

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

In re:

Chapter 11

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

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

Debtors.

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

1. Name of Applicant:	<i>Parker Rosen, LLC</i>
2. Role of Applicant:	<i>Liquidating Trustee's Local Counsel in Minnesota</i>
3. Name of Certifying Professional:	<i>Daniel N. Rosen</i>
4. Date case filed:	<i>November 30, 2009</i>
5. Date of application for employment:	<i>May 27, 2010 [ECF No. 161]</i>
6. Date of order approving employment:	<i>June 24, 2010 [ECF No. 182], nunc pro tunc to May 24, 2010</i>
7. If debtor's counsel, date of Disclosure of Compensation form:	<i>N/A</i>
8. Date of this application:	<i>August 30, 2013</i>
9. Dates of services covered:	<i>March 1, 2013 thru June 30, 2013</i>

Fees...	
10. Total fee requested for this period (from Exhibit 1):	\$ 37,247.00
11. Balance remaining in fee retainer account, not yet awarded:	\$ 0.00
12. Fees paid or advanced for this period, by other sources:	\$ 0.00
13. Net amount of fee requested for this period:	\$ 37,247.00

Expenses...		
14.	Total expense reimbursement requested for this period:	\$ 657.20
15.	Balance remaining in expense retainer account, not yet received:	\$ 0.00
16.	Expenses paid or advanced for this period, by other sources:	\$ 0.00
17.	Net amount of expense reimbursements requested for this period	\$ 657.20
18.	Gross award requested for this period (#10 + #14)	\$ 37,904.20
19.	Net award requested for this period (#13 + #17)	\$ 37,904.20
20.	If <u>Final Fee Application</u>, amounts of net awards requested in interim applications but <u>not previously awarded</u> (total from History of Fees and Expenses, following pages):	\$ 0.00
21.	Final fee and expense award requested (#19 + #20)	\$ 0.00

History of Fees and Expenses

1. Dates, sources, and amounts of retainers received: N/A			
Dates	Sources	Amounts	For fees or costs?
2. Dates, sources, and amounts of third party payments received: N/A			
Dates	Sources	Amounts	For fees or costs?
3. Prior fee and expense awards...			
First interim post confirmation application [ECF No. 608]			
Dates covered by first application:		October 15, 2010 through January 31, 2011	
Amount of fees requested:		\$ 12,239.00	
Amount of expenses requested:		\$ 308.52	
Amount of fees awarded:		\$ 12,239.00	
Amount of expenses awarded:		\$ 308.52	
Amount of fee retainer authorized to be used:		N/A	

Amount of expense retainer authorized to be used:	N/A
Fee award, net of retainer:	N/A
Expense award, net of retainer:	N/A
Date of first award:	April 13, 2011 [ECF No. 629]
Amount of fees actually paid:	\$ 12,239.00
Amount of expense reimbursement actually paid:	\$ 308.52
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Second interim post confirmation application [ECF No. 668]	
Dates covered by second application:	February 1, 2011 through June 30, 2011
Amount of fees requested:	\$ 4,285.50
Amount of expenses requested:	\$ 5.22
Amount of fees awarded:	\$ 4,285.50
Amount of expenses awarded:	\$ 5.22
Amount of fee retainer authorized to be used:	N/A
Amount of expense retainer authorized to be used:	N/A
Fee award, net of retainer:	N/A
Expense award, net of retainer:	N/A
Date of second award:	September 1, 2011 [ECF No. 734]
Amount of fees actually paid:	\$ 4,285.50
Amount of expense reimbursement actually paid:	\$ 5.22

Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Third interim post confirmation application [ECF No. 1027]	
Dates covered by third application:	July 1, 2011 thru October 31, 2011
Amount of fees requested:	\$ 10,001.00
Amount of expenses requested:	\$ 148.16
Amount of fees awarded:	\$ 10,001.00
Amount of expenses awarded:	\$ 148.16
Amount of fee retainer authorized to be used:	N/A
Amount of expense retainer authorized to be used:	N/A
Fee award, net of retainer:	N/A
Expense award, net of retainer:	N/A
Date of third award:	February 17, 2012 [ECF No. 1099]
Amount of fees actually paid:	\$ 10,001.00
Amount of expense reimbursement actually paid:	\$ 148.16
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Fourth interim post confirmation application [ECF No. 1214]	
Dates covered by fourth application:	November 1, 2011 through February 29, 2012
Amount of fees requested:	\$ 26,434.50

Amount of expenses requested:	\$ 507.23
Amount of fees awarded:	\$ 26,434.50
Amount of expenses awarded:	\$ 507.23
Amount of fee retainer authorized to be used:	N/A
Amount of expense retainer authorized to be used:	N/A
Fee award, net of retainer:	N/A
Expense award, net of retainer:	N/A
Date of fourth award:	June 4, 2012 [ECF No. 1269]
Amount of fees actually paid:	\$ 26,434.50
Amount of expense reimbursement actually paid:	\$ 507.23
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Fifth interim post confirmation application [ECF No. 1376]	
Dates covered by fourth application:	March 1, 2011 through June 30, 2012
Amount of fees requested:	\$ 63,959.50
Amount of expenses requested:	\$ 2,270.33
Amount of fees awarded:	\$ 63,959.50
Amount of expenses awarded:	\$ 2,270.33
Amount of fee retainer authorized to be used:	N/A
Amount of expense retainer authorized to be used:	N/A
Fee award, net of retainer:	N/A
Expense award, net of retainer:	N/A

Date of fifth award:	September 28, 2012 [ECF No. 1440]
Amount of fees actually paid:	\$ 63,959.50
Amount of expense reimbursement actually paid:	\$ 2,270.33
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Sixth interim post confirmation application [ECF No. 1575]	
Dates covered by fourth application:	July 1, 2012 through October 31, 2012
Amount of fees requested:	\$ 69,088.50
Amount of expenses requested:	\$ 401.04
Amount of fees awarded:	\$ 69,088.50
Amount of expenses awarded:	\$ 401.04
Amount of fee retainer authorized to be used:	N/A
Amount of expense retainer authorized to be used:	N/A
Fee award, net of retainer:	N/A
Expense award, net of retainer:	N/A
Date of sixth award:	January 31, 2013 [ECF No. 1699]
Amount of fees actually paid:	\$ 69,088.50
Amount of expense reimbursement actually paid:	\$ 401.04
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00

Seventh interim post confirmation application [ECF No. 1812]	
Dates covered by fourth application:	November 1, 2012 through February 28, 2013
Amount of fees requested:	\$ 31,293.00
Amount of expenses requested:	\$ 67.58
Amount of fees awarded:	\$ 31,293.00
Amount of expenses awarded:	\$ 67.58
Amount of fee retainer authorized to be used:	N/A
Amount of expense retainer authorized to be used:	N/A
Fee award, net of retainer:	N/A
Expense award, net of retainer:	N/A
Date of seventh award:	June 5, 2013 [ECF No. 1868]
Amount of fees actually paid:	\$ 31,293.00
Amount of expense reimbursement actually paid:	\$ 67.58
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:	\$ 0.00

Summary of All <i>POST-CONFIRMATION</i> Prior Applications and Awards	
Total fees requested:	\$ 217,301.00
Total fees awarded:	\$ 217,301.00
Prior fees awarded but not yet paid, if any (do not include holdbacks in this number)	\$ 0.00

Total prior fees requested but not awarded, deferred to final fee application	\$ 0.00
Total expenses requested:	\$ 3,708.08
Total expenses awarded:	\$ 3,708.08
Prior expenses awarded but not yet paid, if any (do not include holdbacks in this number)	\$ 0.00
Total prior expenses requested but not awarded, deferred to final fee application	\$ 0.00

Monthly *POST CONFIRMATION* invoicing (Invoice No. 10586) dated September 5, 2011¹

Dates covered by invoicing:	July 1, 2011 through July 31, 2011
Amount of fees and expenses requested:	\$ 259.00
Amount of fees and expenses paid absent objections:	\$ 259.00

Monthly *POST CONFIRMATION* invoicing (Invoice No. 10587) dated September 5, 2011

Dates covered by invoicing:	August 1, 2011 through August 31, 2011
Amount of fees and expenses requested:	\$ 1,221.00
Amount of fees and expenses paid absent objections:	\$ 1,221.00

Monthly *POST CONFIRMATION* invoicing dated October 26, 2011

Dates covered by invoicing:	September 1, 2011 thru September 30, 2011
Amount of fees and expenses requested:	\$ 2,977.62
Amount of fees and expenses paid absent objections:	\$ 2,977.62

Monthly *POST CONFIRMATION* invoicing dated November 15, 2011

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

Dates covered by invoicing:	October 1, 2011 through October 31, 2011
Amount of fees and expenses requested:	\$ 5,691.54
Amount of fees and expenses paid absent objections:	\$ 5,691.54
Monthly <i>POST CONFIRMATION</i> invoicing dated December 28, 2011	
Dates covered by invoicing:	November 1, 2011 through November 30, 2011
Amount of fees and expenses requested:	\$ 5,002.91
Amount of fees and expenses paid absent objections:	\$ 5,002.91
Monthly <i>POST CONFIRMATION</i> invoicing dated February 1, 2012	
Dates covered by invoicing:	December 1, 2011 through December 31, 2011
Amount of fees and expenses requested:	\$ 3,307.37
Amount of fees and expenses paid absent objections:	\$ 3,307.37
Monthly <i>POST CONFIRMATION</i> invoicing dated March 18, 2012	
Dates covered by invoicing:	January 1, 2012 through January 31, 2012
Amount of fees and expenses requested:	\$ 4,299.90
Amount of fees and expenses paid absent objections:	\$ 4,299.90
Monthly <i>POST CONFIRMATION</i> invoicing dated April 12, 2012	
Dates covered by invoicing:	February 1, 2012 through February 29, 2012
Amount of fees and expenses requested:	\$ 14,331.55
Amount of fees and expenses paid absent objections:	\$ 14,331.55
Monthly <i>POST CONFIRMATION</i> invoicing dated April 22, 2012	
Dates covered by invoicing:	March 1, 2012 through March 31, 2012
Amount of fees and expenses requested:	\$ 9,861.96

Amount of fees and expenses paid absent objections:	\$ 9,861.96
Monthly <i>POST CONFIRMATION</i> invoicing dated May 13, 2012	
Dates covered by invoicing:	April 1, 2012 through April 30, 2012
Amount of fees and expenses requested:	\$ 29,763.10
Amount of fees and expenses paid absent objections:	\$ 29,763.10
Monthly <i>POST CONFIRMATION</i> invoicing dated July 20, 2012	
Dates covered by invoicing:	May 1, 2012 through May 31, 2012
Amount of fees and expenses requested:	\$ 8,927.57
Amount of fees and expenses paid absent objections:	\$ 8,927.57
Monthly <i>POST CONFIRMATION</i> invoicing dated August 1, 2012	
Dates covered by invoicing:	June 1, 2012 through June 30, 2012
Amount of fees and expenses requested:	\$ 17,677.20
Amount of fees and expenses paid absent objections:	\$ 17,677.20
Monthly <i>POST CONFIRMATION</i> invoicing dated August 9, 2012	
Dates covered by invoicing:	July 1, 2012 through July 30, 2012
Amount of fees and expenses requested:	\$ 6,605.11
Amount of fees and expenses paid absent objections:	\$ 6,605.11
Monthly <i>POST CONFIRMATION</i> invoicing dated September 10, 2012	
Dates covered by invoicing:	August 1, 2012 through August 31, 2012
Amount of fees and expenses requested:	\$ 25,159.48
Amount of fees and expenses paid absent objections:	\$ 25,159.48
Monthly <i>POST CONFIRMATION</i> invoicing dated October 28, 2012	

Dates covered by invoicing:	September 1, 2012 through September 30, 2012
Amount of fees and expenses requested:	\$ 21,025.21
Amount of fees and expenses paid absent objections:	\$ 21,025.21
Monthly <i>POST CONFIRMATION</i> invoicing dated November 15, 2012	
Dates covered by invoicing:	October 1, 2012 through October 31, 2012
Amount of fees and expenses requested:	\$ 16,699.74
Amount of fees and expenses paid absent objections:	\$ 16,699.74
Monthly <i>POST CONFIRMATION</i> invoicing dated December 11, 2012	
Dates covered by invoicing:	November 1, 2012 thru November 30, 2012
Amount of fees and expenses requested:	\$ 9,976.00
Amount of fees and expenses paid absent objections:	\$ 9,976.00
Monthly <i>POST CONFIRMATION</i> invoicing dated March 14, 2013	
Dates covered by invoicing:	December 1, 2012 thru December 31, 2012
Amount of fees and expenses requested:	\$ 9,224.00
Amount of fees and expenses paid absent objections:	\$ 9,224.00
Monthly <i>POST CONFIRMATION</i> invoicing dated March 17, 2013	
Dates covered by invoicing:	January 1, 2013 thru January 31, 2013
Amount of fees and expenses requested:	\$ 5,195.83
Amount of fees and expenses paid absent objections:	\$ 5,195.83
Monthly <i>POST CONFIRMATION</i> invoicing dated April 10, 2013	
Dates covered by invoicing:	February 1, 2013 thru February 28, 2013
Amount of fees and expenses requested:	\$ 6,964.75

Amount of fees and expenses paid absent objections:	\$6,964.75
Monthly <i>POST CONFIRMATION</i> invoicing dated April 10, 2013	
Dates covered by invoicing:	March 1, 2013 thru March 31, 2013
Amount of fees and expenses requested:	\$ 6,531.01
Amount of fees and expenses paid absent objections:	\$ 6,531.01
Monthly <i>POST CONFIRMATION</i> invoicing dated June 30, 2013	
Dates covered by invoicing:	April 1, 2013 thru June 30, 2013
Amount of fees and expenses requested:	\$ 31,373.19
Amount of fees and expenses paid absent objections:	\$ 31,373.19

UNITED STATES BANKRUPTCY COURT
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WEST PALM BEACH DIVISION
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In re:

Chapter 11

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

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

Debtors.

**EIGHTH INTERIM POST CONFIRMATION FEE APPLICATION OF
PARKER ROSEN, LLC AS LOCAL COUNSEL IN MINNESOTA**

Parker Rosen, LLC, Liquidating Trustee's local counsel in Minnesota ("***Parker Rosen***"), applies pursuant to 11 U.S.C. §§ 330, 331 and 503(b) of the Bankruptcy Code for compensation for services rendered and reimbursement of the necessary expenses paid or incurred by Parker Rosen in this bankruptcy case during the period of March 1, 2013 through June 30, 2013 (the "***Fee Period***") and in support states:

INTRODUCTION

1. Parker Rosen is seeking compensation for services rendered and reimbursement of necessary expenses paid in the total amount of \$37,904.20 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 96.7 hours were expended by Parker Rosen as Liquidating Trustee’s local counsel in Minnesota at hourly rates ranging from \$125-\$450 during the time period for which fees were required in this fee application.

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

REQUEST FOR RELIEF

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

4. During the fee period, Parker Rosen devoted 96.7 hours of time as more fully set forth below.

5. Attached as Exhibit “1-A” is a Summary of Professional and Paraprofessional Time Total Per Individual for this Period Only. Attached as Exhibit “1-B” is a Summary of Professional and Paraprofessional Time by Activity Code Category for this Time Period Only. Attached as Exhibit “2” is a Summary of Requested Reimbursement Of Expenses for this Time Period Only. The transcribed time records and details of services rendered by Parker Rosen are attached as Exhibit “3.” The applicable legal standards for allowing fees and proceedings under the Bankruptcy Code is set forth in 11 U.S.C. §§ 330 and 331 which provides for reasonable compensation for

actual, 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 imposed by the client or other circumstances; the amount involved and the results obtained; experience, reputation and ability of the professional; the undesirability of the case; the nature and length of professional relationship with client; and awards in similar cases.

6. Under these standards, the reasonable value of the services rendered and reimbursement of the necessary expenses paid or incurred by Parker Rosen as local counsel in Minnesota for the Liquidating Trustee is \$37,904.20 for services rendered expended for the Fee Period. This figure was derived from the total amount of hours expended multiplied by the corresponding hourly rates, as more specifically set forth in Exhibit “3”.

7. **Time and Labor Required.** The records transcribed as Exhibit “3” show that Parker Rosen has devoted not less than 96.7 hours of actual recorded time to the performance of services in these proceedings.

8. **Novel and Difficult Questions:** Parker Rosen was retained by the Liquidating Trustee to assist the Liquidating Trustee's counsel by acting as local counsel in the Petters Litigation and tasks that the Liquidating Trustee or its counsel may request including sponsoring the *pro hac vice* applications of Meland Russin & Budwick, P.A. and researching specific issues regarding

Minnesota law. Parker Rosen has attended a number of Minnesota based mediations on behalf of the estate. The issues involved were neither novel nor difficult.

9. **The Skill Requisite to Perform Services Properly:** Knowledge in the field of bankruptcy law, Minnesota law and local rules and procedures in Minnesota was required.

10. **Preclusion of Other Employment Due to Acceptance of this Case:** Parker Rosen has not been precluded from any other employment due to the acceptance of this case.

11. **Customary Fee:** The hourly rate charged is Parker Rosen's customary fee for services of the type rendered herein.

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

13. **Experience, Reputation and Ability of Professional:** Parker Rosen includes experienced trial lawyers with a sophisticated understanding of commercial litigation issues and are qualified to perform such services for the benefit of the Liquidating Trustee. Andrew D. Parker received his J.D. (*cum laude*) from the University of Minnesota Law School in 1988 and is admitted to the Minnesota Bar Association. Daniel N. Rosen also received his J.D. (*cum laude*) from the University of Minnesota Law School in 1994 and is admitted to the Minnesota Bar Association. Daniel N. Lovejoy received his J.D. from the University of Virginia School of Law in 2002 and is admitted to the Minnesota Bar Association. Douglas G. Wardlow received his J.D. (*cum laude*) from Georgetown University Law Center in 2004 and is admitted to the Minnesota Bar Association and District of Columbia Bar Association.

14. **Undesirability of Case:** This case is not undesirable.

15. **Nature and Length of Professional Relationship with Client:** Parker Rosen has not performed services for the Liquidating Trustee previously in any others matters prior to this case.

16. **Allocation Between Estates:** The Liquidating Trustee requests that 18% of the fee awarded be allocated to Palm Beach Finance Partners, L.P. and 82% of the fee awarded be allocated to Palm Beach Finance II, L.P. This pro rata allocation formula is derived from the Compiled Financial Statements, dated April 30, 2008, for each of the Debtors by Kaufman Rossin & Co. The data contained therein supports an 18%/82% allocation between PBF and PBF II, respectively, based upon the total assets of each entity as of the date of such compilations. See Section 1.76, entitled "Pro Rata Allocation Formula," of the Second Amended Joint Plan of Liquidation dated September 3, 2010 7 [ECF No. 245]. Based on the circumstances and since the services provided by Parker Rosen were performed on behalf of and benefitted both estates, the Liquidating Trustee believes that this formula is the proper methodology to allocate the final fee award.

17. **Awards in Similar Cases:** The amount requested by Parker Rosen is reasonable in terms of awards in cases of similar magnitude and complexity. The compensation which Parker Rosen is requesting comports with the mandate of the Bankruptcy Code, which directs that services be evaluated in light of comparable services performed in non-bankruptcy cases in the community. The fee requested by applicant in the amount of \$37,247 for 96.7 hours of services. This request is entirely appropriate.

18. Parker Rosen considers the reasonable value of services rendered to this estate to be not less than \$37,247 for services they have rendered for the Fee Period.

WHEREFORE, Liquidating Trustee's local counsel in Minnesota, Parker Rosen, respectfully requests that it be allowed fees in the amount of \$37,247 for services rendered and reimbursement

of the necessary expenses paid or incurred in the amount of \$657.20, for a total of \$37,904.20, to be paid as follows: 18% of the award be allocated to Palm Beach Finance Partners, L.P. and 82% of the award be allocated to Palm Beach Finance II, L.P., and for such other and further relief as the Court deems just and proper.

CERTIFICATION

1. I am the Applicant and the professional with responsibility in this case for compliance with the current Mandatory Guidelines On Fees and Disbursements For Professionals in The Southern District of Florida Bankruptcy Cases (the “*Guidelines*”).

2. I have read the application for compensation and reimbursement of costs (the “*Application*”).

3. To the best of my knowledge, information, and belief formed after reasonable inquiry, the Application falls within the Guidelines.

4. To the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Guidelines, except as specifically noted in this Certification and described in the Application.

5. Except to the extent that fees or disbursements are prohibited or restricted by the Guidelines, the fees and disbursements sought are billed at rates and in accordance with practices customarily employed by the Applicant and generally accepted by the Applicant's clients.

6. In providing a reimbursable service or disbursement (other than time charged for paraprofessionals and professionals), the Applicant does not make a profit on that service or disbursement (except to the extent that any such profit is included within the permitted allowable amounts set forth in the Guidelines for photocopies and facsimile transmission).

7. In charging for a particular service or disbursement, the Applicant does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission).

8. In seeking reimbursement for a service which the Applicant justifiably purchased or contracted for from a third party, the Applicant is requesting reimbursement only for the amount billed to the Applicant by the third-party vendor and paid by the Applicant to such vendor.

9. The trustee (if any), the examiner (if any), the chairperson of each official Debtor (if any), the debtor, the U.S. Trustee, and their respective counsels, will be mailed, simultaneously with the filing of the Application with the Court, a complete copy of the Application (including all relevant exhibits).

I HEREBY CERTIFY that the foregoing is true and correct.

Parker Rosen, LLC
300 First Avenue North, Suite 200
Minneapolis, MN 55401
Telephone: (612) 767-3000
Telecopy: (612) 767-3001

By: 
Daniel N. Rosen

I HEREBY CERTIFY that, pursuant to that certain Order Authorizing Professionals Employed by the Liquidating Trustee and Monitor to Provide Notice of their Post Confirmation Fee Applications for Compensation in Summary Form [ECF No. 648], a Notice of Filing, which will include a Certificate of Service for the foregoing, will be filed at a later date.

s/ Solomon B. Genet
Solomon B. Genet, Esquire
Fla. Bar No. 617911
sgenet@melandrussin.com
MELAND RUSSIN & BUDWICK, P.A.
3200 Southeast Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131
Telephone: (305) 358-6363
Telecopy: (305) 358-1221

Attorneys for the Liquidating Trustee

EXHIBIT "1-A"**Summary of Professional and Paraprofessional Time
Total per Individual for this Period Only**

[If this is a final application, and does not cumulate fee details from prior interim applications, then a separate Exhibit 1-A showing cumulative time summary from all applications is attached as well.]

Name	Partner, Associate, or Paraprofessional	Year Licensed	Total Hours	Hourly Rate	Total Fees
Daniel N. Rosen	Partner	1994	62.0	\$450.00	\$27,900.00
Anthony G. Edwards	Partner	1998	18.2	\$340.00	\$ 6,188.00
Daniel N. Lovejoy	Associate	2003	2.5	\$290.00	\$ 725.00
Barbara M. Livick	Paraprofessional	N/A	13.6	\$175.00	\$ 2,380.00
Brenda J. Hanson	Paraprofessional	N/A	0.4	\$135.00	\$ 54.00
Blended Hourly Rate				\$385.18	
Total Fees			96.7		\$37,247.00

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

In re Petters Receivership and B/R			
Name	Rate	Hours	Amount
Daniel N. Rosen	\$ 450.00	1.5	\$ 675.00
CATEGORY TOTALS:		1.5	\$ 675.00

Third Party Actions			
Name	Rate	Hours	Amount
Daniel N. Rosen	\$ 450.00	60.5	\$ 27,225.00
Anthony G. Edwards	\$ 340.00	18.2	\$ 6,188.00
Daniel N. Lovejoy	\$ 290.00	2.5	\$ 725.00
Barbara M. Livick	\$ 175.00	13.6	\$ 2,380.00
Brenda J. Hanson	\$ 135.00	0.4	\$ 54.00
CATEGORY TOTALS:		95.2	\$ 36,572.00

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) (15 copies @ 15¢)	\$ 0.00
7.	Photocopies (outside copies)	\$ 1.25
8.	Postage	\$ 1.98
9.	Overnight Delivery Charges	\$ 65.52
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	\$ 588.45
14.	Out of District of Minnesota Travel A. Transportation B. Lodging C. Meals	\$ 0.00
15.	Other (Not specifically disallowed; must specify and justify) Probate court records; Parking	\$ 0.00
TOTAL "GROSS" AMOUNT OF REQUESTED DISBURSEMENTS		\$ 657.20

PARKER ROSEN LLC

300 North First Avenue, Suite 200
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 EIN 20-3550547

Invoice

Date	Invoice #
4/10/2013	11740

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

MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	3/14/2013	Attention to electronic court filings.	0.2	450.00	90.00
Daniel N. Rosen	3/20/2013	Attention to electronic court filings this day and previous day.	0.2	450.00	90.00
Daniel N. Rosen	3/28/2013	Attention to electronic court filings.	0.2	450.00	90.00

Total**\$270.00**

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4/10/2013	11741

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

MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Lovejoy	3/1/2013	Write up notes of pretrial conference in Varga v. U.S. Bank.	0.5	290.00	145.00
Daniel N. Rosen	3/1/2013	Attention to issues relating to Ashton and Parenteau actions.	0.2	450.00	90.00
Daniel N. Rosen	3/2/2013	Attention to issues relating to Ashton settlement enforcement; edit and revise Fidelis settlement agreement and correspondence regarding same.	1.0	450.00	450.00
Daniel N. Rosen	3/4/2013	Telephone conference with Justice Gilbert; email correspondence and analysis of Minnesota Civil Mediation Act in connection with Ashton settlement.	1.0	450.00	450.00
Daniel N. Rosen	3/5/2013	Attention to matters relating to Ashton settlement.	0.2	450.00	90.00
Daniel N. Rosen	3/6/2013	Attention to matters relating to upcoming depositions.	0.2	450.00	90.00
Daniel N. Rosen	3/7/2013	Analysis of effect of death of party on claims.	0.3	450.00	135.00
Daniel N. Rosen	3/8/2013	Attention to Fidelis settlement documentation; confer by telephone with Shreffler.	0.6	450.00	270.00

Total

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 3000 Wachovia Financial Center
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MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	3/13/2013	Attention to orders to dismiss; correspondence regarding Ashton settlement enforcement; attention to Fidelis settlement documentation issues.	0.2	450.00	90.00
Daniel N. Rosen	3/14/2013	Attention to matters relating to Ashton Mediation.	0.2	450.00	90.00
Daniel N. Rosen	3/18/2013	Preparation for depositions of Appleby and Farfante including telephone conferences with Wasserstrom and Budwick.	2.5	450.00	1,125.00
Daniel N. Rosen	3/19/2013	Preparation for depositions and depositions of Farfante and Appleby.	3.8	450.00	1,710.00
Daniel N. Rosen	3/19/2013	Develop strategy regarding Parenteau claims.	0.5	450.00	225.00
Daniel N. Lovejoy	3/19/2013	Analysis of affect of probate or failure to probate on later-asserted claims; memorandum and discussion with DNR regarding same.	2.0	290.00	580.00

Total

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MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	3/21/2013	Analysis of issues affecting decision to take deposition of party regarding enforcement of Ashton settlement; memorandum regarding same.	0.8	450.00	360.00
Daniel N. Rosen	3/22/2013	Attention to issues relating to Minnesota usury laws.	0.3	450.00	135.00
Daniel N. Rosen	3/28/2013	Correspondence regarding various settlements.	0.2	450.00	90.00
	3/31/2013	March 2013 online legal research.		136.01	136.01

Total**\$6,261.01**

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6/30/2013	11877

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

MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	4/3/2013	Correspondence.	0.2	450.00	90.00
Daniel N. Rosen	4/4/2013	Telephone conference with Jessica Wasserstrom regarding Kandi Kourts Motion to Dismiss and Ashton Motion to Enforce Settlement; preparation for call; correspondence.	1.5	450.00	675.00
Daniel N. Rosen	4/8/2013	Draft, edit and revise affidavit for Ashton motion to enforce settlement; analyze and provide memo to Wasserstrom on issues relating to claims against dissolved corporations for Kandi Kourts matter.	3.3	450.00	1,485.00
Daniel N. Rosen	4/9/2013	Provide further assistance for Kandi briefing; provide assistance for briefing of Ashton motion on settlement.	4.2	450.00	1,890.00
Anthony G. Edwards	4/9/2013	Research law applicable to notice of dissolution to known creditors by third-party debtors under Minnesota law and law of other states applying same rules.	3.1	340.00	1,054.00

Total

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MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	4/9/2013	Research regarding publication of Notice of Dissolution regarding Sunny Day Security Systems as indicated on Minnesota Secretary of State filings.	2.3	175.00	402.50
Anthony G. Edwards	4/10/2013	Prepare Memorandum in Support of Trustee's Motion to Approve Settlement.	10.5	340.00	3,570.00
Daniel N. Rosen	4/10/2013	Legal research, writing, editing and consultation in connection with motions to dismiss in Kandi Kourts and Ashton matters.	8.3	450.00	3,735.00
Brenda J. Hanson	4/10/2013	Gather documents and coordinate file.	0.2	135.00	27.00
Daniel N. Rosen	4/11/2013	Legal research, writing, editing and consultation in connection with motions to dismiss in Kandi Kourts and Ashton matters.	5.0	450.00	2,250.00
Anthony G. Edwards	4/11/2013	Finalize material for Memorandum; develop strategy and conduct research regarding same.	4.6	340.00	1,564.00

Total

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MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	4/11/2013	Additional research to contact all legal publishers in Carver and Kandiyohi Counties to confirm Notice of Dissolution was not filed; additional research regarding whether Sunny Day and/or Kandi Kourts are continuing to do business in Minnesota.	3.3	175.00	577.50
Daniel N. Rosen	4/12/2013	Attention to finalization of briefing in Ashton matter and edit and revise affidavit; review  Minnesota law.	1.7	450.00	765.00
Brenda J. Hanson	4/12/2013	Gather documents and coordinate file.	0.2	135.00	27.00
Daniel N. Rosen	4/17/2013	Correspondence regarding scttlment of various matters; telephone conference with Lamb and Wasserstrom.	0.9	450.00	405.00
Daniel N. Rosen	4/18/2013	Phone conference with Brian Weisberg regarding probate matters (Parenteau); statutory analysis; correspondence.	1.2	450.00	540.00

Total

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MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	4/18/2013	Research business activity including UCC filings in Minnesota for Kandi Kourts, Superior Holdings and Sunny Day Security; advise accordingly.	2.3	175.00	402.50
Daniel N. Rosen	4/23/2013	Correspondence and analysis regarding Ashton and Rebney settlements.	1.0	450.00	450.00
Daniel N. Rosen	4/25/2013	Telephone conferences and correspondence regarding Glint, Phil 419, and Williston.	0.6	450.00	270.00
Daniel N. Rosen	4/26/2013	Draft, edit and revise email letter to Rebney; review and edit Williston agreement; correspondence.	0.7	450.00	315.00
Daniel N. Rosen	4/29/2013	Attention to issues relating to revision of Fidelis agreement.	0.2	450.00	90.00
Daniel N. Rosen DISBURSEMENTS	4/30/2013	Correspondence.	0.2	450.00	90.00
	4/4/2013	Research - Pacer Service Center. Q1 2013		9.00	9.00
	4/6/2013	FedEx original depositions of Farfante and Appleby to Meland Russin & Budwick.		46.29	46.29
	4/30/2013	April 2013 online legal research.		443.44	443.44

Total

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

MATTER
 1808-005 Third Party Actions

Date	Description/Comments	Hours	Rate	Amount
4/30/2013	April 2013 postage expense.		1.98	1.98
	SUBTOTAL DISBURSEMENTS			500.71

Total	\$21,175.21
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PARKER ROSEN LLC

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Invoice

Date	Invoice #
6/30/2013	11887

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

MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	4/4/2013	Attention to electronic court filings this day.	0.2	450.00	90.00
Daniel N. Rosen	4/9/2013	Attention to court filings this day.	0.2	450.00	90.00

Total**\$180.00**

PARKER ROSEN LLC

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Invoice

Date	Invoice #
6/30/2013	11882

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

MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	5/2/2013	Correspondence; confer with co-counsel regarding variety of issues; email correspondence with Schresler regarding Fidelis.	0.5	450.00	225.00
Daniel N. Rosen	5/6/2013	Correspondence; telephone conference with Mr. Budwick.	0.4	450.00	180.00
Daniel N. Rosen	5/10/2013	Email correspondence; telephone conference with Wasserstrom and Lamb regarding Greely, Amoit, and Ashton.	1.4	450.00	630.00
Daniel N. Rosen	5/14/2013	Greely and Amoit mediations.	5.8	450.00	2,610.00
Daniel N. Rosen	5/17/2013	Attention to various issues and correspondence regarding Ashton matter.	0.4	450.00	180.00
Daniel N. Rosen	5/23/2013	Telephone conference with Jessica Wasserstrom regarding Ashton; telephone conferences with Lou Remcle and Jessica Wasserstrom regarding Rebney; telephone conference with mediator.	1.7	450.00	765.00
Daniel N. Rosen	5/24/2013	Email to Remele.	0.3	450.00	135.00
Daniel N. Rosen	5/28/2013	Attention to response to Ashton-related discovery demands.	0.5	450.00	225.00

Total

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6/30/2013	11882

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

MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	5/29/2013	Assemble material responsive to discovery requests.	1.3	450.00	585.00
Daniel N. Rosen	5/30/2013	Assemble material responsive to discovery requests.	0.4	450.00	180.00
		DISBURSEMENTS			
	5/21/2013	5/16/13 Fedex to Meland Russin and Budwick.		19.23	19.23

Total	\$5,734.23
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6/30/2013	11888

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

MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	5/3/2013	Attention to court filings.	0.3	450.00	135.00
		DISBURSEMENTS			
	5/31/2013	May 2013 photocopy expense.		1.25	1.25

Total

\$136.25

PARKER ROSEN LLC

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 EIN 20-3550547

Invoice

Date	Invoice #
6/30/2013	11883

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

MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	6/4/2013	Communications regarding settlements.	0.3	450.00	135.00
Daniel N. Rosen	6/5/2013	Communications regarding settlements.	0.2	450.00	90.00
Daniel N. Rosen	6/6/2013	Communications regarding settlements.	0.3	450.00	135.00
Daniel N. Rosen	6/10/2013	Research in response to inquiry by Mr. Genet in connection with GE Capital matter.	0.4	450.00	180.00
Daniel N. Rosen	6/11/2013	Communications regarding settlements.	0.2	450.00	90.00
Daniel N. Rosen	6/17/2013	To St. Paul courthouse for oral argument in Varga vs. U.S. Bank motion to dismiss; confer with Budwick before and after.	2.0	450.00	900.00
Barbara M. Livick	6/17/2013	Review and assist with preparation of Affidavit of Barbara M. Livick in opposition to Motion to Dismiss Sunny Day Security Complaint.	1.3	175.00	227.50

Total

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6/30/2013	11883

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

MATTER

1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	6/18/2013	Review documents, execute Affidavit and return to attorney Wasserman; contact Minnesota Secretary of State to confirm legal newspapers in various counties in 2009.	1.1	175.00	192.50
Daniel N. Rosen	6/21/2013	Research regarding default judgment debtors; telephone conference with Wasserstrom.	1.3	450.00	585.00
Barbara M. Livick	6/21/2013	Confirm legal newspapers with Secretary of State; execute and return revised Affidavit of Barbara M. Livick re Sunny Day.	1.0	175.00	175.00
Barbara M. Livick	6/21/2013	Research regarding Patrick Shea; request certified copy of Marian Dunlap judgment for filing in Minnesota courts.	2.3	175.00	402.50
Daniel N. Rosen	6/24/2013	Email letter to Remele regarding Rebney; telephone conference with Gilbert; telephone conference with Michelle Dove regarding Rebney; email memo to Wasserstrom; telephone conference with Wasserstrom.	1.6	450.00	720.00

Total

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6/30/2013	11883

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 3000 Wachovia Financial Center
 200 South Biscayne Boulevard
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MATTER
 1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	6/25/2013	Telephone conferences with Wasserstrom and Dove regarding Rebney.	0.5	450.00	225.00

Total	\$4,057.50
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6/30/2013	11889

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

MATTER

1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	6/20/2013	Attention to issues relating to Vennes stay.	0.2	450.00	90.00

Total	\$90.00
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