**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)