

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) 691-1367

5 *Successor Receiver*

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7  
8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 SECURITIES AND EXCHANGE  
12 COMMISSION,

13 Plaintiffs,

14 v.

15 JOHN V. BIVONA; SADDLE RIVER  
16 ADVISORS, LLC; SRA MANAGEMENT  
ASSOCIATES, LLC; FRANK GREGORY  
MAZZOLA,

17 Defendants, and

18 SRA I LLC; SRA II LLC; SRA III LLC; FELIX  
19 INVESTMENTS, LLC; MICHELE J.  
20 MAZZOLA; ANNE BIVONA; CLEAR  
SAILING GROUP IV LLC; CLEAR SAILING  
GROUP V LLC,

21 Relief Defendants.

Case No.: 3:16-cv-01386-EMC

**DECLARATION OF NICHOLAS  
SANCHEZ IN SUPPORT OF  
TWENTY- SECOND INTERIM  
ADMINISTRATIVE MOTION FOR  
AN ORDER PURSUANT TO  
LOCAL RULE 7-11 FOR THE  
APPROVAL OF FEES AND  
EXPENSES FOR THE  
SUCCESSOR RECEIVER, RAINES  
FELDMAN LITTRELL LLP, AND  
MILLER KAPLAN ARASE LLP  
FROM APRIL 1, 2024 THROUGH  
JUNE 30, 2024**

Date: No Hearing Set  
Time: No Hearing Set  
Judge: Edward M. Chen

1 I, Nicholas Sanchez, declare:

2 1. I am a partner at Miller Kaplan Arase LLP (“Miller Kaplan” or the “Firm”),  
3 tax advisor for Kathy Bazoian Phelps, the Court appointed Receiver (the “Receiver”) in the  
4 case of *Securities and Exchange Commission v. Bivona, et al.* (the “Action”) before the  
5 United States District Court for the Northern District of California (the “Court”). I am an  
6 attorney at law licensed to practice in all of the courts of the states of California and the  
7 United States Tax Court. I have personal knowledge of the matters set forth below and if  
8 called as a witness, I would and could testify competently to the matters stated herein.

9 2. This declaration is made in support of the Twenty-Second Interim  
10 Administrative Motion for an Order Pursuant to Local Rule 7-11 for the Approval of Fees  
11 and Expenses for the Receiver, Raines Feldman Littrell LLP, and Miller Kaplan Arase LLP  
12 for the period of April 1, 2024 through June 30, 2024 (the “Motion”).

13 3. A true and correct copy of my firm’s invoice reflecting the detailed time  
14 entries for the services we provided from April 1, 2024 through June 30, 2024 (the “Motion  
15 Period”), is attached hereto as Exhibit “6.” Miller Kaplan incurred fees in the amount of  
16 \$3,163.20 during the Motion Period.

17 4. During the Motion Period, the Firm assisted the Receiver in preparation of the  
18 estate’s 2023 tax returns and quarterly estimated tax payments for 2024. The Firm also  
19 assisted the Receiver with 2023 annual accounting.

20 5. The fees requested are reasonable, necessary, and commensurate with the skill  
21 and experience required for the activity performed. Our services and time expenditures are  
22 reasonable in light of the labor required for the matters for which we were retained. Miller  
23 Kaplan respectfully submits that it has not expended time unnecessarily and that it has  
24 rendered efficient and effective services.

25 6. To the best of my knowledge, information and belief formed after reasonable  
26 inquiry, all the fees requested in the attached billing statements are true and correct and  
27 comply with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S.

28

1 Securities and Exchange Commission.

2 7. Miller Kaplan has not included in the amount for which reimbursement of  
3 costs is sought, amortization of the cost of any equipment, investment or capital outlay.

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5 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
6 this 15th day of August 2024 at Santa Barbara, California.

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Nicholas Sanchez

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# EXHIBIT 6



4123 Lankershim Boulevard  
North Hollywood, CA 91602

O. 818.769.2010

millerkaplan.com

FED EIN 95-2036255

Receivers Account Estate of Saddle River Management  
(SRA Receivership)  
Kathy Bazoian Phelps  
Raines Feldman Littrell LLP  
1900 Avenue of the Stars, 19th Floor  
Los Angeles, CA 90067

**Invoice:** 706445

**Date:** 7/5/2024  
**Due Date:** 8/4/2024  
**Client ID:** 3012290

For professional services rendered as follows:

Description	Hours	Rate	Amount
2024 QSF Estimated Taxes			
6/8/2024: Preparation: Dorothy Simpson: Update accounting for 2024 and prepare Q2 estimate.	3.80	180.00	684.00
6/11/2024: Review: Jessica Corbin: 2Q 2024 estimated taxes.	0.80	180.00	144.00
Deliver: Emily Ransom: Q2 amount and payment instructions to Kathy Phelps.	0.10	168.00	16.80
2024 QSF Estimated Taxes Total			844.80
2023 QSF Tax Return			
4/8/2024: Review: Jessica Corbin: Preparation of 2023 income tax returns.	0.20	180.00	36.00
4/10/2024: Review: Jessica Corbin: Preparation of 2023 income tax returns.	0.40	180.00	72.00
4/12/2024: Preparation: Emily Ransom: Extensions and CA payment voucher.	0.30	168.00	50.40
Review: Jessica Corbin: Preparation of 2023 income tax returns.	0.50	180.00	90.00
6/7/2024: Preparation: Dorothy Simpson: Prepare accounting for 2023.	9.50	180.00	1,710.00
6/8/2024: Preparation:			



**Detailed Specification****6/8/2024:****Dorothy Simpson:**

Preparation 3.80 180.00 684.00

**6/11/2024:****Jessica Corbin:**

Review 0.80 180.00 144.00

**Emily Ransom:**

Deliver 0.10 168.00 16.80

**4/8/2024:****Jessica Corbin:**

Review 0.20 180.00 36.00

**4/10/2024:****Jessica Corbin:**

Review 0.40 180.00 72.00

**4/12/2024:****Jessica Corbin:**

Review 0.50 180.00 90.00

**Emily Ransom:**

Preparation 0.30 168.00 50.40

**6/7/2024:****Dorothy Simpson:**

Preparation 9.50 180.00 1,710.00

**6/8/2024:****Dorothy Simpson:**

Preparation 2.00 180.00 360.00



**Schedule of Rates**  
as of December 1, 2022

<b>STAFF LEVEL</b>	<b>CURRENT RATES PER HOUR</b>	<b>DISCOUNTED RATES PER HOUR</b>
Administrative Staff, SMEs & Project Managers	\$65 – \$210	\$52 – \$168
Accounting Staff	\$120 – \$180	\$96 – \$144
Senior Accounting Staff	\$205 – \$270	\$164 – \$216
Attorney	\$250 – \$350	\$200 – \$280
Partner	\$420 – \$570	\$336 – \$456

**Schedule of Rates**

<b>STAFF</b>	<b>CURRENT RATES PER HOUR</b>	<b>DISCOUNTED RATES PER HOUR</b>
Sanchez, Nicholas	\$420	\$336
Mandeville, John	\$265	\$212
Corbin, Jessica	\$225	\$180
Ransom, Emily	\$210	\$168
Kim, Victor	\$240	\$192
Simpson, Dorothy	\$225	\$180
Maumus, Alla	\$180	\$144
Vega, Cecilia	\$120	\$96
Ortega, Jacqueline	\$115	\$92
Fernandez, Monica	\$115	\$92
Tokhi, Dorona	\$110	\$88
Singh, Manmohit	\$100	\$80