

**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.)	
)	
RIVEREDGE 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 EIGHTH & FINAL 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 Eighth and Final Notice of Fee Filing and states as follows:

This filing constitutes RMI’s fee filing for the period from September 1, 2024 through October 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 September 1, 2024 to October 31, 2024 are as follows:

A. Receivership Management Inc.	\$ 11,369.00
\$ 11,204.76 / Contract Labor	
\$ 164.24 / Other Expenses	
B. Berry & Tudor PC-Legal	\$ 12,036.00
C. LBMC, P.C	\$ 781.20
Total:	\$ 24,186.20

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 9/1/24 THRU 10/31/24

Receivership Management Inc.

SEPT 2024 FEES	2,807.16	
OCT 2024 FEES	8,397.60	
		11,204.76

Berry & Tudor, PC - Legal

SEPT 2024 FEES	4,012.00	
OCT 2024 FEES	8,024.00	
		12,036.00

LMBC, PC

AUG-OCT 2024	781.20	
		781.20

TOTAL FEES DUE: **\$ 24,021.96**

TOTAL EXPENSES DUE: **\$ 164.24**

GRAND TOTAL DUE: **\$ 24,186.20**

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

Invoice for Professional Services

RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC					September 2024	
9/4/2024	Robert E. Moore, Jr.	CALL WITH L.GARCIA RE: PROGRESS ON DATA TRANSFERS .10; CALL WITH B.TUDOR RE: SAME .10	0.2	\$204.00	\$40.80	
9/5/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: PROJECT STATUS AND RECORDS .3	0.3	\$204.00	\$61.20	
9/6/2024	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL(S), PROCESS REQUEST FOR PLAN DOCS	0.3	\$104.40	\$31.32	
9/6/2024	Robert E. Moore, Jr.	CONFERENCE CALL WITH U.RENGACHARY RE: PROJECT STATUS 1.0	1	\$204.00	\$204.00	
9/9/2024	Robert E. Moore, Jr.	EMAILS TO B.TUDOR RE: FEE MOTION, NON-DECONVERTED PLANS, WORK ON SAME .5	0.5	\$204.00	\$102.00	
9/11/2024	Lauren B. Garcia	EMAIL TRAFFIC	0.5	\$104.40	\$52.20	
9/11/2024	Robert E. Moore, Jr.	REVIEW AND RESPOND ON INFORMATION CONCERNING TYRONE HOSPITAL 457B PLAN TO L.GARCIA AND B.TUDOR .3	0.3	\$204.00	\$61.20	
9/13/2024	Lauren B. Garcia	EMAILS RE DOCUMENT REQUEST, CALL TO R MOORE	0.2	\$104.40	\$20.88	
9/13/2024	Robert E. Moore, Jr.	EMAIL FROM LEECH TISHMAN 401k PLAN, FORWARD DOCUMENT REQUEST TO COUNSEL .2; EMAILS AND CALLS WITH JOSE JARA RE: AUDIT PACKAGES NOT PERFORMED BY RIVERSEDGE PRIOR TO CLOSING, DATA AVAILABLE .4	0.6	\$204.00	\$122.40	
9/16/2024	Lauren B. Garcia	EMAIL FROM B TUDOR, CALL FROM EMPLOYEE, REVIEW VOICEMAIL, PROCESS PLAN DOCUMENT REQUEST	2.8	\$104.40	\$292.32	
9/16/2024	Robert E. Moore, Jr.	CALL WITH L.GARCIA RE: RECORDS ACCESS QUESTIONS .10	0.1	\$204.00	\$20.40	
9/17/2024	Lauren B. Garcia	EMAILS WITH LBMC	0.2	\$104.40	\$20.88	
9/20/2024	Lauren B. Garcia	PREPARE INVOICING, DISCUSSION W R MOORE RE EMPLOYER COUNSEL REQUEST	0.8	\$104.40	\$83.52	

Monday, October 21, 2024

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RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC**September 2024**

9/20/2024	Robert E. Moore, Jr.	EMAILS TO AND FROM G.FEDELES RE: BEAVER COUNTY DECONVERSION STATUS .2; ADDITIONAL RESEARCH ON SELECTIVE DINING, DRAFT LETTER TO SAME .5; WORK ON ACTIVITY REPORT, UPDATE B.TUDOR ON SAME, REVIEW AND APPROVE FEE REPORT AND EXHIBITS .3	1	\$204.00	\$204.00
9/20/2024	Robert E. Moore, Jr.	EMPLOYER RESEARCH .4; RECORDS INFORMATION AND TRAINING FOR L.GARCIA ISSUES WITH LBMC .7	1.1	\$204.00	\$224.40
9/23/2024	Lauren B. Garcia	PREPARE FEE FILING DRAFT AND EXHIBITS, PROCESS DOCUMENT REQUEST	1.4	\$104.40	\$146.16
9/23/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: OUTSTANDING ISSUES .10; CALL WITH L.GARCIA RE: RECORDS .10; FOLLOW UP CALL WITH B.TUDOR RE: ADDITIONAL WORK REMAINING, QUESTIONS RE: SOC AUDIT.6; COMPLETE FINAL ACTIVITY REPORT .25; EMAIL TO B.TUDOR RE: REPORT AND DATA AND BILLINGS-LBMC .10; APPROVE 7TH FEE FILING .10; REVIEW PAST EMAILS ON SOCS AUDIT .4	1.65	\$204.00	\$336.60
9/24/2024	Lauren B. Garcia	CONF W LBMC RE TRAINING ON BLOB AND PURVIEW TO PROCESS EMPLOYER PLAN DOC REQUEST, EMAIL FROM B TUDOR	0.7	\$104.40	\$73.08
9/25/2024	Robert E. Moore, Jr.	EMAIL UPDATE FROM B.TUDOR RE: FEE FILINGS .10; EMAIL FROM L.GARCIA RE: ADDITIONAL DOCUMENT REQUESTS .10; CONTINUED ATTEMPTS TO REGAIN ACCESS TO EGNYTE .3	0.5	\$204.00	\$102.00
9/26/2024	Lauren B. Garcia	POST TO WEBSITE, EMAIL FROM B TUDOR, EMAIL TO W SONG	0.4	\$104.40	\$41.76
9/26/2024	Robert E. Moore, Jr.	REMAINING PLAN UPDATES, RECORDS ISSUES, REQUEST ISSUES, ACCESS TO LBMC HELD RECORDS ISSUES .5; CONTINUED ATTEMPTS TO NEGOTIATE ACCESS WITH EGNYTE .2	0.7	\$204.00	\$142.80
9/27/2024	Lauren B. Garcia	CONTACT EGNYTE SUPPORT, EMAIL FROM B GEORGE REQUESTING UPDATE ON REMAINING PLANS	0.6	\$104.40	\$62.64
9/30/2024	Lauren B. Garcia	CONF W R MOORE, CALLS END EMAILS WITH EGNYTE, PROCESS PLAN DOCUMENT REQUEST FROM EMPLOYER, EMAILS FROM LBMC	1.5	\$104.40	\$156.60
9/30/2024	Robert E. Moore, Jr.	CONTINUED WORK ON RECORDS ACCESS, DISCUSSION WITH L.GARCIA RE: SAME, LIMITATIONS OF ACCESS TO EGNYTE, LBMC HELD INFORMATION SEARCH LIMITATIONS 1.0	1	\$204.00	\$204.00

Total**\$2,807.16****Monday, October 21, 2024****Page 2 of 2**

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

Invoice for Professional Services

RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC					October 2024	
10/1/2024	Lauren B. Garcia	EMAIL TRAFFIC FROM EGNYTE, EMAIL REQUESTING PLAN DOCUMENTS	0.4	\$104.40	\$41.76	
10/1/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: DATA ISSUES, SOC QUESTIONS .5; UPDATES FROM L.GARCIA RE: DOCUMENT REQUESTS, SEARCH ISSUES .25	0.75	\$204.00	\$153.00	
10/2/2024	Lauren B. Garcia	MEETING WITH LBMC RE TRAINING AND DOWNLOAD ACTIVITY, PURCHASE SSD RELATED TO SUBPOENA	2.6	\$104.40	\$271.44	
10/2/2024	Robert E. Moore, Jr.	CONFERENCE CALL WITH LBMC REPRESENTATIVES RE: LACK OF SEARCH AND LOCATION SOFTWARE, CATALOGUE VIEW BUT SEPARATE FROM FILE VIEW, DOWNLOAD FUNCTIONS-PRINT FUNCTIONS NOT PRESENT 2.2; FOLLOW UP CALLS WITH L.GARCIA ON POTENTIAL WORK-AROUNDS .25; UPDATE B.TUDOR	2.55	\$204.00	\$520.20	
10/3/2024	Lauren B. Garcia	ISSUE PAYMENTS, CALL WITH DAN RE FILEZILLA, RECORDS TRANSFER TO SSD, DISCUSSION WITH R MOORE RE DATA, INITIATED DATA TRANSFER AND MONITOR PROGRESS	4	\$104.40	\$417.60	
10/3/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR RE: INFORMATION REQUESTS, DATA DIFFICULTIES, WORK AROUND PROPOSALS .8; FOLLOW UP ON REMAINING GROUPS WITH B.TUDOR .4; UPDATE CALL WITH D.BENNETT .25	1.45	\$204.00	\$295.80	
10/4/2024	Lauren B. Garcia	INITIATED DATA TRANSFER AND MONITOR PROGRESS, SCAN EMPLOYER PAPER FILES AND SHARE WITH EMPLOYER VIA SHAREFILE PER REQUEST	2.8	\$104.40	\$292.32	
10/4/2024	Robert E. Moore, Jr.	REVIEW EMAILS FROM M.COLLETTI RE: ARCHIVED PARTICIPANT STATEMENT .10; REVIEW REQUESTS FROM LEECH TISHMAN FUSCALDO RE: PLAN INFORMATION-CONFIRMATION ISSUES .2	0.3	\$204.00	\$61.20	

Wednesday, October 30, 2024

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RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC				October 2024	
10/7/2024	Lauren B. Garcia	PULL PAPER DOCUMENT REQUESTED BY EMPLOYERS AND SCAN TO FILE	6.2	\$104.40	\$647.28
10/8/2024	Lauren B. Garcia	DATA TRANSFER AND MONITOR PROGRESS, WORK ON EMPLOYER DATA REQUEST	5.6	\$104.40	\$584.64
10/9/2024	Lauren B. Garcia	DATA TRANSFER AND MONITOR PROGRESS, WORK ON EMPLOYER DATA REQUEST	2.8	\$104.40	\$292.32
10/9/2024	Robert E. Moore, Jr.	CALL WITH SARA BEAUSEIGNEUR, CPA WITH H2R CPA ON BEHALF OF A PLAN RE: MODERATE DIFFERENCE IN PARTICIPANT LEVEL REPORT AND PLAN REPORTS, DISCUSSION OF LACK OF REPORTS, DISCLOSURE OF NEW SOCS AUDIT RECORD FOR PLAN YEAR 2022 .75; RECEIPT OF COPY OF SAME AND	1.25	\$204.00	\$255.00
10/10/2024	Lauren B. Garcia	DATA TRANSFER AND MONITOR PROGRESS, WORK ON EMPLOYER DATA REQUEST	2.5	\$104.40	\$261.00
10/10/2024	Robert E. Moore, Jr.	MEETING WITH L.GARCIA RE: UPDATE ON PROGRESS ON INFORMATION RESPONSES, STATUS OF DOWNLOADS .4; RESPOND TO INQUIRY ON REPORTS REQUEST FROM L.REAGAN ON BEHALF OF ZILLWEGER CONTRACTING .2; CALL WITH B.TUDOR RE: RIVERSEDGE SOC AUDIT REVIEW, DISCUSSION OF SAME	1.85	\$204.00	\$377.40
10/11/2024	Robert E. Moore, Jr.	REVIEW EMAIL FROM B.TUDOR RE: RIVERSEDGE 2022 SOC AUDIT REPORT .7; CALL WITH B.TUDOR RE: SAME .5; CALL WITH D.BENNETT RE: SOC ISSUES AND IMPACT ON REPORT, REQUEST BRIEF REVIEW TO CONFIRM IMPACT IF ANY .6	1.8	\$204.00	\$367.20
10/14/2024	Lauren B. Garcia	EMAIL FROM B TUDOR RE FINAL REPORT, POST FEE AND EXPENSE ACCRUAL(S), EMAIL TO R MOORE, DRAFT FEE FILING AND EXHIBITS	0.7	\$104.40	\$73.08
10/14/2024	Robert E. Moore, Jr.	FOLLOW UP CALL WITH D.BENNETT RE: REVIEW AND RIVERSEDGE 2022 SOCS AUDIT IMPACT .5; REVIEW EMAILS WITH D.BENNETT, B.TUDOR, AND COUNSEL FOR RIVERSEDGE .2; REVIEW AND APPROVE MOTION FOR EXTENSION .2	0.9	\$204.00	\$183.60
10/15/2024	Lauren B. Garcia	EMAIL WITH FILING ATTACHED, POST TO WEBSITE, EMAIL TO B TUDOR RE MOTION FOR DISBURSEMENT, DATA TRANSFER AND MONITOR PROGRESS, WORK ON EMPLOYER DATA REQUEST	3.1	\$104.40	\$323.64
10/15/2024	Robert E. Moore, Jr.	FOLLOW UP EMAIL FROM B.TUDOR RE: EXTENSION .10	0.1	\$204.00	\$20.40

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RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC**October 2024**

10/16/2024	Lauren B. Garcia	VERIFY DATA DOWNLOAD AND EMAIL RE DATA SUMMARY, POST TO WEBSITE, VERIFY PASSWORD FOR TOSHIBA DRIVE	1.4	\$104.40	\$146.16
10/16/2024	Robert E. Moore, Jr.	REVIEW INFORMATION FROM B.TUDOR RE: SOC REPORTS, UPDATE FROM L.GARCIA RE: DATA DOWNLOAD PROCESS .2; REVIEW ORDER FROM COURT .10	0.3	\$204.00	\$61.20
10/17/2024	Lauren B. Garcia	EMAIL RE DATA TRANSFER AND SUBPOENA SCHEDULING	0.3	\$104.40	\$31.32
10/17/2024	Robert E. Moore, Jr.	UPDATE EMAIL FROM L.GARCIA RE: DATA RETRIEVAL FROM LBMC .2; EMAILS FROM B.TUDOR RE: RIVERSEDGE SOCS REPORT ISSUES, DISCLOSURES; REVIEW SUMMARY FROM D.BENNETT, NO IMPACT OF SOCS AUDIT, IMPORTANT INFORMATION FOR PLAN SPONSORS CONFIRMED .25; CALL FROM D.BENN	1.2	\$204.00	\$244.80
10/18/2024	Lauren B. Garcia	CALL FROM EMPLOYER, EMAIL FROM EMPLOYER'S COUNSEL	0.2	\$104.40	\$20.88
10/18/2024	Robert E. Moore, Jr.	CONTINUED UPDATE FROM L.GARCIA, CONFIRMED NO ACCESS TO EGNYTE .2; REVIEW FINAL MARKUP FROM D.BENNETT .4, REVIEW EMAILS FROM COUNSEL FOR ELITE MECHANICAL AND HAWAII DENTAL, L.GARCIA RESPONSE TO SAME .2	0.8	\$204.00	\$163.20
10/21/2024	Lauren B. Garcia	DISCUSS RECORDS PICKUP WITH R MOORE	0.2	\$104.40	\$20.88
10/21/2024	Robert E. Moore, Jr.	REVIEW EMAILS AND RESPOND TO B.TUDOR RE: RECORDS AND US ATTORNEY OFFICE .2; REVIEW CORRESPONDENCE FROM B.TUDOR TO EGNYTE .2; DISCUSSION OF SAME, LOGISTICS AND STATUS OF RECORD DOWNLOAD FROM LBMC, SOCS AUDIT DISCLOSURES .8	1.2	\$204.00	\$244.80
10/22/2024	Lauren B. Garcia	EMAIL TRAFFIC RE WRAP UP, PROCESS MAIL AND SCAN TO R MOORE, REVIEW FINAL REPORT AND EMAIL RE EDIT	0.7	\$104.40	\$73.08
10/22/2024	Robert E. Moore, Jr.	REVIEW COMMENTS FROM COUNSEL RE: RIVERSEDGE SOCS AUDIT .25; FINAL UPDATE ON RECORDS RETRIEVAL FROM LBMC FROM L.GARCIA .2; DISCUSSION OF SAME WITH L.GARCIA .25; UPDATE FROM B.TUDOR RE: SUBPOENA RESPONSE .10; DRAFT ACTIVITY REPORT .6; EMAILS WITH COUNSEL RE	1.85	\$204.00	\$377.40
10/23/2024	Lauren B. Garcia	INTER OFFICE EMAILS RE WRAP UP, UPLOAD FINAL DATA TO SSD PORTABLE DRIVE, PREPARE 40 BOXES FOR PICKUP AND CROSS CHECK INVENTORY	3.2	\$104.40	\$334.08

Wednesday, October 30, 2024

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RIVERSEDGE ADVANCED RETIREMENT SOLUTIONS LLC**October 2024**

10/23/2024	Robert E. Moore, Jr.	UPDATE CALL WITH B.TUDOR RE: FILINGS, DISCLOSURES, LOGISTICS FOR CLOSING .5; CONTINUED CORRESPONDENCE WITH US ATTY RE: RECORDS .2; UPDATE FROM W.SON AT LBMC RE: FINAL INVOICE .1; REVIEW CONFIRMATION OF DECONVERSIONS, EMAILS TO AND FROM S.REISS RE: SAME .2	1.4	\$204.00	\$285.60
10/24/2024	Lauren B. Garcia	POST TO WEBSITE, EMAIL SERVICE COPIES, EMAIL TRAFFIC	0.4	\$104.40	\$41.76
10/24/2024	Robert E. Moore, Jr.	REVIEW AND APPROVE RESPONSE TO J.STEINER .10; UPDATE FROM US ATTY RE: SUBPOENA FOR RECORDS-TURN OVER DATE .2	0.3	\$204.00	\$61.20
10/25/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR (EXTENSIVE) RE: ISSUES PRESENTED RE: CLOSURE OF APPOINTMENT, RECORDS DEMANDS 1.1; REVIEW ADDITIONAL INFORMATION FROM US ATTY RE: RECORDS .2	1.3	\$204.00	\$265.20
10/26/2024	Robert E. Moore, Jr.	REVIEW EMAIL CORRESPONDENCE BETWEEN COUNSEL B.TUDOR AND J.STEINER RE: CERTIFICATION OF PRODUCTION .10	0.1	\$204.00	\$20.40
10/28/2024	Lauren B. Garcia	EMAIL TO B TUDOR	0.1	\$104.40	\$10.44
10/28/2024	Robert E. Moore, Jr.	REVIEW EMAIL UPDATE FROM L.GARCIA RE: RECORDS STATUS FOR PRODUCTION TO US ATTY .1; UPDATE FROM B.TUDOR RE: CORRESPONDENCE FROM COUNSEL FOR LBC CHURCH, REVIEW AND RESPOND TO SAME .2	0.3	\$204.00	\$61.20
10/29/2024	Lauren B. Garcia	EMAIL FROM B TUDOR AND R MOORE RE PLAN FILES, PREPARE DEPOSIT AND ISSUE CHECK PAYMENTS, DISCUSSION WITH R MOORE, TRIP TO BANK TO MAKE DEPOSIT (SPLIT), ISSUE PAYMENT	1	\$104.40	\$104.40
10/29/2024	Robert E. Moore, Jr.	REVIEW CONTINUED RECORD CORRESPONDENCE AND STORAGE QUESTIONS .2; UPDATE FROM L.GARCIA RE: SAME .25	0.45	\$204.00	\$91.80
10/30/2024	Lauren B. Garcia	CALL WITH R MOORE, RECEIPT OF LBMC INVOICE, EMAIL TO LBMC	1	\$104.40	\$104.40
10/30/2024	Robert E. Moore, Jr.	CALL WITH B.TUDOR (EXTENSIVE) RE: FINAL INVOICE RECEIVED FROM LBMC, CONTINUED RECORDS DEMAND FROM J.TOMEVI COUNSEL FOR LBC CHURCH .4 REVIEW EMAILS RE: SAME .4	0.8	\$204.00	\$163.20
10/31/2024	Lauren B. Garcia	EMAIL TRAFFIC, POST TO WEBSITE	0.3	\$104.40	\$31.32

Total**\$8,397.60****Wednesday, October 30, 2024****Page 4 of 4**

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 #: 1068

RE: RiversEdge Advanced Retirement Solutions, LLC

Invoice #: 22585

DATE	DESCRIPTION	HOURS	AMOUNT	
Sept-3-24	Email from A. Luby re: Hampton Tech. plan (NO CHARGE).	0.10	0.00	BET
Sept-5-24	Emails from and to U. Rengachary and J. Strawn re: Teams meeting tomorrow; telephone conference with R. Moore re: same.	0.25	85.00	BET
Sept-6-24	Teams call with R. Moore, U. Rengachary, and A. Luby.	0.75	255.00	BET
Sept-9-24	Emails to and from R. Moore re: proposed update on non-deconverted plans; prepare IF's 5 th Fee Motion, proposed order and certificate of service; emails to and from R. Moore re: same; emails from ECF and to R. Moore re: notice of withdrawal of LCBC counsel.	1.00	340.00	BET
Sept-10-24	Emails to and from R. Moore, W. Delany and S. Reiss re: non-deconverted plans; email to N. Gregorio re: status update on Beaver County plan; finalize 5 th Fee Motion and attachments and file same via ECF; emails to non-party mismanaged Plans' representatives re: same; emails to and from R. Moore and L. Garcia re: same.	1.20	408.00	BET
Sept-11-24	Emails from R. Moore and L. Garcia re: Tyrone Hospital 457b plan.	0.10	34.00	BET

Invoice 22585	Page 2	October 1, 2024		
Sept-12-24	Prepare draft IF's 6 th Fee Filing and certificate of service; review data on non-deconverted plans (cont.); email to R. Moore re: same; review emails re: Tyrone Hospital 457b plan (cont.) and review plan termination amendment and resolutions re: same.	1.10	374.00	BET
Sept-13-24	Emails from and to R. Moore re: Leech Tishman's informal request for documents.	0.40	136.00	BET
Sept-16-24	Emails from and to R. Moore re: St. Barnabas' request for 5500 information; telephone conference with L. Garcia re: Leech Tishman document request.	0.30	102.00	BET
Sept-17-24	Telephone conference with R. Moore re: employers' requests for plan records and documents.	0.20	68.00	BET
Sept-18-24	Emails from ECF and to R. Moore re: order granting motion for counsel withdrawal and order granting IF's 5 th Fee Motion.	0.20	68.00	BET
Sept-19-24	Email from R. Moore re: additional response to St. Barnabas' requests.	0.10	34.00	BET
Sept-20-24	Email from L. Garcia re: response to Leech Tishman's requests; emails from R. Moore and N. Gregorio re: Beaver County status update; email from R. Moore re: letter to Selective Dining.	0.20	68.00	BET
Sept-23-24	Review letter to Selective Dining; email to R. Moore re: same; emails from and to R. Moore re: draft IF's 6 th Activity Report; review and comment on same; emails from and to R. Moore re: draft IF's 6 th Fee Filing and exhibits; review and comment on same; email to A. Luby and U. Rengachary re: draft IF's 6 th Fee Filing.	1.70	578.00	BET

Invoice 22585

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Sept-23-24	Emails from L. Garcia and W. Son re: LBMC reports on data storage costs; emails from and to R. Moore re: draft IF's 7 th Fee Filing and exhibits; review and comment on same; emails to and from A. Luby and U. Rengachary re: same; email from and telephone conference with R. Moore re: LBMC issues; emails from and to L. Garcia re: Fee Filing/Activity Report template; emails from and to A. Luby re: funds held by Court and re: non-ERISA account issues; email to M. Comber re: renewed Egnyte access; email to W. Guappone re: files in IF's possession.	1.60	544.00	BET
Sept-24-24	Emails to and from A. Luby re: approval of draft 6 th and 7 th Fee Filings; email to R. Moore re: same; emails to and from D. Misour and to R. Moore re: Egnyte access; emails to and from W. Guappone and to R. Moore re: files in IF's possession.	0.50	170.00	BET
Sept-25-24	Emails from ECF and to R. Moore re: payment to IF pursuant to 5 th Fee Motion; emails to and from R. Moore re: 6 th and 7 th Fee Filings; email to W. Guappone re: subpoena.	0.20	68.00	BET
Sept-26-24	Finalize IF's 6 th and 7 th Fee Filings, exhibits and certificates of service; file same with Court via ECF; emails to R. Moore and to non-party Mismanaged Plans' representatives re: same; emails to R. Moore re: subpoena; review and comment on same; emails from L. Garcia re: website postings and IF's 6 th Activity Report; revise draft of same; emails to and from R. Moore re: same.	1.30	442.00	BET
Sept-27-24	Emails from L. Garcia and R. Moore re: update on Selective Dining 401(k) Plan.	0.10	34.00	BET
Sept-30-24	Revised draft IF's 6 th Activity Report for Selective Dining 401(k) update; emails to and from R. Moore re: same; file same with Court via ECF; emails from ECF and to R. Moore re: IF's 6 th Activity Report, as filed; emails from N. Gregorio and to R. Moore re: Beaver County plan's document requests.	0.60	204.00	BET
TOTAL FEES:		11.90	\$4,012.00	

Invoice 22585

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October 1, 2024

TOTAL DISBURSEMENTS: \$0.00

TOTAL FEES & DISBURSEMENTS: \$4,012.00

Previous Balance \$16,662.96

Previous Payments \$0.00

PLEASE PAY:	\$20,674.96
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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

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

October 31, 2024

Client #: 1068

RE: RiversEdge Advanced Retirement Solutions, LLC

Invoice #: 22591

DATE	DESCRIPTION	HOURS	AMOUNT	
Oct-1-24	Emails from and to U. Rengachary and to and from R. Moore re: plaintiff's request for copy of MATC's SOC audit report; email from L. Garcia re: website posting of IF's 6 th Activity Report.	0.60	204.00	BET
Oct-2-24	Emails from and to W. Guappone re: subpoena; telephone conference with R. Moore re: LBMC data issues; email from W. Delany re: MATC's provision of SOC audit report to plaintiff.	0.20	68.00	BET
Oct-3-24	Email to R. Moore re: MATC's SOC audit report; emails from and to R. Moore re: Egnyte issues; telephone conferences with R. Moore re: same.	2.40	816.00	BET
Oct-4-24	Emails from L. Garcia and J. Steiner re: documents and files requested by Leech Tishman.	0.10	34.00	BET
Oct-8-24	Telephone conference with R. Moore re: final report due October 16.	0.10	34.00	BET
Oct-9-24	Telephone conference with R. Moore re: non-mismanaged plan's auditor's receipt of RiversEdge's 2022 SOC audit report; emails from R. Moore re: same; emails from R. Moore, L. Garcia and plans' attorneys re: documents provided to Beaver County, Leech Tishman, Hawaii Dental and Elite Mechanical.	0.50	170.00	BET

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Oct-10-24	Email from D. Bennett re: RiversEdge's 2022 SOC audit.	0.10	34.00	BET
Oct-11-24	Review RiversEdge's 2022 SOC audit; telephone conference with R. Moore re: same; Teams call and email to A. Luby re: same; email to R. Moore re: call.	2.90	986.00	BET
Oct-14-24	Email from D. Bennett re: his comments on RiversEdge's 2022 SOC audit report; review same; email to D. Bennett and R. Moore re: my comments on same; emails to and from M. Comber re: motion for extension of time; prepare motion and proposed order; emails to and from R. Moore re: same.	2.50	850.00	BET
Oct-15-24	Finalize and file consent motion for extension of time and proposed order; email to R. Moore re: same; email from L. Garcia re: 6 th fee motion; prepare and file 6 th fee motion, proposed order and certificate of service; emails to non-party mismanaged plan representatives and R. Moore re: same.	1.40	476.00	BET
Oct-16-24	Emails from ECF and to R. Moore re: filing error on 6 th fee motion and orders granting extension of time and 6 th fee motion; email to R. Moore re: SOC audit article; telephone conference with R. Moore re: data storage issues.	0.70	238.00	BET
Oct-17-24	Telephone conference with R. Moore re: inquiries to ASC and Egnyte for their 2022 SOC audit reports; email from L. Garcia re: data transfer/retrievals; email from A. Luby re: anticipated draft of new consent judgment; emails to S. Reiss and Egnyte to request copies of 2022 SOC audit reports; telephone conference with D. Bennett re: SOC audits.	1.90	646.00	BET
Oct-18-24	Emails from D. Bennett re: SOC audits; emails to R. Moore re; Egnyte's non-responses; emails from D. Padilla and L. Garcia re: Hawaii Dental's files.	0.40	136.00	BET
Oct-21-24	Emails from and to R. Moore and L. Garcia re: transfer of electronic and paper files and laptops to FBI pursuant to subpoena; email to R. Moore re: notice to client plans; telephone conference with R. Moore re: same, data storage and final reports.	0.75	255.00	BET

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Oct-22-24	Emails from and to Egnyte, to R. Moore and from L. Garcia re: domain name for RiversEdge; emails to and from E. Laughlin, R. Moore and D. Strassberger re: review of RiversEdge's 2022 SOC audit report; emails from and to R. Moore and L. Garcia re: draft IF's 7 th Activity Report; review and comment on same; emails to AUSA and from and to R. Moore re: grand jury subpoena.	1.70	578.00	BET
Oct-23-24	Emails from AUSA re: subpoena; emails to and from D. Strassberger re: RiversEdge's 2022 SOC audit report; emails from and to L. Garcia and R. Moore re: LBMC's and Berry & Tudor's final invoices; telephone conference with R. Moore re: final activity report; revise same; prepare certificate of service; filing with Court via ECF; emails to R. Moore and to 14 non-party mismanaged plans re: filing; emails from S. Reiss and to R. Moore re: deconversions; telephone conference with R. Moore re: RiversEdge SOC audit report; email from J. Steiner re: prior document request.	2.80	952.00	BET
Oct-24-24	Email from L. Garcia re: website posting of IF's 7 th Activity Report; emails from R. Moore re: several plans' requests for copy of RiversEdge's 2022 SOC audit report; email to R. Moore re: Leech Tishman plan.	0.60	204.00	BET
Oct-25-24	Prepare proposed response to Leech Tishman's counsel; emails to and from R. Moore re: same; email to J. Steiner re: same; telephone conference with D. Strassberger re: RiversEdge SOC audit.	0.80	272.00	BET
Oct-26-24	Emails from J. Steiner and to R. Moore re: RiversEdge's 2022 SOC audit report.	0.10	34.00	BET
Oct-28-24	Emails from and to L. Garcia and R. Moore re: transfer of records to AUSA; emails from J. Tomevi, W. Guappone and to R. Moore re: LCBC Church's request to establish post-appointment data storage.	0.40	136.00	BET
Oct-29-24	Emails from and to R. Moore re: J. Tomevi's request to establish third party data storage; email to J. Tomevi re: same; telephone conference with R. Moore and email to mismanaged plans'	0.90	306.00	BET

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representatives re: 2022 RiversEdge SOC audit report; emails from J. Tomevi and to and from R. Moore re: request for RMI not to destroy records.

Oct-30-24	Emails from and telephone conference with R. Moore re: records storage; emails to and from R. Moore re: same; email to J. Tomevi re: same; prepare final fee motion, proposed order, and certificates of service for IF's notice of fee filing, fee motion and motion for discharge.	2.00	680.00	BET
Oct-31-24	Emails from and to R. Moore and L. Garcia re: final notice of fee filing and motion for discharge; review and comment on same; finalize fee motion, proposed order and certificates of service; file all of the above with Court via ECF; emails to non-party mismanaged plans' representatives re: same.	1.50	510.00	BET

TOTAL FEES:	25.35	\$8,619.00
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TOTAL DISBURSEMENTS:		\$0.00
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TOTAL FEES & DISBURSEMENTS:		\$8,024.00
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Previous Balance		\$20,674.96
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Previous Payments		(\$3,434.00)
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PLEASE PAY:		\$25,264.96
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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

Invoice for Professional Services

August 2024 and October 2024

LBMC					February 2024	
August 2024 - October 2024	Azure Cost	AZURE ENVIRONMENT Data Asset Host •	3	\$260.40	\$781.20	

Total Invoice Amount \$

\$781.20

RMI EXP RECOVERABLE REDGE

9/1/2024 through 10/31/2024

10/31/2024

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Category	9/1/2024- 9/30/2024	10/1/2024- 10/31/2024	OVERALL TOTAL
5100 FEES RMI			
5300-RECEIVERS FEES	-1,825.80	-4,273.80	-6,099.60
5610-CONTRACT LABOR RMI	-981.36	-4,123.80	-5,105.16
TOTAL 5100 FEES RMI	-2,807.16	-8,397.60	-11,204.76
5150 FEES LEGAL			
5400-LEGAL FEES	-4,012.00	-8,024.00	-12,036.00
TOTAL 5150 FEES LEGAL	-4,012.00	-8,024.00	-12,036.00
5150 FEES OTHER			
5697-OTHER CONTRACT LABOR	0.00	-781.20	-781.20
TOTAL 5150 FEES OTHER	0.00	-781.20	-781.20
5300 EXPENSE			
6205-COPIES	-3.00	0.00	-3.00
6210-POSTAGE	-0.69	-2.07	-2.76
6211-SENDPRO CERTIFIED MAIL PO...	-5.54	0.00	-5.54
6230-OFFICE SUPPLIES	0.00	-152.94	-152.94
TOTAL 5300 EXPENSE	-9.23	-155.01	-164.24
OVERALL TOTAL	-6,828.39	-17,357.81	-24,186.20

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, solely as Rule 19)	
defendants,)	
Defendants.)	

**CERTIFICATE OF SERVICE REGARDING INDEPENDENT FIDUCIARY’S
EIGHTH AND FINAL NOTICE OF FEE FILING**

I hereby certify that on October 31, 2024, I caused the Independent Fiduciary’s Eighth and Final Notice of Fee Filing [Dkt. 125], with Exhibits [Dkt. 125-1], 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 October 31, 2024, I caused the Independent Fiduciary’s Eighth and Final Notice of Fee Filing [Dkt. 125], with Exhibits [Dkt. 125-1], 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 November 1, 2024, the Independent Fiduciary posted/will post a copy of the Independent Fiduciary's Eighth and Final Notice of Fee Filing [Dkt. 125], with Exhibits [Dkt. 125-1] 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

Bynum Tudor III (TN Bar 012279)

Admitted Pro Hac Vice

Berry & Tudor PC

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Counsel for Receivership Management, Inc.