#### 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.	

# SUMMARY OF THIRD INTERIM POST CONFIRMATION FEE APPLICATION FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES TO PARKER ROSEN, LLC AS LOCAL COUNSEL IN MINNESOTA

1.	Name of Applicant:	Parker Rosen, LLC
2.	Role of Applicant:	Liquidating Trustee's Local Counsel in Minnesota
3.	Name of Certifying Professional:	Daniel N. Rosen
4.	Date case filed:	November 30, 2009
5.	Date of application for employment:	May 27, 2010 [ECF No. 161]
6.	Date of order approving employment:	June 24, 2010 [ECF No. 182], nunc pro tunc to May 24, 2010
7.	If debtor's counsel, date of Disclosure of Compensation form:	N/A
8.	Date of this application:	December 28, 2011
9.	Dates of services covered:	July 1, 2011 thru October 31, 2011

	Fees	
10.	Total fee requested for this period (from Exhibit 1):	\$ 10,001.00
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
13.	Net amount of fee requested for this period:	\$ 10,001.00

	Expenses	
14.	Total expense reimbursement requested for this period:	\$ 148.16
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	\$ 148.16
18.	Gross award requested for this period (#10 + #14)	\$ 10,149.16
19.	Net award requested for this period (#13 + #17)	\$ 10,149.16
20.	If <u>Final</u> Fee Application, amounts of net awards requested in interim applications but <u>not previously awarded</u> (total from History of Fees and Expenses, following pages):	\$ 0.00
21.	Final fee and expense award requested (#19 + #20)	\$ 0.00

#### History of Fees and Expenses

1. Dates, sources,	and amounts of retain	ners received: N	V/A	
Dates	Sources		Amounts	For fees or costs?
2. Dates, sources,	and amounts of third	party payment	s received: N/A	
Dates	Sources		Amounts	For fees or costs?
3. Prior fee and ex	pense awards		<del> </del>	
First interim post conf	firmation applicatio	n [ECF No. 60	8]	
Dates covered by first a	pplication:	October 15, 2	010 through Jan	uary 31, 2011
Amount of fees requeste	ed:	\$		12,239.00
Amount of expenses rec	quested:	\$		308.52
Amount of fees awarded	d:	\$		12,239.00
Amount of expenses aw	varded:	\$		308.52
Amount of fee retainer used:	authorized to be			N/A
Amount of expense retable used:	iner authorized to			N/A
Fee award, net of retain	er:			N/A
Expense award, net of r	etainer:			N/A
Date of first award:		April 13, 201	1 [ECF No. 629]	
Amount of fees actually	paid:	\$		12,239.00
Amount of expense rein actually paid:	nbursement	\$		308.52
Portion of fees requeste which applicant wishes application:		\$		0.00
Portion of expenses req awarded, which applica to final fee application:		\$		0.00

Second interim post confirmation applica	tion [ECF No. 668]	
Dates covered by second application:	February 1, 2011 through June 30, 2011	
Amount of fees requested:	\$	4,285.50
Amount of expenses requested:	\$	5.22
Amount of fees awarded:	\$	4,285.50
Amount of expenses awarded:	\$	5.22
Amount of fee retainer authorized to be used:		N/A
Amount of expense retainer authorized to be used:		N/A
Fee award, net of retainer:		N/A
Expense award, net of retainer:		N/A
Date of second award:	September 1, 2011 [ECF No. 734]	
Amount of fees actually paid:	\$	4,285.50
Amount of expense reimbursement actually paid:	\$	5.22
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 PRE-CONFIRMATION Prior Applications an	d Awards	
Total fees requested:	\$	19,380.00
Total fees awarded:	\$	19,380.00
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:	\$	883.75
Total expenses awarded:	\$	883.75
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 POST CONFIRMATION invoicing (	Invoice No. 10586) dated Septemb	per 5, 2011
Dates covered by invoicing:	July 1, 2011 through July 31	, 2011
Amount of fees and expenses requested:	\$	259.00
Amount of fees and expenses paid absent objections:	\$	259.00

Monthly POST CONFIRMATION invoicing (	Invoice No. 10587) dated	September 5, 2011
Dates covered by invoicing:	August 1, 2011 thro	ough August 31, 2011
Amount of fees and expenses requested:	\$	1,221.00
Amount of fees and expenses paid absent objections:	\$	1,221.00

<sup>&</sup>lt;sup>1</sup>Pursuant to Section 7.1.11 of the Plan, Professionals retained by the Liquidating Trustee and Liquidating Trust Monitor are entitled to monthly interim compensation for fees and expenses. The Liquidating Trustee is authorized to pay 100% of a professional's fees and expenses absent the submission of an objection by the United States Trustee's Office, the Liquidating Trustee or the Trust Monitor within 10 business days notice.

Monthly POST CONFIRMATION invoicing dated October 26, 2011		
Dates covered by invoicing:	September 1, 2011 th	rough September 30, 2011
Amount of fees and expenses requested:	\$	2,977.62
Amount of fees and expenses paid absent objections:	\$	2,977.62

Monthly POST CONFIRMATION invoicing dated November 15, 2011		
Dates covered by invoicing:	October 1, 2011 thro	ough October 31, 2011
Amount of fees and expenses requested:	\$	5,691.54
Amount of fees and expenses paid absent objections:	\$	5,691.54

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

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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	•

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## THIRD INTERIM POST CONFIRMATION FEE APPLICATION OF PARKER ROSEN, LLC AS LOCAL COUNSEL IN MINNESOTA

Parker Rosen, LLC, Liquidating Trustee's local counsel in Minnesota ("Parker Rosen"), applies pursuant to 11 U.S.C. §§ 330, 331 and 503(b) of the Bankruptcy Code for compensation for services rendered and reimbursement of the necessary expenses paid or incurred by Parker Rosen in this bankruptcy case during the period of July 1, 2011 through October 31, 2011 (the "Fee Period") and in support states:

#### INTRODUCTION

1. Parker Rosen is seeking compensation for services rendered and reimbursement of necessary expenses paid in the total amount of \$10,149.16 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 28.5 hours were expended by Parker Rosen as Liquidating Trustee's local counsel in Minnesota at hourly rates ranging from \$425-\$125 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].

#### **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 28.5 hours of time as more fully set forth below.
- 5. Attached as Exhibit "1-A" is a Summary of Professional and Paraprofessional Time Total Per Individual for this Period Only. Attached as Exhibit "1-B" is a Summary of Professional and Paraprofessional Time by Activity Code Category for this Time Period Only. Attached as Exhibit "2" is a Summary of Requested Reimbursement Of Expenses for this Time Period Only. The transcribed time records and details of services rendered by Parker Rosen are attached as Exhibit "3." 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,

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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.

- 6. 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 \$10,149.16 for services rendered expended for the Fee Period. This figure was derived from the total amount of hours expended multiplied by the corresponding hourly rates, as more specifically set forth in Exhibit "3".
- 7. <u>Time and Labor Required</u>. The records transcribed as Exhibit "3" show that Parker Rosen has devoted not less than 28.5 hours of actual recorded time to the performance of services in these proceedings.
- 8. <u>Novel and Difficult Questions</u>: 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 sponsoring the *pro hac*

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vice applications of Meland Russin & Budwick, P.A. and researching specific issues regarding Minnesota law. The issues involved were neither novel nor difficult.

- 9. The Skill Requisite to Perform Services Properly: Knowledge in the field of bankruptcy law, Minnesota law and local rules and procedures in Minnesota was required.
- 10. Preclusion of Other Employment Due to Acceptance of this Case: Parker Rosen has not been precluded from any other employment due to the acceptance of this case.
- 11. <u>Customary Fee</u>: The hourly rate charged is Parker Rosen's customary fee for services of the type rendered herein.
- 12. 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.
- Experience, Reputation and Ability of Professional: Parker Rosen includes experienced trial lawyers with a sophisticated understanding of financial analysis and valuation, fiduciary duties, and corporate structures, and fiduciary duties and are qualified to perform such services for the benefit of the Liquidating Trustee. Daniel N. Rosen received his J.D. (cum laude) from the University of Minnesota Law School in 1994 and is admitted to the Minnesota Bar Association. Daniel N. Lovejoy received his J.D. from the University of Virginia School of Law in 2002 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.
  - 14. Undesirability of Case: This case is not undesirable.
- 15. Nature and Length of Professional Relationship with Client: Parker Rosen has not performed services for the Liquidating Trustee previously in any others matters prior to this case.

Allocation Between Estates: The Liquidating Trustee requests that 18% of the fee awarded be allocated to Palm Beach Finance Partners, L.P. and 82% of the fee awarded be allocated to Palm Beach Finance II, L.P. This pro rata allocation formula is 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. See Section 1.76, entitled "Pro Rata Allocation Formula," of the Second Amended Joint Plan of Liquidation dated September 3, 2010 7 [ECF No. 245]. Based on the circumstances and since the services provided by Parker Rosen were performed on behalf of and benefitted both estates, the Liquidating Trustee believes that this formula is the proper methodology to allocate the final fee award.

- 17. Awards in Similar Cases: 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 \$10,001 for 28.5 hours of services. This request is entirely appropriate.
- 18. Parker Rosen considers the reasonable value of services rendered to this estate to be not less than \$10,001 for services he has rendered for the Fee Period.

WHEREFORE, Liquidating Trustee's local counsel in Minnesota, Parker Rosen, respectfully requests that it be allowed fees in the amount of \$10,001 for services rendered and reimbursement of the necessary expenses paid or incurred in the amount of \$148.16, for a total of \$10,149.16, to be paid as follows: 18% of the award be allocated to Palm Beach Finance Partners, L.P. and 82% of the

award be allocated to Palm Beach Finance II, L.P., and for such other and further relief as the Court deems just and proper.

#### **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,

Case 09-36379-PGH Doc 1027 Filed 12/28/11 Page 13 of 25

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

300 First Avenue North, Suite 200

Minneapolis, MN 55401

Telephone: (612) 767-3000

Telecopy: (612) 767-3001

D...

Daniel N. Bassa

REMAINDER OF PAGE LEFT INTENTIONALLY BLANK

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.
3000 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	Partner, Associate, or Paraprofessional	Year <u>Licensed</u>	Total <u>Hours</u>	Hourly <u>Rate</u>	Tota <u>Fees</u>	-
Daniel N. Rosen	Partner	1994	15.5	\$425.00	\$	6,587.50
Daniel N. Lovejoy	Associate	2003	2.0	\$280.00	\$	560.00
Douglas G. Wardlow	Associate	2004	9.1	\$280.00	\$	2,548.00
Barbara M. Livick	Paraprofessional	N/A	1.7	\$165.00	\$	280.50
Brenda J. Hanson	Paraprofessional	N/A	0.2	\$125.00	\$	25.00
Blended Hourly Rate				\$255.00		
Total Fees			28.5		\$	10,001.00

#### 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		Am	ount	
Daniel N. Rosen	\$ 42	5.00	9.0	\$	3,825.00	
Daniel N. Lovejoy	\$ 28	0.00	2.0	\$	560.00	
Douglas G. Wardlow	\$ 28	0.00	9.1	\$	2,548.00	
Barbara M. Livick	\$ 16	5.00	1.7	\$	280.50	
CATEGORY TOTALS:			21.8	\$	7,213.50	

In re Howse Malpractice Action						
Name	Ra	te	Hours		An	ount
Daniel N. Rosen	\$	425.00		6.5	\$	2,762.50
Brenda J. Hanson	\$	125.00		0.2	\$	25.00
CATEGOR	Y T	OTALS:		6.7	\$	2,787.50

# EXHIBIT "2" <u>Summary of Requested Reimbursement Of Expenses</u> <u>for this Time Period Only</u>

[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¢)	\$ 33.50
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	\$ 66.66
14.	Out of District of Minnesota Travel A. Transportation B. Lodging C. Meals	\$ 0.00
15.	Other (Not specifically disallowed; must specify and justify) Court Records	\$ 48.00
TOTA	AL "GROSS" AMOUNT OF REQUESTED DISBURSEMENTS	\$ 148.16

300 North First Avenue, Suite 200 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #
9/5/2011	10586

Jonathan S. Feldman, 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	7/8/2011	Attention to electronically filed documents.	0.2	425.00	85.00
Daniel N. Rosen	7/13/2011	Attention to court filings.	0.2	425.00	85.00
Daniel N. Rosen	7/21/2011	Review and sign petition.	0.2	425.00	85.00
	7/6/2011	Research - Pacer Service Center. 41/1/11-6/30/11		4.00	4.00

**Total** \$259.00

300 North First Avenue, Suite 200 Minneapolis, MN 55401 EIN 20-3550547

## Invoice

Date	Invoice #
9/5/2011	10587

Jonathan S. Feldman, 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	8/5/2011	Attention to electronic court filings for final week of July through August 5.	0.3	425.00	127.50
Daniel N. Rosen	8/9/2011	Attention to Receiver's report of August 2.	0.3	425.00	127.50
Daniel N. Rosen	8/12/2011	Attention to court filings this week.	0.2	425.00	85.00
Daniel N. Rosen	8/15/2011	Attention to motion papers filed this day.	0.2	425.00	85.00
Daniel N. Rosen	8/18/2011	Telephone conference with Meland Russin counsel regarding action against follow-up research.	0.6	425.00	255.00
Barbara M. Livick	8/18/2011	Work on obtaining documents from Hennepin County District Court re	0.9	165.00	148.50
Barbara M. Livick	8/23/2011	Obtain documents in	0.8	165.00	132.00
Daniel N. Rosen	8/23/2011	Attention to pleadings in matter.	0.3	425.00	127.50
Daniel N. Rosen	8/29/2011	Attention to periodic report of liquidating trustee and to other electronic filings of this day.	0.2	425.00	85.00

Total

300 North First Avenue, Suite 200 Minneapolis, MN 55401 EIN 20-3550547

## Invoice

Date	Invoice #	
9/5/2011	10587	

Jonathan S. Feldman, 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
8/22/2011	Henn. Co. Court Admin Court Records.		48.00	48.00

**Total** \$1,221.00

300 North First Avenue, Suite 200 Minneapolis, MN 55401 EIN 20-3550547

## Invoice

Date	Invoice #
10/26/2011	10684

Jonathan S. Feldman, 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 9/6/2011		Correspondence with Meland firm regarding materials needed from historical Minnesota case and attention to same.	0.5	425.00	212.50
Daniel N. Rosen	9/12/2011	Correspondence; attention to court filings.	0.3	425.00	127.50
Daniel N. Rosen	9/14/2011	Meet with Sol Genet in our office.	1.0	425.00	425.00
Daniel N. Rosen	9/26/2011	Attention to receiver's status report and other electronic filings; telephone conference with Meland firm.	0.5	425.00	212.50
Douglas G. Wardlow	9/27/2011	Research regarding	1.0	280.00	280.00
Daniel N. Lovejoy	9/27/2011	Revisit research regarding	0.5	280.00	140.00
Douglas G. Wardlow	9/28/2011	Research regarding	2.3	280.00	644.00
	10/4/2011	Research - Pacer Service Center. 7/1/11-9/30/11		1.12	1.12

Total	\$2,042.62

300 North First Avenue, Suite 200 Minneapolis, MN 55401 EIN 20-3550547

## Invoice

Date	Invoice #
10/26/2011	10685

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

MATTER
1808-004 Howse Malpractice Action

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	9/11/2011	Attention to message from S. Genet; email correspondence.	0.2	425.00	85.00
Daniel N. Rosen	9/19/2011	Email correspondence with Sol Genet.	0.2	425.00	85.00
Daniel N. Rosen	9/21/2011	Email correspondence with Sol Genet.	0.2	425.00	85.00
Daniel N. Rosen	9/22/2011	Email correspondence; attention to letter from Budwick to Remele.	0.2	425.00	85.00
Daniel N. Rosen	9/23/2011	Telephone conference with Budwick and Genet; telephone conference with Lew Remele regarding deposition of Judge Anderson; email correspondence with Budwick regarding same.	1.2	425.00	510.00
Daniel N. Rosen	9/24/2011	Correspondence with Budwick.	0.2	425.00	85.00

Total	\$935.00
Total	\$935.00

300 North First Avenue, Suite 200 Minneapolis, MN 55401 EIN 20-3550547

## Invoice

Date	Invoice #		
11/15/2011	10740		

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

Total

\$3,839.04

	Date	Description/Comments	Hours	Rate	Amount
Douglas G. Wardlow	10/3/2011	Draft memorandum regarding viability of certain causes of action under Minnesota law.	3.0	280.00	840.00
Daniel N. Rosen	10/11/2011	Attention to electronically filed order this day.	0.2	425.00	85.00
Daniel N. Rosen	10/12/2011	Memorandum on in Minnesota; email correspondence.	0.6	425.00	255.00
Daniel N. Lovejoy	10/21/2011	Research issue.	1.5	280.00	420.00
Daniel N. Rosen	10/23/2011	Attention to electronic court filings.	0.2	425.00	85.00
Daniel N. Rosen	10/25/2011	Meet in our office with Mr. Budwick; review documents at Fulbright offices.	3.0	425.00	1,275.00
Douglas G. Wardlow	10/25/2011	Research law regarding availability of defense under Minnesota law.	2.1	280.00	588.00
Douglas G. Wardlow DISBURSEMENTS	10/26/2011	Research regarding	0.7	280.00	196.00
•	10/31/2011	October 2011 photocopy expense.		33.50	33.50
	10/31/2011			9.22	9.22
	10/31/2011	October 2011 online legal research.		52.32	52.32
		SUBTOTAL DISBURSEMENTS			95.04

300 North First Avenue, Suite 200 Minneapolis, MN 55401 EIN 20-3550547

## Invoice

Date	Invoice #
11/15/2011	10739

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

MATTER
1808-004 Howse Malpractice Action

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	10/5/2011	Email correspondence with Genet regarding experts; research potential experts' qualifications; phone conference with Mark Rotenberg regarding qualifications of Painter; phone call to Richard Painter.	1.0	425.00	425.00
Daniel N. Rosen	10/6/2011	Telephone conference with Richard Painter; email correspondence.	0.7	425.00	297.50
Daniel N. Rosen	10/7/2011	Telephone conference with Genet and Painter; email correspondence; attention to law on pre-suit requirements for legal malpractice actions in Minnesota.	1.5	425.00	637.50
Daniel N. Rosen	10/12/2011	=	0.3	425.00	127.50
Daniel N. Rosen	10/16/2011	Email correspondence with Prof. Painter and Genet; email correspondence from Remele.	0.2	425.00	85.00
Daniel N. Rosen	10/17/2011	-	0.4	425.00	170.00

Total		

300 North First Avenue, Suite 200 Minneapolis, MN 55401 EIN 20-3550547

## Invoice

Date	Invoice #		
11/15/2011	10739		

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

MATTER
1808-004 Howse Malpractice Action

	Date	Description/Comments	Hours	Rate	Amount
Brenda J. Hanson	10/21/2011	Gather documents and coordinate file.	0.2	125.00	25.00
Daniel N. Rosen	10/24/2011	Attention to correspondence to/from Genet.	0.2	425.00	85.00

Total \$1,852.50