

Receivership Management, Inc.

510 Hospital Drive, Suite 490 Madison, TN 37115 (615) 370-0051 Fax (615) 373-4336

FILED _____ ENTERED _____
LODGED _____ RECEIVED _____

December 23, 2024

JAN - 2 2025

X

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

United States District Court Clerk's Office
101 West Lombard Street
Baltimore, MD 21201

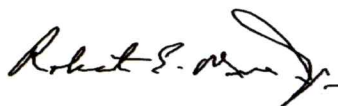
Re: Status Report for Filing in *Civil Case No.: 8:24-cv-00483-PJM*

Dear Clerk's Office Representative:

Enclosed is a 2nd Status Report from the Court-Appointed Independent Fiduciary in the above-referenced case for filing with your office. Since we are not a party to the case, we are filing via U.S. Mail and have served the parties in the same manner as stated in our Certificate of Service.

Please let me know if you need any further information.

Sincerely,



Robert E. Moore, Jr., President
Receivership Management, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FILED _____ ENTERED _____
LODGED _____ RECEIVED _____

JAN - 2 2025

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

JULIE A. SU,
Acting Secretary of Labor,
United States Department of Labor,

Plaintiff,

v.

Civil Case No.: 8:24-cv-00483-PJM

AXIM FRINGE SOLUTIONS GROUP, LLC,
AXIM MANAGED RETIREMENT SOLUTIONS
LLC, AXIM GLOBAL STRATEGIES GROUP,
LLC, JAMES CAMPBELL, MELISSA
MCMANES, FUTURE MIND CONSULTING,
LLC, AND BWELL, INC.,

Defendants.

**2ND STATUS REPORT OF THE COURT-APPOINTED
INDEPENDENT FIDUCIARY**

This Court appointed Receivership Management, Inc. (“RMI”) as Independent Fiduciary (“IF”) in this matter via Consent Order on May 23, 2024. The purpose of this filing is to update the Court on events since the IF’s First Status Report which reported the Defendants’ failure to fund their settlement obligations in the Consent Order. This report covers activity between September 1, 2024, through December 19, 2024.

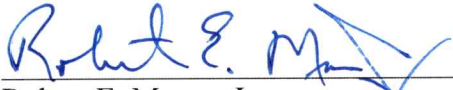
Following the last report of the IF, the Court issued an order directing the IF to file a motion seeking an appropriate remedy for the Defendants’ failure to fund the settlement in the Consent Order. The Department of Labor (“DOL”) filed a Motion for Contempt. The IF filed a motion requesting that this Court consider releasing the IF if it does not grant the DOL’s Motion for Contempt since the limited purpose of the IF’s appointment is for the distribution of settlement funds. At the time of this report, no Axim defendant, including Mr. Campbell, has

filed a response to the respective motions. Mr. Campbell has also not paid any of the anticipated settlement funds to the IF, other than the initial \$100,000 for IF fees. The DOL requested in its Motion for Contempt that Mr. Douglas Desmarais continue to appear as counsel for Mr. Campbell if no notice of substitute counsel is filed prior to the contempt hearing. Counsel for Mr. Desmarais filed a Motion for a Protective Order which asserts that Mr. Desmarais no longer represents Mr. Campbell, and that this Court should not compel Mr. Desmarais to appear before this Court. The IF takes no position on this issue since its role is to distribute the settlement funds. No hearing date has been set for the Motion for Contempt at this time.

The IF has continued to support and perform its limited duties in this matter by responding to status calls from employers affected by Axim's non-payment of its Consent Order obligation, ensuring that all employers have received notice of these proceedings by following up on returned mail and email, maintaining a website with information about these proceedings for the reference of those affected, and monitoring and reviewing all Court filings and responding if appropriate.

RMI has attached a copy of its billing on this matter as Exhibit 1. RMI currently holds \$61,719.24 of the original \$100,000 which Axim paid to cover IF fees and expenses in accordance with the Consent Order. While there is no obligation in the Consent Order to file its fees with the Court, RMI is doing so to disclose its activity to the parties, Axim employer clients, and to the Court. The IF will be debiting the prepaid fee amount to cover its fees and expenses up to November 30, 2024, after this Status Report has been filed for ten (10) days. The IF will also post this report on its Axim website.

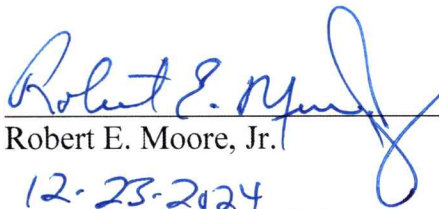
Submitted by:



Robert E. Moore, Jr.
President, Receivership Management Inc.
and Independent Fiduciary
510 Hospital Dr., Ste. 490
Madison, TN 37115
O: (615) 370-0051
rmoore@receivermgmt.com

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2024, a copy of Status Report of the Independent Fiduciary, Receivership Management, Inc., which was mailed first class mail, postage prepaid, to the Court Clerk for this case on December 23, 2024 for filing, was mailed via first class mail, postage prepaid, to all of the following:

By: 
Robert E. Moore, Jr.
Date: 12-23-2024
510 Hospital Dr., Ste. 490
Madison, TN 37115
O: (615) 370-0051
rmoore@receivermgmt.com

For the Plaintiff, Department of Labor:

Seema Nanda
Solicitor of Labor

Samantha Thomas
Acting Regional Solicitor

Usha Rengachary Counsel for ERISA
Andrea Luby Senior Trial Attorney
U.S. Department of Labor Office of the Solicitor, Region III
1835 Market Street Mailstop SOL/22 Philadelphia, PA 19103
(215) 861-5128 (Phone)
(215) 861-5162 (Fax)
luby.andrea@dol.gov

James Campbell
4848 N. Goldwater Blvd.
Unit 4017
Scottsdale, AZ 85251
240-720-0314 (Phone)
jcampbell@aximsg.com

Melissa McManes
2200 S Fort Apache Rd Unit 2250
Las Vegas NV 89117
801-808-2148 (Phone)

For Defendants Axim Fringe Solutions Group, LLC, Axim Managed Retirement Solutions, LLC, Axim Global Strategies Group, LLC, James Campbell, Future Mind Consulting, LLC, and BWell, Inc.:

Douglas W. Desmarais
Smith & Downey, P.A.
320 E. Towsontown Blvd., Suite 1 East
Baltimore, Maryland 21286
410-321-9000 (Phone)
410-321-6270 (Fax)
ddesmarais@smithdowney.com

Andrew Jay Graham
Louis P. Malick
Kramon & Graham, P.A.
750 East Pratt Street, Suite 1100
Baltimore, MD 21202
agraham@kg-law.com
lmalick@kg-law.com

SUMMARY TIME SHEET

SERVICES PROVIDED FOR AXIM FRINGE SOLUTIONS
FOR THE PERIOD 9/30/24 THROUGH 11/30/24

Receivership Management, Inc.

SEPT 2024 FEES	3,778.92
OCT 2024 FEES	2,767.80
NOV 2024 FEES	<u>71.88</u>

Berry & Tudor, LLC

\$6,618.60

BERRY & TUDOR - LEGAL	544.00
BERRY & TUDOR - LEGAL	<u>2,278.00</u>

\$2,822.00

EXPENSES SEPT-NOV 2024	<u>217.38</u>
------------------------	---------------

\$217.38

TOTAL FEES & EXPENSES

 \$9,657.98

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

Invoice for Professional Services

AXIM FRINGE SOLUTIONS GROUP LLC					September 2024	
9/3/2024	Lauren B. Garcia	EMAIL FROM J .LAWSON, RESEARCH ADDRESSES FROM RTS NOTICES TO EMPLOYERS	3.4	\$104.40	\$354.96	
9/3/2024	Robert E. Moore, Jr.	EMAIL TO L.GARCIA AND W.PORCELLO RE: CHECKING ACCOUNT FEE AT REGIONS .2	0.2	\$204.00	\$40.80	
9/3/2024	Wyla P. Porcello	REV OF EMAIL FROM L GARCIA RE ACCOUNT FOR UNPAID SETTLEMENT FUNDS AND SOLUTION FOR FEE AVOIDANCE ON SAME, SENT EMAIL RESPONSE TO L. GARCIA AND REM (.2)	0.2	\$192.00	\$38.40	
9/4/2024	Lauren B. Garcia	RESEARCH AND REISSUE RETURNED NOTICES TO EMPLOYERS	0.8	\$104.40	\$83.52	
9/6/2024	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL(S)	0.1	\$104.40	\$10.44	
9/9/2024	Lauren B. Garcia	PROCESS MAIL, EMAILS	0.2	\$104.40	\$20.88	
9/9/2024	Robert E. Moore, Jr.	EMAIL TO W.PORCELLO RE: UPDATE FROM CAMPBELL RE: NON- PAYMENT OF CONSENT ORDER AMOUNTS .2	0.2	\$204.00	\$40.80	
9/9/2024	Wyla P. Porcello	REVIEWED EMAIL FROM G. MATHISEN OTHER ACCOUNTS, IEA, RE PROVIDING STATEMENTS, SENT EMAIL RESPONSE RE SAME, EMAIL TO L. GARCIA RE QUESTION RE AXIM ACCOUNT STATEMENTS REQUESTED, REV EMAIL FROM B. LANDRY OF HORIZONS, DR EMAIL RESPONSE RE STATUS OF AXIM NONPAYMENT, REV RESPONSE FROM L. GARCIA RE AXIM ACCOUNTS - DR EMAIL TO REM RE PROVIDING STATEMENTS GIVING RECOMMENDATION, (.2)	0.2	\$192.00	\$38.40	
9/10/2024	Lauren B. Garcia	RESEARCH ADDRESSES FOR RETURNED NOTICES, EMAILS RE SUCH, EMAILS FROM W PORCELLO, CALLS FROM EMPLOYERS	2.7	\$104.40	\$281.88	
9/10/2024	Robert E. Moore, Jr.	UPDATE FROM W.PORCELLO RE: FORMER AXIM CLIENT LAWSUIT AGAINST CAMPBELL .2	0.2	\$204.00	\$40.80	

Monday, December 16, 2024

Page 1 of 3

AXIM FRINGE SOLUTIONS GROUP LLC**September 2024**

9/10/2024	Wyla P. Porcello	REV OF EMAIL FROM REM RE STATEMENT QUESTION, CALL W/B. TUDOR RE DISCUSSION OF CASE, ACCOUNTS AND WHETHER STATEMENTS CAN BE PROVIDED AT THIS TIME, EMAIL TO L. GARCIA RE REQUESTING EXAMPLE STATEMENTS AND BOND QUESTION, REVIEWED SAME, DR PROPOSED RESPONSE RE STATEMENT AND FWD TO B. TUDOR AND REM FOR REVIEW AND COMMENT (2.4); BEGAN DR STATUS REPORT FOR MARYLAND DISTRICT COURT (4.5)	6.9	\$192.00	\$1,324.80
9/11/2024	Lauren B. Garcia	CALLS FROM EMPLOYER	0.3	\$104.40	\$31.32
9/11/2024	Robert E. Moore, Jr.	REVIEW AND REVISE DRAFT AXIM REPORT, APPROVE SAME .25	0.25	\$204.00	\$51.00
9/11/2024	Wyla P. Porcello	REV RESPONSES FROM B. TUDOR AND REM RE STATEMENTS, SENT EMAIL TO G. MATHISEN RE PROVIDING STATEMENTS (.1); REV OF CONSENT ORDER AND EMAIL TO B. TUDOR RE STATEMENTS AND INFO RE CONSENT ORDER CONTENTS (.4); COMPLETED STATUS REPORT FOR MARYLAND DISTRICT COURT, SENT DRAFT TO REM AND L. GARCIA FOR REVIEW, COMMENT AND ANY ADDITIONS (2.3); EMAILS W/REM AND L. GARCIA RE FILING AND RETURNED CALL FROM MARYLAND DISTRICT COURT CLERK'S OFFICE (.4)	3.2	\$192.00	\$614.40
9/16/2024	Lauren B. Garcia	PREPARE FEE FILING EXHIBITS	0.8	\$104.40	\$83.52
9/16/2024	Wyla P. Porcello	REV COMMENTS ON STATUS REPORT, DR COVER LETTER FOR FILING DR EMAIL TO REM AND L. GARCIA RE CALL W/DISTRICT COURT CLERK'S OFFICE AND PREFERRED FILING METHOD, ATTACHED COVER LETTER AND INSTRUCTIONS FOR L. GARCIA FOR FILING, EMAIL W/L. GARCIA RE FEE ATTACHMENT (.6)	0.6	\$192.00	\$115.20
9/17/2024	Lauren B. Garcia	MAIL ACTIVITY REPORT AND SERVICES COPIES VIA CERTIFIED MAIL	1	\$104.40	\$104.40
9/19/2024	Lauren B. Garcia	CALL RE STATUS REPORT	0.1	\$104.40	\$10.44
9/23/2024	Robert E. Moore, Jr.	EMAIL TO W.PORCELLO RE: AXIM NOTICE OF FAILURE TO FUND SETTLEMENT .2	0.2	\$204.00	\$40.80
9/23/2024	Wyla P. Porcello	REV EMAIL AND DR RESPONSE TO E. SELKOWITZ OF ELWYN RE STATUS OF AXIM NONPAYMENT (.2), REV OF RESPONSE FROM E. SELKOWITZ, FWD SAME TO REM (.1)	0.1	\$192.00	\$19.20

Monday, December 16, 2024

Page 2 of 3

AXIM FRINGE SOLUTIONS GROUP LLC					September 2024	
9/24/2024	Robert E. Moore, Jr.	UPDATE FROM DEFENDANT COUNSEL RE: NO LONGER REPRESENTING PARTIES POST ENTRY OF CONSENT JUDGMENT BECOMING FINAL, FORWARD SAME TO W.PORCELLO AND DOL COUNSEL .2; UPDATED EMAILS FROM W.PORCELLO AND DOL COUNSEL RE: NON-REPRESENTED PARTIES, DIRECT W.PORCELLO TO UPDATE WEBSITE RE: SAME .3	0.5	\$204.00	\$102.00	
9/26/2024	Lauren B. Garcia	RECEIPT OF VM, EMAIL TO W PORCELLO	0.1	\$104.40	\$10.44	
9/26/2024	Robert E. Moore, Jr.	FOLLOW UP FROM W.PORCELLO RE: NON-REPRESENTATION .10	0.1	\$204.00	\$20.40	
9/27/2024	Wyla P. Porcello	REV OF EMAIL FROM D. DESAMARIS RE NON REPRESENTATION ASSERTED, EMAIL TO REM RE SAME, REV OF MARYLAND DISTRICT COURT LOCAL RULES ON WITHDRAWAL OF COUNSEL (.2)	0.2	\$192.00	\$38.40	
9/30/2024	Lauren B. Garcia	DOWNLOAD FILING FROM PACER AND UPLOAD TO WEBSITE, CALL W PORCELLO	0.3	\$104.40	\$31.32	
9/30/2024	Wyla P. Porcello	EMAILS W/REM AND L. GARCIA RE SERVICE OF STATUS REPORT ON J. CAMPBELL, WAIT TIME STATED IN REPORT, MARYLAND DISTRICT COURT LOCAL RULE AND APPOINTMENT ORDER CONTENTS RE IF DUTIES AND REPORTS, EMAIL TO J. CAMPBELL RE CURRENT PERSONAL ADDRESS, CALL W/REM ABOUT SERVICE OF STATUS REPORT (1.2)	1.2	\$192.00	\$230.40	
Total					\$3,778.92	

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

Invoice for Professional Services

AXIM FRINGE SOLUTIONS GROUP LLC

October 2024

10/3/2024	Wyla P. Porcello	DR EMAIL TO L. GARCIA RE CHECKING ON FEES IN AXIM BANK ACCOUNTS (.1); DR EMAIL TO L. GARCIA WITH INFORMATION TO PUT ON RMI WEBSITE RE STATUS REPORT AND PLAINTIFF REPRESENTATIVES (.2)	0.3	\$192.00	\$57.60
10/4/2024	Lauren B. Garcia	POST TO WEBSITE	0.3	\$104.40	\$31.32
10/5/2024	Jacqui D. Lawson	DOWNLOAD ONLINE STATEMENT FOR SEPTEMBER 2024. POST INTEREST AND EXPENSE ACCRUALS TO GL. RECONCILE BANK ACCOUNTS. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 9/30/2024. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. GENERATE PDF RECONCILIATION & UPLOAD TO SERVER FOR PRINT	0.3	\$104.40	\$31.32
10/5/2024	Wyla P. Porcello	DR EMAIL IN RESPONSE TO EMAIL FROM E. MATHISEN - STATUS ON SETTLEMENT FUNDING (.1)	0.1	\$192.00	\$19.20
10/8/2024	Jacqui D. Lawson	CALL WITH RMOORE RE: COURT RULING; CALCULATE FUNDS AVAILABLE FOR PROJECT COMPLETION BASED ON RESERVE (1.70)	1.7	\$104.40	\$177.48
10/8/2024	Lauren B. Garcia	TRANSFER FUNDS	0.1	\$104.40	\$10.44
10/9/2024	Lauren B. Garcia	ISSUE CHECK PAYMENTS	0.1	\$104.40	\$10.44
10/9/2024	Robert E. Moore, Jr.	FOLLOW UP CALL WITH B.TUDOR RE: RECENT INFORMATION FROM THE JUDGE .20;	0.2	\$204.00	\$40.80
10/10/2024	Lauren B. Garcia	EMAIL TO W PORCELLO, EMAIL TO EAGLE BANK, DOWNLOAD STMTS AND SAVE TO FILE	0.3	\$104.40	\$31.32
10/10/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: RECENT COURT ORDER, BACKGROUND DISCUSSION AND AXIM OPERATIONS 1.25; UPDATE ON CONFERENCE CALL TOMORROW WITH DOL COUNSEL .10	1.35	\$204.00	\$275.40

Monday, December 16, 2024

Page 1 of 3

AXIM FRINGE SOLUTIONS GROUP LLC					October 2024
10/14/2024	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL(S)	0.1	\$104.40	\$10.44
10/14/2024	Robert E. Moore, Jr.	EMAIL WITH W.PORCELLO RE: UPCOMING FILING WITH THE COURT, UPDATE CALL WITH W.PORCELLO RE: SAME .6	0.6	\$204.00	\$122.40
10/14/2024	Wyla P. Porcello	FWD EMAIL TO DHL FROM J. CAMBELL TO REM W/COMMENTS ON AMOUNTS ASSERTED AS DUE FROM DHL (.3); DR RESPONSE TO D. BAKER FROM DLH (.3); REV EMAIL FROM L. GARCIA RE ACCOUNTS THAT REMAIN OPEN, DR EMAIL TO SAME RE CONSOLIDATION/CLOSING AND QUESTIONS, SENT EMAIL TO REM RE SAME RE PREFERENCE (.4); REV OF ORDER RECEIVED FROM COURT RE FILING MOTION, DR EMAIL TO REM RE SAME (.3); CALL W/REM RE ORDER FROM COURT AND POSSIBLE ACTIONS BY IF AND WORDING OF POTENTIAL MOTION (.7)	2	\$192.00	\$384.00
10/16/2024	Lauren B. Garcia	RESEARCH EMPLOYER ADDRESSES FOR RETURNED TO SENDER NOTICES	0.7	\$104.40	\$73.08
10/17/2024	Lauren B. Garcia	REISSUE AND RESEARCH RETURNED TO SENDER EMPLOYER NOTICES	3.1	\$104.40	\$323.64
10/17/2024	Robert E. Moore, Jr.	DRAFT PROPOSED MOTION IN AXIM, FORWARD TO B.TUDOR FOR REVIEW 1.7	1.7	\$204.00	\$346.80
10/18/2024	Lauren B. Garcia	RESEARCH EMPLOYER ADDRESSES FOR RETURNED TO SENDER NOTICES	2.7	\$104.40	\$281.88
10/21/2024	Lauren B. Garcia	EMAIL RESPONSE FROM EMPLOYER, DISCUSS FILING WITH R MOORE	0.2	\$104.40	\$20.88
10/21/2024	Robert E. Moore, Jr.	REVIEW RECOMMENDED EDITS FROM B.TUDOR IN PROPOSED MOTION, INCORPORATE SAME .2	0.2	\$204.00	\$40.80
10/22/2024	Lauren B. Garcia	EMAIL TO EAGLE BANK RE CLOSING ZERO BALANCE ACCTS, SCAN MAIL TO FILE, CALL AND EMAIL FROM NICOLE AT EAGLE BANK	0.4	\$104.40	\$41.76
10/22/2024	Robert E. Moore, Jr.	UPDATE ON BANK FEES FROM L.GARCIA, INSTRUCTIONS ON SAME .2	0.2	\$204.00	\$40.80
10/22/2024	Wyla P. Porcello	REV OF IF MOTION, DR EMAIL W/COMMENTS AND SUGGESTED ADDITIONS (.8)	0.8	\$192.00	\$153.60
10/23/2024	Lauren B. Garcia	CALL FROM EMPLOYER WITH QUESTION REGARDING PYMT TO AXIM, EMAIL TO W PORCELLO RE SUCH	0.2	\$104.40	\$20.88
10/23/2024	Robert E. Moore, Jr.	UPDATE FROM B.TUDOR RE: RECENT AXIM FILINGS .10	0.1	\$204.00	\$20.40

Monday, December 16, 2024

Page 2 of 3

AXIM FRINGE SOLUTIONS GROUP LLC					October 2024
10/24/2024	Lauren B. Garcia	PREPARE REPORT AND SERVICE COPIES AND MAILED CERTIFIED, UPDATE TO WEBSITE	0.7	\$104.40	\$73.08
10/25/2024	Lauren B. Garcia	EMAIL TO EMPLOYER RE STATUS	0.1	\$104.40	\$10.44
10/25/2024	Robert E. Moore, Jr.	REVIEW COMMENTS FROM W.PORCELLO ON FILINGS .2	0.2	\$204.00	\$40.80
10/25/2024	Wyla P. Porcello	REV OF PHONE MESSAGE SENT BY L. GARCIA FROM NETS, DR RESPONSE TO SAME, DR EMAIL TO REM REQUESTING COPY OF RECENT DOL COURT FILINGS (4)	0.4	\$192.00	\$76.80
Total					\$2,767.80

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

Invoice for Professional Services

AXIM FRINGE SOLUTIONS GROUP LLC					November 2024
11/8/2024	Jacqui D. Lawson	DOWNLOAD ONLINE STATEMENT FOR OCTOBER 2024. POST INTEREST AND EXPENSE ACCRUALS TO GL. RECONCILE BANK ACCOUNTS. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 10/31/2024. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. GENERATE PDF RECONCILIATION & UPLOAD TO SERVER FOR PRINT	0.2	\$104.40	\$20.88
11/11/2024	Robert E. Moore, Jr.	UPDATE CALL TO B.TUDOR .25	0.25	\$204.00	\$51.00
Total					\$71.88

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

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

Telephone: (615) 726-1000

FEIN: 62-1525112

Fax: (615) 370-0077

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

October 1, 2024

Client #: 1074

RE: Axim

Invoice #: 22588

DATE	DESCRIPTION	HOURS	AMOUNT	
Sept-6-24	Emails from A. Luby and to R. Moore re: status update.	0.10	34.00	BET
Sept-10-24	Telephone conference with W. Porcello re: status update on case, ERISA bonding, and an employer's request for copies of master trust account statements; emails from and to W. Porcello re: draft response to employer's request.	1.40	476.00	BET
Sept-11-24	Emails from and to W. Porcello re: RMI's access to master trusts' and subtrusts' books, records and documents.	0.10	34.00	BET
TOTAL FEES:		1.60	\$544.00	
TOTAL DISBURSEMENTS:			\$0.00	
TOTAL FEES & DISBURSEMENTS:			\$544.00	
Previous Balance			\$136.00	
Previous Payments			\$0.00	

PLEASE PAY:**\$680.00**

Invoice 22588

Page 2

October 1, 2024

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

cc: Rob Moore via email

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

November 1, 2024

Client #: 1074

RE: Axim

Invoice #: 22611

DATE	DESCRIPTION	HOURS	AMOUNT	
Oct-9-24	Email from A. Luby re: recent order; review order re: IF's motion to address non-payment; email to R. Moore re: same.	0.10	34.00	BET
Oct-10-24	Telephone conference with R. Moore re: court order for IF's motion; emails to and from A. Luby re: same; review Maryland District Court local rules re: pro hac vice admission.	2.00	680.00	BET
Oct-11-24	Telephone conversation with R. Moore re: order; Teams call with A. Luby re: same; email to R. Moore re: call.	0.90	306.00	BET
Oct-14-24	Telephone conference with R. Moore re: motion for discharge.	0.25	85.00	BET
Oct-15-24	Voicemail to Clerk of Maryland District Court re: motion for admission pro hac vice; email to R. Moore re: same.	0.10	34.00	BET
Oct-16-24	Telephone conference with R. Moore re: proposed response to order.	0.20	68.00	BET
Oct-21-24	Emails from and to R. Moore re: draft report and motion; review and comment on same; emails to and from A. Luby re: same; telephone conference with R. Moore re: same.	1.75	595.00	BET

Invoice 22611

Page 2

November 1, 2024

Oct-22-24	Email from W. Porcello re: comments on draft report and motion.	0.10	34.00	BET
Oct-23-24	Review DOL's motion for contempt and related pleadings; emails from and to and telephone conference with R. Moore re: same; prepare revised draft IF's response and motion.	1.20	408.00	BET
Oct-24-24	Email from L. Garcia re: copy of IF's response and motion, as filed and served; review same.	0.10	34.00	BET
TOTAL FEES:		6.70	\$2,278.00	

TOTAL DISBURSEMENTS:	\$0.00
-----------------------------	--------

TOTAL FEES & DISBURSEMENTS:	\$2,278.00
--	------------

Previous Balance	\$680.00
------------------	----------

Previous Payments	(\$136.00)
-------------------	------------

PLEASE PAY:	\$2,822.00
--------------------	-------------------

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

cc: Rob Moore via email

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

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

Telephone: (615) 726-1000

FEIN: 62-1525112

Fax: (615) 370-0077

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

October 1, 2024

Client #: 1074

RE: Axim

Invoice #: 22588

DATE	DESCRIPTION	HOURS	AMOUNT	
Sept-6-24	Emails from A. Luby and to R. Moore re: status update.	0.10	34.00	BET
Sept-10-24	Telephone conference with W. Porcello re: status update on case, ERISA bonding, and an employer's request for copies of master trust account statements; emails from and to W. Porcello re: draft response to employer's request.	1.40	476.00	BET
Sept-11-24	Emails from and to W. Porcello re: RMI's access to master trusts' and subtrusts' books, records and documents.	0.10	34.00	BET
TOTAL FEES:		1.60	\$544.00	
TOTAL DISBURSEMENTS:			\$0.00	
TOTAL FEES & DISBURSEMENTS:			\$544.00	
Previous Balance			\$136.00	
Previous Payments			\$0.00	

PLEASE PAY:**\$680.00**

Invoice 22588

Page 2

October 1, 2024

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

cc: Rob Moore via email

12/16/2024

RMI EXP RECOVERABLE AXIM

9/1/2024 through 11/30/2024

Page 1

Category	9/1/2024- 9/30/2024	10/1/2024- 10/31/2024	11/1/2024- 11/30/2024	OVERALL TOTAL
5100 FEES RMI				
5300-RECEIVERS FEES	-336.60	-928.20	-51.00	-1,315.80
5610-CONTRACT LABOR RMI	-3,442.32	-1,839.60	-20.88	-5,302.80
TOTAL 5100 FEES RMI	-3,778.92	-2,767.80	-71.88	-6,618.60
5150 FEES LEGAL				
5400-LEGAL FEES	-544.00	-2,278.00	0.00	-2,822.00
TOTAL 5150 FEES LEGAL	-544.00	-2,278.00	0.00	-2,822.00
5300 EXPENSE				
6205-COPIES	-32.80	-29.00	0.00	-61.80
6210-POSTAGE	0.00	-102.27	0.00	-102.27
6211-SENDPRO CERTIFIED MAIL P...	-53.31	0.00	0.00	-53.31
TOTAL 5300 EXPENSE	-86.11	-131.27	0.00	-217.38
OVERALL TOTAL	-4,409.03	-5,177.07	-71.88	-9,657.98

CERTIFIED MAIL

LAUREN GARCIA
RECEIVERSHIP MANAGEMENT
INC
510 HOSPITAL DR. STE 490
MADISON TN 37115-5049

USPS CERTIFIED MAIL



9414 8098 9864 3568 0329

ENTERED
LOADED RECEIVED

JAN - 3 2025

CV3

AT BALTIMORE
FILED IN U.S. DISTRICT COURT
DISTRICT OF MARYLAND

US DIST COURT CLERK'S OFFICE
101 W LOMBARD ST
BALTIMORE MD 21201-2605

FILED ENTERED
LOADED RECEIVED

JAN - 3 2025

CV3

AT BALTIMORE
FILED IN U.S. DISTRICT COURT
DISTRICT OF MARYLAND

