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

In re:

PALM BEACH FINANCE PARTNERS, L.P.,
a Delaware limited partnership, *et al.*,[1]

Debtors.
_______________________________________/

Chapter 11

Case No. 09-36379-BKC-PGH

Jointly Administered

SUMMARY OF
FIFTH POST-CONFIRMATION APPLICATION FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED BY JONATHAN GUY MANNING AND CAMPBELLS LAW FIRM AS SPECIAL COUNSEL FOR GEOFFREY VARGA, THE LIQUIDATING TRUST MONITOR FOR PALM BEACH FINANCE II, L.P. FOR THE PERIOD OF JULY 1, 2016 THROUGH JULY 31, 2016

1. Name of Applicant: Campbells Law Firm (THE "APPLICANT")

2. Role of Applicant: Special Counsel for Geoffrey Varga, the Liquidating Trust Monitor for Palm Beach Finance II, L.P.

3. Name of Certifying Professional: Jonathan Guy Manning, Esq.

4. Date Case Filed: November 30, 2009

5. Date of application for employment: April 29, 2015

6. Date of Order Approving Professional Employment: May 28, 2015, *nunc pro tunc* to January 16, 2015

7. Date of Disclosure of Compensation (FRBP 2016): N/A

8. Date of this Application: December 27, 2016

9. Dates of Services Reimbursement Sought: July 1, 2016 through July 31, 2016

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[1] The address and last four digits of the taxpayer identification number for each of the Debtors follows in parenthesis: (i) Palm Beach Finance Partners, L.P., 3601 PGA Blvd., Suite 301, Palm Beach Gardens, FL 33410 (TIN 9943); and (ii) Palm Beach Finance II, L.P., 3601 PGA Blvd., Suite 301, Palm Beach Gardens, FL 33410 (TIN 0680).

10. Total fee requested for this period: **<u>$764.50</u>**

11. Balance remaining in fee retainer account, not yet awarded: $ 0.00

12. Fees paid or advanced for this period, by other sources: N/A

13. **<u>TOTAL "NET"AMOUNT OF REQUESTED PROFESSIONAL FEE</u>: <u>$764.50</u>**

14. Total expense reimbursement requested for this period: **<u>$ .45</u>**

15. Balance remaining in expense retainer account, not yet received: N/A

16. Expenses paid or advanced for this period, by other sources: N/A

17. **<u>TOTAL NET AMOUNT OF EXPENSE REIMBURSEMENTS REQUESTED FOR THIS PERIOD</u>: <u>$ .45</u>**

18. <u>Total gross requested award (fees & costs) for this period (#10 + #14)</u> $764.95

19. **<u>TOTAL NET REQUESTED AWARD (Fees & Costs) (#13 + #17)</u>: <u>$764.95</u>**

20. If Final Fee Application, amounts of net awards requested in interim Applications but not previously awarded (total from History of Fees and Expenses, following pages):

21. Final fee and expense award requested (#19 + #20)

History of Fees and Expenses

1. Dates, sources, and amounts of retainers received: N/A

2. Dates, sources and amounts of third party payments received: N/A

Dates	Sources	Amounts	For fees or costs?
9/10/15	Barry E. Mukamal, as Liq. Trustee	$12,476.25[2]	Fees
9/10/15	Barry E. Mukamal, as Liq. Trustee	$1,411.21[3]	Fees and Costs

[2] 18% of this figure ($2,245.72) was due by Palm Beach Finance Partners, L.P. and 82% of this figure ($10,230.53) was due by Palm Beach Finance II, L.P. for the January 2015 fees incurred by the Applicant.

[3] 18% of this figure ($254.02) was due by Palm Beach Finance Partners, L.P. and 82% of this figure ($1,157.19) was

9/10/15	Barry E. Mukamal, as Liq. Trustee	$10,802.00[4]	Fees and Costs
10/8/15	Barry E. Mukamal, as Liq. Trustee	$ 250.87[5]	Fees
10/8/15	Barry E. Mukamal, as Liq. Trustee	$1,142.88[6]	Fees
10/27/15	Barry E. Mukamal, as Liq. Trustee	$ 357.41[7]	Fees and Costs
10/27/15	Barry E. Mukamal, as Liq. Trustee	$1,628.19[8]	Fees and Costs
12/1/15	Barry E. Mukamal, as Liq. Trustee	$ 969.75[9]	Fees
12/1/15	Barry E. Mukamal, as Liq. Trustee	$4,417.75[10]	Fees
1/26/16	Barry E. Mukamal, as Liq. Trustee	$1,024.14[11]	Fees and Costs
1/26/16	Barry E. Mukamal, as Liq. Trustee	$4,665.51[12]	Fees and Costs

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due by Palm Beach Finance II, L.P. for the April 2015 fees and costs incurred by the Applicant.

[4] 18% of this figure ($1,944.36) was due by Palm Beach Finance Partners, L.P. and 82% of this figure ($8,857.64) was due by Palm Beach Finance II, L.P. for the May 2015 fees and costs incurred by the Applicant.

[5] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the July 2015 fees incurred by the Applicant.

[6] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the July 2015 fees incurred by the Applicant.

[7] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the August 2015 fees and costs incurred by the Applicant.

[8] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the August 2015 fees and costs incurred by the Applicant.

[9] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the September 2015 fees incurred by the Applicant.

[10] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the September 2015 fees incurred by the Applicant.

[11] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the October 2015 fees and costs incurred by the Applicant.

[12] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the October 2015 fees and costs incurred by the Applicant.

1/26/16	Barry E. Mukamal, as Liq. Trustee	$ 781.83[13]	Fees
1/26/16	Barry E. Mukamal, as Liq. Trustee	$3,561.67[14]	Fees
2/12/16	Barry E. Mukamal, as Liq. Trustee	$1,148.55[15]	Fees and Costs
2/12/16	Barry E. Mukamal, as Liq. Trustee	$5,232.26[16]	Fees and Costs
4/19/16	Barry E. Mukamal, as Liq. Trustee	$912.63[17]	Fees and Costs
4/19/16	Barry E. Mukamal, as Liq. Trustee	$4,157.52[18]	Fees and Costs
4/29/16	Barry E. Mukamal, as Liq. Trustee	$2,330.05[19]	Fees
4/29/16	Barry E. Mukamal, as Liq. Trustee	$10,614.70[20]	Fees
5/10/16	Barry E. Mukamal, as Liq. Trustee	$2,401.38[21]	Fees and Costs
5/10/16	Barry E. Mukamal, as Liq. Trustee	$10,939.60[22]	Fees and Costs

[13] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the November 2015 fees incurred by the Applicant.

[14] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the November 2015 fees incurred by the Applicant.

[15] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the December 2015 fees and costs incurred by the Applicant.

[16] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the December 2015 fees and costs incurred by the Applicant.

[17] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the January 2016 fees and costs incurred by the Applicant.

[18] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the January 2016 fees and costs incurred by the Applicant.

[19] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the February 2016 fees incurred by the Applicant.

[20] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the February 2016 fees incurred by the Applicant.

[21] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the March 2016 fees and costs incurred by the Applicant.

[22] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the March 2016 fees and costs incurred by the Applicant.

6/16/16	Barry E. Mukamal, as Liq. Trustee	$2,588.37[23]	Fees and Costs
6/16/16	Barry E. Mukamal, as Liq. Trustee	$11,791.46[24]	Fees and Costs
7/14/16	Barry E. Mukamal, as Liq. Trustee	$4,814.94[25]	Fees and Costs
7/14/16	Barry E. Mukamal, as Liq. Trustee	$21,934.71[26]	Fees and Costs
8/9/16	Barry E. Mukamal, as Liq. Trustee	$4,165.23[27]	Fees and Costs
8/9/16	Barry E. Mukamal, as Liq. Trustee	$18,974.95[28]	Fees and Costs
9/20/16	Barry E. Mukamal, as Liq. Trustee	$137.69[29]	Fees and Costs
9/20/16	Barry E. Mukamal, as Liq. Trustee	$627.26[30]	Fees and Costs

3. Prior fee and expense awards:

   Order Approving First Post-Confirmation Application And Awarding Compensation And Reimbursement Of Expenses Incurred By Jonathan Guy Manning and Campbells Law Firm as Special Counsel For Geoffrey Varga, The Liquidating Trust Monitor For Palm Beach Finance II, L.P. For The Period Of January 16, 2015 Through June 30, 2015 [ECF No. 2728] dated October 16, 2015.

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[23] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the April 2016 fees and costs incurred by the Applicant.

[24] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the April 2016 fees and costs incurred by the Applicant.

[25] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the May 2016 fees and costs incurred by the Applicant.

[26] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the May 2016 fees and costs incurred by the Applicant.

[27] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the June 2016 fees and costs incurred by the Applicant.

[28] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the June 2016 fees and costs incurred by the Applicant.

[29] This figure comprises the 18% due by Palm Beach Finance Partners, L.P. for the July 2016 fees and costs incurred by the Applicant.

[30] This figure comprises the 82% due by Palm Beach Finance II, L.P. for the July 2016 fees and costs incurred by the Applicant.

Order Approving Second Post-Confirmation Application And Awarding Compensation And Reimbursement Of Expenses Incurred By Jonathan Guy Manning and Campbells Law Firm as Special Counsel For Geoffrey Varga, The Liquidating Trust Monitor For Palm Beach Finance II, L.P. For The Period Of July 1, 2015 Through October 31, 2015 [ECF No. 2801] dated January 22, 2016.

Order Approving Third Post-Confirmation Application And Awarding Compensation And Reimbursement Of Expenses Incurred By Jonathan Guy Manning and Campbells Law Firm as Special Counsel For Geoffrey Varga, The Liquidating Trust Monitor For Palm Beach Finance II, L.P. For The Period Of November 1, 2015 Through February 29, 2016 [ECF No. 2942] dated June 10, 2016.

Order Approving Fourth Post-Confirmation Application And Awarding Compensation And Reimbursement Of Expenses Incurred By Jonathan Guy Manning and Campbells Law Firm as Special Counsel For Geoffrey Varga, The Liquidating Trust Monitor For Palm Beach Finance II, L.P. For The Period Of March 1, 2016 Through June 30, 2016 [ECF No. 3041] dated September 23, 2016.

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., a Delaware limited partnership, *et al.*,[1]

Case No. 09-36379-BKC-PGH

Jointly Administered

Debtors.
_____________________________________/

FIFTH POST-CONFIRMATION APPLICATION FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED BY JONATHAN GUY MANNING AND CAMPBELLS LAW FIRM AS SPECIAL COUNSEL FOR GEOFFREY VARGA, THE LIQUIDATING TRUST MONITOR FOR PALM BEACH FINANCE II, L.P. FOR THE PERIOD OF JULY 1, 2016 THROUGH JULY 31, 2016

Jonathan Guy Manning and Campbells Law Firm (the "Firm," or "Applicant"), as special counsel for Geoffrey Varga, in his capacity as the Liquidating Trust Monitor for Palm Beach Finance II, L.P. (the "Monitor"), respectfully requests the entry of an order, pursuant to 11 U.S.C. §330, 331, 503(b)(2), the Confirmation Order and the Liquidating Trust Agreements for the Palm Beach Finance Partners and Palm Beach Finance II Liquidating Trusts, allowing and awarding to the Firm, as an administrative expense, the total amount of $764.95, consisting of fees in the amount of $764.50 and reimbursement for actual and necessary expenses incurred in the amount of $.45 during the period of July 1, 2016 through July 31, 2016. In this fifth post-confirmation application ("Application"), a total of 1.10 hours were expended by the Firm in its representation of the Monitor,

[1] The address and last four digits of the taxpayer identification number for each of the Debtors follows in parenthesis: (i) Palm Beach Finance Partners, L.P., 3601 PGA Blvd., Suite 301, Palm Beach Gardens, FL 33410 (TIN 9943); and (ii) Palm Beach Finance II, L.P., 3601 PGA Blvd., Suite 301, Palm Beach Gardens, FL 33410 (TIN 0680).

for an average hourly rate of $695.00 during the time period for which fees and expenses are requested in this Application. Pursuant to Section 7.1.11 of 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 for Palm Beach Offshore, Ltd. and Palm Beach Offshore II, Ltd. (the "Plan")[2], and the PBF II Liquidating Trust Agreement authorized thereunder, professionals retained by the Liquidating Trustee and Monitor are authorized to receive monthly interim compensation for fees and expenses incurred in carrying out their duties consistent with the Plan and Liquidating Trust Agreements from Trust Assets of the Liquidating Trusts, as long as: (i) notice of the fees and expenses are provided on a monthly basis to the Liquidating Trustee and U.S. Trustee; (ii) no written objections to the fees and expenses sought are received within 10 business days (if objections to the fees and expenses are timely made and cannot be resolved amicably, the Court is to hear and resolve the objections); and (iii) professionals submit applications to the Court for final approval of reimbursement of fees and expenses previously paid to them, no less than once every four (4) months. The Firm has received payment from the Liquidating Trustee for the services rendered and costs incurred by the Firm on behalf of the Monitor during July 2016 and makes this Application to obtain final allowance of the fees and expenses incurred by the Firm during the month of July 2016.

[2] Capitalized terms not defined herein shall have the meaning given such terms in the Plan.

I. JURISDICTION

This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334, and the Court's retained jurisdiction pursuant to the Confirmation Order. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is core pursuant to 28 U.S.C. §157(b)(2). The statutory predicate for the relief sought herein is sections 330, 331 and 503(b)(2) of the Bankruptcy Code.

II. INTRODUCTION

A. Allocation of Request For Attorneys' Fees And Reimbursement of Expenses

In this Application, the Firm requests compensation and reimbursement of fees and expenses in the amount of $764.95 in connection with 1.1 hours worked and expenses incurred on behalf of the Monitor.

B. Retainer Paid To The Firm

None.

C. The Exhibits To This Fee Application

There are a total number of 4 exhibits attached to this Application. The exhibits are as follows:

EXHIBIT NO.	
Exhibit 1	Summary of Professional and Paraprofessional Time
Exhibit 2	Summary of Requested Reimbursement of Expenses and Disbursements
Exhibit 3	Declaration of Certification
Composite Exhibit 4	Contemporaneous Expense and Time Records

III. BACKGROUND

1. On November 30, 2009 (the "Petition Date"), Palm Beach Finance Partners, L.P. and Palm Beach Finance II, L.P. (the "Debtors") commenced these bankruptcy cases by each filing a voluntary petition for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Florida, West Palm Beach Division.

2. On January 28, 2010, in connection with motions filed by the U.S. Trustee for the Southern District of Florida (the "U.S. Trustee") and Geoffrey Varga, as Joint Official Liquidator of Palm Beach Offshore, Ltd. and Palm Beach Offshore II, Ltd. (the "JOL"), the Court entered an order granting the motion to appoint a Chapter 11 trustee and directed the U.S. Trustee to appoint a Chapter 11 trustee. On or about January 29, 2010, the U.S. Trustee selected Barry Mukamal as the Chapter 11 trustee of the Debtors (the "Chapter 11 Trustee"). This selection was approved on February 2, 2010 by Order of the Court.

3. On August 27, 2010, the Chapter 11 Trustee and the JOL, as co-plan proponents, filed their Amended Disclosure Statement and First Amended Plan, and, on September 3, 2010, the Plan Proponents filed their Second Amended Disclosure Statement and the Second Amended Plan (the "Plan").

4. On October 21, 2010, following a hearing on October 19, 2010, the Court entered an order confirming the Plan.

5. Pursuant to the Plan, on the Effective Date of the Plan, the Chapter 11 Trustee, on behalf of the Debtors and the Beneficiaries, executed the Liquidating Trust Agreements thereby establishing the Liquidating Trusts for the estates of each of the Debtors.

6. Pursuant to the Plan, Barry Mukamal was appointed the Liquidating Trustee with the power and authority set forth in the Liquidating Trust Agreements, subject only (in the case of the PBF II Liquidating Trust Agreement) to the power and authority granted to the Monitor in the Plan and the PBF II Liquidating Trust Agreement. Pursuant to the Plan, Geoffrey Varga, as JOL was appointed the Monitor with the power and authority set forth in the PBF II Liquidating Trust Agreement.

7. The PBF II Liquidating Trust Agreement authorizes the Monitor to employ and pay reasonable compensation to attorneys, accountants, appraisers, expert witnesses, insurance adjusters or other persons whose services, in the sole judgment of the Monitor, may be reasonably necessary or advisable to advise or assist him in the discharge of his duties, or otherwise in the exercise of any powers vested in the Monitor.

8. On April 29, 2015, the Monitor filed the Application to Employ Jonathan Guy Manning from Campbells Law Firm Nunc Pro Tunc to January 16, 2015 as special counsel for the Monitor (the "Retention Application") [ECF. No. 2603]. On May 28, 2015, the Court entered an order approving the employment of Jonathan Guy Manning and the Firm, *nunc pro tunc* to January 16, 2015, pursuant to the terms of the Retention Application [ECF No. 2624].

9. Pursuant to Section 7.1.11 of the Plan, professionals retained by the Liquidating Trustee and Monitor are authorized to receive monthly interim compensation for fees and expenses incurred in carrying out their duties consistent with the Plan and Liquidating Trust Agreements from Trust Assets of the Liquidating Trusts, as long as: (i) notice of the fees and expenses are provided on a monthly basis to the Liquidating Trustee and U.S. Trustee; (ii) no

written objections to the fees and expenses sought are received within 10 business days (if objections to the fees and expenses are timely made and cannot be resolved amicably, the Court is to hear and resolve the objections); and (iii) professionals submit applications to the Court for final approval of reimbursement of fees and expenses previously paid to them, no less than once every four (4) months.

10. Pursuant to Section 7.1.11 of the Plan, on August 15, 2016, the Firm submitted to the Liquidating Trustee and the U.S. Trustee its invoice for services rendered to, and costs incurred by, the Monitor for the period July 1, 2016 through July 31, 2016 in the amount of $764.95 ($764.50 for fees and $.45 for costs). No objection to the requested fees or costs was made. Accordingly, $764.95 was paid to the Firm for services rendered to, and costs incurred by, the Monitor from July 1, 2016 through July 31, 2016.

11. By this Application, the Firm seeks final allowance of the foregoing fees and costs, spanning July 1, 2016 through July 31, 2016, which total $764.95.

IV. SERVICES RENDERED BY THE FIRM TO THE ESTATE

The Firm was retained by the Monitor to advise him on Cayman law in connection with the pending adversary case filed by the Liquidating Trustee against General Electric Capital Corporation ("GECC"), Adv. No. 12-01979-PGH (the "Adversary Case"). Specifically, on January 12, 2015, GECC served a subpoena *duces tecum* upon the JOL seeking information and documents that largely implicate Cayman law. On April 22, 2015, GECC cancelled that subpoena and re-issued a new subpoena *duces tecum* upon the Monitor seeking the same information and documents, which continued to implicate Cayman law.

During the time period covered in this Application, the Firm coordinated with Duff & Phelps (Cayman) Ltd. f/k/a Kinetic Partners (Cayman) Ltd. ("Duff & Phelps") and Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLSG"), the Monitor's Consultant and Local Counsel, respectively, in order to respond to discovery requests made by GECC and GECC's Cayman counsel. In this regard, the Firm participated in discussions with the Duff & Phelps, LKLSG and GECC's Cayman counsel regarding discovery issues.

V. ALLOWANCE AND EVALUATION OF SERVICES RENDERED BY THE FIRM

Section 330(a) of the Bankruptcy Code provides, in relevant part:

> (a)(1) After notice to the parties in interest and the United States trustee and a hearing, and subject to sections 326, 328, and 329, the court may award to a trustee, an examiner, a professional person employed under Section 327 or 1103–
>
> (A) reasonable compensation for actual, necessary services rendered by the trustee, examiner, professional person, or attorney and by any paraprofessional person employed by any such person; and
>
> (B) reimbursement for actual, necessary expenses.
>
> (2) The court may, on its own motion or on the motion of the United States Trustee, the United States Trustee for the District or Region, the trustee for the estate, or any other party in interest, award compensation that is less than the amount of compensation that is requested.
>
> (3)(A) In determining the amount of reasonable compensation to be awarded, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including–
>
> (A) the time spent on such services;
>
> (B) the rates charged for such services;

(C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

(D) 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; and

(E) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

(4)(A) Except as provided in subparagraph (B), the court shall not allow compensation for –

(i) unnecessary duplication of services; or
(ii) services that were not –

(I) reasonably likely to benefit the Debtors' estate; or
(II) necessary to the administration of the case.

(B) In a chapter 12 or chapter 13 case in which the Debtors is an individual, the court may allow reasonable compensation to the Debtors' attorney for representing the interests of the Debtors in connection with the bankruptcy case based on a consideration of the benefit and necessity of such services to the Debtors and the other factors set forth in this section.

(5) The court shall reduce the amount of compensation awarded under this section by the amount of any final compensation awarded under §331, and, if the amount of such final compensation exceeds the amount of compensation awarded under this section, may order the return of the excess to the estate.

(6) Any compensation awarded for the preparation of a fee application shall be based on the level and skill reasonably required to prepare the application.

The Applicant believes that the requested fee of $764.50 for 1.10 hours worked is reasonable considering the factors to be applied under 11 U.S.C. §330(a)(1) and the factors enumerated in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974), made applicable to bankruptcy proceedings by *In re First Colonial Corp. of America,* 544 F.2d 1291 (5th Cir. 1977) as follows:

a. The time and labor required;

b. The novelty and difficulty of the questions presented;

c. The skill required to perform the legal services properly;

d. The preclusion of other employment by the attorney due to acceptance of the case;

e. The customary fee for similar work in the community;

f. Whether the fee is fixed or contingent;

g. Time limitations imposed by the client or by the circumstances;

h. The amount involved and the results obtained;

i. The experience, reputation and ability of the attorneys;

j. The undesirability of the case;

k. The nature and length of the professional relationship with the client;

l. Awards in similar cases;

m. Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title; and

n. 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.

A. <u>Consideration Of Section 330(a) and The First Colonial Factors</u>

The foregoing description of the services rendered by the Firm to the Monitor, together with the more detailed description of time expended and services rendered set forth in the attached exhibits, describe the nature and extent of the professional services rendered by the Firm to the Monitor for the benefit of the bankruptcy estate during the period of time from July 1, 2016 through July 31, 2016.

Jonathan Guy Manning is the Partner at the Firm with principal responsibility for the representation of the Monitor as special counsel in these cases and for supervision of legal services rendered to the Monitor. Mr. Manning concentrates his practice in the areas of investment fund litigation, insolvency and restructuring. Mr. Manning's hourly billing rate in this Application is $875.00. Mark Goodman is a Partner at the Firm who also has experience in the areas of litigation, insolvency and restructuring. Mr. Goodman's hourly billing rate in this Application is $695.00. Liam Faulkner, a senior associate at the Firm, handles litigation, insolvency and restructuring matters and his hourly billing rate in this Application is $695.00. Given the foregoing, the average billing rate for the Firm's legal services to the Monitor during the Application period is $695.00 per hour.

The Monitor's legal matters demanded considerable legal skills in the areas of litigation and business law. The Firm's attorneys enjoy a good reputation for their abilities in the areas of complex commercial litigation in the Cayman Islands, and the Firm's billing rates reflect customary billing rates in the Cayman Islands for legal services similar to the services rendered by the Firm to the Monitor in these cases.

With respect to additional factors enumerated in section 330(a) of the Bankruptcy Code, the legal services rendered by the Firm were necessary to achieve the Monitor's goals and legal obligations at the time the services were rendered. Moreover, the legal services performed by the Firm were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed.

With regard to the remaining *First Colonial* factors, the Firm's fees were fixed; the Firm was not precluded from other employment due to the acceptance of representation on behalf of the Monitor in these cases; the cases were not undesirable; and the Firm did not have a relationship with the Monitor prior to the commencement of these cases, except that the Firm serves as Cayman counsel for Geoffrey Varga in his capacity as the Joint Official Liquidator of Palm Beach Offshore, Ltd. and Palm Beach Offshore II, Ltd. in the those entities' liquidation proceedings in the Cayman Islands. Finally, the award requested by the Firm in this Application is similar to awards made by this bankruptcy court in similar cases.

VI. CONCLUSION

For the foregoing reasons, the Firm respectfully requests that the Court enter an Order allowing and awarding the Firm, as an administrative expense, $764.50 for legal services rendered by the Firm in connection with representation of the Monitor for the period of time from July 1, 2016 through July 31, 2016 and $.45 for reimbursement of actual and necessary expenses incurred by the Firm, for a total of $764.95.

Dated: December 19, 2016.

In re: Palm Beach Finance Partners, L.P., et al.,
Case No. 09-36379-PGH, Jointly Administered

Respectfully submitted,

CAMPBELLS LAW FIRM
Special Counsel for the Monitor,
Geoffrey Varga
Floor 4
Willow House
Cricket Square
P.O. Box 884
Grand Cayman, KY1-1103, Cayman Islands
Telephone: 345.949.2648
Facsimile: 345.949.8618
E-mail: gmanning@campbellslegal.com

By ______________________
JONATHAN GUY MANNING

EXHIBIT 1

Summary of Professional and Paraprofessional Time
July 1, 2016 through July 31, 2016

Name of Professional	Position	Year Licensed	Total Hours	Published Rates	Blended Hourly Rate	Total Fee
Mark Goodman	Partner	2008	0.60	$695.00	$ 695.00	$ 417.00
Liam Faulkner	Senior Associate	2012	0.50	$695.00	$ 695.00	$ 347.50
Subtotals:			**1.10**		**$ 695.00**	**$ 764.50**
TOTALS:			**1.10**		**$ 695.00**	**$ 764.50**

Total Hours by Professionals and Paraprofessionals: **1.10**

"Blended" Hourly Rate: **$695.00**

Total* Professional and Paraprofessional Fees: **$764.50**

1075624

EXHIBIT 2

Summary of Requested Reimbursement of Expenses and Disbursements
July 1, 2016 through July 31, 2016

In House Duplicating	$0.45
TOTAL "GROSS" AMOUNT OF REQUESTED DISBURSEMENTS	**$0.45**

1075661

EXHIBIT 3

Declaration of Certification

I have been designated by Campbells Law Firm (the "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" (the "Guidelines").

I have read the Applicant's application for compensation and reimbursement of expenses (the "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.

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.

In seeking reimbursement for the expenditures described on Exhibit 2, 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).

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.

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: Not applicable.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

J.G.M.
Jonathan Guy Manning

Dated: 12/19/16

Composite Exhibit 4

Contemporaneous Expense and Time Records

Campbells

INVOICE

Geoff Varga, as Trust Monitor
675 Third Avenue, 21st Floor
New York, NY 10017
USA

31 July 2016
Invoice # 136081

File #	15193-23157
Client	Geoff Varga, as Trust Monitor
Matter	Palm Beach GECC Litigation

For Professional Services Rendered	**764.50**
Disbursements	
Photocopies & Printing	0.45
Total Disbursements	**0.45**
Total Professional Services and Disbursements	**US$ 764.95**

Client Ref 15193 - 23157
Invoice # 136081

31 July 2016
Page 1

File # 15193-23157
Client Geoff Varga, as Trust Monitor
Matter Palm Beach GECC Litigation

Professional Services

Date		Professional Service	Hours	Amount
07/05/16	MGM	Exchange of emails with Robin Rubens and Liz Hall re cancellation of court call (0.2)	0.20	139.00
07/26/16	LMF	Email from A Brown (0.1); review letter from Harneys (0.1); email from M Goodman (0.1)	0.30	208.50
07/26/16	MGM	Considering letter /email from Harneys (0.1); exchange of emails with Kate Lattner re Note of Hearing (0.2); email to Liam Faulkner re response to Harneys (0.1)	0.40	278.00
07/29/16	LMF	Letter to Harneys (0.1); email to A Brown (0.1)	0.20	139.00

Timekeeper Summary

		Rate	Hours	Amount
LMF	Liam Faulkner	695.00	0.50	347.50
MGM	Mark Goodman	695.00	0.60	417.00
Total Professional Services			US$	764.50

Disbursements

Date	Disbursements		Amount
	Photocopies & Printing		0.45
Total Disbursements		US$	0.45

Total Professional Services and Disbursements	US$	764.95