughlin re: motion to seal.	2.75	935.00	BET
July-22-24	Emails from and to L. Garcia re: plan's need to switch TPAs (Tyrone Hospital).	0.20	68.00	BET
July-23-24	Emails from and to E. Laughlin re: status of motion to seal; emails from ECF and to R. Moore re: appearance of new counsel for DOL and granting motion to seal.	0.60	204.00	BET
July-24-24	Emails from and to U. Rengachary re: call to discuss accounting report.	0.10	34.00	BET

Invoice 22545

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August 1, 2024

July-25-24	Teams call with U. Rengachary, A. Luby, J. Strawn and R. Moore re: MATC reports; emails from and to L. Garcia re: 4 th Fee Motion; finalize and file 4 th Fee Motion, proposed order and certificate of service; emails to R. Moore and to representatives of non-party Mismanaged Plans re: same; email from L. Garcia re: posting same to web site; emails from ECF and to R. Moore re: order granting 4 th Fee Motion.	1.60	544.00	BET
July-29-24	Email from R. Moore re: non-deconverted plans; emails to W. Delany, S. Reiss and DOL re: same; emails from and to R. Moore and L. Garcia re: draft IF's 5 th Activity Report; review and comment on same; emails to and from N. Gregorio and to R. Moore re: Beaver County plan deconversion; emails from S. Reiss and to R. Moore re: Schwab-custodied non-deconverted plans; emails from and to R. Moore re: Schwab SRT's deconversion spreadsheet; finalize and file IF's 5 th Activity Report with Court; emails from W. Delany and to R. Moore re: MATC's non-deconverted plans.	1.80	612.00	BET
July-30-24	Emails from ECF and R. Moore re: DOL's motion to approve consent judgment; review same; emails to and telephone conference with R. Moore re: same; emails from ECF and to R. Moore re: 8/6/24 Zoom hearing.	1.30	442.00	BET
July-31-24	Telephone conference with L. Garcia re: response to B. George's questions on non-deconverted plans; emails from L. Garcia and B. George re: same.	0.10	34.00	BET

TOTAL FEES:

26.45 \$8,959.00

DISBURSEMENTS

Photocopies (37 @ \$0.08)

\$2.96

TOTAL DISBURSEMENTS:

\$2.96

TOTAL FEES & DISBURSEMENTS:

\$8,961.96

Previous Balance

\$18,707.12

Invoice 22545

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August 1, 2024

Previous Payments

(\$7,634.30)

PLEASE PAY:

\$20,034.78

**PAYMENT DUE WITHIN 30 DAYS OF STATEMENT. THANK YOU.
PLEASE MAKE CHECKS PAYABLE TO BERRY & TUDOR, P.C.**

cc: Rob Moore via email

MIKE MANCOUR
 1773 EDINBORO WAY
 FRANKLIN, TN 37064

JULY 2024

Date	Activity	Time	Project	Rate	Amount
Wednesday, July 10, 2024	Reviewed backup for Robert, it was corrupted	0.25	RiversEdge	120.00	\$ 30.00
Thursday, July 11, 2024	Robert downloaded as Zip file, but the original corrupted file was zipped instead of the original file on the source	0.25	RiversEdge	120.00	\$ 30.00
Total Amount		0.50			\$ 60.00

RMI EXP RECOVERABLE REDGE - Jul 2024

7/1/2024 through 7/31/2024

8/22/2024

Page 1

Category	7/1/2024- 7/31/2024	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-5,049.00	-5,049.00
5610-CONTRACT LABOR RMI	-2,045.40	-2,045.40
TOTAL 5100 FEES RMI	-7,094.40	-7,094.40
5150 FEES LEGAL		
5400-LEGAL FEES	-9,083.46	-9,083.46
TOTAL 5150 FEES LEGAL	-9,083.46	-9,083.46
5150 FEES OTHER		
5697-OTHER CONTRACT LABOR	-60.00	-60.00
TOTAL 5150 FEES OTHER	-60.00	-60.00
5300 EXPENSE		
6210-POSTAGE	-1.92	-1.92
TOTAL 5300 EXPENSE	-1.92	-1.92
OVERALL TOTAL	-16,239.78	-16,239.78

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JULIA A. SU, ACTING SECRETARY OF U.S.)	
DEPARTMENT OF LABOR,)	
)	
Plaintiff,)	CASE NO. 2:24-CV-00104 (MJH)
)	
v.)	
)	
RIVERSEDGE ADVANCED RETIREMENT)	
SOLUTIONS, LLC a Pennsylvania Company,)	
PAUL PALGUTA, an individual,)	
)	
v.)	
)	
MID ATLANTIC TRUST COMPANY dba)	
AMERICAN TRUST CUSTODY, a)	
corporation, and CHARLES SCHWAB)	
TRUST BANK, a corporation, <i>solely as Rule 19</i>)	
<i>defendants</i>)	
Defendants.)	

CERTIFICATE OF SERVICE REGARDING
INDEPENDENT FIDUCIARY’S SIXTH NOTICE OF FEE FILING

I hereby certify that on September 26, 2024, I caused the Independent Fiduciary’s Sixth Notice of Fee Filing [Dkt. 116], with Exhibits [Dkt. 116-1], to be filed and electronically served using the Court’s CM/ECF system to counsel for all parties to this action.

I also hereby certify that on September 26, 2024, I caused the Independent Fiduciary’s Sixth Notice of Fee Filing [Dkt. 116], with Exhibits [Dkt. 116-1], to be served upon the following fourteen (14) non-party plans listed in the Court’s Preliminary Injunction Order [Dkt. 40], by email:

- (1) RiversEdge 401(k) Profit Sharing Plan (pshoup@amibenefit.com);
- (2) Hampton Technical Associates 401(k) Profit Sharing Plan (MarkS@Hampton-Tech.net);
- (3) Max Environmental Technologies, Inc. 401(k) Savings Plan (JStango@MaxEnvironmental.com);
- (4) Medical Predictive Science Corporation (GAlms@HeroScore.com);
- (5) Elite Mechanical, Inc. 401(k) Profit Sharing Plan (donna@elite-mechanical.com);
- (6) Leech Tishman Fuscaldo & Lampl, LLC 401(k) Profit Sharing Plan (jsteiner@leechtishman.com);

- (7) W.N. Tuscano Agency, Inc. 401(k) Savings Plan (scrary@tuscano.com);
- (8) St. Barnabas Health System Retirement Savings Plan (jdturco@stbarnabashealthsystem.com);
- (9) Hawaiian Island Dental, Inc. 401(k) Plan (allhawaiiismiles@hotmail.com);
- (10) Ad-base Group 401K Plan (adams@abgcapital.com);
- (11) Arc of Wabash County Inc. 403(b) Plan (MGuthrie@ArcWabash.org);
- (12) Adventure WV Plan (m.fowler@onthegorge.com);
- (13) The National Fruit Product Co., Inc. 401(k) Employee Savings Plan (atinsman@nfpc.com) and (agum@nfpc.com) and (tomwillis@glenlochlegal.com); and
- (14) Family Medicine of Albemarle 401(k) Plan (rwynne@mcguirewoods.com) and (lsneathern@mcguirewoods.com).

Further, on or before September 27, 2024, the Independent Fiduciary posted/will post a copy of the Independent Fiduciary's Sixth Notice of Fee Filing [Dkt. 116], with Exhibits [Dkt. 116-1] on its web site at www.receivermgmt.com/riversedge.

Respectfully submitted,

**RECEIVERSHIP MANAGEMENT, INC., AS
COURT-APPOINTED INDEPENDENT
FIDUCIARY OF MISMANAGED PLANS AND
CLIENT PLANS OF RIVERSEDGE
ADVANCED RETIREMENT SOLUTIONS
LLC,**

/s/ Bynum E. Tudor III

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