

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.

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

Debtors.

**PARKER ROSEN, LLC'S EIGHTEENTH INTERIM POST
CONFIRMATION FEE APPLICATION AS LOCAL COUNSEL
IN MINNESOTA TO THE LIQUIDATING TRUSTEE**

1.	Name of Applicant:	<i>Parker Rosen, LLC</i>
2.	Role of Applicant:	<i>Liquidating Trustee's Local Counsel</i>
3.	Name of Certifying Professional:	<i>Daniel N. Rosen</i>
4.	Date cases filed:	<i>November 30, 2009</i>
5.	Date of order approving employment:	<i>June 24, 2010 [ECF No. 182], nunc pro tunc to May 24, 2010</i>
IF INTERIM APPLICATION, COMPLETE 6, 7 AND 8 BELOW:		
6.	Period for this application:	<i>July 1, 2016 through October 31, 2016</i>
7.	Amount of Compensation Sought	\$ 15,070.00
8.	Amount of Expenses Sought:	\$ 1,465.82
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 September 2016 [ECF No. 3063] PBF II September 2016 [ECF No. 99, Case 09-36396]
14.	If case is Chapter 11, current funds in the Chapter 11 estate:	PBF \$10,653,381.33 PBFII \$30,373,513.31
15.	If case is Chapter 7, current funds held by Chapter 7 trustee:	N/A

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Chapter 11

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PALM BEACH FINANCE II, L.P.

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

Debtors.

**EIGHTEENTH INTERIM POST CONFIRMATION FEE
APPLICATION OF PARKER ROSEN, LLC AS LOCAL COUNSEL
IN MINNESOTA TO THE LIQUIDATING TRUSTEE**

Parker Rosen, LLC, Liquidating Trustee's local counsel in Minnesota ("***Parker Rosen***"), applies for interim compensation for fees for services rendered in this Chapter 11 proceeding between July 1, 2016 through October 31, 2016 (the "***Fee Period***"). This application is filed pursuant to 11 U.S.C. § 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, Parker Rosen states as follows:

I. INTRODUCTION

1. Parker Rosen is seeking compensation and reimbursement of necessary expenses paid in the total amount of \$16,535.82 for services rendered as Liquidating Trustee's local counsel in Minnesota regarding the following bankruptcy proceedings pending in the United States Bankruptcy Court, District of Minnesota: *In re Petters Company, Inc.* (Case No. 08-45257); *In re Petters Group Worldwide, LLC* (Case No. 08-45258); *In re PC Funding, LLC* (Case No. 08-45326); *In re Thousand Lakes, LLC* (Case No. 08-45327); *In re SPF Funding, LLC* (Case No. 08-45328); *In re*

PL Ltd., Inc. (Case No. 08-45329); *In re Edge One, LLC* (Case No. 08-45330); *In re MGC Finance, Inc.* (Case No. 08-45331); *In re PAC Funding, LLC* (Case No. 08-45371); *In re Palm Beach Finance Holdings, Inc.* (Case No. 08-45392); and also the following proceedings pending in the United States District Court, District of Minnesota: *USA v. Thomas Petters et al.* (Case No. 08-5348) (collectively know as the “*Petters Litigation*”) during this Fee Period. A total of 53.4 hours were expended by Parker Rosen as Liquidating Trustee’s local counsel in Minnesota at hourly rates ranging from \$135-\$460 during the time period for which fees were required in this fee application.

2. On May 27, 2010, the Liquidating Trustee filed his Application for Employment of Parker Rosen as Local Counsel in Minnesota [ECF No. 161], which was approved on June 24, 2010, *nunc pro tunc* to May 24, 2010 [ECF No. 182].

II. REQUEST FOR RELIEF

3. By way of this Application, Parker Rosen seeks Court approval and allowance of compensation for services rendered and reimbursement of the necessary expenses paid or incurred by Parker Rosen as Liquidating Trustee's local counsel in Minnesota.

4. During the fee period, Parker Rosen devoted 48.3 hours of time as more fully set forth below.

5. The transcribed time records and details of services rendered by Parker Rosen are attached hereto as Exhibit 3. Parker Rosen has devoted 53.4 hours in time in providing services to the Liquidating Trustee between July 1, 2016 through October 31, 2016.

6. 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.

7. The applicable legal standards for allowing fees and proceedings under the Bankruptcy Code is set forth in 11 U.S.C. §§ 330 and 331 which provides for reasonable compensation for actual, necessary services rendered by a professional, based on the time, the nature, the extent and value of such services and the costs of comparable services other than cases under Title 11, as well as for reimbursement of actual necessary expenses. *See also, In re First Colonial Corp. of America*, 544 F. 2d 1291 (5th Cir. 1977). These standards include the time and labor required; the novelty and difficulty of the questions presented; the skill requisite to perform professional services properly; the preclusion of other employment and the acceptance of this case; the customary fee; whether the fee is fixed or contingent; the time limitations opposed by the client or other circumstances; the amount involved and the results obtained; experience, reputation and ability of the professional; the undesirability of the case; the nature and length of professional relationship with client; and awards in similar cases.

8. Under these standards, the reasonable value of the services rendered and reimbursement of the necessary expenses paid or incurred by Parker Rosen as local counsel in Minnesota for the Liquidating Trustee is \$15,070 for fees and \$1,465.82 for costs during the Fee

Period. The figure to calculate the fees was derived from the total amount of hours expended multiplied by the corresponding hourly rates, as more specifically set forth in Exhibit “3”.

III. TIME AND LABOR REQUIRED.

9. The records transcribed as Exhibit “3” show that Parker Rosen has devoted not less than 53.4 hours of actual recorded time to the performance of services in these proceedings.

IV. NOVELTY AND DIFFICULTY OF THE ISSUES AND QUESTIONS PRESENTED

10. Parker Rosen was retained by the Liquidating Trustee to assist the Liquidating Trustee's counsel by acting as local counsel in the Petters Litigation and tasks that the Liquidating Trustee or its counsel may request including, among other things, sponsoring the *pro hac vice* applications of Meland Russin & Budwick, P.A., researching specific issues regarding Minnesota law, as well as attending a number of hearings or Minnesota based mediations. Parker Rosen is frequently asked to assist in various analysis and at times the issues involved are novel and difficult.

V. SKILL REQUISITE TO PERFORM THE LEGAL SERVICES PROPERLY

11. Knowledge in the field of bankruptcy law, Minnesota law and local rules and procedures in Minnesota was required.

VI. PRECLUSION FROM OTHER EMPLOYMENT

12. Parker Rosen has not been precluded from any other employment due to the acceptance of this case.

VII. CUSTOMARY FEE

13. The hourly rate charged is Parker Rosen’s customary fee for services of the type rendered herein.

14. **Whether the Fee is Fixed or Contingent:** The fee is contingent in the sense that it is subject to the review and approval of this Court pursuant to the Bankruptcy Code.

VIII. TIME LIMITATIONS IMPOSED BY CLIENT OR THE CIRCUMSTANCES

15. Parker Rosen has not been required to expend considerable time within short periods.

IX. THE EXPERIENCE, REPUTATION AND ABILITY OF THE PROFESSIONALS

16. Parker Rosen includes experienced trial lawyers with a sophisticated understanding of commercial litigation issues and are qualified to perform such services for the benefit of the Liquidating Trustee. Andrew D. Parker received his J.D. (*cum laude*) from the University of Minnesota Law School in 1988 and is admitted to the Minnesota Bar Association. Daniel N. Rosen also received his J.D. (*cum laude*) from the University of Minnesota Law School in 1994 and is admitted to the Minnesota Bar Association. Douglas G. Wardlow received his J.D. (*cum laude*) from Georgetown University Law Center in 2004 and is admitted to the Minnesota Bar Association and District of Columbia Bar Association.

X. THE UNDESIRABILITY OF THE CASE

17. Parker Rosen does not deem these cases to be undesirable and is honored to have been retained by the Liquidating Trustee.

**XI. THE NATURE AND LENGTH OF THE PROFESSIONAL
RELATIONSHIP OF THE CLIENT**

18. Parker Rosen has not performed services for the Liquidating Trustee previously in any others matters prior to this case.

XII. ALLOCATION BETWEEN DEBTORS' ESTATES

19. 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 Parker Rosen formula 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%)	\$2,712.60	\$263.85
Palm Beach Finance II, L.P. (82%)	\$12,357.40	\$1,201.97
TOTAL FEES AND COSTS:	\$15,070.00	\$1,465.82

XIII. APPLICABLE LEGAL STANDARD

20. The amount requested by Parker Rosen is reasonable in terms of awards in cases of similar magnitude and complexity. The compensation which Parker Rosen 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

applicant in the amount of \$15,070 for 53.4 hours of services. This request is entirely appropriate.

21. Parker Rosen considers the reasonable value of services rendered to this estate to be not less than \$15,070 for services they have rendered for the Fee Period.

WHEREFORE, Liquidating Trustee's local counsel in Minnesota, Parker Rosen, respectfully requests that it be allowed full compensation and reimbursement of expenses sought under this application. Parker Rosen requests this Court award a total of \$15,070 for fees and \$1,465.82 for costs incurred between July 1, 2016 and October 31, 2016, for a total request of \$16,535.82, approve the allocation of fees and expenses between the estates, and for such other and further relief this Court deems just and proper.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

CERTIFICATION

1. I am the Applicant and the professional with responsibility in this case 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 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 falls within 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 Certification 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 (if any), the examiner (if any), the chairperson of each official Debtor (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).

I HEREBY CERTIFY that the foregoing is true and correct.

Parker Rosen, LLC
123 North Third Street, Suite 888
Minneapolis, MN 55401
Telephone: (612) 767-3000
Telecopy: (612) 767-3001

By: 

Daniel N. Rosen

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
T: (305) 358-6363 F: (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	Partner, Associate, or Paraprofessional	<u>Year Licensed</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total Fees</u>
Daniel N. Rosen	Partner	1994	16.00	\$460.00	\$ 7,360.00
Drew L. McNeill	Associate	2012	7.8	\$260.00	\$ 2,028.00
Barbara M. Livick	Paraprofessional	N/A	28.1	\$195.00	\$ 5,479.50
Brenda J. Hanson	Paraprofessional	N/A	1.5	\$135.00	\$ 202.50
Blended Hourly Rate				\$282.21	
Total Fees			53.40		\$15,070.00

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

In re Petters Receivership and B/R			
Name	Rate	Hours	Amount
Daniel N. Rosen	\$ 460.00	14.0	\$ 6,440.00
Drew L. McNeill	\$ 260.00	1.4	\$ 364.00
Barbara M. Livick	\$ 195.00	28.1	\$ 5,479.50
Brenda J. Hanson	\$ 135.00	1.5	\$ 202.50
CATEGORY TOTALS:		45.0	\$12,486.00

Third Party Actions			
Name	Rate	Hours	Amount
Daniel N. Rosen	\$ 460.00	2.00	\$ 920.00
Drew L. McNeill	\$ 260.00	6.4	\$ 1,664.00
CATEGORY TOTALS:		8.40	\$ 2,584.00

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¢)	\$ 3.25
7.	Photocopies (outside copies)	\$ 0.00
8.	Postage	\$ 1.88
9.	Overnight Delivery Charges	\$ 74.59
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	\$ 835.10
14.	Out of District of Minnesota Travel A. Transportation B. Lodging C. Meals	\$ 44.00
15.	Other (Not specifically disallowed; must specify and justify) Certified Copy charges	\$ 507.00
TOTAL "GROSS" AMOUNT OF REQUESTED DISBURSEMENTS		\$ 1,465.82

PARKER ROSEN LLC

123 North Third Street, Suite 888
 Minneapolis, MN 55401
 EIN 20-3550547

Invoice

Date	Invoice #
8/26/2016	13940

Michael Budwick, Esq.
 Meland Russin & Budwick, PA
 3000 Wachovia Financial Center
 200 South Biscayne Boulevard
 Miami, FL 33131

MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	7/6/2016	Confer with Mr. Mukamal regarding various Minnesota-related issues; email memo to co-counsel.	0.50	460.00	230.00
Daniel N. Rosen	7/7/2016	Confer with Mr. Mukamal regarding [REDACTED]	0.20	460.00	92.00
Brenda J. Hanson	7/8/2016	Update pleadings file.	0.30	135.00	40.50
Barbara M. Livick	7/14/2016	Search Pacer for recent developments and hearing dates in the PCI bankruptcy, Polaroid bankruptcy; PCI federal civil case and 8th Circuit appeal; print key documents, advised attorney Rosen regarding dates and deadlines; diary hearing dates and items of followup.	2.40	195.00	468.00
Daniel N. Rosen	7/14/2016	Attention to BML update memo.	0.20	460.00	92.00
Barbara M. Livick	7/26/2016	Review Pacer for updates and developments; print key documents and note deadlines.	2.10	195.00	409.50
Brenda J. Hanson	7/27/2016	Update pleadings file.	0.20	135.00	27.00
Daniel N. Rosen	7/27/2016	Attend omnibus hearing; oral report on same; attention to court filings this day.	2.20	460.00	1,012.00

Total

PARKER ROSEN LLC

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Invoice

Date	Invoice #
8/26/2016	13940

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MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	7/28/2016	Review filings following Omnibus hearing, note dates and deadlines.	1.10	195.00	214.50
	7/1/2016	Research - Pacer Service Center. Q2 2016		328.20	328.20

Total**\$2,913.70**

PARKER ROSEN LLC

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Invoice

Date	Invoice #
8/26/2016	13941

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MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	7/24/2016	Email memo to Mr. Mukamal providing recommendation in Shea matter.	0.40	460.00	184.00
DISBURSEMENTS					
	6/30/2016	June 2016 postage expense.		1.41	1.41
	6/30/2016	June 2016 photocopy expense.		0.50	0.50
		SUBTOTAL DISBURSEMENTS			1.91

Total**\$185.91**

PARKER ROSEN LLC

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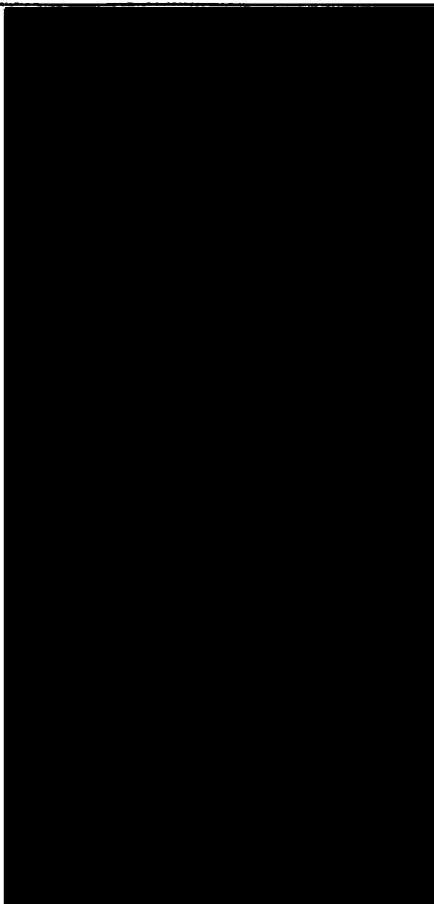
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Date	Invoice #
10/14/2016	14060

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MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	8/9/2016		3.10	195.00	604.50
Daniel N. Rosen	8/9/2016		0.20	460.00	92.00
Daniel N. Rosen	8/10/2016		0.20	460.00	92.00
Barbara M. Livick	8/11/2016		0.90	195.00	175.50
Daniel N. Rosen	8/15/2016		0.20	460.00	92.00
Barbara M. Livick	8/16/2016		1.30	195.00	253.50
Daniel N. Rosen	8/19/2016		0.30	460.00	138.00
Barbara M. Livick	8/22/2016		0.40	195.00	78.00

Total

PARKER ROSEN LLC

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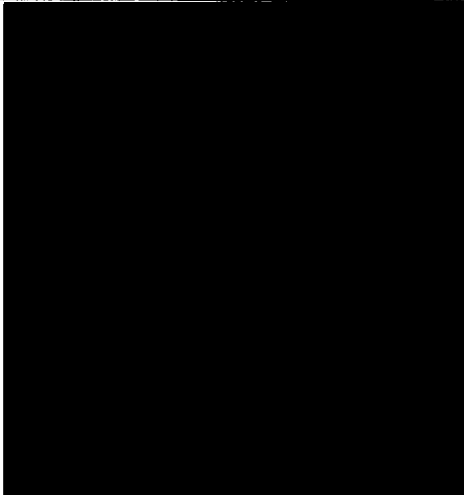
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Date	Invoice #
10/14/2016	14060

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MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	8/22/2016		0.30	460.00	138.00
Daniel N. Rosen	8/24/2016		0.70	460.00	322.00
Barbara M. Livick	8/30/2016		1.20	195.00	234.00
DISBURSEMENTS	7/27/2016			6.00	6.00
	8/31/2016			0.47	0.47
					6.47

Total**\$2,225.97**

PARKER ROSEN LLC

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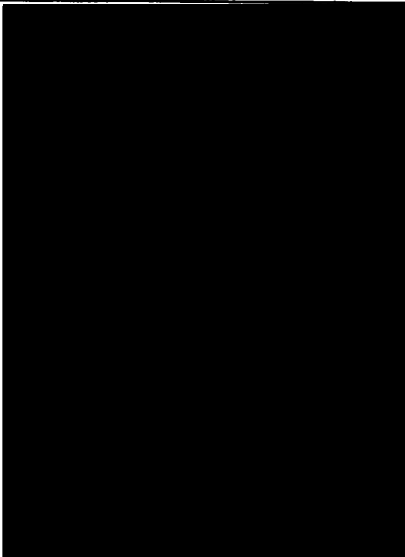
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Date	Invoice #
10/14/2016	14061

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MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	8/2/2016		0.40	460.00	184.00
Daniel N. Rosen	8/3/2016		0.20	460.00	92.00
Daniel N. Rosen	8/5/2016		0.30	460.00	138.00
Daniel N. Rosen	8/9/2016		0.20	460.00	92.00
Drew L. McNeill	8/30/2016		0.60	260.00	156.00

Total	\$662.00
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PARKER ROSEN LLC

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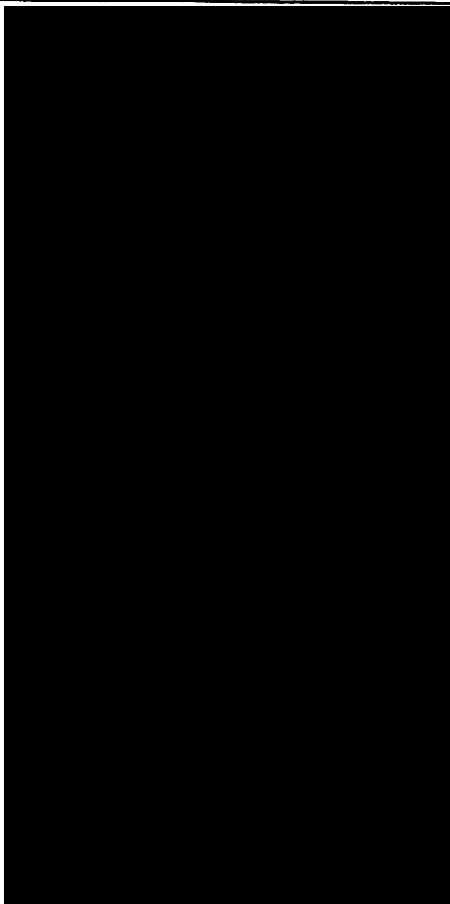
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Date	Invoice #
10/14/2016	14062

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 200 South Biscayne Boulevard
 Miami, FL 33131

MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	9/1/2016		3.00	460.00	1,380.00
Barbara M. Livick	9/1/2016		2.20	195.00	429.00
Daniel N. Rosen	9/2/2016		2.50	460.00	1,150.00
Drew L. McNeill	9/6/2016		0.50	260.00	130.00
Barbara M. Livick	9/6/2016		0.20	195.00	39.00
Brenda J. Hanson	9/9/2016		0.30	135.00	40.50
Drew L. McNeill	9/12/2016		0.90	260.00	234.00

Total

PARKER ROSEN LLC

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 Minneapolis, MN 55401
 EIN 20-3550547

Invoice

Date	Invoice #
10/14/2016	14062

Michael Budwick, Esq.
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 200 South Biscayne Boulevard
 Miami, FL 33131

MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Brenda J. Hanson	9/12/2016		0.20	135.00	27.00
Daniel N. Rosen	9/12/2016		0.20	460.00	92.00
Brenda J. Hanson	9/13/2016		0.20	135.00	27.00
Barbara M. Livick	9/19/2016		3.10	195.00	604.50
Brenda J. Hanson	9/20/2016		0.30	135.00	40.50
Barbara M. Livick	9/20/2016		2.20	195.00	429.00
Barbara M. Livick	9/26/2016		2.30	195.00	448.50
Daniel N. Rosen	9/26/2016		0.20	460.00	92.00
Daniel N. Rosen	9/28/2016		2.50	460.00	1,150.00

Total

PARKER ROSEN LLC

123 North Third Street, Suite 888
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Invoice

Date	Invoice #
10/14/2016	14062

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MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	9/29/2016		1.80	195.00	351.00
DISBURSEMENTS					
	9/1/2016			7.50	7.50
	9/2/2016			6.00	6.00
	9/19/2016			507.00	507.00
	9/19/2016			5.00	5.00
	9/30/2016			2.75	2.75
	9/30/2016			308.40	308.40
					836.65

Total	\$7,500.65
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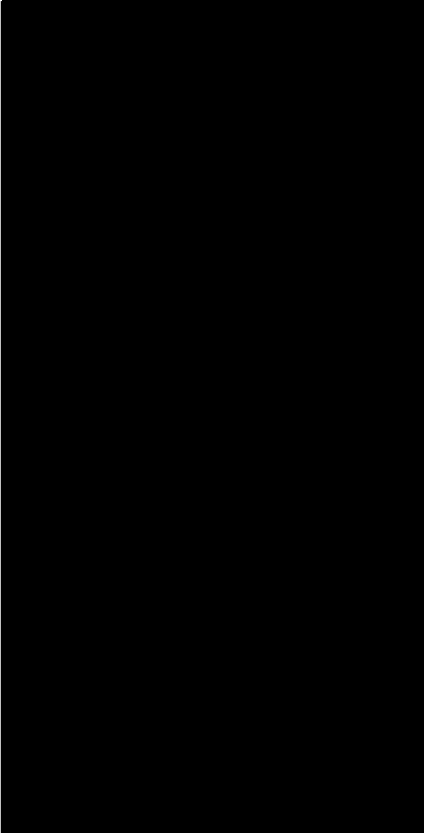
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Date	Invoice #
10/14/2016	14063

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MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Drew L. McNeill	9/7/2016		1.60	260.00	416.00
Drew L. McNeill	9/8/2016		2.80	260.00	728.00
Drew L. McNeill	9/9/2016		0.30	260.00	78.00
Drew L. McNeill	9/13/2016		0.60	260.00	156.00
Drew L. McNeill	9/14/2016		0.10	260.00	26.00
Daniel N. Rosen	9/21/2016		0.20	460.00	92.00
	9/30/2016			185.03	185.03

Total**\$1,681.03**

PARKER ROSEN LLC

123 North Third Street, Suite 888
 Minneapolis, MN 55401
 EIN 20-3550547

Invoice

Date	Invoice #
11/11/2016	14132

Michael Budwick, Esq.
 Meland Russin & Budwick, PA
 3000 Wachovia Financial Center
 200 South Biscayne Boulevard
 Miami, FL 33131

MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	10/6/2016	Review Pacer in various bankruptcy and federal civil cases for recent filings and developments; print key documents and diary key dates; provide updates.	1.50	195.00	292.50
Barbara M. Livick	10/10/2016	Review Pacer for updates on Petters Bankruptcy-related matters; print and diary deadlines.	1.10	195.00	214.50
Daniel N. Rosen	10/14/2016	Attention to court filings over previous week and to BML memorandum.	0.20	460.00	92.00
Barbara M. Livick	10/18/2016	Review Pacer for recent developments and updates.	1.20	195.00	234.00
Daniel N. Rosen	10/21/2016	Attention to court filings this week.	0.20	460.00	92.00
Daniel N. Rosen	10/28/2016	Attention to court filings and BML memo.	0.20	460.00	92.00
DISBURSEMENTS					
	9/24/2016	Federal Express to G. Santiago		74.59	74.59
	9/28/2016	Parking for hearing.		9.00	9.00
	10/19/2016	Parking.		10.50	10.50
		SUBTOTAL DISBURSEMENTS			94.09

Total**\$1,111.09**

PARKER ROSEN LLC

123 North Third Street, Suite 888
 Minneapolis, MN 55401
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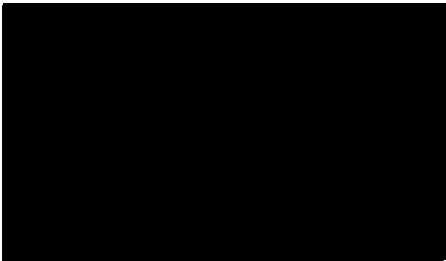
Invoice

Date	Invoice #
11/11/2016	14133

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 200 South Biscayne Boulevard
 Miami, FL 33131

MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	10/3/2016	Letter to counsel for Shea.	0.30	460.00	138.00
Drew L. McNeill	10/25/2016		0.40	260.00	104.00
	10/31/2016	October 2016 online legal research.		13.47	13.47

Total**\$255.47**

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
3/15/2011	608	10/15/10 - 1/31/11	\$ 12,239.00	\$ 308.52	4/13/2011	629	\$ 12,239.00	\$ 308.52	\$ 12,239.00	\$ 308.52	\$ -	\$ -
7/28/2011	668	2/1/11 - 6/30/11	\$ 4,285.50	\$ 5.22	9/1/2011	734	\$ 4,285.50	\$ 5.22	\$ 4,285.50	\$ 5.22	\$ -	\$ -
12/28/2011	1027	6/1/11 - 10/31/11	\$ 10,001.00	\$ 148.16	2/17/2012	1099	\$ 10,001.00	\$ 148.16	\$ 10,001.00	\$ 148.16	\$ -	\$ -
4/30/2012	1214	11/1/11 - 2/29/12	\$ 26,434.50	\$ 507.23	6/4/2012	1269	\$ 26,434.50	\$ 507.23	\$ 26,434.50	\$ 507.23	\$ -	\$ -
8/30/2012	1376	3/1/12 - 6/30/12	\$ 63,959.50	\$ 2,270.33	9/28/2012	1440	\$ 63,959.50	\$ 2,270.33	\$ 63,959.50	\$ 2,270.33	\$ -	\$ -
12/21/2012	1575	7/1/12 - 10/31/12	\$ 69,088.50	\$ 401.04	1/31/2013	1699	\$ 69,088.50	\$ 401.04	\$ 69,088.50	\$ 401.04	\$ -	\$ -
4/26/2013	1812	11/1/12 - 2/28/13	\$ 31,293.00	\$ 67.58	6/5/2013	1868	\$ 31,293.00	\$ 67.58	\$ 31,293.00	\$ 67.58	\$ -	\$ -
8/30/2013	1935	3/1/13 - 6/30/13	\$ 37,247.00	\$ 657.20	10/7/2013	1984	\$ 37,247.00	\$ 657.20	\$ 37,247.00	\$ 657.20	\$ -	\$ -
12/27/2013	2065	7/1/13 - 10/31/13	\$ 17,628.50	\$ 1,454.01	1/29/2014	2139	\$ 17,628.50	\$ 1,454.01	\$ 17,628.50	\$ 1,454.01	\$ -	\$ -
4/25/2014	2235	11/1/13 - 2/28/14	\$ 35,232.50	\$ 3,989.60	6/4/2014	2313	\$ 35,232.50	\$ 3,989.60	\$ 35,232.50	\$ 3,989.60	\$ -	\$ -
8/26/2014	2389	3/1/14 - 6/30/14	\$ 14,758.50	\$ 588.00	9/24/2014	2443	\$ 14,758.50	\$ 588.00	\$ 14,758.50	\$ 588.00	\$ -	\$ -
12/19/2014	2516	7/1/14 - 10/31/14	\$ 17,365.00	\$ 224.57	1/16/2015	2544	\$ 17,365.00	\$ 224.57	\$ 17,365.00	\$ 224.57	\$ -	\$ -
4/23/2015	2579	11/1/14 - 2/28/15	\$ 16,277.50	\$ 1,804.50	5/28/2015	2622	\$ 16,277.50	\$ 1,804.50	\$ 16,277.50	\$ 1,804.50	\$ -	\$ -
8/27/2015	2704	3/1/15 - 6/30/15	\$ 24,750.70	\$ 325.17	10/16/2015	2735	\$ 24,750.70	\$ 325.17	\$ 24,750.70	\$ 325.17	\$ -	\$ -
12/28/2015	2794	7/1/15 - 10/31/15	\$ 31,849.00	\$ 688.47	1/21/2016	2823	\$ 31,849.00	\$ 688.47	\$ 31,849.00	\$ 688.47	\$ -	\$ -
4/28/2016	2885	11/1/15 - 2/29/16	\$ 17,054.00	\$ 577.09	6/8/2016	2934	\$ 17,054.00	\$ 577.09	\$ 17,054.00	\$ 577.09	\$ -	\$ -
8/29/2016	3000	3/1/16 - 6/30/16	\$ 23,554.50	\$ 1,607.97	9/21/2016	3030	\$ 23,554.50	\$ 1,607.97	\$ 23,554.50	\$ 1,607.97	\$ -	\$ -
TOTALS:			\$ 453,018.20	\$ 15,624.66			\$ 453,018.20	\$ 15,624.66	\$ 453,018.20	\$ 15,624.66	\$ -	\$ -

Invoicing Date:	Billing Period:	Fees and expenses requested:		Amount paid absent objection:	
2/2/2011	October 15, 2010 through November 30, 2010	\$	3,966.50	\$	3,966.50
2/2/2011	December 1, 2010 through December 31, 2010	\$	818.00	\$	818.00
2/28/2011	December 1, 2010 through January 31, 2011	\$	7,763.02	\$	7,763.02
3/1/2011	February 1, 2011 through February 28, 2011	\$	850.00	\$	850.00
3/17/2011	March 1, 2011 through April 30, 2011	\$	1,912.72	\$	1,912.72
7/26/2011	May 1, 2011 through June 30, 2011	\$	1,528.00	\$	1,528.00
9/5/2011	July 1, 2011 through July 31, 2011	\$	259.00	\$	259.00
9/5/2011	August 1, 2011 through August 31, 2011	\$	1,221.00	\$	1,221.00
10/26/2011	September 1, 2011 through September 30, 2011	\$	2,977.62	\$	2,977.62
11/15/2011	October 1, 2011 through October 31, 2011	\$	5,691.54	\$	5,691.54
12/28/2011	November 1, 2011 through November 30, 2011	\$	5,002.91	\$	5,002.91
2/1/2012	December 1, 2011 through December 31, 2011	\$	3,307.37	\$	3,307.37
3/18/2012	January 1, 2012 through January 31, 2012	\$	4,299.90	\$	4,299.90
4/12/2012	February 1, 2012 through February 29, 2012	\$	14,331.55	\$	14,331.55
4/22/2012	March 1, 2012 through March 31, 2012	\$	9,861.96	\$	9,861.96
5/13/2012	April 1, 2012 through April 30, 2012	\$	29,763.10	\$	29,763.10
7/20/2012	May 1, 2012 through May 31, 2012	\$	8,927.57	\$	8,927.57
8/1/2012	June 1, 2012 through June 30, 2012	\$	17,677.20	\$	17,677.20
8/9/2012	July 1, 2012 through July 30, 2012	\$	6,605.11	\$	6,605.11
9/10/2012	August 1, 2012 through August 31, 2012	\$	25,159.48	\$	25,159.48
10/28/2012	September 1, 2012 through September 30, 2012	\$	21,025.21	\$	21,025.21
11/15/2012	October 1, 2012 through October 31, 2012	\$	16,699.74	\$	16,699.74
12/11/2012	November 1, 2012 through November 30, 2012	\$	9,976.00	\$	9,976.00
3/14/2013	December 1, 2012 through December 31, 2012	\$	9,224.00	\$	9,224.00
3/17/2013	January 1, 2013 through January 31, 2013	\$	5,195.83	\$	5,195.83
4/10/2013	February 1, 2013 through February 28, 2013	\$	6,964.75	\$	6,964.75
4/10/2013	March 1, 2013 through March 31, 2013	\$	6,531.01	\$	6,531.01
6/30/2013	April 1, 2013 through June 30, 2013	\$	31,373.19	\$	31,373.19
10/16/2013	July 1, 2013 through July 30, 2013	\$	2,677.42	\$	2,677.42
10/17/2013	August 1, 2013 through August 31, 2013	\$	2,425.92	\$	2,425.92
12/1/2013	September 1, 2013 through October 31, 2013	\$	13,979.17	\$	13,979.17
12/16/2013	November 1, 2013 through November 30, 2013	\$	28,715.19	\$	28,715.19
2/24/2014	January 1, 2014 through January 31, 2014	\$	4,210.30	\$	4,210.30
4/4/2014	February 1, 2014 through February 28, 2014	\$	6,296.61	\$	6,296.61
4/4/2014	March 1, 2014 through March 31, 2014	\$	3,039.74	\$	3,039.74
5/12/2014	April 1, 2014 through April 30, 2014	\$	2,991.10	\$	2,991.10
6/26/2014	May 1, 2014 through May 31, 2014	\$	5,030.45	\$	5,030.45
8/5/2014	June 1, 2014 through June 30, 2014	\$	4,285.21	\$	4,285.21
8/5/2014	July 1, 2014 through July 31, 2014	\$	6,390.98	\$	6,390.98
10/26/2014	August 1, 2014 through August 31, 2014	\$	3,021.50	\$	3,021.50
11/5/2014	September 1, 2014 through September 30, 2014	\$	4,699.89	\$	4,699.89
12/9/2014	October 1, 2014 through October 31, 2014	\$	3,477.20	\$	3,477.20
12/9/2014	November 1, 2014 through November 30, 2014	\$	10,480.66	\$	10,480.66
4/7/2015	December 1, 2014 through December 31, 2014	\$	3,230.34	\$	3,230.34
4/7/2015	January 1, 2015 through January 31, 2015	\$	3,018.50	\$	3,018.50
4/7/2015	February 1, 2015 through February 28, 2015	\$	1,352.50	\$	1,352.50
4/7/2015	March 1, 2015 through March 31, 2015	\$	3,250.07	\$	3,250.07
5/7/2015	April 1, 2015 through April 30, 2015	\$	6,140.60	\$	6,140.60
6/5/2015	May 1, 2015 through May 31, 2015	\$	7,689.70	\$	7,689.70
7/21/2015	June 1, 2015 through June 30, 2015	\$	7,995.50	\$	7,995.50
8/20/2015	July 1, 2015 through July 31, 2015	\$	5,052.00	\$	5,052.00
9/4/2015	August 1, 2015 through August 31, 2015	\$	10,677.55	\$	10,677.55

10/18/2015	September 1, 2015 through September 30, 2015	\$	13,736.42	\$	13,736.42
11/24/2015	October 1, 2015 through October 31, 2015	\$	3,071.50	\$	3,071.50
1/26/2016	November 1, 2015 through November 30, 2015	\$	5,142.69	\$	5,142.69
2/22/2016	December 1, 2015 through December 31, 2015	\$	3,503.90	\$	3,503.90
2/22/2016	January 1, 2016 through January 31, 2016	\$	2,869.50	\$	2,869.50
4/1/2016	February 1, 2016 through February 29, 2016	\$	6,115.00	\$	6,115.00
4/19/2016	March 1, 2016 through March 31, 2016	\$	9,520.50	\$	9,520.50
7/7/2016	April 1, 2016 through April 30, 2016	\$	10,745.97	\$	10,745.97
7/7/2016	May 1, 2016 through May 31, 2016	\$	1,494.50	\$	1,494.50
7/24/2016	June 1, 2016 through June 30, 2016	\$	3,401.50	\$	3,401.50
8/26/2016	July 1, 2016 through July 31, 2016	\$	3,099.61	\$	3,099.61
10/14/2016	August 1, 2016 through August 31, 2016	\$	2,887.97	\$	2,887.97
10/14/2016	September 1, 2016 through September 30, 2016	\$	9,181.68	\$	9,181.68
11/11/2016	October 1, 2016 through October 31, 2016	\$	1,366.56	\$	1,366.56