

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**SECURITIES & EXCHANGE
COMM.,
*Plaintiff,***

v.

**MAURICIO CHAVEZ et al.,
*Defendants.***

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CIVIL ACTION 4:22-CV-3359

UNOPPOSED MOTION FOR PAYMENT OF ATTORNEYS' FEES

Robert Burford and the law firm of Burford Perry, LLP (“Burford Perry” or “Law Firm”) move the Court for an order permitting the Law Firm to pay \$38,000.00 of \$49,085 unpaid invoices (the “Request”) for legal services provided from August 2022 to December 2022 in representing Mauricio Chavez, Giorgio Benvenuto, CryptoFx, LLC, and CBT Group, LLC (“Defendants”) in connection with the Securities and Exchange Commission (“SEC”) investigation and Receiver’s request for information. Burford Perry provided redacted copies of its fee bills to the Receiver and his counsel in advance of filing this Motion. The Receiver does not oppose this request but asked that the Law Firm file this motion and obtain Court approval before making the payment.

The SEC conducted an investigation of Defendants. As is consistent with normal practice, the Law Firm received a deposit into its trust account to secure payment of hourly fees and expenses billed each month. The Law Firm, and Mr. Burford in particular, are experienced in advising and defending clients who are being investigated, sued, or pursuing claims involving alleged violations of federal securities law.¹

The Law Firm's unpaid invoices for legal services from August through December 2022 consisted of, among other tasks: (i) working with Defendants to provide information and documents to the SEC (and later to the Receiver at his request); (ii) reviewing and producing Defendants' documents responsive to the SEC's pre-suit information and discovery requests; (iii) obtaining and providing the SEC with information responsive to its post-suit information demands; (iv) reviewing and producing documents responsive to the Receiver's post-suit request for documents; (v) researching legal and accounting issues; and (vi) conferring with the SEC, the Receiver's counsel, successor counsel for Defendants, the Defendants, and the individual Defendants' criminal law

¹ Robert Burford worked as a public accountant for two Big Eight accounting firms before graduating with honors from the University of Houston Law school in 1986. He practiced at a nationally acclaimed commercial litigation firm, Gibbs & Bruns, L.L.P for twenty (20) years, when he decided to start his own firm. For more than 35 years Mr. Burford has represented clients in complex commercial and securities litigation. He is ranked in Chambers and Partners USA 2022 for Litigation: General Commercial, and has been selected for numerous other accolades, including Benchmark, Best Lawyers, and Super Lawyers (consecutively for the last 19 years). Additional qualifications and experience of Mr. Burford and the Law Firm are available at burfordperry.com.

counsel. The details of the Law Firm's unpaid work by each timekeeper and time spent is set forth in invoices that were made available to the Receiver.

Burford Perry had \$193,631 in its trust account when the Law Firm reached an agreement with the Receiver. The Receiver and Burford Perry agreed that Burford Perry could retain \$38,000 to pay its outstanding fees provided that the Law Firm turned over the remaining \$155,631 to the Receiver and that Burford Perry adjusted its rates to \$425 an hour or less, consistent with the Court's guidelines. Burford Perry wired \$155,631 to the Receiver's designated account on November 22, 2022. Applying the Court's guidelines, Burford Perry had \$49,085 in unpaid bills at the time Burford Perry withdrew. This agreed amount—\$38,000—represents an additional 20% discount to the Receivership Estate in addition to the discount due to reduced rates. Receipt of this \$38,000.00 is in full satisfaction of any attorney fee claim Burford Perry may have against the Receiver or the Estate.

Burford Perry moves the Court for an order allowing the Law Firm to transfer \$38,000.00 from its trust account to its operating account.

DATED: February 23, 2024

Respectfully submitted,

BURFORD PERRY, LLP

/s/ Robert R. Burford

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I conferred with the Receiver and his counsel, and they do not oppose this motion.

/s/ Brent C. Perry

Brent C. Perry

CERTIFICATE OF SERVICE

On February 23, 2024, I filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing, via the Court's electronic filing system, on all parties of record.

/s/ Robert R. Burford

Robert R. Burford

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ORDER TO PAY ATTORNEYS' FEES

Burford Perry, LLP filed an Unopposed Motion for Payment of Attorneys' Fees and asked the Court for permission to transfer \$38,000.00 from its trust account to pay for legal services provided to Defendants from August to December 2022.

For the reasons stated in the Motion, the Motion is granted, and Burford Perry, LLP may transfer \$38,000.00 from its trust account to pay for services provided.

Signed on this ____ day of February 2024.

UNITED STATES DISTRICT COURT JUDGE