

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

www.flsb.uscourts.gov

In re:

Chapter 11

PALM BEACH FINANCE PARTNERS, L.P.,
PALM BEACH FINANCE II, L.P.¹

Case No. 09-36379-EPK
Case No. 09-36396-EPK
(Jointly Administered)

Debtors.

**ELLIOT B. KULA AND KULA & ASSOCIATES, P.A.'S
TENTH INTERIM POST CONFIRMATION FEE APPLICATION**

(Pursuant to the Second Amended Joint Plan of Liquidation confirmed on October 21, 2010 [ECF No. 444], the Applicant seeks final approval of fees and costs incurred during the period of this Application as well as those subject to all prior applications filed post Plan confirmation).

1.	Name of Applicant:	<i>Kula & Associates, P.A.</i>
2.	Role of Applicant:	<i>Liquidating Trustee's Consultant</i>
3.	Name of Certifying Professional:	<i>Elliot B. Kula</i>
4.	Date cases filed:	<i>November 30, 2009</i>
5.	Date of order approving employment:	<i>July 2, 2014[ECF No. 2352]nunc pro tunc to June 30, 2014²</i>
IF INTERIM APPLICATION, COMPLETE 6, 7 AND 8 BELOW:		
6.	Period for this Application:	<i>March 1, 2018 through June 30, 2018</i>
7.	Amount of Compensation Sought:	\$ 18,090.00

¹The address and last four digits of the taxpayer identification number for each of the Debtors are as follows: (i) Palm Beach Finance Partners, L.P., 3601 PGA Blvd., Suite 301, Palm Beach Gardens, FL 33410, TIN 9943; and (ii) Palm Beach Finance II, L.P., 3601 PGA Blvd., Suite 301, Palm Beach Gardens, FL 33410, TIN 0680.

²The Order authorizing the employment of Kula & Samson, LLP ("K&S") and Elliot B. Kula was modified by Court Order [ECF No. 2352] to reflect the substitution of K&S with Kula & Associates, P.A., *nunc pro tunc* to June 30, 2014.

8.	Amount of Expenses Reimbursement Sought:	\$	0.00
----	--	----	------

IF FINAL APPLICATION, COMPLETE 9 AND 10 BELOW:

9.	Total Amount of Compensation Sought during case:		N/A
10.	Total Amount of Expense Reimbursement Sought During Case		N/A
11.	Amount of Original Retainer (s) Please disclose both Fee Retainer and Cost Retainer if such a Retainer has been received:	\$	0.00
12.	Current Balance of Retainer (s) remaining:	\$	0.00
13.	Last monthly operating report filed (Month/Year and ECF No.):	PBF June 2018 [ECF No. 3505]; PBF II June 2018 [ECF No. 122, Case No. 09-36396]	
14.	If case is Chapter 11, current funds in the Chapter 11 estate:	PBF \$3,564,730.24 a/o 6/30/18 PBFII \$12,159,318.31 a/o 6/30/18	
15.	If case is Chapter 7, current funds held by Chapter 7 trustee:		N/A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
www.flsb.uscourts.gov

In re:

Chapter 11

PALM BEACH FINANCE PARTNERS, L.P.,
PALM BEACH FINANCE II, L.P.³

Case No. 09-36379-EPK
Case No. 09-36396-EPK
(Jointly Administered)

Debtors.

**TENTH INTERIM POST CONFIRMATION FEE APPLICATION
FOR ALLOWANCE AND PAYMENT OF COMPENSATION OF
ELLIOT B. KULA AND KULA & ASSOCIATES, P.A. AS CONSULTANTS
TO CHAPTER 11 LIQUIDATING TRUSTEE**

Kula & Associates, P.A. (“**K&A**”), having been approved by this Court as expert consultants for Chapter 11 Liquidating Trustee, Barry E. Mukamal (“**Trustee**”), applies for interim compensation for fees for services rendered in this Chapter 11 proceeding between March 1, 2018 through June 30, 2018. This application is filed pursuant to 11 U.S.C. §§ 330 and 331 and Bankruptcy Rule 2016, and meets all of the requirements set forth in the Guidelines incorporated in Local Rule 2016-1(B)(1). In support of the application, K&A states as follows:

1. On November 30, 2009, Palm Beach Finance Partners, L.P. (the “**Debtor**”) filed its Voluntary Petition for relief under chapter 11 of the United States Bankruptcy Code [ECF No. 1]. On December 1, 2009, this case was jointly administered with the estate of *In re Palm Beach Finance II, L.P.*, Case No. 09-36396-PGH [ECF No. 19].

³The address and last four digits of the taxpayer identification number for each of the Debtors are as follows: (i) Palm Beach Finance Partners, L.P., 3601 PGA Blvd., Suite 301, Palm Beach Gardens, FL 33410, TIN 9943; and (ii) Palm Beach Finance II, L.P., 3601 PGA Blvd., Suite 301, Palm Beach Gardens, FL 33410, TIN 0680.

2. On January 28, 2010, the Court entered the Agreed Order Directing Appointment of Chapter 11 Trustee and denying the United States Trustee's Motion to Convert Cases to Cases under Chapter 7 [ECF No. 100].

3. On January 29, 2010, the United States Trustee appointed the Liquidating Trustee as Trustee in both estates [ECF No. 107].

4. On April 2, 2013, this Court entered an Order (the "**Employment Order**") [ECF No. 1778] granting the Liquidating Trustee's Application to Employ Elliot B. Kula and Kula & Samson, LLP, ("**K&S**") as expert consultants to the Liquidating Trustee.

5. On July 2, 2014, the Employment Order was modified to reflect the substitution of K&S with Kula & Associates, P.A., *nunc pro tunc* to June 30, 2014 [ECF No. 2352].

6. At the confirmation hearing held on October 19, 2010, the Court confirmed the *Second Amended Joint Plan of Liquidation of Barry Mukamal, as Chapter 11 Trustee of Palm Beach Finance Partners, L.P. and Palm Beach Finance II, L.P. and Geoffrey Varga, as Joint Official Liquidator of Palm Beach Offshore, Ltd. And Palm Beach Offshore II, Ltd.*, dated September 3, 2010 [ECF No. 245] (the "**Plan**") in the above referenced jointly administered bankruptcy proceeding.

The Plan defines Confirmation Date as "the date on which the Bankruptcy Court enters the Confirmation Order on its docket". The Order Confirming Second Amended Joint Liquidating Chapter 11 Plan [ECF No. 444] (the "**Confirmation Order**") was entered on the Court's docket on October 21, 2010.

7. Article 7 of the Plan provides:

7.1.4 *PBF Liquidating Trust Management.* Barry Mukamal shall be PBF Liquidating Trustee with the power and authority set forth in the PBF Liquidating Trust Agreement.

7.1.5 *PBF Liquidating Trust Structure.* As more fully set forth in the PBF Liquidating Trust Agreement, the PBF Liquidating Trustee shall oversee and

direct the PBF Liquidating Trust's operations and activities, including the retention of counsel.

7.1.7 *PBF II Liquidating Trust Monitor.* Geoffrey Varga, as Joint Official Liquidator for Offshore Funds shall be the PBF II Liquidating Trust Monitor with the power and authority set forth in the PBF II Liquidating Trust Agreement.

7.1.11 *Compensation of Professionals Retained by the Liquidating Trustees and the PBF II Liquidating Trust Monitor.* Professionals retained by the PBF II Liquidating Trust Monitor and the Liquidating Trustee shall be entitled to monthly interim compensation for fees and expenses incurred in carrying out their duties consistent with the Plan and the Liquidating Trust Agreements; provided, however, that the PBF II Liquidating Trust Monitor or the Liquidating Trustee shall provide to the other, and the United States Trustee, notice of such requested fees and expenses on a monthly basis. Following such notice, if no objections to the fees and expenses set forth in the monthly statement are received in writing within 10 business days, 100% of such professional's fees and expenses shall be paid. Notice of objections to such fees and expenses shall be made via e-mail and/or facsimile. If objections to the fees and expenses are made and cannot be resolved, such objections will be heard and resolved by the Bankruptcy Court. Any such fees and expenses shall be payable from the Trust Asset of the Liquidating Trusts. The PBF II Liquidating Trust Monitor and the Liquidating Trustee shall, no less frequently than once every four (4) months, submit applications to the Bankruptcy Court for final approval of reimbursement of fees and expenses paid to their professionals.

8. This application is submitted pursuant to 11 U.S.C. §§ 330 and 331 for the allowance and payment to K&A in the amount of \$18,090.00 for fees incurred between March 1, 2018 and June 30, 2018.

9. All of the services rendered by K&A were performed for and on behalf of the Liquidating Trustee.

I. SUMMARY OF SERVICES RENDERED

10. K&A rendered varied services as experts on behalf of the Liquidating Trustee for the period of time from March 1, 2018 through June 30, 2018. K&A is requesting \$18,090.00 in

professional fees for services rendered. K&A logged a total of 43.6 hours at the hourly rates ranging from \$250 through \$500 during the time period for which fees were required in this fee application.

11. K&A devoted 36.4 hours, for a total fee request of \$18,090.00, as it relates to the appellate matter *General Electric Capital Corp. v. Mukamal*, Case No. 17-80788-RLR, Southern District of Florida (Bankr. Court Appeal). K&A has also consulted on appellate issues that arise from time to time in this case.

II. REQUEST FOR COMPENSATION

12. Pursuant to the decisions of the United States Court of Appeals for the Fifth Circuit in In re First Colonial Corp. of America, 544 F.2d 1291 (5th Cir. 1977); and In re Johnson v. Georgia Highway Express, Inc., 488 F.2d 714 (5th Cir. 1974), the applicant requests that this Court consider the following factors in determining the amount of compensation that is reasonable for the applicant's services in this case.

III. TIME AND LABOR REQUIRED

13. The transcribed time records and details of services rendered by K&A are attached hereto as Exhibit 3. To preserve work product and maintain confidentiality, the records are redacted. Unredacted records have been shared with the Office of the U.S. Trustee and if the Court so requests, may be filed under seal. K&A has devoted 43.6 hours in time in providing services to the Liquidating Trustee between March 1, 2018 through June 30, 2018.

14. The exhibits attached to this application, pursuant to the Guidelines, are:

Exhibits "1-A" and "1-B" - Summary of Professional and Paraprofessional Time;

Exhibit "2" - Summary of Requested Reimbursement of Expenses for this Time Period Only;

Exhibit "3" - The applicant's complete time records, in chronological order, by activity code category (if applicable), for the time period covered by this application. The requested fees are itemized to the tenth of an hour; and

Exhibit "4" - Fee Application Summary Chart.

15. K&A record the time expended in the rendition of professional services for the Liquidating Trustee by recording a detailed description of such professional services rendered.

16. K&A avoided any unnecessary duplication of work and time expended.

IV. NOVELTY AND DIFFICULTY OF THE ISSUES AND QUESTIONS PRESENTED

17. K&A was retained by the Liquidating Trustee as advisors providing consulting services on a wide range of appellate matters that the Liquidating Trustee deems necessary.

V. SKILL REQUISITE TO PERFORM THE LEGAL SERVICES PROPERLY

18. K&A submits that the professionals assigned to these cases have the requisite experience, seniority and skills necessary to effectively and efficiently meet the requirements of the tasks required. K&A believes it has demonstrated the requisite, substantial expertise to skillfully provide its services.

VI. PRECLUSION FROM OTHER EMPLOYMENT

19. Though K&A has devoted time as consultants for the Liquidating Trustee as more fully set forth in Exhibit 3, K&A has not been forced to decline other matters as a result of its accepting this employment.

VII. CUSTOMARY FEE

20. The hourly rate charged is K&A's customary fee for services of the type rendered herein.

**VIII. TIME LIMITATIONS IMPOSED BY THE CLIENT
OR THE CIRCUMSTANCES**

21. K&A has not been required to expend considerable time within short periods.

IX. THE EXPERIENCE, REPUTATION AND ABILITY OF THE PROFESSIONALS

22. K&A is a well-respected law firm having substantial experience in the type of services required under this engagement. The quality of work performed by K&A in this proceeding attests to the firm's experience, reputation and ability.

23. Elliot Kula received his Juris Doctor from Hamline University School of Law in 1993. Mr. Kula practices exclusively as an appellate attorney. A copy of Mr. Kula's resume is attached to the Liquidating Trustee's Application to Employ Elliot B. Kula and Kula & Samson, LLP, [ECF No. 1751], and is incorporated herein by reference.

X. THE UNDESIRABILITY OF THE CASE

24. K&A does not deem these cases to be undesirable and is honored to have been retained by the Liquidating Trustee.

XI. APPLICABLE LEGAL STANDARD

25. The amount requested by K&A is reasonable in terms of awards in cases of similar magnitude and complexity. The compensation which K&A is requesting comports with the mandate of the Bankruptcy Code, which directs that services be evaluated in light of comparable services performed in non-bankruptcy cases in the community. The fee requested by K&A in the amount of \$18,090.00 for 43.6 hours of services is entirely appropriate.

26. K&A considers the reasonable value of services rendered to this estate to be not less than \$18,090.00 for services rendered for the Fee Period.

XII. ALLOCATION BETWEEN DEBTORS' ESTATES

27. The Liquidating Trustee requests that 18% of the fee awarded be allocated to Palm Beach Finance Partners, L.P. (“**PBF**”) and 82% of the fee awarded be allocated to Palm Beach Finance II, L.P. (“**PBF II**”). Section 1.76, entitled “Pro Rata Allocation Formula,” of the Second Amended Joint Plan of Liquidation dated September 3, 2010 [ECF No. 245] provides for a *pro rata* allocation formula derived from the Compiled Financial Statements, dated April 30, 2008, for each of the Debtors by Kaufman Rossin & Co. The data contained therein supports an 18%/82% allocation between PBF and PBF II, respectively, based upon the total assets of each entity as of the date of such compilations. Based on the circumstances and since the services provided by K&A were performed on behalf of and benefitted both estates, the Liquidating Trustee believes that this formula is the proper methodology to allocate certain fees and expenses between the two estates and respectfully requests the Court approve the allocation of fees requested in this Application as follows:

Estate / Percentage	Fees	Costs
Palm Beach Finance Partners, L.P. (18%)	\$3,256.20	\$0.00
Palm Beach Finance II, L.P. (82%)	\$14,833.80	\$0.00
TOTAL FEES AND COSTS:	\$18,090.00	\$0.00

Request for Final Approval

28. Pursuant to Article 7.1.11 of the Plan: “The PBF II Liquidating Trust Monitor and the Liquidating Trustee shall, no less frequently than once every four (4) months, submit applications to the Bankruptcy Court for final approval of reimbursement of fees and expenses paid to their professionals.”

29. As a result, the Trust Monitor's professionals post confirmation applications have each sought final rather than interim approval. However, the Liquidating Trustee's professionals have sought the opposite: interim rather than final approval.

30. To ensure consistency, and comport with Article 7.1.11 of the Plan, Applicant seeks final approval for fees and costs incurred during the application period, as well as for all prior applications during the post-Plan confirmation time period.

31. As a result, Applicant submits this application for final approval of reimbursement of fees paid and further requests that this Court deem any and all previously awarded post confirmation interim fees and expenses paid to Applicant as final awards pursuant to Article 7.1.11 of the Plan which is consistent with other orders awarding fees to the Trust Monitor's professionals. Those awards are set forth in the attached Exhibit 4.

WHEREFORE, K&A respectfully requests that it be allowed the full compensation sought under this application as a final award. K&A requests this Court award a total of \$18,090.00 for fees incurred between March 1, 2018 and June 30, 2018, and approve the allocation of fees between the estates. K&A further requests that this Court deem any and all previously awarded post confirmation interim fees and expenses paid to Applicant as final awards pursuant to Article 7.1.11 of the Plan and for such other and further relief this Court deems just and proper.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

CERTIFICATION

1. I have been designated by Kula & Associates, P.A. (the "Applicant") as the professional with responsibility in these cases for compliance with the current Mandatory Guidelines on Fees and Disbursements For Professionals In The Southern District of Florida Bankruptcy Cases (the "Guidelines").

2. I have read the Applicant's application for compensation and reimbursement of costs (the "Application").

3. To the best of my knowledge, information, and belief formed after reasonable inquiry, the Application complies with the Guidelines.

4. To the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Guidelines, except as specifically noted in this Certificate and described in the Application.

5. Except to the extent that fees or disbursements are prohibited or restricted by the Guidelines, the fees and disbursements sought are billed at rates and in accordance with practices customarily employed by the Applicant and generally accepted by the Applicant's clients.

6. In providing a reimbursable service or disbursement (other than time charged for paraprofessionals and professionals), the Applicant does not make a profit on that service or disbursement (except to the extent that any such profit is included within the permitted allowable amounts set forth in the Guidelines for photocopies and facsimile transmission).

7. In charging for a particular service or disbursement, the Applicant does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission).


8. In seeking reimbursement for a service which the Applicant justifiably purchased or contracted for from a third party, the Applicant is requesting reimbursement only for the amount billed to the Applicant by the third-party vendor and paid by the Applicant to such vendor.

9. The trustee, the examiner (if any), the chairperson of each official committee (if any), the debtor, the U.S. Trustee, and their respective counsels, will be mailed, simultaneously with the filing of the Application with the Court, a complete copy of the Application (including all relevant exhibits).

10. The following are the variances with the provisions of the Guidelines, the date of the specific Court approval of such departure, and the justification for the departure: None.

I HEREBY CERTIFY that the foregoing is true and correct.

Kula & Associates, P.A.
11900 Biscayne Blvd.
Suite 310
Miami, FL 33181
Telephone (305) 354-3858
Facsimile (305) 354-3822

By: 
Fla. Bar No. 3794
E-mail: elliott@kulalegal.com

I HEREBY CERTIFY that, pursuant to that certain Order Authorizing Professionals Employed by the Liquidating Trustee and Monitor to Provide Notice of their Post Confirmation Fee Applications for Compensation in Summary Form [ECF No. 648], a Notice of Filing, which will include a Certificate of Service for the foregoing, will be filed at a later date.

s/ Michael S. Budwick
Michael S. Budwick, Esquire
Fla. Bar No. 938777
mbudwick@melandrussin.com
MELAND RUSSIN & BUDWICK, P.A.
3200 Southeast Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131
Telephone: (305) 358-6363
Telecopy: (305) 358-1221

Attorneys for the Liquidating Trustee

EXHIBIT "1-A"**Summary of Professional and Paraprofessional Time
Total per Individual for this Period Only**

[If this is a final application, and does not cumulate fee details from prior interim applications, then a separate Exhibit 1-A showing cumulative time summary from all applications is attached as well.]

Name	Title	<u>Year Licensed</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total Fees</u>
Elliot B. Kula	Partner	1994	26.50	\$500.00	\$ 13,250.00
W. Aaron Daniel	Associate	2012	11.30	\$300.00	\$ 3,390.00
William D. Mueller	Associate	2015	5.80	\$250.00	\$ 1,450.00
Blended Hourly Rate				\$414.91	
Total Fees			43.60		\$ 18,090.00

EXHIBIT "1-B"**Summary of Professional and Paraprofessional Time
by Activity Code Category for this Time Period Only**

Professional Services				
	Name	Rate	Hours	Amount
Partner	Elliot B. Kula	\$500.00	26.50	\$ 13,250.00
Associate	W. Aaron Daniel	\$300.00	11.30	\$ 3,390.00
Associate	William D. Mueller	\$250.00	5.80	\$ 1,450.00
CATEGORY TOTALS:			43.60	\$ 18,090.00

EXHIBIT "2"
Summary of Requested Reimbursement Of Expenses
for this Time Period Only

[If this is a final application which does not cumulate prior interim applications, a separate summary showing cumulative expenses for all applications is attached as well]

1.	Filing Fees	\$ 0.00
2.	Process Service Fees	\$ 0.00
3.	Witness Fees	\$ 0.00
4.	Court Reporter & Transcripts	\$ 0.00
5.	Lien and Title Searches	\$ 0.00
6.	Photocopies (in-house copies) (copies @ 15¢)	\$ 0.00
7.	Photocopies (outside copies)	\$ 0.00
8.	Postage	\$ 0.00
9.	Overnight Delivery Charges	\$ 0.00
10.	Outside Courier/Messenger Services	\$ 0.00
11a.	Long Distance (a) Telephone Charges	\$ 0.00
11b.	Long Distance (b) Conference Calls	\$ 0.00
12.	Long Distance Fax Transmission @ \$1.00/pg.	\$ 0.00
13.	Computerized Research	\$ 0.00
14.	Out of Southern District of Florida Travel A. Transportation B. Lodging C. Meals	\$ 0.00
15.	Other (Not specifically disallowed; must specify and justify)	\$ 0.00
TOTAL "GROSS" AMOUNT OF REQUESTED DISBURSEMENTS		\$ 0.00



Kula & Associates, P.A.

Appeals and Litigation Support

11900 Biscayne Blvd., Suite 310
 North Miami, Florida 33181
 Tel. 305-354-3858
 Fax. 305-354-3822
www.kulalegal.com

INVOICE

EIN: 27-4482368
***For legal services rendered March 2018 – June 2018**

Date: 07/19/2018

Invoice #: 1871

Matter:

In re: Palm Beach Finance Partners, L.P. and Palm Beach Finance II, L.P.
Case Nos.: 09-36379-EPK and 09-36396-EPK (*Jointly Administered*)

Adv. No. 12-1979-EPK

General Electric Capital Corp. v. Mukamal
Southern District of Florida (*Bankr. Court Appeal*) No. 17-80788-RLR
General Electric Capital Corp. v. Mukamal

Eleventh Circuit Court of Appeals No. 18-10797 (previously 17-90027)

Bill To:

Barry Mukamal, as Liquidating Trustee
 c/o Meland Russin Budwick
 3200 Southeast Financial Center
 200 South Biscayne Blvd.
 Miami, FL 33131

Due Date: 08/18/2018

Payment received after 7/19/2018 are not reflected in this statement.
Professional Services

Date		Details	Hours	Rate	Amount
03/02/2018	EBK	L500 Appeal Review and analyze Eleventh Circuit order granting leave to appeal; strategic consideration of [REDACTED]; legal research regarding [REDACTED]; review [REDACTED] in consultation with bankruptcy counsel	1.40	500.00	700.00
03/05/2018	WDM	L510 Appellate Motions and Submissions review file and prepare procedural submissions in consultation with BK counsel, including appearance of counsel forms for the entire team; prepare draft of Certificate of Interested Persons	2.30	250.00	575.00

		(the "CIP") for distribution in advance of deadline			
03/05/2018	EBK	L500 Appeal review and analyze issues related to appeal both on [REDACTED] conference with bankruptcy counsel regarding [REDACTED] review and finalize procedural submissions for circulation to bankruptcy counsel	1.50	500.00	750.00
03/14/2018	WAD	L500 Appeal Review preliminary filings and requirements in recently docketed 11th cir action.	0.60	300.00	180.00
03/14/2018	WDM	L510 [REDACTED] conference call with BK counsel to review procedural submission, to discuss strategy of [REDACTED]; review file materials for additional information and for verification; finalize appearance of counsel forms for filing	1.40	250.00	350.00
03/14/2018	EBK	L510 Appellate Motions and Submissions continued and further work on [REDACTED] [REDACTED], revising procedural submissions compliant with Eleventh Circuit rules of court; further consideration of [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	1.20	500.00	600.00
03/15/2018	WAD	L500 Appeal Consult and review with JW, SG, MB. [REDACTED] [REDACTED].	0.50	300.00	150.00
03/15/2018	EBK	L500 Appeal update [REDACTED] [REDACTED], focusing on recent [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]; follow up conferral with bankruptcy counsel	1.90	500.00	950.00
03/16/2018	WAD	L500 Appeal further and continued [REDACTED] [REDACTED] [REDACTED]	3.70	300.00	1110.00

www.KulaLegal.com

		legal research responsive to BK counsel inquiry; review rule requirements for [REDACTED] [REDACTED]			
03/26/2018	EBK	L500 Appeal conferral with [REDACTED] [REDACTED] [REDACTED] [REDACTED]	0.40	500.00	200.00
03/27/2018	WDM	L510 Appellate Motions and Submissions legal research and confirmation of [REDACTED] [REDACTED]; review proposed Certificate of Interested Persons for filing with Eleventh Circuit for compliance with applicable Federal Rules of Appellate Procedure and Eleventh Circuit internal rules	1.30	250.00	325.00
03/27/2018	EBK	L510 Appellate Motions and Submissions revise and finalize CIP and Web-Based CIP compliant with Eleventh Circuit Court of Appeals rules, [REDACTED] [REDACTED]; follow up conferral regarding [REDACTED]	1.00	500.00	500.00
03/28/2018	WDM	L510 Appellate Motions and Submissions review [REDACTED] of [REDACTED] [REDACTED] [REDACTED]	0.80	250.00	200.00
03/30/2018	EBK	L510 Appellate Motions and Submissions review and analyze [REDACTED] [REDACTED] [REDACTED] [REDACTED]	0.80	500.00	400.00
04/05/2018	EBK	L500 Appeal analysis of issues and follow up [REDACTED] [REDACTED] [REDACTED]	0.50	500.00	250.00
04/06/2018	EBK	L510 Appellate Motions and Submissions continued analysis of issues and follow up strategy conference addressed to Eleventh Circuit mediation procedures	0.50	500.00	250.00
04/10/2018	WAD	L500 Appeal supplemental legal research based on [REDACTED] [REDACTED] [REDACTED]; analyze impact on current appeal.	1.70	300.00	510.00
04/11/2018	EBK	L520 Appellate Briefs legal research following up on [REDACTED]	2.20	500.00	1100.00

		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
04/12/2018	EBK	L510 Appellate Motions and Submissions review and analyze [REDACTED]; strategy conferral with bankruptcy counsel regarding [REDACTED]	0.50	500.00	250.00
04/13/2018	WAD	L500 Appeal Review issues on appeal and analyze interplay between [REDACTED]; legal research; review [REDACTED], as well as effect on [REDACTED]	2.40	300.00	720.00
		[REDACTED]			
		[REDACTED]; [REDACTED]			
		[REDACTED]			
04/13/2018	EBK	L510 Appellate Motions and Submissions strategy conferral and analysis of [REDACTED]; follow up communication with [REDACTED]	1.30	500.00	650.00
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
04/25/2018	EBK	L520 Appellate Briefs preliminary review of [REDACTED]	2.20	500.00	1100.00
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
04/26/2018	EBK	L520 Appellate Briefs continued review and analysis of [REDACTED]; revisit [REDACTED]	2.50	500.00	1250.00
		[REDACTED]			
		[REDACTED]			
05/01/2018	EBK	L520 Appellate Briefs conferral with bankruptcy counsel regarding [REDACTED]	0.80	500.00	400.00
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			

05/02/2018	EBK	L510 Appellate Motions and Submissions review [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	0.50	500.00	250.00
05/09/2018	EBK	L520 Appellate Briefs analyze briefing issues; strategy conferral regarding [REDACTED] [REDACTED]	0.40	500.00	200.00
05/10/2018	EBK	L520 Appellate Briefs communication with deputy clerk assigned to appeal in order to procure first extension of time for filing Appellee's Brief; [REDACTED] [REDACTED] strategy conferral regarding [REDACTED] [REDACTED]	0.50	500.00	250.00
05/23/2018	EBK	L510 Appellate Motions and Submissions draft motion seeking [REDACTED] [REDACTED]	0.80	500.00	400.00
05/29/2018	EBK	L510 Appellate Motions and Submissions [REDACTED] [REDACTED]	0.50	500.00	250.00
05/31/2018	EBK	L500 Appeal review Eleventh Circuit Court of Appeals order granting second extension for filing of Appellee's brief and [REDACTED] [REDACTED]	0.30	500.00	150.00
06/27/2018	EBK	L520 Appellate Briefs strategy conference for review and analysis of briefing issues	0.30	500.00	150.00
For professional services rendered			43.60		\$18,090.00
			Finance Charges		\$0.00
			Invoice Amount		\$18,090.00
			Payment Received		\$0.00
			Invoice Balance		\$18,090.00

FEE APPLICATION SUMMARY CHART												
REQUEST					APPROVAL				PAID		HOLDBACK	
Date Filed	ECF #	Period Covered	Fees Requested	Expenses Requested	Date Order Entered	ECF #	Fees Approved	Expenses Approved	Fees Paid	Expenses Paid	Fees Holdback	Expenses Holdback
12/27/2013	2069	7/1/13 - 10/31/13	\$ 2,050.00	\$ -	1/29/2014	2138	\$ 2,050.00	\$ -	\$ 2,050.00	\$ -	\$ -	\$ -
4/25/2014	2245	11/1/13 - 2/28/14	\$ 350.00	\$ -	6/4/2014	2316	\$ 350.00	\$ -	\$ 350.00	\$ -	\$ -	\$ -
8/26/2014	2395	3/1/14 - 6/30/14	\$ 5,750.00	\$ -	9/24/2014	2446	\$ 5,750.00	\$ -	\$ 5,750.00	\$ -	\$ -	\$ -
12/19/2014	2504	7/1/14 - 10/31/14	\$ 28,650.00	\$ -	1/16/2015	2538	\$ 28,650.00	\$ -	\$ 28,650.00	\$ -	\$ -	\$ -
4/23/2015	2585	11/1/14 - 2/28/15	\$ 8,850.00	\$ -	5/28/2015	2616	\$ 8,850.00	\$ -	\$ 8,850.00	\$ -	\$ -	\$ -
8/27/2015	2700	3/1/15 - 6/30/15	\$ 4,150.00	\$ -	10/19/2015	2733	\$ 4,150.00	\$ -	\$ 4,150.00	\$ -	\$ -	\$ -
8/28/2017	3328	7/1/2015 - 6/30/17	\$ 13,175.00	\$ -	2/6/2018	3433	\$ 13,175.00	\$ -	\$ 13,175.00	\$ -	\$ -	\$ -
12/22/2017	3400	7/1/17 - 10/31/17	\$ 23,780.00	\$ -	2/6/2018	3434	\$ 23,780.00	\$ -	\$ 23,780.00	\$ -	\$ -	\$ -
4/25/2018	3457	11/1/17 - 2/28/18	\$ 13,625.00	\$ -	5/25/2018	3489	\$ 13,625.00	\$ -	\$ 13,625.00	\$ -	\$ -	\$ -
											\$ -	\$ -
TOTALS:			\$ 100,380.00	\$ -			\$ 100,380.00	\$ -	\$ 100,380.00	\$ -	\$ -	\$ -

Invoicing Date:	Billing Period:	Fees and expenses requested:		Amount paid absent objection:	
12/5/2013	August 28, 2013 through October 31, 2013	\$	2,050.00	\$	2,050.00
3/10/2014	November 1, 2013 through February 28, 2014	\$	350.00	\$	350.00
8/1/2014	March 1, 2014 through June 30, 2014	\$	5,750.00	\$	5,750.00
12/1/2014	July 1, 2014 through October 31, 2014	\$	28,650.00	\$	28,650.00
3/23/2015	November 1, 2014 through February 28, 2015	\$	8,850.00	\$	8,850.00
7/24/2015	March 1, 2015 through June 30, 2015	\$	4,150.00	\$	4,150.00
12/8/2015	July 1, 2015 through October 31, 2015	\$	750.00	\$	750.00
8/7/2017	November 1, 2015 through June 30, 2017	\$	12,425.00	\$	12,425.00
11/21/2017	July 1, 2017 through October 31, 2017	\$	23,780.00	\$	23,780.00
3/21/2018	November 1, 2017 through February 28, 2018	\$	13,625.00	\$	13,625.00
7/19/2018	March 1, 2018 through June 30, 2018	\$	18,090.00	\$	18,090.00