

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

Debtors.

**DANIEL N. ROSEN, ESQ. AND KLUGER, KAPLAN, SILVERMAN, KATZEN &
LEVINE, P.L.'S FOURTH INTERIM POST CONFIRMATION FEE APPLICATION AS
LOCAL COUNSEL IN MINNESOTA TO THE LIQUIDATING TRUSTEE**

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

1. Name of Applicant:	<i>Kluger, Kaplan, Silverman, Katzen & Levine, P.L.</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>July 20, 2017 [ECF No. 3288], nunc pro</i>
IF INTERIM APPLICATION, COMPLETE 6, 7 AND 8 BELOW:	
6. Period for this application:	<i>March 1, 2018 through June 30, 2018</i>
7. Amount of Compensation Sought	\$ 15,436.50
8. Amount of Expenses Sought:	\$ 106.00
IF FINAL APPLICATION, COMPLETE 9 AND 10 BELOW:	
9. Total Amount of Compensation Sought during case:	\$ 0.00

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

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In re:

Chapter 11

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

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

Debtors.

**FOURTH INTERIM POST CONFIRMATION FEE APPLICATION
FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES TO KLUGER, KAPLAN, SILVERMAN, KATZEN & LEVINE, P.L., AS
LOCAL COUNSEL IN MINNESOTA TO THE LIQUIDATING TRUSTEE**

Kluger, Kaplan, Silverman, Katzen & Levine, P.L., Liquidating Trustee's local counsel in Minnesota ("***KKSKL***"), applies for interim compensation for fees and reimbursement of expenses for services rendered in this Chapter 11 proceeding between March 1, 2018 through June 30, 2018 (the "***Fee Period***"). This application is filed pursuant to 11 U.S.C. §§ 330 and 331 and Bankruptcy Rule 2016, and meets all of the requirements set forth in the Guidelines incorporated in Local Rule 2016-1(B)(1). In support of the application, KKS KL states as follows:

I. INTRODUCTION

1. KKS KL is seeking compensation in the total amount of \$15,436.50 and reimbursement of expenses in the amount of \$106.00 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 44.6 hours were expended by KSKSL as Liquidating Trustee’s local counsel in Minnesota at hourly rates ranging from \$210-\$495 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 Daniel N. Rosen, Esq., and 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].

3. Mr. Rosen now serves as Partner-in-Charge of KSKSL’s Minneapolis office.

4. On June 20, 2017, the Liquidating Trustee filed his Application to Employ Daniel N. Rosen, Esq. And Kluger, Kaplan, Silverman, Katzen & Levine, P.L. as Local Counsel in Minnesota [ECF No. 3269], which was approved on July 20, 2017, *nunc pro tunc* to May 9, 2017. The Trustee’s relationship with Parker Rosen ceased as of May 8, 2017.

II. REQUEST FOR RELIEF

5. By way of this Application, KSKSL seeks Court approval and allowance of compensation for services rendered by KSKSL as Liquidating Trustee's local counsel in Minnesota.

6. During the fee period, KSKSL devoted 44.6 hours of time as more fully set forth below.

7. The transcribed time records and details of services rendered by KSKSL are attached hereto as Exhibit 3. To preserve work product and maintain confidentiality, the records are redacted.

Unredacted records have been shared with the Office of the U.S. Trustee and if the Court so requests, may be filed under seal. KSKSL has devoted 44.6 hours in time in providing services to the Liquidating Trustee between March 1, 2018 through June 30, 2018.

8. 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.

9. 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.

10. Under these standards, the reasonable value of the services rendered and reimbursement of the necessary expenses paid or incurred by KSKSL as local counsel in Minnesota for the Liquidating Trustee is \$15,436.50 for fees incurred 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.

11. The transcribed time records and details of services rendered by KSKSL are attached hereto as Exhibit 3. To preserve work product and maintain confidentiality, the records are redacted. Unredacted records have been shared with the Office of the U.S. Trustee and if the Court so requests, may be filed under seal. KSKSL has devoted not less than 44.6 hours of actual recorded time to the performance of services in these proceedings.

IV. NOVELTY AND DIFFICULTY OF THE ISSUES AND QUESTIONS PRESENTED

12. KSKSL 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. KSKSL 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

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

VI. PRECLUSION FROM OTHER EMPLOYMENT

14. KKSKL has not been precluded from any other employment due to the acceptance of this case.

VII. CUSTOMARY FEE

15. The hourly rate charged is KKSKL's customary fee for services of the type rendered herein.

16. **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

17. KKSKL has not been required to expend considerable time within short periods.

IX. THE EXPERIENCE, REPUTATION AND ABILITY OF THE PROFESSIONALS

18. KKSKL 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. 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.

X. THE UNDESIRABILITY OF THE CASE

19. KKSKL 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**

20. KKSKL has not performed services for the Liquidating Trustee previously in any others matters prior to this case.

XII. APPLICABLE LEGAL STANDARD

21. The amount requested by KSKSL is reasonable in terms of awards in cases of similar magnitude and complexity. The compensation which KSKSL 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 \$15,436.50 for 44.6 hours of services. This request is entirely appropriate.

22. KSKSL considers the reasonable value of services rendered to this estate to be not less than \$15,436.50 for services they have rendered for the Fee Period

XIII. ALLOCATION BETWEEN DEBTORS' ESTATES

23. 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 KSKSL 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%)	\$2,778.57	\$19.08
Palm Beach Finance II. L.P. (82%)	\$12,657.93	\$86.92
TOTAL FEES AND COSTS:	\$15,436.50	\$106.00

Request for Final Approval

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

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

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

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

WHEREFORE, Liquidating Trustee's local counsel in Minnesota, KKSKL, respectfully requests that it be allowed the full compensation and reimbursement of expenses sought under this application as a final award. KKSKL requests this Court award a total of \$15,436.50 for fees and

\$106.00 for costs incurred between March 1, 2018 and June 30, 2018, for a total award of \$15,542.50, and approve the allocation of fees and expenses between the estates. KKSKL further requests that this Court deem any and all previously awarded post confirmation interim fees and expenses paid to KKSKL as final awards pursuant to Article 7.1.11 of the Plan and for such other and further relief this Court deems just and proper.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

CERTIFICATION

1. I 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.

Kluger, Kaplan, Silverman, Katzen
& Levine, P.L.
60 South 6th Street, Suite 3615
Minneapolis, MN 55402
Telephone: (612) 767-3000
Telecopy: (612) 767-3004

By: s/ Daniel N. Rosen (efiled with consent)
Daniel N. Rosen, Esq.

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	21.30	\$495.00	\$10,543.50
Barbara M. Livick	Paraprofessional	N/A	23.30	\$210.00	\$ 4,893.00
Blended Hourly Rate				\$346.11	
Total Fees			44.60		\$15,436.50

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

In re Petters Bankruptcy			
Name	Rate	Hours	Amount
Daniel N. Rosen	\$ 495.00	8.70	\$ 4,306.50
Barbara M. Livick	\$ 210.00	23.30	\$ 4,893.00
CATEGORY TOTALS:		32.00	\$ 9,199.50

Third Party Actions			
Name	Rate	Hours	Amount
Daniel N. Rosen	\$ 495.00	12.60	\$ 6,237.00
CATEGORY TOTALS:		12.60	\$ 6,237.00

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

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

1.	Filing Fees	\$ 0.00
2.	Process Service Fees	\$ 0.00
3.	Witness Fees	\$ 0.00
4.	Court Reporter & Transcripts	\$ 0.00
5.	Lien and Title Searches	\$ 0.00
6.	Photocopies (in-house copies) (copies @ 15¢)	\$ 0.00
7.	Photocopies (outside copies)	\$ 0.00
8.	Postage	\$ 0.00
9.	Overnight Delivery Charges	\$ 0.00
10.	Outside Courier/Messenger Services	\$ 0.00
11a.	Long Distance (a) Telephone Charges	\$ 0.00
11b.	Long Distance (b) Conference Calls	\$ 0.00
12.	Long Distance Fax Transmission @ \$1.00/pg.	\$ 0.00
13.	Computerized Research	\$ 106.00
14.	Out of District of Minnesota Travel A. Transportation B. Lodging C. Meals	\$ 0.00
15.	Other (Not specifically disallowed; must specify and justify)	\$ 0.00
TOTAL "GROSS" AMOUNT OF REQUESTED DISBURSEMENTS		\$ 106.00



Barry Mukamal, Trustee
Kapila Mukamal LLP
1 S.E. 3rd Avenue
Suite 2150
Miami, FL 33131
RE Petters Bankruptcy

Invoice Date: 04/25/2018
Invoice No.: 32134
KKSKL Matter No.: 20001.0001
Page: 1

Party Action

Previous Balance \$8,478.30

FEES

		HOURS	
03/13/2018	BML Check Pacer for recent activity.	1.00	210.00
03/15/2018	DNR Attention to [REDACTED]	0.20	99.00
03/23/2018	BML Check Pacer for recent activity, deadlines and hearings. Report to attorney Rosen with [REDACTED]	2.00	420.00

Kluger, Kaplan, Silverman, Katzen & Levine P.L.
201 South Biscayne Boulevard, Suite 2700
Miami, Florida 33131
Phone: (305) 379-9000 Fax: (305) 379-3428
Fed. ID# 26-4527913

EXHIBIT 3

Barry Mukamal, Trustee
 KKS KL Matter No.: 20001.0001
 RE: Petters Bankruptcy

Invoice Date: 04/25/2018
 Invoice No. 32134
 Page No. 2

HOURS

03/27/2018	BML	Research Pacer for recent developments; provide attorney Rosen with [REDACTED]	1.20	252.00
03/28/2018	DNR	Attend omnibus hearing.	2.00	990.00
03/29/2018	DNR	Case management.	0.30	148.50
		FOR CURRENT FEE SERVICES	6.70	2,119.50

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Daniel N. Rosen	Partner	2.50	\$495.00	\$1,237.50
Barbara M Livick	Paralegal	4.20	210.00	882.00

TOTAL CURRENT WORK 2,119.50

BALANCE DUE \$10,597.80

PLEASE REMIT \$10,597.80



Barry Mukamal, Trustee
 Solomon Genet, Meland Russin et al.
 3200 Wachovia Financial Center
 200 S. Biscayne Blvd.
 Miami, FL 33131

Invoice Date: 04/25/2018
 Invoice No.: 32135
 KKS KL Matter No.: 20001.0002
 Page: 1

RE Third Party Actions

Previous Balance \$445.50

FEES

		HOURS	
03/06/2018	DNR Email correspondence regarding [REDACTED]	0.20	99.00
03/15/2018	DNR Arrange for [REDACTED] correspondence.	0.20	99.00
	DNR Correspondence regarding [REDACTED]	0.20	99.00
03/25/2018	DNR Attention to matters in preparation for [REDACTED]	0.30	148.50
	FOR CURRENT FEE SERVICES	0.90	445.50

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 Miami, Florida 33131
 Phone: (305) 379-9000 Fax: (305) 379-3428
 Fed. ID# 26-4527913

Barry Mukamal, Trustee
 KKS KL Matter No.: 20001.0002
 RE: Third Party Actions

Invoice Date: 04/25/2018
 Invoice No. 32135
 Page No. 2

<u>Timekeeper</u>	<u>Title</u>	Recapitulation	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Daniel N. Rosen	Partner		0.90	\$495.00	\$445.50
TOTAL CURRENT WORK					445.50
BALANCE DUE					<u>\$891.00</u>
PLEASE REMIT					<u>\$891.00</u>



Barry Mukamal, Trustee
Kapila Mukamal LLP
1 S.E. 3rd Avenue
Suite 2150
Miami, FL 33131

RE Petters Bankruptcy

Invoice Date: 05/31/2018
Invoice No.: 32171
KKSKL Matter No.: 20001.0001
Page: 1

Party Action

Previous Balance \$10,597.80

FEES

		HOURS	
04/10/2018	BML Search Pacer for recent filings and developments; Advise DNR	1.50	315.00
04/16/2018	BML Review recent filings and hearing dates	1.50	315.00
04/25/2018	DNR Attend omnibus hearing.	2.00	990.00

Kluger, Kaplan, Silverman, Katzen & Levine P.L.
201 South Biscayne Boulevard, Suite 2700
Miami, Florida 33131
Phone: (305) 379-9000 Fax: (305) 379-3428
Fed. ID# 26-4527913

Barry Mukamal, Trustee
 KKS KL Matter No.: 20001.0001
 RE: Petters Bankruptcy

Invoice Date: 05/31/2018
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04/30/2018	BML Search Pacer and report recent developments	HOURS	
		1.50	315.00
	FOR CURRENT FEE SERVICES	6.50	1,935.00

Recapitulation		Hours	Rate	Total
<u>Timekeeper</u>	<u>Title</u>			
Daniel N. Rosen	Partner	2.00	\$495.00	\$990.00
Barbara M Livick	Paralegal	4.50	210.00	945.00

ADVANCES

04/27/2018	Pacer Service Center ; #Q12018: Search Public Courts (01/01/18-03/31/18)	13.60
04/27/2018	Pacer Service Center ; #Q12018: Search Public Courts (01/01/18-03/31/18)	9.80
04/27/2018	Pacer Service Center ; #Q12018: Search Public Courts (01/01/18-03/31/18)	12.10
04/27/2018	Pacer Service Center ; #Q12018: Search Public Courts (01/01/18-03/31/18)	13.30
04/27/2018	Pacer Service Center ; #Q12018: Search Public Courts (01/01/18-03/31/18)	12.20
04/27/2018	Pacer Service Center ; #Q12018: Search Public Courts (01/01/18-03/31/18)	4.80
04/27/2018	Pacer Service Center ; #Q12018: Search Public Courts (01/01/18-03/31/18)	24.00
04/27/2018	Pacer Service Center ; #Q12018: Search Public Courts (01/01/18-03/31/18)	0.30
04/27/2018	Pacer Service Center ; #Q12018: Search Public Courts (01/01/18-03/31/18)	15.90
	TOTAL ADVANCES	106.00
	TOTAL CURRENT WORK	2,041.00

PAYMENTS

04/30/2018	Payment Received Ck# 11852 dtd. 4/25/18 from PBF II Liquidating Trust	-2,581.77
04/30/2018	Payment Received Ck# 11852 dtd. 4/25/18 from PBF II Liquidating Trust	-2,127.90
04/30/2018	Payment Received Ck# 11907 dtd. 4/25/18 from PBF II Liquidating Trust	-566.73
04/30/2018	Payment Received Ck# 11907 dtd. 4/25/18 from PBF II Liquidating Trust	-467.10
05/29/2018	Payment Received ; Rabobank NA (Barry Mukamal) Ck#11866 dtd:	

Barry Mukamal, Trustee
KKSKL Matter No.: 20001.0001
RE: Petters Bankruptcy

Invoice Date: 05/31/2018
Invoice No. 32171
Page No. 3

05/29/2018	05/24/18	-2,607.85
	Payment Received ; Rabobank NA (Barry Mukamal) Ck#11913 dtd:	
	05/24/18	-126.95
	TOTAL PAYMENTS RECEIVED	<u>-8,478.30</u>
	BALANCE DUE	<u>\$4,160.50</u>
	PLEASE REMIT	<u>\$4,160.50</u>

Final Statement Run Totals 05/31/2018

Statements Printed:	1
Hours:	6.50
Fees:	1,935.00
Advances:	106.00



Barry Mukamal, Trustee
 Solomon Genet, Meland Russin et al.
 3200 Wachovia Financial Center
 200 S. Biscayne Blvd.
 Miami, FL 33131

Invoice Date: 05/31/2018
 Invoice No.: 32172
 KKS KL Matter No.: 20001.0002
 Page: 1

RE Third Party Actions

Previous Balance \$891.00

FEES

		HOURS	
04/11/2018	DNR Correspondence regarding [REDACTED]	0.20	99.00
04/12/2018	DNR Prepare for phone conference; phone conference with Mr. Mukamal and MRB lawyers; follow-up; email to mediator.	2.20	1,089.00
04/15/2018	DNR Prepare for [REDACTED]	2.10	1,039.50
04/16/2018	DNR [REDACTED] in Eden Prairie, MN.	6.00	2,970.00
	FOR CURRENT FEE SERVICES	10.50	5,197.50

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 Fed. ID# 26-4527913

Barry Mukamal, Trustee
 KKSKL Matter No.: 20001.0002
 RE: Third Party Actions

Invoice Date: 05/31/2018
 Invoice No. 32172
 Page No. 2

<u>Timekeeper</u>	<u>Title</u>	Recapitulation	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Daniel N. Rosen	Partner		10.50	\$495.00	\$5,197.50

TOTAL CURRENT WORK	5,197.50
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PAYMENTS

05/29/2018	Payment Received ; Rabobank NA (Barry Mukamal) Ck#11913 dtd: 05/24/18	-445.50
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BALANCE DUE	<u>\$5,643.00</u>
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PLEASE REMIT	<u>\$5,643.00</u>
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Final Statement Run Totals 05/31/2018

Statements Printed:	1
Hours:	10.50
Fees:	5,197.50



Barry Mukamal, Trustee
Kapila Mukamal LLP
1 S.E. 3rd Avenue
Suite 2150
Miami, FL 33131
RE Petters Bankruptcy

Invoice Date: 06/28/2018
Invoice No.: 32192
KKSKL Matter No.: 20001.0001
Page: 1

Party Action

Previous Balance \$4,160.50

FEES

			HOURS	
05/09/2018	BML	Research Pacer regarding recent developments and report to DRosen re same.	1.10	231.00
05/11/2018	BML	Review Star Tribune article re Petters' matters and forward to DRosen for review.	0.20	42.00
	DNR	Attention to matters relating to dispute between [REDACTED]		

Kluger, Kaplan, Silverman, Katzen & Levine P.L.
201 South Biscayne Boulevard, Suite 2700
Miami, Florida 33131
Phone: (305) 379-9000 Fax: (305) 379-3428
Fed. ID# 26-4527913

Barry Mukamal, Trustee
 KKS KL Matter No.: 20001.0001
 RE: Petters Bankruptcy

Invoice Date: 06/28/2018
 Invoice No. 32192
 Page No. 2

		HOURS	
	██████ telephone conference with Genet regarding same.	0.60	297.00
05/15/2018	DNR Monitor motion hearing in federal court.	1.00	495.00
05/16/2018	BML Check Pacer for recent developments and report to DRosen re same; confer with DRosen regarding current issues involving client and priorities when reviewing Pacer.	2.20	462.00
05/18/2018	DNR Meet with BML for update on all pending matters.	0.30	148.50
05/23/2018	DNR Attend and monitor omnibus hearing.	1.70	841.50
05/31/2018	BML Review Pacer for recent developments and report to DRosen re same.	2.30	483.00
	FOR CURRENT FEE SERVICES	9.40	3,000.00

Recapitulation		Hours	Rate	Total
<u>Timekeeper</u>	<u>Title</u>			
Daniel N. Rosen	Partner	3.60	\$495.00	\$1,782.00
Barbara M Livick	Paralegal	5.80	210.00	1,218.00

TOTAL CURRENT WORK 3,000.00

BALANCE DUE \$7,160.50

PLEASE REMIT \$7,160.50



Barry Mukamal, Trustee
 Solomon Genet, Meland Russin et al.
 3200 Wachovia Financial Center
 200 S. Biscayne Blvd.
 Miami, FL 33131

RE Third Party Actions

Invoice Date: 06/28/2018
 Invoice No.: 32193
 KKSkl Matter No.: 20001.0002
 Page: 1

Previous Balance \$5,643.00

FEES

		HOURS	
05/22/2018	DNR Investigate issue raised by [REDACTED] [REDACTED] email memo to Mr. James regarding same.	0.60	297.00
	FOR CURRENT FEE SERVICES	0.60	297.00

		Recapitulation			
<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>	
Daniel N. Rosen	Partner	0.60	\$495.00	\$297.00	

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Barry Mukamal, Trustee
KKSKL Matter No.: 20001.0002
RE: Third Party Actions

Invoice Date: 06/28/2018
Invoice No. 32193
Page No. 2

TOTAL CURRENT WORK 297.00

BALANCE DUE \$5,940.00

PLEASE REMIT \$5,940.00



Barry Mukamal, Trustee
Kapila Mukamal LLP
1 S.E. 3rd Avenue
Suite 2150
Miami, FL 33131
RE Petters Bankruptcy

Invoice Date: 07/20/2018
Invoice No.: 32205
KKSKL Matter No.: 20001.0001
Page: 1

Party Action

Previous Balance \$7,160.50

FEES

		HOURS	
06/07/2018	BML Review Pacer for recent development in bankruptcy matters; report to attorney Rosen regarding same.	1.30	273.00
06/08/2018	DNR Attention to court filings this week.	0.20	99.00
06/22/2018	BML Review Pacer for developments and deadlines in Petters		

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Barry Mukamal, Trustee
 KKSKL Matter No.: 20001.0001
 RE: Petters Bankruptcy

Invoice Date: 07/20/2018
 Invoice No. 32205
 Page No. 2

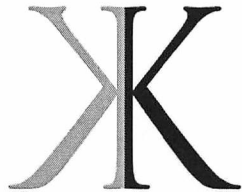
		HOURS	
	bankruptcy; report to attorney Rosen.	1.50	315.00
06/25/2018	DNR Attention to electronic court filings at to memo of BML.	0.20	99.00
06/27/2018	BML Review Pacer for recent developments and agenda for hearing; attend omnibus hearing in Minneapolis; report to attorney Rosen regarding same.	6.00	1,260.00
06/28/2018	DNR Attention to BML memo on omnibus hearing.	0.20	99.00
	FOR CURRENT FEE SERVICES	9.40	2,145.00

Recapitulation		Hours	Rate	Total
<u>Timekeeper</u>	<u>Title</u>			
Daniel N. Rosen	Partner	0.60	\$495.00	\$297.00
Barbara M Livick	Paralegal	8.80	210.00	1,848.00

TOTAL CURRENT WORK	2,145.00
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PAYMENTS

07/10/2018	Payment Received ; Rabobank NA Ck#11873 dtd: 07/02/18	-2,565.00
07/10/2018	Payment Received ; Rabobank NA Ck#11873 dtd: 07/02/18	-1,595.50
	TOTAL PAYMENTS RECEIVED	-4,160.50
	BALANCE DUE	<u>\$5,145.00</u>
	PLEASE REMIT	<u>\$5,145.00</u>



KLUGER KAPLAN

Barry Mukamal, Trustee
 Solomon Genet, Meland Russin et al.
 3200 Wachovia Financial Center
 200 S. Biscayne Blvd.
 Miami, FL 33131

Invoice Date: 07/20/2018
 Invoice No.: 32206
 KKS KL Matter No.: 20001.0002
 Page: 1

RE Third Party Actions

Previous Balance \$5,940.00

FEES

HOURS

06/15/2018 DNR Telephone conference with MRB associate regarding Minnesota
 law on [REDACTED]
 [REDACTED]

0.60 297.00

FOR CURRENT FEE SERVICES

0.60 297.00

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Daniel N. Rosen	Partner	0.60	\$495.00	\$297.00

Kluger, Kaplan, Silverman, Katzen & Levine P.L.

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Miami, Florida 33131

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Barry Mukamal, Trustee
KKSKL Matter No.: 20001.0002
RE: Third Party Actions

Invoice Date: 07/20/2018
Invoice No. 32206
Page No. 2

TOTAL CURRENT WORK 297.00

PAYMENTS

07/10/2018 Payment Received ; Rabobank NA Ck#11873 dtd: 07/02/18 -3,878.87

07/10/2018 Payment Received ; Rabobank NA Ck#11921 dtd: 07/02/18 -1,764.13

TOTAL PAYMENTS RECEIVED -5,643.00

BALANCE DUE \$594.00

PLEASE REMIT \$594.00

FEE APPLICATION SUMMARY CHART												
REQUEST					APPROVAL				PAID		HOLDBACK	
Date Filed	ECF #	Period Covered	Fees Requested	Expenses Requested	Date Order Entered	ECF #	Fees Approved	Expenses Approved	Fees Paid	Expenses Paid	Fees Holdback	Expenses Holdback
8/28/2017	3334	5/9/17 - 6/30/17	\$ 5,237.70	\$ -	10/10/2017	3368	\$ 5,237.70	\$ -	\$ 5,237.70	\$ -	\$ -	\$ -
12/22/2017	3406	7/1/17 - 10/31/17	\$ 13,812.30	\$ 230.70	2/7/2018	3437	\$ 13,812.30	\$ 230.70	\$ 13,812.30	\$ 230.70	\$ -	\$ -
4/25/2018	3461	11/1/17 - 2/28/18	\$ 11,283.30	\$ 199.50	5/25/2018	3491	\$ 11,283.30	\$ 199.50	\$ 11,283.30	\$ 199.50	\$ -	\$ -
TOTALS:			\$ 30,333.30	\$ 430.20			\$ 30,333.30	\$ 430.20	\$ 30,333.30	\$ 430.20	\$ -	\$ -

Invoicing Date:	Billing Period:	Fees and expenses requested:		Amount paid absent objection:	
8/11/2017	May 9, 2017 through June 30, 2017	\$	5,237.70	\$	5,237.70
8/31/2017	July 1, 2017 through July 31, 2017	\$	1,892.60	\$	1,892.60
9/19/2017	August 1, 2017 through August 31, 2017	\$	1,852.80	\$	1,852.80
10/25/2017	September 1, 2017 through September 30, 2017	\$	4,180.50	\$	4,180.50
11/30/2017	October 1, 2017 through October 31, 2017	\$	6,117.10	\$	6,117.10
12/28/2017	November 1, 2017 through November 30, 2017	\$	2,559.00	\$	2,469.00
1/29/2018	December 1, 2017 through December 31, 2017	\$	3,148.50	\$	3,148.50
2/28/2018	January 1, 2018 through January 31, 2018	\$	2,595.00	\$	2,595.00
3/29/2018	February 1, 2018 through February 28, 2018	\$	445.50	\$	445.50
3/29/2018	February 1, 2018 through February 28, 2018	\$	2,734.80	\$	2,734.80
4/25/2018	March 1, 2018 through March 31, 2018	\$	2,119.50	\$	2,119.50
4/25/2018	March 1, 2018 through March 31, 2018	\$	445.50	\$	445.50
5/31/2018	April 1, 2018 through April 30, 2018	\$	2,041.00	\$	2,041.00
5/31/2018	April 1, 2018 through April 30, 2018	\$	5,197.50	\$	5,197.50
6/28/2018	May 1, 2018 through May 31, 2018	\$	3,000.00	\$	30,000.00
6/28/2018	May 1, 2018 through May 31, 2018	\$	297.00	\$	297.00
7/20/2018	June 1, 2018 through June 30, 2018	\$	2,145.00	\$	2,145.00
7/20/2018	June 1, 2018 through June 30, 2018	\$	297.00	\$	297.00