

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-PGH
Case No. 09-36396-PGH
(Jointly Administered)

Debtors.

**DAVID S. MANDEL AND MANDEL & MANDEL, LLP'S
FIFTH INTERIM POST CONFIRMATION FEE APPLICATION**

1.	Name of Applicant:	<i>Mandel & Mandel, LLP</i>
2.	Role of Applicant:	<i>Liquidating Trustee's Special Co-Counsel</i>
3.	Name of Certifying Professional:	<i>David S. Mandel</i>
4.	Date cases filed:	<i>November 30, 2009</i>
5.	Date of application for employment:	<i>February 14, 2014 [ECF No. 2167]</i>
6.	Date of order approving employment:	<i>March 18, 2014 [ECF No. 2197] nunc pro tunc to February 17, 2014</i>
7.	If debtor's counsel, date of Disclosure of Compensation form:	<i>N/A</i>
8.	Date of this application:	<i>August 26, 2015</i>
9.	Dates of services covered:	<i>March 1, 2015 thru June 30, 2015</i>
Fees...		
10.	Total fee requested for this period (from Exhibit 1):	\$ 17,133.41
11.	Balance remaining in fee retainer account, not yet awarded:	\$ 0.00
12.	Fees paid or advanced for this period, by other sources:	\$ 0.00

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.

13.	Net amount of fee requested for this period:	\$	17,133.41
Expenses...			
14.	Total expense reimbursement requested for this period:	\$	17,694.24
15.	Balance remaining in expense retainer account, not yet received:	\$	0.00
16.	Expenses paid or advanced for this period, by other sources:	\$	0.00
17.	Net amount of expense reimbursements requested for this period	\$	17,694.24
18.	Gross award requested for this period (#10 + #14)	\$	34,827.65
19.	Net award requested for this period (#13 + #17)	\$	34,827.65

History of Fees and Expenses

1. Dates, sources, and amounts of retainers received:			
Dates	Sources	Amounts	For fees or costs?
N/A			
2. Dates, sources, and amounts of third party payments received:			
Dates	Sources	Amounts	For fees or costs?
N/A			
3. Prior fee and expense awards...			
First interim application [ECF No. 2253]			
Dates covered by first application:		February 17, 2014 - February 28, 2014	
Amount of fees requested:		\$	11,008.52
Amount of expenses requested:		\$	481.59
Amount of fees awarded:		\$	11,008.52
Amount of expenses awarded:		\$	481.59
Amount of fee retainer authorized to be used:		\$	0.00
Amount of expense retainer authorized to be used:		\$	0.00
Fee award, net of retainer:		\$	0.00
Expense award, net of retainer:		\$	0.00

Date of first award:	June 4, 2014 [ECF No. 2323]
Amount of fees actually paid:	\$ 11,008.52
Amount of expense reimbursement actually paid:	\$ 481.59
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00

Second interim application [ECF No.2399]	
Dates covered by second application:	March 1, 2014 - June 30, 2014
Amount of fees requested:	\$ 360,960.27
Amount of expenses requested:	\$ 4,056.24
Amount of fees awarded:	\$ 360,960.27
Amount of expenses awarded:	\$ 4,056.24
Amount of fee retainer authorized to be used:	\$ 0.00
Amount of expense retainer authorized to be used:	\$ 0.00
Fee award, net of retainer:	\$ 0.00
Expense award, net of retainer:	\$ 0.00
Date of second award:	September 24, 2014 [ECF No. 2448]
Amount of fees actually paid:	\$ 360,960.27
Amount of expense reimbursement actually paid:	\$ 4,056.24
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00

Third interim application [ECF No. 2498]	
Dates covered by third application:	July 1, 2014 - October 31, 2014
Amount of fees requested:	\$ 367,369.30
Amount of expenses requested:	\$ 2,434.70
Amount of fees awarded:	\$ 367,369.30
Amount of expenses awarded:	\$ 2,434.70
Amount of fee retainer authorized to be used:	\$ 0.00
Amount of expense retainer authorized to be used:	\$ 0.00
Fee award, net of retainer:	\$ 0.00
Expense award, net of retainer:	\$ 0.00
Date of third award:	January 16, 2015 [ECF No. 2535]
Amount of fees actually paid:	\$ 367,369.30
Amount of expense reimbursement actually paid:	\$ 2,434.70
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Fourth interim application [ECF No. 2575]	
Dates covered by fourth application:	November 1, 2014 - February 28, 2015
Amount of fees requested:	\$ 74,600.81
Amount of expenses requested:	\$ 8,087.09
Amount of fees awarded:	\$ 74,600.81
Amount of expenses awarded:	\$ 8,087.09
Amount of fee retainer authorized to be used:	\$ 0.00
Amount of expense retainer authorized to be used:	\$ 0.00
Fee award, net of retainer:	\$ 0.00
Expense award, net of retainer:	\$ 0.00

Date of fourth award:	May 28, 2015 [ECF No. 2617]
Amount of fees actually paid:	\$ 74,600.81
Amount of expense reimbursement actually paid:	\$ 8,087.09
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00

Summary of All Prior Applications and Awards	
Total fees requested:	\$ 813,938.90
Total fees awarded:	\$ 813,938.90
Prior fees awarded but not yet paid, if any (do not include holdbacks in this number)	\$ 0.00
Total prior fees requested but not awarded, deferred to final fee application	\$ 0.00
Total expenses requested:	\$ 15,059.62
Total expenses awarded:	\$ 15,059.62
Prior expenses awarded but not yet paid, if any (do not include holdbacks in this number)	\$ 0.00
Total prior expenses requested but not awarded, deferred to final fee application	\$ 0.00

Monthly <i>POST CONFIRMATION</i> invoicing dated February 28, 2014	
Dates covered by invoicing:	February 17, 2014 through February 28, 2014
Amount of fees and expenses requested:	\$ 11,490.11
Amount of fees and expenses paid absent objection:	\$ 11,490.11

Monthly <i>POST CONFIRMATION</i> invoicing dated March 31, 2014
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Dates covered by invoicing:	March 1, 2014 through March 31, 2014
Amount of fees and expenses requested:	\$ 25,111.87
Amount of fees and expenses paid absent objection:	\$ 25,111.87

Monthly *POST CONFIRMATION* invoicing dated April 30, 2014

Dates covered by invoicing:	April 1, 2014 through April 30, 2014
Amount of fees and expenses requested:	\$ 120,038.02
Amount of fees and expenses paid absent objection:	\$ 120,038.02

Monthly *POST CONFIRMATION* invoicing dated May 31, 2014

Dates covered by invoicing:	May 1, 2014 through May 31, 2014
Amount of fees and expenses requested:	\$ 119,428.74
Amount of fees and expenses paid absent objection:	\$ 119,428.74

Monthly *POST CONFIRMATION* invoicing dated June 30, 2014

Dates covered by invoicing:	June 1, 2014 through June 30, 2014
Amount of fees and expenses requested:	\$ 100,437.88
Amount of fees and expenses paid absent objection:	\$ 100,437.88

Monthly *POST CONFIRMATION* invoicing dated July 31, 2014

Dates covered by invoicing:	July 1, 2014 through July 31, 2014
Amount of fees and expenses requested:	\$ 110,453.14
Amount of fees and expenses paid absent objection:	\$ 110,453.14

Monthly *POST CONFIRMATION* invoicing dated August 30, 2014²

²Reflects a credit of \$1,532.64 in fees for time billed in the GECC Adversary (as defined below), which was inadvertently requested in Applicant's Second Interim Fee Application [ECF No.

Dates covered by invoicing:	August 1, 2014 through August 30, 2014
Amount of fees and expenses requested:	\$ 83,248.80
Amount of fees and expenses paid absent objection:	\$ 83,248.80

Monthly *POST CONFIRMATION* invoicing dated September 30, 2014

Dates covered by invoicing:	September 1, 2014 through September 30, 2014
Amount of fees and expenses requested:	\$ 79,228.27
Amount of fees and expenses paid absent objection:	\$ 79,228.27

Monthly *POST CONFIRMATION* invoicing dated October 31, 2014

Dates covered by invoicing:	October 1, 2014 through October 31, 2014
Amount of fees and expenses requested:	\$ 95,341.15
Amount of fees and expenses paid absent objection:	\$ 95,341.15

Monthly *POST CONFIRMATION* invoicing dated November 30, 2014

Dates covered by invoicing:	November 1, 2014 through November 30, 2014
Amount of fees and expenses requested:	\$ 17,381.64
Amount of fees and expenses paid absent objection:	\$ 17,381.64

Monthly *POST CONFIRMATION* invoicing dated December 31, 2014

Dates covered by invoicing:	December 1, 2014 through December 31, 2014
Amount of fees and expenses requested:	\$ 7,251.62

2399] and paid.

Amount of fees and expenses paid absent objection:	\$ 7,251.62
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Monthly *POST CONFIRMATION* invoicing dated January 31, 2015

Dates covered by invoicing:	January 1, 2015 through January 31, 2015
Amount of fees and expenses requested:	\$ 33,886.45
Amount of fees and expenses paid absent objection:	\$ 33,886.45

Monthly *POST CONFIRMATION* invoicing dated February 28, 2015

Dates covered by invoicing:	February 1, 2015 through February 28, 2015
Amount of fees and expenses requested:	\$ 24,168.19
Amount of fees and expenses paid absent objection:	\$ 24,168.19

Monthly *POST CONFIRMATION* invoicing dated April 30, 2015

Dates covered by invoicing:	March 1, 2015 through April 30, 2015
Amount of fees and expenses requested:	\$ 20,617.08
Amount of fees and expenses paid absent objection:	\$ 20,617.08

Monthly *POST CONFIRMATION* invoicing dated May 31, 2015

Dates covered by invoicing:	May 1, 2015 through May 31, 2015
Amount of fees and expenses requested:	\$ 8,460.94
Amount of fees and expenses paid absent objection:	\$ 8,460.94

Monthly *POST CONFIRMATION* invoicing dated June 30, 2015

Dates covered by invoicing:	June 1, 2015 through June 30, 2015
Amount of fees and expenses requested:	\$ 5,749.63

Amount of fees and expenses paid absent objection:	\$ 5,749.63
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UNITED STATES BANKRUPTCY COURT
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In re:

Chapter 11

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

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

Debtors.

**FIFTH INTERIM POST CONFIRMATION FEE APPLICATION FOR ALLOWANCE
AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES OF
DAVID S. MANDEL AND MANDEL & MANDEL, LLP, AS SPECIAL CO-COUNSEL
TO CHAPTER 11 LIQUIDATING TRUSTEE**

Mandel & Mandel, LLP (“*M&M*”), having been approved by this Court as special co-counsel for Chapter 11 Liquidating Trustee, Barry E. Mukamal (“*Trustee*”), applies for allowance of compensation for professional services rendered and reimbursement of the necessary expenses paid or incurred by M&M between March 1, 2015, through June 30, 2015, and in support states:

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].

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].

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.

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

4. On March 18, 2014, this Court entered an Order [ECF No. 2197] granting, among other things, the Liquidating Trustee's Application to Employ David S. Mandel and Mandel & Mandel, LLP, as special co-counsel to the Liquidating Trustee.

5. 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.

6. 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.

7. This application is submitted pursuant to 11 U.S.C. § 331 for the allowance and payment to M&M in the amount of \$17,133.41 for fees and \$17,694.24 for costs incurred between March 1, 2015, and June 30, 2015, for a total request of \$34,827.65.

8. All of the services rendered by M&M were performed for and on behalf of the Liquidating Trustee.

I. SUMMARY OF SERVICES RENDERED

9. M&M in consultation with MR&B, is co-counsel in both the adversary proceeding styled *Mukamal v. BMO Harris Bank N.A.*, Adv. Case No. 11-3015-PGH (“***M&I Adversary***”) and the adversary proceeding styled *Mukamal v. General Electric Capital Corporation*, Adv. Case No. 12-1979-PGH (“***GECC Adversary***”).

10. M&M rendered varied services as special co-counsel on behalf of the Liquidating Trustee for the period of time from March 1, 2015 through June 30, 2015. M&M is requesting \$17,133.41 in professional fees for services rendered in connection with the M&I Adversary. M&M

logged a total of 45.0 hours in the M&I Adversary at the reduced hourly rates ranging from \$82.50 to \$506.25 during the time period for which fees were required in this fee application.

11. Specifically, in the M&I Adversary, M&M devoted 45.0 hours, for a total of \$17,133.41, towards, among other things, the analysis of issues, extensive research and review of documents and other case materials, drafting motions and attending hearings and depositions.

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 M&M in the M&I Adversary are attached hereto as Exhibit 3. In the M&I Adversary, M&M has devoted 45.0 hours in time in providing services to the Liquidating Trustee between March 1, 2015 through June 30, 2015. Attached as Exhibit 1-A is a Summary of Professional and Paraprofessional Time Total Per Individual for this Period Only and attached as Exhibit 1-B is a Summary of Professional and Paraprofessional Time by Activity Code Category for this Time Period Only. Also attached as Exhibit 2 is a Summary of Requested Reimbursement of Expenses for this Time Period Only.

14. All professionals of M&M record the time expended in the rendition of professional services for the Liquidating Trustee by recording a detailed description of such professional services rendered.

15. All professionals involved in the rendering of services in this proceeding avoided, to the best of their ability, any unnecessary duplication of work and time expended.

IV. NOVELTY AND DIFFICULTY OF THE ISSUES AND QUESTIONS PRESENTED

16. M&M in consultation with MR&B, is co-counsel in both the M&I Adversary and the GECC Adversary.

V. SKILL REQUISITE TO PERFORM THE LEGAL SERVICES PROPERLY

17. M&M 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. M&M believes it has demonstrated the requisite, substantial expertise to skillfully provide its services.

VI. PRECLUSION FROM OTHER EMPLOYMENT

18. Though M&M has devoted time as special co-counsel for the Liquidating Trustee as more fully set forth in Exhibit 3, M&M has not been forced to decline other matters as a result of its accepting this employment.

VII. CUSTOMARY FEE

19. The hourly rates charged by M&M related to the M&I Adversary have been reduced by 25 %t as per the terms of M&M's retention agreement, exclusive of a partial contingency fee. With respect to the GECC Adversary, M&M is compensated purely on a contingency fee basis.

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

20. M&M has not been required to expend considerable time within short periods.

IX. THE EXPERIENCE, REPUTATION AND ABILITY OF THE PROFESSIONALS

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

22. A copy of Mr. Mandel's resume is attached to the Liquidating Trustee's (I) Motion to Modify Compensation Structure for Meland Russin & Budwick, P.A. as to Two Litigation Matters and (II) Application to Employ David S. Mandel and Mandel & Mandel, LLP, as Special Co-Counsel *Nunc Pro Tunc* to February 17, 2014 [ECF No. 2167], and is incorporated by reference.

X. THE UNDESIRABILITY OF THE CASE

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

XI. APPLICABLE LEGAL STANDARD

24. The amount requested by M&M is reasonable in terms of awards in cases of similar magnitude and complexity. The compensation which M&M 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 fees requested by M&M in the amount of \$17,133.41 for 45.0 hours of services is entirely appropriate.

25. M&M considers the reasonable value of services rendered to this estate to be not less than \$17,133.41 for services rendered for the Fee Period.

XII. ALLOCATION BETWEEN DEBTORS' ESTATES

26. 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 M&M 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%)	\$3,084.01	\$3,184.96
Palm Beach Finance II. L.P. (82%)	\$14,049.40	\$14,509.28
TOTAL FEES AND COSTS:	\$17,133.41	\$17,694.24

WHEREFORE, M&M respectfully requests that it be allowed the full compensation and reimbursement of expenses sought under this application. M&M requests this Court to award a total of \$17,133.41 for fees in connection with the M&I Adversary and \$17,694.24 for costs incurred between March 1, 2015 and June 30, 2015, for a total request of \$34,827.65. Further, Applicant requests this Court approve the allocation of fees and expenses between the estates, and for such other and further relief this Court deems just and proper.

CERTIFICATION

1. I have been designated by Mandel & Mandel, LLP, (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.

Mandel & Mandel, LLP
1200 Alfred I. duPont Building
169 East Flagler Street
Miami, FL 33131
T: 305-374-7771
F: 305-374-7776

By: 

David S. Mandel, Esquire
Fla. Bar No. 38040
dmandel@mandel-law.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>
David S. Mandel	Attorney	1986	18.30	\$506.25	\$ 9,264.41
Nina S. Mandel	Attorney	1988	14.50	\$450.00	\$ 6,525.00
Camellia Noriega	Attorney	2013	2.00	\$251.25	\$ 502.50
Paul Crespo	Paralegal	N/A	10.20	\$82.50	\$ 841.50
Blended Hourly Rate				\$380.74	
Total Fees			45.00		\$ 17,133.41

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

Professional Services				
	Name	Rate	Hours	Amount
Attorney	David S. Mandel	\$506.25	18.30	\$ 9,264.41
Attorney	Nina S. Mandel	\$450.00	14.50	\$ 6,525.00
Attorney	Camellia Noriega	\$251.25	2.00	\$ 502.50
Paralegal	Paul Crespo	\$82.50	10.20	\$ 841.50
CATEGORY TOTALS:			45.00	\$ 17,133.41

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) (7,616 copies @ 15¢)	\$ 1,142.40
7.	Photocopies (outside copies)	\$ 417.08
8.	Postage	\$ 11.91
9.	Overnight Delivery Charges	\$ 123.82
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	\$ 673.32
14.	Out of Southern District of Florida Travel A. Transportation : \$10,981.97 B. Lodging : \$3,430.33 C. Meals: \$883.41	\$ 15,295.71
15.	Other (Not specifically disallowed; must specify and justify): Courtcall	\$ 30.00
TOTAL "GROSS" AMOUNT OF REQUESTED DISBURSEMENTS		\$ 17,694.24

MANDEL & MANDEL LLP

1200 Alfred I. duPont Building

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Miami, Florida 33131

Telephone: (305) 374-7771

Facsimile: (305) 374-7776

Tax I.D. # 65-0963493

Barry E. Mukamal, Liquidating Trustee
 c/o Michael S. Budwick, Esq.
 Meland, Russin & Budwick
 200 Southeast Biscayne Boulevard, Suite 3200
 Miami, FL 33131

Re: **Mukamal v. BMO Harris Bank N.A., Adv. Case No. 11-3015-PGH (Bk. S.D. Fla.)**

For the period ending April 30, 2015

Invoice # 15999

		<u>Hours</u>	<u>Amount</u>
3/2/2015 PC	Review documents produced by Defendant and [REDACTED] [REDACTED]	1.30	107.25
DSM	Email correspondence with counsel; review of memorandum.	0.80	405.00
3/3/2015 CN	Research [REDACTED] [REDACTED]	2.00	502.50
3/9/2015 NSM	Meeting with B. Mukamal and counsel.	3.00	1,350.00
PC	Review documents produced by Defendant and [REDACTED] [REDACTED]	3.00	247.50
DSM	Conference with counsel; review of file.	4.00	2,025.00
3/10/2015 NSM	Meeting with B. Mukamal and counsel.	10.00	4,500.00
DSM	Meeting with counsel; travel to and from meeting.	10.00	5,062.50
3/11/2015 PC	Review documents produced by Defendant and [REDACTED] [REDACTED]	2.50	206.25
3/13/2015 DSM	Review of case status and email correspondence with counsel; review of [REDACTED] provided by defendant.	0.50	253.13

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Barry E. Mukamal, Liquidating Trustee

		<u>Hours</u>	<u>Amount</u>
3/18/2015	DSM Conference with counsel; review of file.	0.50	253.13
3/19/2015	PC Review documents produced by Defendant and [REDACTED]	3.40	280.50
	NSM Review documents.	0.70	315.00
3/23/2015	NSM Conference with Z. James re status; review file; emails with [REDACTED] counsel.	0.80	360.00
3/26/2015	DSM Conference with counsel; review of file.	0.30	151.88
4/8/2015	DSM Review and analysis of document received from co-counsel.	0.60	303.75

43.40 \$16,323.39

For professional services rendered

Additional Charges :

3/31/2015	Computerized research expense.	30.00
	Photocopying cost @ 0.15 cents.	49.65
4/30/2015	Postage cost @ 0.15 cents.	10.05
	Total costs	<hr/> \$89.70

Total amount of this bill

\$16,413.09

Previous balance

\$23,655.94

4/20/2015 Payment - thank you. Check No. 11456

(\$19,397.87)

4/20/2015 Payment - thank you. Check No. 11447

(\$4,258.07)

Total payments and adjustments

(\$23,655.94)

Balance due

\$16,413.09

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Barry E. Mukamal, Liquidating Trustee

Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
David S. Mandel	16.70	506.25
Nina Stillman Mandel	14.50	450.00
Camellia Noriega	2.00	251.25
Paul Crespo	10.20	82.50

*** Billing rates are 75 percent of actual per agreement with the Liquidating Trustee.

MANDEL & MANDEL LLP

1200 Alfred I. duPont Building

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Facsimile: (305) 374-7776

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Re: **Mukamal v. General Electric Capital Corporation**, Adv. Case No. 12-1979-PGH (Bk. S.D. Fla).

For the period ending April 30, 2015

Invoice # 15998

Additional Charges :

	<u>Amount</u>
3/31/2015 Computerized research expense.	30.00
Photocopying cost @ 0.15 cents.	62.25
Court Conference charges for telephonic attendance at the February 12th hearing.	30.00
4/9/2015 Round trip air fare from Miami to Chicago for the April 13th and 14th deposition of Richard Menczyinski.	2,030.69
4/14/2015 Hotel expense re: April 13th and 14th deposition of Richard Menczyinski .	1,240.42
Meal expenses 4/12/15 to 4/14/15 re Richard Menczynski deposition.	170.75
4/15/2015 Taxi expenses from; O'Hare airport to hotel, from deposition location to hotel, from hotel airport.	216.23
4/30/2015 Computerized research expense.	62.53
Photocopying cost @ 0.15 cents.	361.12
Total costs	<u>\$4,203.99</u>
Previous balance	\$512.25

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Re: **Mukamal v. BMO Harris Bank N.A., Adv. Case No. 11-3015-PGH (Bk. S.D. Fla.)**

For the period ending May 31, 2015

Invoice # 16008

	<u>Hours</u>	<u>Amount</u>
5/13/2015 DSM Telephone conference with counsel regarding confidentiality issue.	0.30	151.88
5/18/2015 DSM Telephone conference with counsel; review of file.	0.40	202.50
5/19/2015 DSM Receipt and review of motion for extension; review of file.	0.30	151.88
5/22/2015 DSM Conference with counsel; review of file.	0.30	151.88
5/26/2015 DSM Receipt and review of motion to abate; review of file.	0.30	151.88
For professional services rendered	<u>1.60</u>	<u>\$810.02</u>
Additional Charges :		
5/31/2015 Photocopying cost @ 0.15 cents.		41.10
Total costs		<u>\$41.10</u>
Total amount of this bill		<u>\$851.12</u>
Previous balance		\$16,413.09

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Re: **Mukamal v. General Electric Capital Corporation**, Adv. Case No. 12-1979-PGH (Bk. S.D. Fla).

For the period ending May 31, 2015

Invoice # 16009

Additional Charges :

	<u>Amount</u>
5/7/2015 Outside copying cost for various documents required for deposition of James Ungari.	55.96
5/11/2015 Delivery of deposition documents to New York regarding James Ungari May 12th deposition.	106.15
5/12/2015 Meals for counsel for March 11th and 12th, re deposition of James Ungari in New York.	439.50
Hotel expense re deposition of James Ungari in New York .	1,531.08
MIA airport parking costs.	51.00
Taxis cabs from: LGA airport to hotel and return from hotel to LGA airport.	89.59
Roundtrip airline travel expense for counsel from Miami to New York for deposition of James Ungari.	2,116.00
5/28/2015 Roundtrip airline travel expense from Miami to Minnesota for May 27th meeting [REDACTED]	1,872.20
Hotel expense for May 27th meeting [REDACTED]	255.15

Barry E. Mukamal, Liquidating Trustee

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	<u>Amount</u>
5/28/2015 Overnight parking at MIA airport.	17.00
Taxi expense from hotel to airport.	48.00
5/31/2015 Computerized research expense.	194.94
Photocopying cost @ 0.15 cents.	833.25
Total costs	<u>\$7,609.82</u>
Previous balance	\$4,716.24
6/3/2015 Payment - thank you. Check No. 11469	<u>(\$4,716.24)</u>
Total payments and adjustments	<u>(\$4,716.24)</u>
Balance due	<u><u>\$7,609.82</u></u>

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Re: **Mukamal v. General Electric Capital Corporation**, Adv. Case No. 12-1979-PGH (Bk. S.D. Fla.).

For the period ending June 30, 2015

Invoice # 16015

Additional Charges :

	<u>Amount</u>
6/26/2015 Roundtrip airline travel expense from Miami to Seattle for July 1st deposition.	4,295.40
6/30/2015 Hotel expense for July 1st deposition.	403.68
Taxi fares from airport to hotel; hotel to deposition location and back; hotel to airport.	211.86
Parking at MIA.	34.00
FedEx overnight delivery expense.	17.67
Photocopying cost @ 0.15 cents.	156.15
Postage cost.	1.86
Computerized research expense.	355.85
Meals for counsel during Seattle deposition.	273.16
Total costs	<u>\$5,749.63</u>
Previous balance	\$7,609.82