#### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF FLORIDA 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
Debtors.	(Jointly Administered)

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

1.	Name of Applicant:	Parker Rosen, LLC
2.	Role of Applicant:	Liquidating Trustee's Local Counsel in Minnesota
3.	Name of Certifying Professional:	Daniel N. Rosen
4.	Date case filed:	November 30, 2009
5.	Date of application for employment:	May 27, 2010 [ECF No. 161]
6.	Date of order approving employment:	June 24, 2010 [ECF No. 182], nunc pro tunc to May 24, 2010
7.	If debtor's counsel, date of Disclosure of Compensation form:	N/A
8.	Date of this application:	April 25, 2014
9.	Dates of services covered:	November 1, 2013 thru February 28, 2014

	Fees	
10.	Total fee requested for this period (from Exhibit 1):	\$ 35,232.50
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:	\$ 35,232.50

	Expenses	
14.	Total expense reimbursement requested for this period:	\$ 3,989.60
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	\$ 3,989.60
18.	Gross award requested for this period (#10 + #14)	\$ 39,222.10
19.	Net award requested for this period (#13 + #17)	\$ 39,222.10
20.	If <u>Final</u> Fee Application, amounts of net awards requested in interim applications but <u>not previously awarded</u> (total from History of Fees and Expenses, following pages):	\$ 0.00
21.	Final fee and expense award requested (#19 + #20)	\$ 0.00

#### **History of Fees and Expenses**

1. Dates, sources, and amounts of retainers received: <b>N/A</b>				
Dates	Sources		Amounts	For fees or costs?
2. Dates, sources, and amounts of third party payments received: <b>N/A</b>			<b>'A</b>	
Dates	Sources		Amounts	For fees or costs?
3. Prior fee and e	expense awards			
First interim post confirmation application [ECF No. 608]				
Dates covered by first application: October 15, 2010 through January 31, 2011			ary 31, 2011	
Amount of fees requested: \$ 12,23			12,239.00	
Amount of expenses requested: \$ 308			308.52	
Amount of fees awarded: \$ 12,239			12,239.00	
Amount of expenses a	mount 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 appl	ication [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 applie	cation [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 appl	ication [ECF No. 1214]
Dates covered by fourth application:	November 1, 2011 through February 29, 2012
Amount of fees requested:	\$ 26,434.50

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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 applica	ation [ECF No. 1376]	
Dates covered by fifth 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

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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 applic	ation [ECF No. 1575]	
Dates covered by sixth 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

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Seventh interim post confirmation application [ECF No. 1812]		
Dates covered by seventh application:	November 1, 2012 through February 28, 2013	
Amount of fees requested:	\$ 31,29	3.00
Amount of expenses requested:	\$	57.58
Amount of fees awarded:	\$ 31,29	3.00
Amount of expenses awarded:	\$	57.58
Amount of fee retainer authorized to be used:	N/A	A
Amount of expense retainer authorized to be used:	N/A	A
Fee award, net of retainer:	N/A	A
Expense award, net of retainer:	N/A	A
Date of seventh award:	June 5, 2013 [ECF No. 1868]	
Amount of fees actually paid:	\$ 31,29	3.00
Amount of expense reimbursement actually paid:	\$ 6	57.58
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

Eighth interim post confirmation application [ECF No. 1935]			
Dates covered by eighth application:	March 1, 2013 through June 30, 2013		
Amount of fees requested:	\$	37,247.00	
Amount of expenses requested:	\$	657.20	
Amount of fees awarded:	\$	37,247.00	
Amount of expenses awarded:	\$	657.20	

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 eighth award:	October 7, 2013 [ECF No. 1984]	
Amount of fees actually paid:	\$	37,247.00
Amount of expense reimbursement actually paid:	\$	657.20
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
Ninth interim post confirmation applic	eation [ECF No.2065]	
Dates covered by seventh application:	July 1, 2013 through October 31, 2013	
Amount of fees requested:	\$	17,628.50
Amount of expenses requested:	\$	1,454.01
Amount of fees awarded:	\$	17,628.50
Amount of expenses awarded:	\$	1,454.01
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 ninth award:	January 29, 2014 [ECF No. 2139]	
Amount of fees actually paid:	\$	17,628.50

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Amount of expense reimbursement actually paid:	\$ 1,454.01
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 POST-CONFIRMATION Prior Applications and Awards			
Total fees requested:	\$	272,176.50	
Total fees awarded:	\$	272,176.50	
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:	\$	5,819.29	
Total expenses awarded:	\$	5,819.29	
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, 2011 <sup>1</sup>				
Dates covered by invoicing: July 1, 2011 through July 31, 2011				

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

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		
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 POST CONFIRMATION 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 POST CONFIRMATION 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		

ated March 18, 2012		
January 1, 2012 through January 31, 2012		
\$ 4,299.		
\$ 4,299.90		
ated April 12, 2012		
February 1, 2012 through February 29, 2012		
\$ 14,331.55		
\$ 14,331.55		
ated April 22, 2012		
March 1, 2012 through March 31, 2012		
\$ 9,861.96		
\$ 9,861.96		
ated May 13, 2012		
April 1, 2012 through April 30, 2012		
\$ 29,763.10		
\$ 29,763.10		
ated July 20, 2012		
May 1, 2012 through May 31, 2012		
\$ 8,927.57		
\$ 8,927.57		
ated August 1, 2012		
June 1, 2012 through June 30, 2012		
\$ 17,677.20		

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Amount of fees and expenses paid absent objections:	\$ 17,677.20			
Monthly POST CONFIRMATION 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 POST CONFIRMATION 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 POST CONFIRMATION invoicing of	lated 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 POST CONFIRMATION invoicing	lated 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 POST CONFIRMATION invoicing	lated 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 POST CONFIRMATION 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 POST CONFIRMATION invoicing da	ated March 17, 2013			
Monthly POST CONFIRMATION invoicing da  Dates covered by invoicing:	January 1, 2013 thru January 31, 2013			
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Monthly POST CONFIRMATION invoicing dated April 10, 2013				
Dates covered by invoicing:	February 1, 2013 thru February 28, 2013			
Amount of fees and expenses requested:	\$ 6,964.73			
Amount of fees and expenses paid absent objections:	\$6,964.75			
Monthly POST CONFIRMATION invoicing d	ated 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 POST CONFIRMATION invoicing d	ated 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			
Monthly POST CONFIRMATION invoicing dated October 16, 2013				
Dates covered by invoicing:	July 1, 2013 thru July 31, 2013			
Amount of fees and expenses requested:	\$ 2,677.42			

Amount of fees and expenses paid absent objections:	\$ 2,677.42			
Monthly POST CONFIRMATION invoicing dated October 17, 2013				
Dates covered by invoicing:	August 1, 2013 thru August 31, 2013			
Amount of fees and expenses requested:	\$ 2,425.92			
Amount of fees and expenses paid absent objections:	\$ 2,425.92			
Monthly POST CONFIRMATION invoicing dated December 1, 2013				
Dates covered by invoicing:	September 1, 2013 thru October 31, 2013			
Amount of fees and expenses requested:	\$ 13,979.17			
Amount of fees and expenses paid absent objections:	\$ 0.00			
Monthly POST CONFIRMATION invoicing dated December 16, 2013 and February 24, 2014				
Dates covered by invoicing:	November 1, 2013 thru December 31, 2013			
Amount of fees and expenses requested:	\$ 28,715.19			
Amount of fees and expenses paid absent objections:	\$ 28,715.19			
Monthly POST CONFIRMATION invoicing dated February 24, 2014				
Dates covered by invoicing:	January 1, 2014 thru January 31, 2014			
Amount of fees and expenses requested:	\$ 4,210.30			
Amount of fees and expenses paid absent objections:	\$ 4,210.30			
Monthly POST CONFIRMATION invoicing dated April 4, 2014				
Dates covered by invoicing:	February 1, 2014 thru February 28, 2014			
Amount of fees and expenses requested:	\$ 6,296.61			
Amount of fees and expenses paid absent objections:	\$ 6,296.61			

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

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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
Debtors.	(Jointly Administered)

# TENTH 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 November 1, 2013 through February 28, 2014 (the "*Fee Period*") and in support states:

#### **I.INTRODUCTION**

1. Parker Rosen is seeking compensation and reimbursement of necessary expenses paid in the total amount of \$39,222.10 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 92.1 hours were expended by Parker Rosen as Liquidating Trustee's local counsel in Minnesota at hourly rates ranging from \$135-\$460 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].

#### II. 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 92.1 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

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as for reimbursement of actual necessary expenses. *See also, In re First Colonial Corp. of America*, 544 F. 2d 1291 (5th Cir. 1977). These standards include the time and labor required; the novelty and difficulty of the questions presented; the skill requisite to perform professional services properly; the preclusion of other employment and the acceptance of this case; the customary fee; whether the fee is fixed or contingent; the time limitations opposed by the client or other circumstances; the amount involved and the results obtained; experience, reputation and ability of the professional; the undesirability of the case; the nature and length of professional relationship with client; and awards in similar cases.

6. Under these standards, the reasonable value of the services rendered and reimbursement of the necessary expenses paid or incurred by Parker Rosen as local counsel in Minnesota for the Liquidating Trustee is \$39,222.10 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".

#### III. TIME AND LABOR REQUIRED.

7. The records transcribed as Exhibit "3" show that Parker Rosen has devoted not less than 92.1 hours of actual recorded time to the performance of services in these proceedings.

# IV. NOVELTY AND DIFFICULTY OF THE ISSUES AND QUESTIONS PRESENTED

8. 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 hearings as well as mediations both in and outside of Minnesota on behalf of the estate. The issues involved were neither novel nor difficult.

#### V. SKILL REQUISITE TO PERFORM THE LEGAL SERVICES PROPERLY

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

#### VI. PRECLUSION FROM OTHER EMPLOYMENT

10. Parker Rosen has not been precluded from any other employment due to the acceptance of this case.

#### VII. CUSTOMARY FEE

- 11. 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.

#### VIII. TIME LIMITATIONS IMPOSED BY CLIENT OR THE CIRCUMSTANCES

13. Parker Rosen has not been required to expend considerable time within short periods.

#### IX. THE EXPERIENCE, REPUTATION AND ABILITY OF THE PROFESSIONALS

14. 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. 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.

#### X. THE UNDESIRABILITY OF THE CASE

15. Parker Rosen does not deem these cases to undesirable and is honored to have been retained by the Liquidating Trustee.

## XI. THE NATURE AND LENGTH OF THE PROFESSIONAL RELATIONSHIP OF THE CLIENT

16. Parker Rosen has not performed services for the Liquidating Trustee previously in any others matters prior to this case.

#### XII. ALLOCATION BETWEEN DEBTORS' ESTATES

17. 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 Parker Rosen formula were performed on behalf of and benefitted both estates, the Liquidating Trustee believes that this formula is the proper methodology to allocate certain fees and expenses between the two estates and respectfully requests the Court approve the allocation of fees requested in this Application as follows:

Estate / Percentage	Fees	Costs	
Palm Beach Finance Partners, L.P. (18%)	\$6,341.85	\$718.13	
Palm Beach Finance II. L.P. (82%)	\$28,890.65	\$3,271.47	
TOTAL FEES AND COSTS:	\$35,232.50	\$3,989.60	

#### XIII. APPLICABLE LEGAL STANDARD

- 18. 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 \$35,232.50 for 92.1 hours of services. This request is entirely appropriate.
- 19. Parker Rosen considers the reasonable value of services rendered to this estate to be not less than \$35,232.50 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 full compensation and reimbursement of expenses sought under this application. Parker Rosen requests this Court award a total of \$35,232.50 for fees and \$3,989.60 for costs incurred between November 1, 2013 and February 28, 2014, for a total request of \$39,222.10, approve the allocation of fees and expenses between the estates, and for such other and further relief this Court deems just and proper.

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#### **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 123 North Third Street, Suite 888 Minneapolis, MN 55401 Telephone: (612) 767-3000

Telecopy: (612) 767-3001/

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/ Michael S. Budwick
Michael S. Budwick, Esquire
Fla. Bar No. 938777
mbudwick@melandrussin.com
MELAND RUSSIN & BUDWICK, P.A.
3200 Southeast Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131
T: (305) 358-6363 F: (305) 358-1221
Attorneys for the Liquidating Trustee

#### EXHIBIT "1-A"

#### Summary of Professional and Paraprofessional Time Total per Individual for this Period Only

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

Name	Partner, Associate, or Paraprofessional	Year <u>Licensed</u>	Total Hours	Hourly <u>Rate</u>	Total <u>Fees</u>
Daniel N. Rosen	Partner	1994	15.4	\$460.00	\$ 7,084.00
			48.1	\$450.00	\$21,645.00
Anthony G. Edwards	Partner	1998	5.0	\$400.00	\$ 2,000.00
			1.5	\$340.00	\$ 510.00
Barbara M. Livick	Paraprofessional	N/A	10.9	\$195.00	\$ 2,125.50
			8.9	\$175.00	\$ 1,557.50
Brenda J. Hanson	Paraprofessional	N/A	1.3	\$135.00	\$ 175.50
Karen V. Wendt	Paraprofessional	N/A	1.0	\$135.00	\$ 135.00
Blended Hourly Rate				\$382.55	
<b>Total Fees</b>			92.1		\$35,232.50

#### 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	\$ 460.00	7.7	\$ 3,542.00			
	\$ 450.00	14.1	\$ 6,345.00			
Anthony G. Edwards	\$ 400.00	3.0	\$ 1,200.00			
Barbara M. Livick	\$ 175.00	1.0	\$ 175.00			
Brenda J. Hanson	\$ 135.00	1.3	\$ 175.50			
Karen V. Wendt	\$ 135.00	0.7	\$ 94.50			
CATEGORY	TOTALS:	27.8	\$11,532.00			

Third Party Actions			
Name	Rate	Hours	Amount
Daniel N. Rosen	\$ 460.00	7.7	\$ 3,542.00
	\$ 450.00	34.0	\$ 15,300.00
Anthony G. Edwards	\$ 400.00	2.0	\$ 800.00
	\$ 340.00	1.5	\$ 510.00
Barbara M. Livick	\$ 195.00	10.9	\$ 2,125.50
	\$ 175.00	7.9	\$ 1,382.50
Karen V. Wendt	\$ 135.00	0.3	\$ 40.50
CATEGOR	Y TOTALS:	64.3	\$ 23,700.50

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

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

1.	Filing Fees	\$ 20.00
2.	Process Service Fees	\$ 72.00
3.	Witness Fees	\$ 0.00
4.	Court Reporter & Transcripts	\$ 0.00
5.	Lien and Title Searches	\$ 0.00
6.	Photocopies (in-house copies) (copies @ 15¢)	\$ 0.00
7.	Photocopies (outside copies)	\$ 87.50
8.	Postage	\$ 1.88
9.	Overnight Delivery Charges	\$ 0.00
10.	Outside Courier/Messenger Services	\$ 0.00
11a.	Long Distance (a) Telephone Charges	\$ 0.00
11b.	Long Distance (b) Conference Calls	\$ 0.00
12.	Long Distance Fax Transmission @ \$1.00/pg.	\$ 0.00
13.	Computerized Research	\$ 313.24
14.	Out of District of Minnesota Travel A. Transportation B. Lodging C. Meals	\$ 3,494.98
15.	Other (Not specifically disallowed; must specify and justify) Hard drive; software	\$ 0.00
	AL "GROSS" AMOUNT OF REQUESTED URSEMENTS	\$ 3,989.60

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #
12/16/2013	12051

MATTER
1808-001 Petters Receivership and B/R

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	11/4/2013	Print and save copy of transcript of Petters hearing on October 23; arrange for payment of bill.	0.80	175.00	140.00
Daniel N. Rosen	11/4/2013	Correspondence and attention to matters related to court documents.	0.20	450.00	90.00
Daniel N. Rosen	11/8/2013	Attend Prevost and Harrold sentencing hearings at federal courthouse in St. Paul.	5.70	450.00	2,565.00
Barbara M. Livick	11/14/2013	Provide Sol Genet with copy of hearing transcript from October 23, 2013.	0.20	175.00	35.00
Daniel N. Rosen	11/21/2013	Attend "status conference" hearing, Judge Kishel's courtroom; meetings thereafter with counsel for other parties.	8.20	450.00	3,690.00
DISBURSEMENTS		•			
	11/8/2013	Parking for sentencing.		13.00	13.00
	11/21/2013	Parking for Petters status conference.		14.00	14.00
		SUBTOTAL DISBURSEMENTS			27.00

Total	\$6,547.00

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #
12/16/2013	12050

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	11/4/2013	Monitor status/developments of related litigation between third parties on Pacer.	0.20	175.00	35.00
Daniel N. Rosen	11/5/2013	Travel to Miami for GE mediation and prepare for mediation.	5.50	450.00	2,475.00
Daniel N. Rosen	11/6/2013	Mediation in GE case; conference with MRB lawyers regarding several third party matters.	8.00	450.00	3,600.00
Daniel N. Rosen	11/7/2013	Travel for GE mediation and attention to correspondence.	4.00	450.00	1,800.00
Anthony G. Edwards	11/11/2013	Research law regarding	0.60	340.00	204.00
Barbara M. Livick	11/11/2013	Review recent pleadings in related litigation between third parties using Pacer; advise attorney Rosen regarding developments and scheduling; diary hearing dates.	0.90	175.00	157.50
Daniel N. Rosen	11/11/2013	Attention to filings in related cases; correspondence.	0.20	450.00	90.00

Total

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #
12/16/2013	12050

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
Anthony G. Edwards	11/12/2013	Research law regarding	0.90	340.00	306.00
		prepare email correspondence to counsel regarding same.			
Daniel N. Rosen	11/12/2013	<u> </u>	0.50	450.00	225.00
Daniel N. Rosen	11/13/2013	Correspondence regarding Ashton matter.	0.20	450.00	90.00
Barbara M. Livick	11/26/2013	Check Pacer for recent developments in related litigation between third parties.	0.20	175.00	35.00
DISBURSEMENTS		•			
	10/17/2013	Parking for meeting.		14.00	14.00
	10/20/2013	Parking for meeting.		6.00	6.00
	10/23/2013	Parking for Petters.		20.00	20.00
	11/7/2013	Hertz car rental in Miami.		150.71	150.71
	11/7/2013	Hotel for Miami mediation.		436.54	436.54
	11/7/2013	Airport parking.		58.00	58.00
	11/14/2013	Miami airfare for Attorney Rosen.		425.80	425.80
	11/17/2013	DNR car rental - GE mediation.		42.38	42.38
	11/30/2013	November 2013 online legal research.		283.54	283.54
	12/4/2013	Ashton hearing prep parking.		30.00	30.00

Total

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### **Invoice**

Date	Invoice #
12/16/2013	12050

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
12/6/2013	Car rental and fuel - Ashton hearing.		346.65	346.65
12/6/2013	MSP airport parking - Ashton hearing.		148.00	148.00
12/6/2013	Hotel for Ashton hearing.		1,768.40	1,768.40
12/13/2013	Order filing fee. SUBTOTAL DISBURSEMENTS		20.00	20.00 3,750.02

**Total** \$12,767.52

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #		
2/24/2014	12143		

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
Karen V. Wendt	12/5/2013	Coordinate file.	0.30	135.00	40.50
Daniel N. Rosen	1/10/2014	Attention to electronic court filings.	0.20	460.00	92.00
Karen V. Wendt	1/22/2014	Coordinate file.	0.20	135.00	27.00
Daniel N. Rosen DISBURSEMENTS	1/28/2014	Attend Petters omnibus hearing.	2.30	460.00	1,058.00
	12/31/2013	December 2013 photocopy expense.		7.00	7.00
	1/31/2014	January 2014 photocopy expense. SUBTOTAL DISBURSEMENTS		0.25	0.25 7.25

**Total** \$1,224.75

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #
2/24/2014	12144

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	12/2/2013	Check Pacer for activity in	1.20	175.00	210.00
		print documents and advise attorney Rosen regarding court hearing schedule.	•		
Daniel N. Rosen	12/3/2013	Telephone conference with Budwick and Wasserstrom in preparation for Ashton hearing.	0.40	450.00	180.00
Daniel N. Rosen	12/4/2013	Prepare for evidentiary hearing in Ashton.	7.00	450.00	3,150.00
Daniel N. Rosen	12/5/2013	Attend and provide testimony at Ashton evidentiary hearing; meetings with co-counsel.	7.50	450.00	3,375.00
Daniel N. Rosen	12/10/2013	Attention to Dunlap collection matters.	0.20	450.00	90.00
Barbara M. Livick	12/10/2013	Review Order for Disclosure and transmit to Plaintiff at Minnesota and Florida addresses; consider follow-up to obtain financial disclosures.	0.90	175.00	157.50
Daniel N. Rosen	12/13/2013		0.30	450.00	135.00
Barbara M. Livick	12/16/2013		0.30	175.00	52.50

Total

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #		
2/24/2014	12144		

MATTER
1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Daniel N. Rosen	12/23/2013	Attention to Dunlap and Amiot collections.	0.20	450.00	90.00
Barbara M. Livick	12/23/2013	Contact Hennepin County regarding procedure for obtaining and enforcing Order to Show Cause; update file; consult with attorney Rosen regarding pursuing contempt of court charges against Marian Dunlap; prepare Affidavit in Support of Request for Order to Show Cause and proposed Order.	2.30	175.00	402.50
Barbara M. Livick	12/23/2013	Review documents regarding Amiot judgment in Florida; consider enforcement through Minnesota Courts.	0.40	175.00	70.00
Barbara M. Livick	12/27/2013	(Amiot) Prepare proposed Affidavit of Identification of Judgment Debtor, Affidavit of Identification of Judgment Creditor, and letter requesting docketing of judgment in Hennepin County District Court; consider further handling.	1.50	175.00	262.50

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Total		

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #	
2/24/2014	12144	

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

# MATTER 1808-005 Third Party Actions

D	ate	Description/Comments	Hours	Rate	Amount
		DISBURSEMENTS			
12/31	1/2013	December 2013 postage expense.		0.92	0.92

**Total** \$8,175.92

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #		
2/24/2014	12145		

MATTER
1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	1/2/2014	(Dunlap) Review status and follow-up with attorney Rosen regarding Order for Disclosure.	0.30	195.00	58.50
Barbara M. Livick	1/3/2014	Research Pacer for bankruptcy appeals.	0.40	195.00	78.00
Barbara M. Livick	1/9/2014	(Dunlap) Take Order for Disclosure documents to Hennepin County signing judge, have documents signed and prepare documents for service on Dunlap at her home.	2.80	195.00	546.00
Daniel N. Rosen	1/10/2014	Telephone conference with Genet regarding follow-on telephone conferences and email correspondence; attention to Dunlap collection.	0.70	460.00	322.00
Barbara M. Livick	1/10/2014	Arrange for personal service of Orders for Disclosure on Dunlap; consider need for service in Florida is Plaintiff cannot be located.	0.90	195.00	175.50
Daniel N. Rosen	1/12/2014	Email correspondence and consideration of evidentiary issues.	0.20	460.00	92.00

Total		

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #		
2/24/2014	12145		

MATTER
1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	1/14/2014	(Dunlap) Confirm personal service on Dunlap in Minnesota.	0.20	195.00	39.00
Barbara M. Livick	1/14/2014	(Amiot) Follow up with Jessica Wasserstrom regarding certified copy of judgment.	0.20	195.00	39.00
Daniel N. Rosen	1/16/2014	Telephone conference with counsel for Dunlap and email correspondence.	0.40	460.00	184.00
Daniel N. Rosen	1/20/2014	Telephone conference with new counsel for Dunlap; email correspondence with Wasserstrom; analysis.	0.70	460.00	322.00
Barbara M. Livick	1/20/2014	(Dunlap) Compile documents from Florida litigation and Minnesota litigation; prepare correspondence to Dunlap's Minnesota attorney at Moss & Barnett providing same.	2.20	195.00	429.00
Daniel N. Rosen	1/21/2014	Correspondence regarding Dunlap.	0.20	460.00	92.00
Daniel N. Rosen	1/27/2014	Attention to Amiot collection issues.	0.20	460.00	92.00

Total		

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #
2/24/2014	12145

MATTER
1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	1/28/2014	(Dunlap) Review correspondence from Dunlap's attorney and consider response regarding postponing hearing on Order to Show Cause.	0.20	195.00	39.00
Daniel N. Rosen	1/30/2014	Meet in Budwick's office with Budwick and Genet regarding strategy and several third party actions.	3.50	460.00	1,610.00
DISBURSEMENTS					
	1/1/2014	Research - Pacer Service Center. O4 2013		20.30	20.30
	1/20/2014	Legal Process Service - M. Dunlap.		72.00	72.00
		SUBTOTAL DISBURSEMENTS			92.30

Total	\$4,210.30

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #			
4/4/2014	12200			

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	2/4/2014	Email correspondence.	0.20	460.00	92.00
Anthony G. Edwards	2/5/2014	Review and revise motion papers in support of Motion to Intervene and Motion in Support of Stay Relief.	1.20	400.00	480.00
Daniel N. Rosen	2/5/2014	Telephone conference with J. Marcus regarding motion to lift stay; attention to matters relating to same.	0.30	460.00	138.00
Daniel N. Rosen	2/5/2014	Telephone conference with Josh Marcus; attention to matters relating to motions for lifting of stay in Catain matter.	0.50	460.00	230.00
Anthony G. Edwards	2/6/2014	Prepare Motions and Notices of Hearing regarding new motions.	0.60	400.00	240.00
Anthony G. Edwards	2/7/2014	Finalize motion papers; discussion with Attorney Marcus regarding same; discussion with chambers regarding hearing date.	0.90	400.00	360.00
Brenda J. Hanson	2/10/2014	Assist in service and filing of Motion to Intervene pleadings and Motion Seeking Relief of Stay of Litigation Against Michael Catain and Enchanted Family Buying Company.	0.70	135.00	94.50

Total

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #
4/4/2014	12200

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	2/10/2014	Attention to court filings this day; attention to Catain motion.	0.40	460.00	184.00
Daniel N. Rosen	2/11/2014	Attention to electronic court filings this day and specifically to	0.40	460.00	184.00
Anthony G. Edwards	2/18/2014	Vicis settlement-motion papers. Handle filing of supplemental Exhibit; exchange email correspondence with client regarding same.	0.30	400.00	120.00
Brenda J. Hanson	2/18/2014	Assist in filing Exhibit 1 to Memorandum Seeking Relief from Stay of Litigation Against Michael Catain and Enchanted Family Buying Company; delivery of courtesy copies to Judge Montgomery.	0.60	135.00	81.00
Karen V. Wendt	2/18/2014	Gather documents; coordinate file.	0.20	135.00	27.00
Daniel N. Rosen	2/18/2014	Attention to Catain motion issues and to court filings this day.	0.20	460.00	92.00
Daniel N. Rosen	2/25/2014	Attend hearing on motion to lift stay; telephone conference with court clerk.	1.20	460.00	552.00
Daniel N. Rosen DISBURSEMENTS	2/27/2014	Attend omnibus hearing.	2.00	460.00	920.00

Total

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #
4/4/2014	12200

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
1/28/2014	DNR parking.		3.00	3.00
1/28/2014			3.50	3.50
1/30/2014	• •		15.00	15.00
2/28/2014			2.25	2.25
	expense. SUBTOTAL DISBURSEMENT	S		23.75

**Total** \$3,818.25

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #
4/4/2014	12201

**MATTER**1808-005 Third Party Actions

	Date	Description/Comments	Hours	Rate	Amount
Barbara M. Livick	2/10/2014	(Dunlap) Follow-up regarding disclosures and/or settlement in anticipation of hearing on Order to Show Cause scheduled for February 12, 2014.	0.40	195.00	78.00
Barbara M. Livick	2/10/2014	(Amiot) File and serve Certified copy of Judgment, Affidavit of Identification of Judgment Debtor, and Affidavit of Identification of Judgment Creditor.	1.10	195.00	214.50
Daniel N. Rosen	2/10/2014	Attention to Amiot collection.	0.20	460.00	92.00
Karen V. Wendt	2/10/2014	Gather documents; coordinate file.	0.30	135.00	40.50
Daniel N. Rosen	2/11/2014	Telephone conference with counsel for Dunlap and email memorandum to Budwick and Wasserstrom.	0.50	460.00	230.00
Barbara M. Livick	2/11/2014	(Dunlap) Reschedule hearing on Order to Show Cause; advise court and adverse parties.	0.80	195.00	156.00
Daniel N. Rosen	2/14/2014	Correspondence.	0.20	460.00	92.00

Total	

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #		
4/4/2014	12201		

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	2/17/2014	(Dunlap) E-file documents relating to rescheduled hearing on Order to Show Cause; mail documents to Dunlap and her attorney.	0.90	195.00	175.50
Anthony G. Edwards	2/24/2014	Research changes to Minnesota law regarding clawback of donations to charities; memorandum to DNR.	2.00	400.00	800.00
Barbara M. Livick	2/24/2014	(Amiot) Review court docket and diary for Request for Order for Disclosure.	0.30	195.00	58.50
Daniel N. Rosen	2/24/2014	Email correspondence with Russin regarding NCF case; legal research and analysis and attention to AGE memo.	0.30	460.00	138.00
Daniel N. Rosen Barbara M. Livick	2/25/2014 2/27/2014	Confer with Budwick and Genet. (Dunlap) Follow-up regarding disclosures, settlement, and Order to Show Cause hearing on March 6.	0.60 0.20	460.00 195.00	276.00 39.00
DISBURSEMENTS	2/28/2014 2/28/2014	February 2014 postage expense. February 2014 photocopy expense.		0.96 78.00	0.96 78.00

Total

123 North Third Street, Suite 888 Minneapolis, MN 55401 EIN 20-3550547

### Invoice

Date	Invoice #
4/4/2014	12201

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
2/28/2014	February 2014 online legal		9.40	9.40
	research. SUBTOTAL DISBURSEMENTS			88.36

**Total** \$2,478.36