**Exhibit B**

|  |  |  |
| --- | --- | --- |
| **Settlement Amount**  | **Trustee Counsel** **Contingency Fee** |  **Gross Distributable Amount (Estimated)** |
|  ***Richards Layton***  |  |   |
|  $ 5,000,000.00  |  $ 1,250,000.00  |  $ 3,750,000.00  |
|   |  |   |
|  ***Jackson Walker***  |   |
|  $ 405,000.00  |  $ 101,250.00  |  $ 303,750.00  |
|   |  |   |
|  ***PCA Parties***  |  |   |
|  $ 1,900,000.00  |  $ 475,000.00  |  $ 1,425,000.00  |
|  |  Subtotal  |  $ 5,478,750.00  |
|  |  Less: Litigation Trust Expense  Reserve |  $ -  |
|  |  Notice Costs (Estimated) |  $ (220,000.00) |
|  |  Litigation Trustee  Success Fee (Est)[[1]](#footnote-1) |  $ (104,303.92) |
|  | **Net Distribution to** **Wind Down Trust (Estimated)** |  **$ 5,154,446.08**  |

1. The GWG Litigation Trustee’s compensation under the GWG Litigation Trust Agreement includes a success fee comprised of (a) 2% of the net amount available for distribution to the Wind Down Trust Beneficiaries *plus* (b) 2% of the amount of any fees and expenses paid to any experts and/or contingency counsel retained by the Litigation Trustee on behalf of the Litigation Trust (“Success Fee”), less 50% of all monthly compensation paid or payable to the Litigation Trustee. *See* Dkt No. 1910 at Schedule A. The amount included above is the Litigation Trustee’s best current estimate of that amount and may be subject to change. [↑](#footnote-ref-1)