

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.

**SUMMARY OF TENTH POST CONFIRMATION FEE APPLICATION
FOR DANIEL N. ROSEN AND ROSEN, LLC, AS LOCAL COUNSEL IN MINNESOTA
TO CHAPTER 11 LIQUIDATING TRUSTEE**

1.	Name of Applicant:	Rosen, LLC
2.	Role of Applicant:	Liquidating Trustee's Local Counsel
3.	Name of Certifying Professional:	Daniel N. Rosen
4.	Date case filed:	November 30, 2009
5.	Date of order approving employment:	July 20, 2017 [ECF No. 3288], <i>nunc pro tunc</i> to May 9, 2017 ¹
IF INTERIM APPLICATION (POST CONFIRMATION), COMPLETE 6, 7 AND 8 BELOW:		
6.	Period for this Application:	July 1, 2021 to October 31, 2022
7.	Amount of Compensation Sought:	\$9,513.50
8.	Amount of Expense Reimbursement Sought:	\$207.40
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

¹ Mr. Rosen's previous employment at Kluger, Kaplan, Silverman, Katzen & Levine, P.L. ("KKS KL") terminated and he has returned to his former firm Parker Rosen, LLC which is now renamed as Rosen, LLC. The Trustee's relationship with KKS KL ceased as of November 1, 2021.

13.	Last monthly operating report filed (Month/Year and ECF No.):	PBF 09/2022 [ECF No. 3901]; PBF II 09/2022 [ECF No. 3902, 09-36396]
14.	If case is Chapter 11, current funds in the Chapter 11 estate:	PBF \$2,593,432.45 a/o 09/30/2022 PBF II \$11,729,126.23 a/o 09/30/2022
15.	If case is Chapter 7, current funds held by Chapter 7 trustee:	N/A

Fee Application

Rosen, LLC, having been approved by this Court as local counsel in Minnesota for the Chapter 11 Liquidating Trustee, Barry E. Mukamal (“*Trustee*”), applies for allowance of final compensation for professional services rendered and reimbursement of the necessary expenses paid or incurred by Rosen, LLC in this Chapter 11 proceeding between July 1, 2021 through October 31, 2022. 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). The exhibits attached to this application, pursuant to the Guidelines, are:

Exhibits “1” - Fee Application Summary Chart;

Exhibit “2A” and “2B” - Summary of Professional and Paraprofessional Time;

Exhibit “3” – Summary of Requested Reimbursements of Expenses; and

Exhibit “4” – The applicant's complete time records, in chronological order, by activity code category, for the time period covered by this application. The requested fees are itemized to the tenth of an hour.

Background

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

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

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

4. 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].

5. 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.

6. As of November 1, 2021, Mr. Rosen has returned to his former firm, formerly known as Parker Rosen, LLC, which is now renamed as Rosen, LLC.

7. On April 29, 2022, the Trustee filed the *Ex Parte* Motion to Amend Order Authorizing the Employment and Retention of Daniel N. Rosen and KKSCL [ECF No. 3876], which was granted by the Court on May 2, 2022, *nunc pro tunc* to November 1, 2021 [ECF No. 3877]. The Trustee's relationship with KKSCL ceased as of November 1, 2021.

8. At the confirmation hearing held on October 19, 2010, the Court confirmed the Second Amended Joint Plan of Liquidation of Barry Mukamal, as Chapter 11 Trustee of Palm Beach Finance Partners, L.P. and Palm Beach Finance II, L.P. and Geoffrey Varga, as Joint Official Liquidator of Palm Beach Offshore, Ltd. and Palm Beach Offshore II, Ltd., dated September 3, 2010 [ECF No. 245] ("**Plan**") in the above referenced jointly administered bankruptcy proceeding. The Plan defines Confirmation Date as "the date on which the Bankruptcy Court enters the Confirmation Order on its docket." The Order Confirming Second

Amended Joint Liquidating Chapter 11 Plan [ECF No. 444] (“*Confirmation Order*”) was entered on the Court’s docket on October 21, 2010.

9. Article 7 of the Plan provides in pertinent part:

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

7.1.5 PBF Liquidating Trust Structure. As more fully set forth in the PBF Liquidating Trust Agreement, the PBF Liquidating Trustee shall oversee and direct the PBF Liquidating Trust’s operations and activities, including the retention of counsel.

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

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

10. This application is submitted for the allowance and payment to Rosen, LLC in the amount of \$9,513.50 for fees and \$207.40 for costs incurred between July 1, 2021 and October 31, 2022, for a total request of \$9,720.90.

11. All of the services rendered by Rosen, LLC were performed for and on behalf of the Liquidating Trustee.

Summary of Services Rendered

12. Rosen, LLC serves as local counsel in Minnesota for the Liquidating Trustee 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 known as the “*Petters Litigation*”).

13. Rosen, LLC is seeking compensation in the total amount of \$9,513.50 and reimbursement of expenses in the amount of \$207.40 for services rendered for the period of time from July 1, 2021 through October 31, 2022.

14. Rosen, LLC logged a total of 31.2 hours at hourly rates ranging from \$210 - \$600 during the time period for which fees were required in this fee application.

15. Rosen, LLC believes that the requested fees of \$9,513.50 for 31.2 hours worked, is reasonable considering the nature, extent, and the value of such services, taking into account all relevant factors, including:

The time spent on such services.

16. The transcribed time records and details of services rendered by Rosen, LLC are

attached as Exhibit 4. Rosen, LLC has devoted 31.2 hours in time in providing services to the Liquidating Trustee between July 1, 2021 through October 31, 2022.

17. All professionals of Rosen, LLC record the time expended in the rendition of professional services for the Liquidating Trustee by recording a detailed description of such professional services rendered.

18. All professionals involved in the rendering of services in this proceeding avoided any unnecessary duplication of work and time expended.

The rates charged for such services.

19. Rosen, LLC logged a total of 31.2 hours at hourly rates ranging from \$210 - \$600 during the time period for which fees were required in this fee application. The hourly rate charged is Rosen LLC's customary fee for services of the type rendered herein.

20. The applicant represents that the fees applied for are in conformity with the fees allowed in similar proceedings for similar services rendered and results obtained. Rosen, LLC respectfully requests that the Court take notice of the awards which have been made in similar proceedings.

Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of the case.

21. Rosen, LLC 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 Budwick, P.A., researching specific issues regarding Minnesota law, as well as monitoring pending cases and attending a number of hearings in Minnesota. The services provided by Rosen, LLC were necessary to the administration of, and beneficial to the

estates at the time at which the services were rendered as well as towards the completion of the case.

Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed.

22. Rosen, LLC submits that the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue and tasks addressed.

With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field.

23. Rosen, LLC 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. The quality of work performed by Rosen, LLC in this proceeding attests to the firm's experience, reputation and ability.

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

Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under title 11.

25. The amount requested by Rosen, LLC is reasonable in terms of awards in cases of similar magnitude and complexity. The compensation which Rosen, LLC is requesting comports with the mandate of the Bankruptcy Code, which directs that services be evaluated in light of

comparable services performed in non-bankruptcy cases in the community. The fees requested by Rosen, LLC in the amount of \$9,513.50 for 31.2 hours of services is entirely appropriate.

26. Rosen, LLC considers the reasonable value of services rendered to this estate to be not less than \$9,513.50 for services rendered for the Fee Period.

Allocation Between Debtors' Estates

27. The Liquidating Trustee requests that 18% of the fee awarded be allocated to Palm Beach Finance Partners, L.P. (“**PBF**”) and 82% of the fee awarded be allocated to Palm Beach Finance II, L.P. (“**PBF II**”). Section 1.76, entitled “Pro Rata Allocation Formula,” of the Second Amended Joint Plan of Liquidation dated September 3, 2010 [ECF No. 245] provides for a *pro rata* allocation formula derived from the Compiled Financial Statements, dated April 30, 2008, for each of the Debtors by Kaufman Rossin & Co. The data contained therein supports an 18%/82% allocation between PBF and PBF II, respectively, based upon the total assets of each entity as of the date of such compilations. Based on the circumstances and since the services provided by Rosen, LLC 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%)	\$1,712.43	\$37.33
Palm Beach Finance II, L.P. (82%)	\$7,801.07	\$170.07
TOTAL FEES AND COSTS:	\$9,513.50	\$207.40

Request for Final Approval

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

WHEREFORE, Rosen, LLC respectfully requests that it be allowed the full compensation and reimbursement of expenses sought under this application as a final award. Rosen, LLC requests this Court (i) to award a total of \$9,513.50 for fees and \$207.40 for costs incurred between July 1, 2021 and October 31, 2022, for a total award of \$9,720.90; (ii) to approve the allocation of fees and expenses between the estates; and (iii) for such other and further relief this Court deems just and proper.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

CERTIFICATION

1. I have been designated by Rosen, LLC (“*Applicant*”) as the professional with responsibility in this case for compliance with the “Guidelines for Fee Applications for Professionals in the Southern District of Florida in Bankruptcy Cases” (“*Guidelines*”).

2. I have read the Applicant's application for compensation and reimbursement of expenses (“*Application*”). The application complies with the Guidelines, and the fees and expenses sought fall within the Guidelines, except as specifically noted in this certification and described in the application.

3. The fees and expenses sought are billed at rates and in accordance with practices customarily employed by the Applicant and generally accepted by the Applicant's clients.

4. In seeking reimbursement for the expenditures described on Exhibit 4, the Applicant is seeking reimbursement only for the actual expenditure and has not marked up the actual cost to provide a profit or to recover the amortized cost of investment in staff time or equipment or capital outlay (except to the extent that the Applicant has elected to charge for in-house photocopies and outgoing facsimile transmissions at the maximum rates permitted by the Guidelines).

5. In seeking reimbursement for any service provided by a third party, the Applicant is seeking reimbursement only for the amount actually paid by the Applicant to the third party.

6. The following are the variances with the provisions of the Guidelines, the date of each court order approving the variance, and the justification for the variance: none.

I HEREBY CERTIFY that the foregoing is true and correct.

Rosen, LLC
60 South 6th Street, Suite 2800
Minneapolis, MN 55402
Telephone: (612) 767-3000

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.

Dated: January 4, 2023.

s/ Michael S. Budwick
Michael S. Budwick, Esquire
Florida Bar No. 938777
mbudwick@melandbudwick.com
MELAND BUDWICK, P.A.
200 South Biscayne Boulevard
Suite 3200
Miami, Florida 33131
Phone: (305) 358-6363
Facsimile: (305) 358-1221

Attorneys for the Liquidating Trustee

EXHIBIT 1 - 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	\$ -	\$ -
9/5/2018	3515	3/1/18 - 6/30/18	\$ 15,436.50	\$ 106.00	10/16/2018	3539	\$ 15,436.50	\$ 106.00	\$ 15,436.50	\$ 106.00	\$ -	\$ -
1/9/2019	3558	7/1/18 - 10/31/18	\$ 6,354.00	\$ 308.20	2/8/2019	3578	\$ 6,354.00	\$ 308.20	\$ 6,354.00	\$ 308.20	\$ -	\$ -
5/6/2019	3614	11/1/18 - 2/28/19	\$ 5,059.50	\$ 155.10	6/5/2019	3624	\$ 5,059.50	\$ 155.10	\$ 5,059.50	\$ 155.10	\$ -	\$ -
8/28/2019	3649	3/1/19 - 6/30/19	\$ 4,822.50	\$ 121.20	10/4/2019	3664	\$ 4,822.50	\$ 121.20	\$ 4,822.50	\$ 121.20	\$ -	\$ -
12/23/2019	3677	7/1/19 - 10/31/19	\$ 4,189.50	\$ 224.40	2/11/2020	3685	\$ 4,189.50	\$ 224.40	\$ 4,189.50	\$ 224.40	\$ -	\$ -
8/24/2021	3839	11/1/19 - 6/30/21	\$ 7,726.50	\$ 392.80	9/23/2021	3847	\$ 7,726.50	\$ 392.80	\$ 7,726.50	\$ 392.80	\$ -	\$ -
TOTALS:			\$ 73,921.80	\$ 1,737.90			\$ 73,921.80	\$ 1,737.90	\$ 73,921.80	\$ 1,737.90	\$ -	\$ -

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
8/29/2018	July 1, 2018 through July 31, 2018	\$	2,601.00	\$	2,601.00
9/28/2018	August 1, 2018 through August 31, 2018	\$	1,276.50	\$	1,276.50
10/1/2018	September 1, 2018 through September 30, 2018	\$	841.50	\$	841.50
11/1/2018	October 1, 2018 through October 31, 2018	\$	1,943.20	\$	1,943.20
12/12/2018	November 1, 2018 through November 30, 2018	\$	1,698.00	\$	1,698.00
12/12/2018	November 1, 2018 through November 30, 2018	\$	148.50	\$	148.50
1/30/2019	December 1, 2018 through December 31, 2018	\$	951.30	\$	951.30
4/1/2019	January 1, 2019 through February 28, 2019	\$	2,169.30	\$	2,169.30
4/1/2019	February 1, 2019 through February 28, 2019	\$	247.50	\$	247.50
4/24/2019	March 1, 2019 through March 31, 2019	\$	651.00	\$	651.00
4/24/2019	March 1, 2019 through March 31, 2019	\$	3,415.50	\$	3,415.50
5/31/2019	April 1, 2019 through April 30, 2019	\$	877.20	\$	877.20
10/18/2019	May 1, 2019 through September 30, 2019	\$	3,876.00	\$	3,876.00
12/10/2019	October 1, 2019 through October 31, 2019	\$	537.90	\$	537.90
12/11/2019	November 1, 2019 through November 30, 2019	\$	1,102.50	\$	1,102.50
1/1/2020	December 1, 2019 through December 31, 2019	\$	798.00	\$	798.00
5/4/2021	January 1, 2020 through April 7, 2021	\$	5,705.80	\$	5,705.80
7/30/2021	April 8, 2021 through June 30, 2021	\$	513.00	\$	513.00
12/28/2021	July 1, 2021 through October 31, 2021	\$	1,855.60	\$	1,855.60
8/4/2022	November 1, 2021 through December 31, 2021	\$	871.50	\$	871.50

Summary of Professional and Paraprofessional Time Total
per Individual for this Period Only
(EXHIBIT "2-A")

[If this is a final application, and does not cumulate fee details from prior interim applications, then a separate Exhibit 2-A showing cumulative time summary from all applications is attached as well]

Name	Partner, Associate or Paraprofessional	Year Licensed	Total Hours	Average Hourly Rate*	Fee
Daniel N. Rosen	Partner	1994	8.20	\$557.74	\$4,573.50
Barbara M. Livick	Paraprofessional	N/A	23.00	\$214.78	\$4,940.00

*Indicate any changes in hourly rate and the date of such change:

Effective September 2022, rates changed from/to:

	2021	2022
	Normal	Normal
Daniel N. Rosen	\$495.00	\$600.00
Barbara M. Livick	\$210.00	\$235.00

Summary of Professional and Paraprofessional Time by
Activity Code Category for this Time Period Only
(EXHIBIT "2-B")

CATEGORY: Petters Bankruptcy				
Title	Name	Rate	Hours	Fees
Partner	Daniel N. Rosen	\$495.00	3.30	\$ 1,633.50
		\$600.00	4.90	\$ 2,940.00
Paraprofessional	Barbara M. Livick	\$210.00	20.60	\$ 4,376.00
		\$235.00	2.40	\$ 564.00
CATEGORY SUBTOTAL:			31.20	\$ 9,513.50

Summary of Requested Reimbursement Of Expenses
for this Time Period Only

"EXHIBIT 3"

[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 Fees and Transcripts	\$0.00
5. Lien and Title Searches:	\$0.00
6. Photocopies:	
(a) In-house copies (at \$0.15/page)	\$0.00
(b) Outside copies (\$)	\$0.00
7. Postage	\$0.00
8. Overnight Delivery Charges	\$0.00
9. Outside Courier/Messenger Services	\$0.00
10. Long Distance Telephone Charges	\$0.00
11. Long Distance Fax Transmissions (@ \$1/page)	\$0.00
12. Computerized Research	\$207.40
13. Out-of-Southern-District-of-Florida Travel:	
(a) Transportation	\$0.00
(b) Lodging	\$0.00
(c) Meals	\$0.00
14. Other:	\$0.00
TOTAL:	\$207.40

KKSKLMN, P.A.
d/b/a Kluger Kaplan (Minnesota)
151 Crandon Boulevard
Suite 706
Key Biscayne, FL 44319

INVOICE

December 28, 2021

Barry Mukamal, Trustee
c/o Meland Budwick
200 South Biscayne Blvd.
Suite 3200
Miami, FL 33141

VIA EMAIL: *phornia@melandbudwick.com* and *gvallejo@melandbudwick.com*

Re: Petters Bankruptcy, services as Minnesota local counsel
Our Matter No. 20001.0001

Fees incurred this billing period (Aug. 1 through Oct. 31, 2001):	\$1,717.50
Costs incurred this billing period (Aug. 1 through Oct. 31, 2001):	\$ 138.10
Total due:	<u>\$1,855.60</u>

Please see attached itemization for details.

Please remit payment to:

KKSKLMN, P.A.
151 Crandon Blvd., Suite 706
Key Biscayne, FL 33149

Tax ID No.: 82-1708816

Electronic payment options available upon request.

Time Record – Matter No. 20001.0001 (Mukamal, Trustee)

<u>Date</u>	<u>Professional</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount Billed</u>	<u>Description</u>
07/19/2021	BML	210.00	2.0	420.00	Research Pacer for recent developments and advise attorney Rosen.
07/27/2021	BML	210.00	1.0	210.00	Research Pacer for recent developments and advise attorney Rosen.
08/09/2021	BML	210.00	2.00	420.00	Review Pacer for recent developments in Petters-related bankruptcies and litigation; download relevant documents; note deadlines; report to attorney Rosen regarding same.
09/01/2021	BML	210.00	0.90	189.00	Research Pacer for recent developments in Petters cases; download documents and report to attorney Rosen.
10/01/2021	BML	210.00	1.10	231.00	Locate 8th Circuit Court of Appeals matter, download documents and provide to attorney Rosen.
10/31/2021	DNR	495.00	0.5	247.50	Review of BML-provided updates in this billing period.
Billable Total:	Barbara M Livick		7.00	\$1,470.00	
	Daniel N. Rosen		0.5	247.50	
	Total Fees		7.50	\$1,717.50	

Advances:

07/08/2021	DNR	37.90	Pacer Service Center
10/10/2021	DNR	100.20	Pacer Service Center

Total Billable Advances: \$138.10

ROSEN LLC
60 South 6th Street, Suite 2800
Minneapolis, MN 55402

INVOICE

August 4, 2022

Barry Mukamal, Trustee
c/o Meland Budwick
200 South Biscayne Blvd.
Suite 3200
Miami, FL 33141

VIA EMAIL: *phornia@melandbudwick.com* and *gvallejo@melandbudwick.com*

Re: Petters Bankruptcy, services as Minnesota local counsel
Our Matter No. 20001.0001

Fees incurred this billing period (Nov. 1 through Dec. 31, 2021):	\$ 871.50
Costs incurred this billing period (Nov. 1 through Dec. 31, 2021):	\$.00
Total due:	<u>\$ 871.50</u>

Please see attached itemization for details.

Please remit payment to:

Rosen LLC
60 South 6th Street
Suite 2800
Minneapolis, MN 55402

Tax ID No.: 20-3550547

Electronic payment options available upon request.

Time Record – Matter No. 20001.0001 (Mukamal, Trustee)

<u>Date</u>	<u>Professional</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount Billed</u>	<u>Description</u>
11/03/2021	DNR	495.00	0.2	99.00	Attention to Livick status report memo.
11/28/2021	BML	210.00	1.0	210.00	Check Pacer for recent activity in related court cases; download documents and email memo to Dan Rosen.
12/08/2021	DNR	495.00	0.3	148.50	Attention to Livick memo; attention to correspondence with B. Livick and to court docket.
12/08/2021	BML	210.00	0.5	105.00	Emails with Dan Rosen regarding recent Mukamal-Petters activity and handling.
12/28/2021	BML	210.00	1.0	210.00	Research Pacer for recent developments in Petters cases; download documents and report to attorney Rosen.
12/29/2021	DNR	495.00	0.2	99.00	Attn to Livick status report memo and docket.

Billable Total:	Barbara M Livick	2.50	\$ 525.00
	Daniel N. Rosen	<u>0.7</u>	<u>346.50</u>
	Total Fees	<u>7.50</u>	<u>\$ 871.50</u>

Advances:

None this period.

Total Billable Advances: \$ 0.00

ROSEN LLC
60 South 6th Street, Suite 2800
Minneapolis, MN 55402

INVOICE

August 4, 2022

Barry Mukamal, Trustee
c/o Meland Budwick
200 South Biscayne Blvd.
Suite 3200
Miami, FL 33141

VIA EMAIL: *phornia@melandbudwick.com* and *gvallejo@melandbudwick.com*

Re: Petters Bankruptcy, services as Minnesota local counsel
Our Matter No. 20001.0001

Fees incurred this billing period (Jan. 1 through June 30, 2022):	\$1,861.50
Costs incurred this billing period (Jan. 1 through June 30, 2022):	\$.00
Total due:	<u>\$1,861.50</u>

Please see attached itemization for details.

Please remit payment to:

Rosen LLC
60 South 6th Street
Suite 2800
Minneapolis, MN 55402

Tax ID No.: 20-3550547

Electronic payment options available upon request.

Time Record – Matter No. 20001.0001 (Mukamal, Trustee)

<u>Date</u>	<u>Professional</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount Billed</u>	<u>Description</u>
1/31/2022	BML	210.00	0.8	168.00	Emails with attorney Rosen regarding changing court contact information in all venues; consider cases, issues and handling.
1/31/2022	DNR	495.00	0.2	99.00	Case management
2/4/2022	BML	210.00	1.0	210.00	Research Pacer for recent activity in Mukamal Petters matters and report to attorney Rosen re same.
2/4/2022	DNR	495.00	0.3	148.50	Attention to Livick memo and to court docket and other filings attached to memo.
2/22/2022	BML	210.00	1.0	210.00	Search Pacer for recent developments in Mukamal-Petters related cases and report to attorney Rosen.
2/24/2022	DNR	495.00	0.2	99.00	Attention to Livick report and to court docket.
3/4/2022	BML	210.00	0.5	105.00	Emails with attorney Rosen regarding ongoing issues relating to service contacts in the various electronic filing systems; contact courts to resolve issues.
3/4/2022	DNR	495.00	0.2	99.00	Work with B. Livick on resolving court-notice issues in various Mukamal-related cases.
3/28/2022	BML	210.00	1.6	336.00	Search Pacer for recent developments in Mukamal-Petters related cases and Mamalakis matter; report to attorney Rosen with status updates and deadlines.
3/30/2022	DNR	495.00	0.2	99.00	Attention to Livick report and to court docket.
4/15/2022	BML	210.00	0.9	189.00	Research Pacer for recent court activities involving Petters; email attorney Rosen with updates.
4/20/2022	DNR	495.00	0.2	99.00	Attention to Livick report and to court docket.
Billable Total:	Barbara M Livick		5.80	\$1,218.00	
	Daniel N. Rosen		<u>1.30</u>	<u>\$ 643.50</u>	
	Total		<u>7.10</u>	<u>\$1,861.50</u>	

Total Fees 7.50 \$ 871.50

Advances:

None this period.

Total Billable Advances: \$ 0.00

ROSEN LLC
60 South 6th Street, Suite 2800
Minneapolis, MN 55402

INVOICE

October 13, 2022

Barry Mukamal, Trustee
c/o Meland Budwick
200 South Biscayne Blvd.
Suite 3200
Miami, FL 33141

VIA EMAIL: *phornia@melandbudwick.com* and *gvallejo@melandbudwick.com*

Re: Petters Bankruptcy, services as Minnesota local counsel, 3rd Quarter 2022
Our Matter No. 20001.0001

Fees incurred: \$1,559.00

Costs incurred: \$ 69.30

Total due: \$1,628.30

Please see attached itemization for details.

Please remit payment to:

Rosen LLC
60 South 6th Street
Suite 2800
Minneapolis, MN 55402

Tax ID No.: 20-3550547

Electronic payment options available upon request.

Time Record – Matter No. 20001.0001 (Mukamal, Trustee)

<u>Date</u>	<u>Professional</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount Billed</u>	<u>Description</u>
4/15/2022	BML	210.00	0.9	189.00	Research Pacer for recent court activities involving Petters; email attorney Rosen with updates
8/3/22	BML	210.00	1.5	365.00	Research PACER for recent developments in monitored cases; email to Attorney Rosen regarding same.
8/3/2022	DNR	495.00	0.2	99.00	Attention to report from Livick.
8/9/2022	BML	210.00	1.3	273.00	Address notice issues on court's ECF system; report to attorney Rosen
8/9/22	DNR	495.00	0.2	99.00	Attention to report from Livick.
9/2/2022	BML	210.00	0.8	168.00	Research PACER for recent developments in monitored cases; email to Attorney Rosen regarding same.
9/2/2022	DNR	495.00	0.2	99.00	Attention to report from Livick; attention to post-confirmation report.
9/16/2022	BML	210.00	0.8	168.00	Research PACER for recent developments in monitored cases; email to Attorney Rosen regarding same.
9/18/22	DNR	495.00	0.2	99.00	Attention to report from Livick.
Billable Total: Barbara M Livick			5.30	\$1,163.00	
Daniel N. Rosen			0.80	\$ 396.00	
Total Fees			6.10	\$1,559.00	

Advances:

PACER quarterly charges	5/10/2022	\$ 69.30
Total Billable Advances:		\$ 69.30

ROSEN LLC
60 South 6th Street, Suite 2800
Minneapolis, MN 55402

INVOICE

December 16, 2022

Barry Mukamal, Trustee
c/o Meland Budwick
200 South Biscayne Blvd.
Suite 3200
Miami, FL 33141

VIA EMAIL: *phornia@melandbudwick.com* and *gvallejo@melandbudwick.com*

Re: Petters Bankruptcy, services as Minnesota local counsel, October-November 2022
Our Matter No. 20001.0001

Fees incurred: \$3,504.00

Costs incurred: \$ 0.00

Total due: \$3,504.00

Please see attached itemization for details.

Please remit payment to:

Rosen LLC
151 Crandon Blvd. #706
Key Biscayne, FL 33149

Tax ID No.: 20-3550547

Electronic payment options available upon request.

Time Record – Matter No. 20001.0001 (Mukamal, Trustee)

<u>Date</u>	<u>Professional</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount Billed</u>	<u>Description</u>
9/21/2022	BML	235.00	1.2	282.00	Research Pacer for recent court activities involving Petters; email attorney Rosen with updates
10/24/2022	DNR	600.00	0.3	180.00	Telephone conference with Mike Budwick regarding BMO-Kelley trial.
10/26/2022	DNR	600.00	0.8	480.00	Preparation for attendance at BMO-Kelley trial
10/27/2022	BML	235.00	1.2	282.00	Email correspondence with DNR; research PACER for documents requested; assist DNR in preparation for attendance at Kelley-BMO trial.
10/28/2022	DNR	600.00	3.8	2,280.00	Attend Kelley-BMO trial; report to Budwick and Genet.
Billable Total:	Barbara M Livick		2.4	\$ 564.00	
	Daniel N. Rosen		<u>4.9</u>	<u>\$2,940.00</u>	
	Total Fees		<u>10.8</u>	<u>\$3,504.00</u>	

Advances:

	\$ 0.00
Total Billable Advances:	<u>\$ 0.00</u>