

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

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

**INDEPENDENT FIDUCIARY’S NINTH 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 (Dkt. #40) hereby submits its Ninth Notice of Fee Filing and states as follows:

This filing constitutes RMI’s fee filing for the period from November 1 through November 30, 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 funds. 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 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 (Dkt. #40), as amended for subsequent amounts deposited. 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 November 1, 2024 to November 30, 2024 are as follows:

A. Receivership Management Inc.	\$ 4,603.99
\$ 4,453.56 / Contract Labor	
\$ 150.43 / Other Expenses	
B. Berry & Tudor PC-Legal	\$ 11,800.76
C. Strassburger McKenna Gutnick & Gefsky	\$ 792.50
Total:	\$ 17,197.25

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)

btudor@berrytudor.com

*Counsel for Receivership Management, Inc.*

**SUMMARY TIME SHEET- RMI**  
**SERVICES PROVIDED FOR RIVERSEDGE**  
**FOR THE PERIOD 11/1/24 THRU 11/30/24**

Receivership Management Inc.		
NOV 2024 FEES	4,453.56	4,453.56
Strassburger McKenna Gutnick & Gefsky		
NOV 2024 FEES	792.50	792.50
Berry & Tudor, PC - Legal		
NOV 2024 FEES	11,800.76	11,800.76
<b>TOTAL FEES DUE:</b>	<b>\$</b>	<b>17,046.82</b>
<b>TOTAL EXPENSES DUE:</b>	<b>\$</b>	<b>150.43</b>
<b>GRAND TOTAL DUE:</b>	<b>\$</b>	<b>17,197.25</b>

Receivership Management, Inc.  
510 Hospital Drive, Suite 490  
Madison, TN 37115

Invoice for Professional Services

<b>RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC</b>				<b>November 2024</b>	
11/1/2024	Robert E. Moore, Jr.	EMAILS WITH L.GARCIA, J.LAWSON AND B.TUDOR RE: ORDER EXTENDING IF RECORD RETENTION RESPONSIBILITY; EMAIL WITH B.TUDOR RE: MOTION BY LCBC, OPPOSITION .3	0.3	\$204.00	\$61.20
11/2/2024	Robert E. Moore, Jr.	EMAIL TO AND FROM B.TUDOR RE: CASE ACTIVITY .10	0.1	\$204.00	\$20.40
11/4/2024	Robert E. Moore, Jr.	UPDATE CALL FROM A.AMATO RE: UNCLAIMED MAIL .10; CALLS WITH B.TUDOR RE: COURT EMERGENCY ORDER .55; EMAILS WITH B.TUDOR RE: SAME .25	0.9	\$204.00	\$183.60
11/5/2024	Robert E. Moore, Jr.	EMAILS AND CALLS WITH B.TUDOR RE: EMERGENCY ORDER, COSTS, RECENT CRIMINAL INFORMATION .8; REVIEW AND RESPOND TO EMAIL FROM B.TUDOR RE: CRITICISM OF DRAFT CONSENT JUDGMENT .2; REVIEW DRAFT MOTION FOR HEARING .2	1.2	\$204.00	\$244.80
11/6/2024	Robert E. Moore, Jr.	UPDATE ON RECORDS MATTERS FROM B.TUDOR, FOLLOW UP CALL FROM B.TUDOR RE DOL MATTERS .55; REVIEW COUNSEL RECOMMENDATIONS ON MATTERS PRESENTED .2; REVIEW EMAILS FROM LBMC AND L.GARCIA RE: PROJECT POTENTIAL CHARGES .2;	0.95	\$204.00	\$193.80
11/7/2024	Lauren B. Garcia	EMAIL WITH LBMC, WORK ON COST ESTIMATE REQUEST, DISCUSS WITH R MOORE RE PLAN STATUS	1.1	\$104.40	\$114.84
11/7/2024	Robert E. Moore, Jr.	CALL FROM B.TUDOR RE: UPDATE ON CONTINUATION ORDER, POSSIBLE COSTS FORWARD .5; FOLLOW UP FROM EMAILS TO OTHER COUNSEL .10; REVIEW LBMC POTENTIAL CHARGES AND THE CONTRACT BETWEEN RMI AND LBMC, EMAIL TO B.TUDOR RE: SAME .25	0.85	\$204.00	\$173.40
11/8/2024	Jacqui D. Lawson	STATUS UPDATE CALL WITH RMOORE & LGARCIA RE: RECORDS & EMAIL REQUEST FROM DOL	1	\$104.40	\$104.40

Tuesday, December 17, 2024

Page 1 of 3

**RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC****November 2024**

11/8/2024	Lauren B. Garcia	WORK ON COST ESTIMATE, CALL WITH J.LAWSON RE SUCH, EMAIL TRAFFIC WITH L BMC, POST TO WEBSITE	1.4	\$104.40	\$146.16
11/8/2024	Robert E. Moore, Jr.	EMAIL WITH B.TUDOR RE: PROPOSED CONSENT ORDER, RECORDS ISSUES .2; ADDITIONAL EMAILS TO J.LAWSON AND L.GARCIA RE: RECORDS RETENTION COSTS .10; ADDITIONAL FOLLOW UP ON THE DRAFT CONSENT ORDER .2	0.4	\$204.00	\$81.60
11/10/2024	Robert E. Moore, Jr.	UPDATED INFORMATION ON THE RECORDS RETENTION ISSUES AND LCBC FROM B.TUDOR .2	0.2	\$204.00	\$40.80
11/11/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: REMAINING RECORDS DOWNLOAD, QUESTIONS RE: SRT DOWNLOAD, SOCS AUDIT REQUEST TO EGNYTE, EGNYTE DATA STATUS .7; EMAILS RE: PROPOSED CONSENT ORDER AND RECORDS RETENTION FROM B.TUDOR .10	0.8	\$204.00	\$163.20
11/12/2024	Jacqui D. Lawson	STATUS UPDATE CALL WITH RMOORE & LGARCIA RE: DEATH OF FORMER TRUSTEE AND PLANS FOR FUTURE	1	\$104.40	\$104.40
11/12/2024	Lauren B. Garcia	CONF WITH R MOORE RE PLAN STATUS	1	\$104.40	\$104.40
11/12/2024	Robert E. Moore, Jr.	UPDATE TO B.TUDOR RE: OBJECTIONS BEING MADE TO OUR FEE SUBMISSION. .10; EMAIL AND CALL FROM B.TUDOR RE: PALGUTA SUICIDE .35; UPDATE L.GARCIA, D.BENNETT, E.SINOR .3; FOLLOW UP CALL FROM B.TUDOR RE: LCBC, IMPACT OF PALGUTA DEATH, UPDATE BY B.TUDOR OF CALL F	1.85	\$204.00	\$377.40
11/13/2024	Robert E. Moore, Jr.	CALL TO B.TUDOR RE: DATA REVIEW UPDATE .2	0.2	\$204.00	\$40.80
11/14/2024	Lauren B. Garcia	REVIEW RECENT FILED COURT DOCUMENTS, EMAIL TRAFFIC RE DATA BACKUPS, ATTEMPT BACKUP OF PST FILE	1.4	\$104.40	\$146.16
11/14/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: CONTINUED UPDATES ON CASE STATUS, .25; EMAIL UPDATE ON SAME .10	0.35	\$204.00	\$71.40
11/15/2024	Lauren B. Garcia	EMAIL AND CALL TRAFFIC RE PST FILES, TRIP TO CAPITOL CITY COMPUTERS TO CAPTURE PST FILE	4.2	\$104.40	\$438.48
11/15/2024	Robert E. Moore, Jr.	REVIEW AND RESPOND TO EMAILS AND CALL WITH B.TUDOR RE: CONTINUED EFFORTS TO DEAL WITH RECORDS .4; CALL WITH L.GARCIA RE: SAME .10; CALL WITH DR. JAUREQUI RE: PALGUTA DEATH .10; INQUIRY RIVERSEDGE EMAILS .10	0.7	\$204.00	\$142.80
11/18/2024	Jacqui D. Lawson	REVIEW OF EXPENSE REIMBURSEMENT APPROVED FOR EMAIL RECOVERY FROM LAPTOP	0.1	\$104.40	\$10.44

**Tuesday, December 17, 2024****Page 2 of 3**

<b>RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC</b>					<b>November 2024</b>	
11/18/2024	Robert E. Moore, Jr.	QUESTIONS RE: RECORDS EXPENSE REIMBURSEMENT .2	0.2	\$204.00	\$40.80	
11/19/2024	Robert E. Moore, Jr.	CALL WITH L.GARCIA RE: RECORDS BILLING .10; CALL WITH B.TUDOR RE: CASE STATUS, LCBC ISSUES, RECORDS CHARGES, 1.3	1.4	\$204.00	\$285.60	
11/20/2024	Jacqui D. Lawson	DISCUSSION WITH RMOORE & LGARCIA TO STATUS UPDATE AFTER HEARING	0.6	\$104.40	\$62.64	
11/20/2024	Lauren B. Garcia	MEETING W J LAWSON AND R MOORE RE PLAN STATUS	0.7	\$104.40	\$73.08	
11/22/2024	Robert E. Moore, Jr.	CALL TO B.TUDOR RE: CASE UPDATE .5	0.5	\$204.00	\$102.00	
11/25/2024	Lauren B. Garcia	STATUS CONF AND DISCUSSION RE NEXT STEPS WITH R MOORE, EMAIL WITH QUESTIONS RE DATA RETENTION, TRX PST FILE TO SSD DRIVE	2	\$104.40	\$208.80	
11/25/2024	Robert E. Moore, Jr.	CALL FROM B.TUDOR RE: INFORMATION FOR HEARING, RESPOND TO QUESTIONS RE: SAME .6; COURT HEARING .9; FOLLOW UP CALL WITH B.TUDOR RE: LCBC, RECORDS, LBMC CHARGES .95; EMAIL UPDATE FROM L.GARCIA RE: LBMC CHARGES .10; REVIEW AND APPROVE DRAFT LETTER TO LCBC CO	2.85	\$204.00	\$581.40	
11/26/2024	Lauren B. Garcia	EMAIL FROM B TUDOR ATTACHING RECENT FILINGS FOR WEBSITE	0.1	\$104.40	\$10.44	
11/26/2024	Robert E. Moore, Jr.	CALL FROM DR. JAUREQUI RE: YESTERDAY'S HEARING .10; EMAIL UPDATE FROM B.TUDOR RE: LCBC .10	0.2	\$204.00	\$40.80	
11/27/2024	Lauren B. Garcia	EMAIL FROM B TUDOR WITH QUESTIONS, PULL RECORDS AND REPLY, POST TO WEBSITE	0.8	\$104.40	\$83.52	
<b>Total</b>					<b>\$4,453.56</b>	

Tuesday, December 17, 2024

Page 3 of 3



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

Matter ID: 19197-00001  
 Bill No: 136885  
 Billed Through: 10/31/2024  
 Bill Date: 11/14/2024

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

PAYMENT HISTORY

Outstanding Accounts Receivable as of 08/08/2024	\$192.70
Payments received through 11/14/2024	(\$192.70)
<b>PREVIOUS BALANCE</b>	<b>\$0.00</b>

RETAINER INFORMATION

Retainer as of 11/14/2024	\$0.00
Retainer Received/Applied Through 11/14/2024	\$0.00
<b>RETAINER BALANCE</b>	<b>\$0.00</b>

FOR PROFESSIONAL SERVICES RENDERED

Date	Prof		Hours	Rate	Amount
10/22/2024	DAS	Reviewed emails and background on dispute; Reviewed Lally report; Reviewed local rules and protocols on confidential filings; Reviewed accountant client privilege; Exchange of email re no apparent restrictions on filing publicly	0.80	485.00	388.00
10/22/2024	ELL	Email exchange with B. Tudor re audit report issue; Discussion with D. Strassburger re same; Drafted email to B. Tudor re D. Strassburger involvement	0.40	405.00	162.00
10/23/2024	DAS	Email exchange re local rules governing confidentiality	0.10	485.00	48.50
10/25/2024	DAS	Call with Bym Tudor re background and how to handle Lally report	0.40	485.00	194.00
<b>Fee Subtotal</b>					<b>\$792.50</b>

RATE SUMMARY

Professionals Name	Hours	Rate	Total
DAS - David A. Strassburger	1.30	\$485.00	630.50
ELL - Erica L. Laughlin	0.40	\$405.00	162.00
<b>Total Hours</b>	<b>1.70</b>		<b>\$792.50</b>

Accounts Receivable Information



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

CURRENT FEES:	\$792.50
CURRENT EXPENSES:	\$0.00
<b>CURRENT AMOUNT DUE:</b>	<b>\$792.50</b>
PREVIOUS BALANCE:	\$0.00
RETAINER APPLICATION:	\$0.00
RETAINER REPLENISHMENT:	\$0.00
<b>TOTAL AMOUNT DUE:</b>	<b>\$792.50</b>

**Please remit with payment**

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

**Matter ID: 19197-00001**

Statement Date: 11/14/2024	<b>Amount Due Now</b> <b>\$792.50</b>
Statement No: 136885	
Billed Through: 10/31/2024	

*Payment due upon receipt*

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

Strassburger McKenna Gutnick & Gefsky  
Four Gateway Center, 22nd Floor  
444 Liberty Avenue  
Pittsburgh, PA 15222

(412) 281-5423

- Payment Type     Online at  
    <https://secure.lawpay.com/pages/smglaw/operating>  
 Check/Money Order  
 Credit Card\*  
    (complete form below)

**Amount Enclosed: \$** \_\_\_\_\_

**Please let us know if your contact information has changed.**

New Address \_\_\_\_\_  
\_\_\_\_\_

New Phone \_\_\_\_\_

New Email \_\_\_\_\_

\*  Visa     MasterCard     Discover     American Express

Card Number \_\_\_\_\_

Expiration Date \_\_\_\_\_

Security Code \_\_\_\_\_

Card Holder Name \_\_\_\_\_

Signature \_\_\_\_\_



**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

December 5, 2024

Client #: 1068

RE: RiversEdge Advanced Retirement Solutions, LLC

*REVISED* Invoice #: 22625

DATE	DESCRIPTION	HOURS	AMOUNT	
Oct-30-24	Emails from R. Moore re: monthly storage costs; telephone conference with and email to J. Tomevi re: motion to extend records retention period; telephone conference with R. Moore re: same.	1.00	340.00	BET
Oct-31-24	Emails from and to J. Tomevi and R. Moore re: draft LCBC motion and proposed order; telephone conferences with R. Moore re: same; revise draft motion and order; emails from A. Luby, W. Delany, M. Comber, S. Reiss, W. Guappone and R. Ottinger re: no objections to same; emails from ECF and to R. Moore re: LCBC's motion, as filed, and order granting motion.	2.40	816.00	BET
Nov-1-24	Emails from and to R. Moore re: Order; prepare draft motion for hearing and supporting memorandum; emails from ECF and to R. Moore re: hearing transcript; emails from R. Moore re: LBMC storage fees and re: draft motion.	2.20	748.00	BET
Nov-4-24	Prepare memorandum (cont.), Moore declaration and proposed order; emails to and from R. Moore re: same; telephone conferences with R. Moore and A. Luby re: same; emails to and from A. Luby, U. Rengachary and J. Strawn re: draft memorandum and revised draft consent judgment; review revised draft consent judgment; email to R. Moore re: same.	3.00	1,020.00	BET

Invoice 22625	Page 2	December 5, 2024		
Nov-5-24	Telephone conference with R. Moore re: review of draft consent judgment; draft response to DOL; emails to and from R. Moore re: same; emails to and from U. Rengachary re: comments on draft consent judgment; emails from and to J. Strawn re: availability on Nov. 6.	2.00	680.00	BET
Nov-6-24	Emails from and to R. Moore re: additional language for draft consent judgment; telephone conference with Jeb Gerth (Epstein firm) re: his possible engagement by two mismanaged plans; email to R. Moore re: same; telephone call with R. Moore re: Teams call with DOL; attend Teams call; emails to R. Moore re: items discussed on call; telephone conference with R. Moore re: same; emails from and to R. Moore re: notice to court; emails from R. Moore and W. Son re: LBMC's future direct involvement with mismanaged plans.	2.10	714.00	BET
Nov-7-24	Emails from and to A. Luby and R. Moore re: LBMC contact info; email from and telephone conference with R. Moore re: files at LBMC vs. RMI; prepare Statement of Independent Fiduciary; email to R. Moore re: same; revise Statement; prepare Notice of Filing and Certificate of Service; file same with court via ECF; serve copies of same on non-party mismanaged plans via email; email to R. Moore re: same.	3.40	1,156.00	BET
Nov-11-24	Emails from and to Egnyte re: second request for 2022 SOC audit report; email from L. Garcia re: website posting (Statement of IF); emails from R. Moore, W. Delany, S. Reiss and A. Luby re: proposed draft consent judgment; review same; emails to and from R. Moore re: comments on same.	0.90	306.00	BET
Nov-11-24	Emails from and to R. Moore re: RMI's informal bid for post-October 31 services; telephone conference with R. Moore re: same.	0.75	255.00	BET
Nov-12-24	Email to A. Luby re: comments on draft consent judgment; emails from Egnyte and to R. Moore re: 2022 SOC audit report; telephone conferences with A. Luby and R. Moore re: Mr. Palguta's death; email to RMI re: same; email from J. Tomevi re: LCBC's draft response to Statement of IF; review same;	0.90	306.00	BET

Invoice 22625

Page 3

December 5, 2024

emails to and from R. Moore re: same.

Nov-12-24	Telephone conference with R. Moore re: LCBC's draft response to Statement of IF and re: impact of Mr. Palguta's death on DOL action; emails from W. Guappone and to R. Moore re: withdrawal of subpoena; emails to and from J. Tomevi re: alternate payment sources for records storage expenses.	0.75	255.00	BET
Nov-13-24	Emails from W. Delany re: MATC's comments on draft consent judgment; email to R. Moore re: same; emails from and to Egnyte and R. Moore and telephone conference with R. Moore re: obstacles to receive copy of Egnyte's 2022 SOC audit report.	0.50	170.00	BET
Nov-14-24	Emails from ECF and to R. Moore re: LCBC's response, as filed; review and comment on same; telephone conference with R. Moore re; information filed in criminal case on 10/31/24 and subsequent criminal case filings; emails from and to R. Moore re: local counsel invoice and re; criminal case pleadings; forward criminal case pleadings to DOL, W. Delany, S. Reiss and mismanaged plans' counsel; emails from and to W. Delany re: same.	1.70	578.00	BET
Nov-14-24	Emails to and from D. Misour and to R. Moore re: Mr. Palguta's Outlook password; telephone conference with R. Moore re: limited access to Mr. Palguta's emails and anticipated withdrawal of Mr. Palguta's counsel; emails from ECF and to R. Moore re: hearing set for 11/25/24; emails from J. Tomevi and U. Rengachary re: hearing.	0.50	170.00	BET
Nov-15-24	Voicemail from R. Moore re: 11/25/24 hearing and DOL's desire for a 90-day continuance; emails from and to Egnyte re: non-access of SOC report; email from R. Moore re: media article on Mr. Palguta's death; telephone conference with R. Moore re: 90-day continuance; emails from and to U. Rengachary re: RMI files relevant to Palguta estate; emails from ECF and to R. Moore re: DOL's motion for extension of time; review same.	1.00	340.00	BET
Nov-18-24	Emails from ECF and to R. Moore re: order granting extension of time; emails from ECF and to R. Moore re: DOL's status report; email to R. Moore re: same.	0.30	102.00	BET

Invoice 22625	Page 4	December 5, 2024		
Nov-19-24	Telephone conference with R. Moore re: preparation for 11/25/24 hearing.	1.40	476.00	BET
Nov-22-24	Emails from ECF and to R. Moore re: appearance of additional counsel for Beaver County, motion to substitute defendant and motion to freeze assets; prepare for 11/25/24 hearing; telephone conference with R. Moore re: above.	1.50	510.00	BET
Nov-24-24	Prepare for 11-25-24 hearing (cont.).	0.50	170.00	BET
Nov-25-24	Prepare for 11-25-24 hearing (cont.); telephone conference with R. Moore re: LBMC fee estimates; attend video conference hearing; emails from ECF and to R. Moore re: order substituting defendant and order freezing assets; emails to and from R. Moore re: draft letters to LCBC Church counsel and mismanaged plan representatives; emails from and to A. Luby and R. Moore re: records retention; telephone conference with R. Moore re: above; prepare 8 <sup>th</sup> Fee Motion and proposed order (cont.).	6.50	2,210.00	BET
Nov-26-24	Emails from and to J. Tomevi re: video call next week; emails from and to R. Moore re: 7 <sup>th</sup> motion for fees; finalize and file same via ECF; emails to R. Moore and mismanaged plan representatives re: same; emails from ECF and to R. Moore re: DOL's emergency motion; review and comment on same; email to mismanaged plan representatives re: request for comments on records retention.	1.00	340.00	BET
Nov-26-24	Email from ECF re: errata notice; prepare revised fee motion, proposed order and certificate of service; email service of same to non-party mismanaged plan representatives, P. DiLucente, and J. DePasquale; serve P. DiLucente by mail (NO CHARGE).	0.50	0.00	BET
Nov-26-24	Emails from Max Environmental Tech and from and to Hawaii Dental re: response to request for comments on records retention; emails to and from R. Moore re: same.	0.10	34.00	BET
Nov-27-24	Emails from ECF re: notices of appearance for DiLucente and DePasquale; emails from L. Garcia re: website postings of fee motions and re; comments	0.30	102.00	BET

Invoice 22625

Page 5

December 5, 2024

on request for comments on records retention; emails  
 from M. Betts and M. Boyd re: records retention;  
 emails to R. Moore re: same.

**TOTAL FEES:** 35.20 \$11,798.00

**DISBURSEMENTS**

Photocopies (7 @ \$.25) \$1.75

Postage \$1.01

**TOTAL DISBURSEMENTS:** \$2.76

**TOTAL FEES & DISBURSEMENTS:** \$11,800.76

Previous Balance \$25,264.96

Previous Payments (\$13,228.96)

<b>PLEASE PAY:</b>	<b>\$23,836.76</b>
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**PAYMENT DUE WITHIN 30 DAYS OF STATEMENT. THANK YOU.  
 PLEASE MAKE CHECKS PAYABLE TO BERRY & TUDOR, P.C.**

cc: Rob Moore via email

12/17/2024

Page 1

RMI EXP RECOVERABLE REDGE - Nov 2024

11/1/2024 through 11/30/2024

Category	11/1/2024- 11/30/2024	OVERALL TOTAL
<b>5100 FEES RMI</b>		
5300-RECEIVERS FEES	-2,845.80	-2,845.80
5610-CONTRACT LABOR RMI	-1,607.76	-1,607.76
<b>TOTAL 5100 FEES RMI</b>	<b>-4,453.56</b>	<b>-4,453.56</b>
<b>5150 FEES LEGAL</b>		
5400-LEGAL FEES	-12,593.26	-12,593.26
<b>TOTAL 5150 FEES LEGAL</b>	<b>-12,593.26</b>	<b>-12,593.26</b>
<b>5300 EXPENSE</b>		
6225-E MAIL INTERNET EXPENSE	-150.43	-150.43
<b>TOTAL 5300 EXPENSE</b>	<b>-150.43</b>	<b>-150.43</b>
<b>OVERALL TOTAL</b>	<b>-17,197.25</b>	<b>-17,197.25</b>



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

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

**CERTIFICATE OF SERVICE REGARDING INDEPENDENT FIDUCIARY’S  
NINTH NOTICE OF FEE FILING**

I hereby certify that on January 7, 2024, I caused the Independent Fiduciary’s Ninth Notice of Fee Filing [Dkt. 164], with Exhibits [Dkt. 164-1], 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 January 7, 2024, I caused the Independent Fiduciary’s Eighth and Final Notice of Fee Filing [Dkt. 164], with Exhibits [Dkt. 164-1], 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](mailto:pshoup@amibenefit.com));
- (2) Hampton Technical Associates 401(k) Profit Sharing Plan ([MarkS@Hampton-Tech.net](mailto:MarkS@Hampton-Tech.net)) and ([mbetts@bettsllc.com](mailto:mbetts@bettsllc.com)) and ([ggunnett@hh-law.com](mailto:ggunnett@hh-law.com));
- (3) Max Environmental Technologies, Inc. 401(k) Savings Plan ([JStango@MaxEnvironmental.com](mailto:JStango@MaxEnvironmental.com));
- (4) Medical Predictive Science Corporation ([GAlms@HeroScore.com](mailto:GAlms@HeroScore.com));
- (5) Elite Mechanical, Inc. 401(k) Profit Sharing Plan ([donna@elite-mechanical.com](mailto:donna@elite-mechanical.com));

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

Further, on or before January 8, 2025, the Independent Fiduciary posted/will post a copy of the Independent Fiduciary's Ninth Notice of Fee Filing [Dkt. 164], with Exhibits [Dkt. 164-1] on its web site at [www.receivermgmt.com/riversedge](http://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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*Counsel for Receivership Management, Inc.*