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Counsel for David Stapleton, Receiver

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

SILICONSAGE BUILDERS, LLC aka
SILICON SAGE BUILDERS and SANJEEV
ACHARYA,

Defendants.

Case No.: 3:20-cv-09247-CRB

Assigned to: Hon. Charles R. Breyer

**NOTICE OF HEARING ON
APPLICATIONS OF THE RECEIVER
AND HIS PROFESSIONALS FOR THE
THIRD QUARTER OF 2024**

Date: January 10, 2025

Time: 10:00 a.m.

Ctrlm: 6-17th Floor (Hearing by Zoom)

TO ALL PARTIES ENTITLED TO NOTICE:

PLEASE TAKE NOTICE that on January 10, 2025, at 10:00 a.m., the Court is scheduled to hold a hearing on the applications for the allowance and payment of fees and costs for the third quarter of 2024 of (1) David P. Stapleton, the receiver for SiliconSage Builders, LLC, and its affiliates, (2) Raines Feldman Littrell LLP, his counsel, and (3) Ratzlaff Tamberi & Wong, his tax accountants (together, the “Applications”). At present and unless appearances are excused prior to the hearing, the Court is conducting hearings by Zoom.

1 Instructions can be found at the Court’s website at [https://cand.uscourts.gov/judges/breyer-](https://cand.uscourts.gov/judges/breyer-charles-r-crb/)
2 [charles-r-crb/](https://cand.uscourts.gov/judges/breyer-charles-r-crb/).

3 In his fee application, the Receiver is requesting that the Court approve his fees and
4 expenses in the amounts of \$181,518.00 and \$465.14, respectively. Of the \$181,518.00 in
5 fees, \$158,385.00 of this amount is attributable to the day-to-day management of two
6 construction projects and pursuant to a Construction Funding Agreement approved by the
7 Court in December 2021, is the financial responsibility of Acres Loan Origination (“Acres”),
8 although they must first be allowed by the Court. The balance of the fees totals \$23,133.00,
9 and with respect to those fees, the Receiver is requesting that the Court authorize payment, on
10 an interim basis, of 80% of these fees, or \$18,506.40, and 100% of his expenses, or \$465.14,
11 from available funds.

12 In its fee application, Raines Feldman Littrell LLP is seeking allowance of fees of
13 \$4,282.20 in fees. Of the \$4,282.20 in fees, \$988.20 were related to disputes with
14 subcontractors at the condominium projects and pursuant to a Court-approved agreement with
15 Acres, are to be paid by Acres. With respect to the balance of \$3,294.00, the firm seeks
16 allowance of that amount and authorization for the Receiver to use funds on hand to pay 80%
17 of these fees, or \$2,635.20, on an interim basis.

18 Last, in its fee application, Ratzlaff Tamberi & Wong is seeking allowance of fees of
19 \$5,263.50 in fees and payment of 80% of this amount, or \$4,210.80, from funds on hand.

20 Pursuant to Local Civil Rule 7-3, any opposition to the relief sought in the Applications
21 must be filed with the Court and served on the undersigned counsel no later than fourteen (14)
22 days of service of this Notice, which is occurring on December 5, 2024. Pursuant to a Court
23 order, service on creditors and investors is being effectuated through the posting of these
24 pleadings on the website that the Receiver established for this case at
25 www.siliconsagereceivership.com.

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1 Failure to timely oppose the relief sought may be deemed by the Court to be consent to
2 the granting of the relief sought in the Applications.

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Respectfully submitted,

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Dated: December 5, 2024

RAINES FELDMAN LITTRELL LLP

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By: /s/ Kyra E. Andrassy

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Kyra E. Andrassy
Counsel for David Stapleton, Receiver

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PROOF OF SERVICE

I am over the age of 18 and not a party to the within action; I am employed by Raines Feldman Littrell LLP and its business address is 3200 Park Center Drive, Suite 250, Costa Mesa, California 92626.

On December 5, 2024, I served the following document(s) described as **NOTICE OF HEARING ON APPLICATIONS OF THE RECEIVER AND HIS PROFESSIONALS FOR THE THIRD QUARTER OF 2024**

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list.

SEE ATTACHED SERVICE LIST

BY COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”): Pursuant to United States District Court, Northern District of California, Local Civil Rule 5, the foregoing document will be served by the court via NEF and hyperlinked to the document. On December 5, 2024, I checked the CM/ECF docket for this case and determined that the aforementioned person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated.

BY MAIL: I placed said envelope(s) for collection and mailing, following ordinary business practices, at the business offices of Raines Feldman Littrell LLP, and addressed as shown on the attached service list, for deposit in the United States Postal Service. I am readily familiar with the practice of Raines Feldman Littrell LLP for collection and processing correspondence for mailing with the United States Postal Service, and said envelope(s) will be deposited with the United States Postal Service on said date in the ordinary course of business.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury that the above is true and correct.

Executed December 5, 2024 at Costa Mesa, California.

Ja’Nita Fisher
Type or Print Name

/s/ Ja’Nita Fisher
Signature

SERVICE LIST

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