UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

www.flsb.uscourts.gov

Chapter 11

\$3,742.30

In re:

1 GLOBAL CAPITAL LLC, et al., 1	Case No. 18-19121-RAM
	(Jointly Administered)
GREENBERG TRAUR	TERIM FEE APPLICATION OF IG, LLP AS COUNSEL FOR <u>ATING TRUSTEE</u>
1. Name of Applicant:	Greenberg Traurig, LLP
2. Role of Applicant:	Counsel for the Liquidating Trustee
3. Name of Certifying Professional:	Stephen Mendelsohn
4. Date case filed:	July 27, 2018
5. Date of Retention Order:	February 26, 2020
IF INTERIM APPLICATION, COMPLETE	6, 7 AND 8 BELOW:
6. Period for this Application:	December 1, 2020 through May 31, 2021
7. Amount of Compensation Sought:	\$29,600.60 ²

8. Amount of Expense Reimbursement Sought:

¹The Debtors in the Chapter 11 Cases, along with the business addresses and the last four (4) digits of each Debtor's federal tax identification number, if applicable, are: 1 GC Collections, c/o Development Specialists, Inc., 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309 (9517); and 1 West Collections, c/o Development Specialists, Inc., 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309 (1711).

² This amount does not include fees in the amount of \$\$8,499.60, still pending from the first interim fee application, for services relating to the SEC's objections to PBYA's fee application and Greenberg Traurig's fee application. Greenberg Traurig is not seeking approval and/or payment of these fees in this Application and will address same in a future Application, as appropriate.

IF FINAL APPLICATION, COMPLETE 9 AND	D 10 BELOW:
9. Total Amount of Compensation Sought during case:	n/a
10. Total Amount of Expense Reimbursement Sought during case:	n/a
11. Amount of Original Retainer (s) Please disclose both Fee Retainer and Cost Retainer if such a Retainer has been received:	\$0.00
12. Current Balance of Retainer(s) remaining:	\$0.00
13. Last Post-Confirmation Quarterly Operating Report (Month/Year and ECF No.):	January 2021 - March 31, 2021; ECF No. 2507
14. If case is Chapter 11, current funds in the Chapter 11 estate:	\$7,987,388.00 ³
15. If case is Chapter 7, current funds held by Chapter 7 trustee:	N/A

³ Amount as of March 31, 2021, per Liquidating Trustee's Post-Confirmation Quarterly Operating Report for the Period from January 1, 2021 Through March 31, 2021 [ECF No. 2507].

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

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In re:		Chapter 11
1 GC COLLECTIONS, et al., ¹		Case No. 18-19121-RAM
Debtors.	/	(Jointly Administered)

THIRD INTERIM APPLICATION OF GREENBERG TRAURIG, LLP AS COUNSEL FOR THE LIQUIDATING TRUSTEE

Greenberg Traurig, LLP ("Greenberg Traurig"), counsel to the Liquidating Trustee, applies for interim compensation for fees for services rendered and reimbursement for costs incurred in these Chapter 11 cases. This application is filed pursuant to 11 U.S.C. §§ 330 and 331, Bankruptcy Rule 2016, Local Rule 2016-1, this Court's Order Granting Motion of the Liquidating Trustee for Entry of an Order Modifying Procedures for Monthly, Interim, and Final Compensation and Reimbursement of Expenses of Professionals and Affirming that Such Procedures as Modified Shall Apply to Professionals Retained by the Liquidating Trustee [ECF No. 2253], and the First Amended Joint Plan of Liquidation [ECF No. 805] (the "Plan"), and meets all of the requirements set forth in the Guidelines incorporated in Local Rule 2016-1(B)(1). The exhibits attached to this application, pursuant to the Guidelines, are:

¹ The Debtors in the Chapter 11 Cases, along with the business addresses and the last four (4) digits of each Debtor's federal tax identification number, if applicable, are: 1 GC Collections, c/o Development Specialists, Inc., 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309 (9517); and 1 West Collections, c/o Development Specialists, Inc., 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309 (1711)

Exhibit "1" - Fee Application Summary Chart

Exhibits "2-A" and "2-B" - Summary of Professional and Paraprofessional Time.

Exhibit "3" - Summary of Requested Reimbursements of Expenses

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

Exhibit "5" - The applicant's detailed expense records for the time period covered by this application.

As explained more fully below, Applicant believes that the requested compensation of \$29,600.60 for the Third Interim Period (as defined below), is reasonable considering the twelve factors enumerated in Johnson v. Georgia Highway Express, Inc., 488 F.2d 714 (5th Circuit 1974), made applicable to bankruptcy proceedings by In re First Colonial Corp. of America, 544 F.2d 1291 (5th Cir. 1977), as follows:

Background

- 1. On July 27, 2018 (the "**Petition Date**"), 1 Global Capital LLC and 1 West Capital LLC (collectively, the "Debtors") commenced the above-captioned bankruptcy cases (the "Chapter 11 Cases") by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), in the United States Bankruptcy Court for the Southern District of Florida (the "Court").
- 2. On July 22, 2019, the Debtors and the Official Committee of Unsecured Creditors filed the First Amended Joint Plan of Liquidation of 1 Global Capital LLC and 1 West Capital LLC Under Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors (as it may be further amended, supplemented or modified from time to time, the "Plan") [ECF No. 805].²

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² All capitalized terms used in the Application but not defined herein shall have the meanings set forth for such terms in the Plan.

- 3. On September 20, 2019, the Court entered the *Order Confirming First Amended Joint Plan of Liquidation of 1 Global Capital LLC and 1 West Capital LLC Under Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors* [ECF No. 1197] (the "Confirmation Order"), confirming the Plan, directing the execution of the 1 GC Collections Creditors' Liquidating Trust Agreement (the "Liquidating Trust Agreement"), and approving the appointment of the Liquidating Trustee as the liquidating trustee of the Trust.
- 4. On November 21, 2019, the Effective Date of the Plan occurred. See Notice of (A) Effective Date of Chapter 11 Plan and (B) Administrative Claims Bar Date [ECF No. 1586].
- 5. Pursuant to the Liquidating Trust Agreement, the Liquidating Trustee may retain attorneys, financial advisors, accountants or other professionals and employees. Liquidating Trust Agreement ¶ 3.9. Any such retention shall be made upon application to the Court in accordance with Rule 2014 of the Federal Rules of Bankruptcy Procedure. *Id*.
- 6. On February 26, 2020, this Court entered an order authorizing the employment and retention of Greenberg Traurig as counsel for the Liquidating Trustee in these cases *nunc pro tunc* to the Effective Date, November 21, 2019 [ECF No. 2252].

Jurisdiction, Venue and Predicates for Relief

- 7. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this district pursuant to 28 U.S.C. § 1408. This matter is core within the meaning of 28 U.S.C. § 157(b)(2).
- 8. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

Summary of Services Rendered

9. This Application is the third interim application for compensation for services rendered and reimbursement of expenses incurred filed by Greenberg Traurig, as counsel for the Liquidating Trustee, in these cases. In connection with the professional services described below, by this Application, Greenberg Traurig seeks Court approval of compensation in the amount of \$29,600.60 and \$3,742.30 for reimbursement of expenses incurred for the period from December 1, 2020 through May 31, 2021 (the "Third Interim Period").

10. A detailed recitation of each and every item of professional services that Greenberg Traurig performed during the Third Interim Period would unduly burden the Court. The following summaries are therefore intended to highlight the areas in which services were rendered throughout the Third Interim Period. As more fully described in the attached exhibits, these services included, but were not limited to, the following:

a) Case Administration (804)

Third Interim Period: 2.90 hours; \$2,175.00 in fees

This category includes services relating to general case administration issues, including but not limited to communications regarding various case matters; analyzing plan; reviewing annual reports; numerous ECF notices, docket and pleadings; preparing letters regarding agent distribution; attendance at telephonic meetings with Liquidating Trustee; and responding to inquiries from creditors and vendors.

b) Litigation Matters (810)

Third Interim Period: 51.00 hours; \$25,589.60 in fees

This category includes the prosecution of cases by the Liquidating Trust against numerous merchants and guarantors for breaches of Merchant Agreements, and in one case for fraudulent transfers. All cases prosecuted by Greenberg Traurig, P.A. have been settled or the defendants have filed for bankruptcy protection and proofs of claim have been filed.

c) SEC Matters (844)

Third Interim Period: 5.40 hours; \$1,836.00 in fees

This category includes services relating to the Securities and Exchange

Commission.

- 11. The professional services that Greenberg Traurig rendered as counsel to the Liquidating Trustee during the Third Interim Period included, but were not limited to, the following:
 - a) providing legal advice with respect to the Liquidating Trustee's powers and duties as Liquidating Trustee under the terms of the Liquidating Trust;
 - b) negotiating, drafting, and pursuing all documentation necessary in the administration of the Trust;
 - c) preparing on behalf of the Liquidating Trustee applications, motions, answers, orders, reports, and other legal papers necessary to the administration of the Trust;
 - d) appearing in Court and protecting the interests of the Liquidating Trustee before the Court;
 - e) assisting with any disposition of the Trust assets, by sale or otherwise;
 - f) attending meetings and negotiating with representatives of creditors, the United States Trustee, the United States Attorney's Office, the Securities and Exchange Commission and other parties-in-interest;
 - g) providing legal advice regarding bankruptcy law, corporate law, corporate governance, securities, employment, transactional, tax, labor, litigation, intellectual property and other issues to the Liquidating Trustee in connection with the administration of the Trust; and
 - h) taking all necessary actions, including prosecuting actions on the Liquidating Trustee's behalf, defending any action commenced against the Liquidating Trustee, and representing the Liquidating Trustee in negotiations concerning litigation in which the Liquidating Trustee is involved; and
 - i) performing other legal services for, and providing other necessary legal advice to, the Liquidating Trustee, which may be necessary and proper.

Factors to be Considered

The Time and Labor Required: The detailed time records of services rendered, attached hereto as Exhibit "4", show that the professionals and paraprofessionals of Greenberg Traurig devoted 59.30 hours of time in the representation of the Liquidating Trustee during the Third Interim Period. In circumstances where the expertise and judgment of an attorney were not required, responsibilities were delegated to paralegals. The services rendered were performed within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue or task addressed. Greenberg Traurig submits that whether viewed individually as to each of the tasks or collectively as a whole, the time expended and fees incurred during the Second Interim Period have been reasonable and efficient to accomplish the needs of these cases.

The Novelty and Difficulty of the Services Rendered: Greenberg Traurig assisted the Liquidating Trustee in addressing a number of complex legal and business issues raised during the pendency of these Chapter 11 cases, requiring in-depth knowledge of bankruptcy law, corporate law and securities law, among other areas. Such legal questions arising in the representation of the Liquidating Trustee have required the exercise of skill by experienced counsel in a variety of legal disciplines.

The Skill Requisite to Perform the Services Properly: Greenberg Traurig was able to draw upon resources within the firm to provide all of the legal services rendered to the Liquidating Trustee in the multiple areas of law recited in the preceding paragraph.

The Preclusion of Other Employment by the Professional Due to the Acceptance of the Case: Greenberg Traurig is aware of no other employment which was precluded as a result of its accepting this case, though the attorneys assigned to these cases were limited in their ability to generate other business due to their active involvement in and focus on these cases.

The Customary Fee: The rates charged by the participating attorneys and paralegals as set forth in Exhibits "2-A" and "2-B" are within the range charged by such professionals of similar skill and reputation in their respective jurisdictions and their respective fields of practice. The blended billable rate of \$499.17 per hour for the professionals and paraprofessionals working on these cases during the Third Interim Period is less than the rates customarily charged by Greenberg Traurig for similar cases. In all instances care was taken to avoid duplication of effort, and much of the work initially performed by senior attorneys was gradually delegated to more junior attorneys billing at lower hourly rates. In addition, as noted in its retention application, at the outset of its engagement, in light of the public interest surrounding these Chapter 11 Cases, Greenberg Traurig agreed with the Liquidating Trustee, solely in and for purposes of these cases, to reduce its customary hourly rates for 2018³ for all timekeepers by 20%, with a maximum hourly rate of \$750.00.

Whether the Fee is Fixed or Contingent: The Applicant's compensation in this matter is subject to and contingent upon approval of the Court, a factor which militates in favor of a fee in the amount requested. The amount requested is consistent with the fee that the Applicant would charge its clients in other cases in which fees are payable on a monthly basis without the requirement of application to and approval by any court, except as indicated in the preceding paragraph.

<u>Time Limitations Imposed by the Client or Other Circumstances</u>: The immediate nature of matters involved in these cases required Greenberg Traurig's attorneys to devote a substantial amount of their time to handle matters concerning the Chapter 11 estate. In the course of providing the services covered in this Application, Greenberg Traurig attorneys consistently

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³ Greenberg Traurig will use 2018 rates for the life of this matter, and will not adjust rates based on any annual rate changes by the firm.

responded to the Debtors' needs on an expedited basis. Simply stated, these cases required Greenberg Traurig to devote substantial time on an urgent basis to a great number of issues within a highly compressed period of time.

<u>The Experience, Reputation, and Ability of the Professional</u>: Greenberg Traurig is an established law firm having extensive experience and knowledge in the field of debtor and creditor rights and business reorganizations under chapter 11 of the Bankruptcy Code.

The Undesirability of the Case: Greenberg Traurig did not find it undesirable to represent the Liquidating Trustee in these cases or any other reputable party in any form of bankruptcy proceeding, based upon the understanding that reasonable compensation will be awarded for fees and expenses incurred during the course of representation.

<u>The Nature and Length of the Professional Relationship of the Client</u>: Greenberg Traurig has not previously provided legal services to the Liquidating Trustee.

Awards in Similar Cases: The amount requested by the Applicant is reasonable in terms of awards in cases of similar magnitude and complexity. The compensation that the Applicant requests comports with the mandate of the Bankruptcy Code, which directs that services be evaluated in light of comparable services performed in non-bankruptcy cases in the community. The fees requested by the Applicant reflect an average hourly rate of approximately \$499.17 during the Third Interim Period. Considering the results obtained thus far in these cases and the complexity of the issues addressed during the period covered by this Application, this rate is appropriate.

Summary of Expenses

- 12. Greenberg Traurig incurred or disbursed actual and necessary costs and expenses related to these cases in the aggregate amount of \$3,742.30 during the Third Interim Period. The expenses incurred include, among other things, business meals, color copies, conference calls, messenger services, overnight mail charges, travel related expenses, in-house and off-site photocopying charges, research charges, and filing fees. A detailed description of the necessary costs and expenses incurred by Greenberg Traurig is attached hereto as Exhibit "5".
- 13. Pursuant to Local Rule 2016-1(B)(1) and the Guidelines for Fee Applications for Professionals in the Southern District of Florida in Bankruptcy Cases, Greenberg Traurig represents as follows with regard to its charges for actual and necessary costs and expenses incurred during the Interim Application Period:
- a) Copy Charges were \$.15 per page, which charge is reasonable and customary in the legal industry and represents the costs of copy material, acquisition, maintenance, storage and operation of copy machines, together with a margin for recovery of related expenditures. In addition, Greenberg Traurig often utilizes outside copier services for high volume projects, and this Application seeks the recovery of those costs, if applicable:
 - b) Incoming facsimiles are not billed;
- c) Out-going facsimiles are billed at the rate of \$1.00 per page. The cost represents operator time, maintaining several dedicated facsimile telephone lines, supplies and equipment, and includes a margin for recovery of related expenditures; and
 - d) Toll telephone charges are not billed.

WHEREFORE, Greenberg Traurig requests that upon due consideration of the foregoing facts and circumstances, the Court enter an Order (a) granting this Application; (b) allowing and awarding compensation of fees in the amount of \$29,600.60⁴ and reimbursement of expenses in the amount of \$3,742.30 for the Third Interim Period; (c) directing immediate payment of amounts so allowed and awarded less payments that have previously been made to Greenberg Traurig by the Liquidating Trustee; and (d) affording such other and further relief as may be fair and reasonable under the circumstances.

Dated: June 11, 2021 GREENBERG TRAURIG, LLP

/s/ Stephen A. Mendelsohn
Stephen A. Mendelsohn
Fla. Bar No. 849324
mendelsohnm@gtlaw.com
333 S.E. 2nd Avenue, Suite 4400
Miami, Florida 33131

Tel: 305 579-0500 Fax: 305 579-0717

Counsel for the Liquidating Trustee

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⁴ This amount does not include fees in the amount of \$\$8,499.60, still pending from the first interim fee application, for services relating to the SEC's objections to PBYA's fee application and Greenberg Traurig's fee application. Greenberg Traurig is not seeking approval and/or payment of these fees in this Application and will address same in a future Application, as appropriate.

FEE APPLICATION SUMMARY CHART EXHIBIT 1

	REQUEST			APPROVAL			PAI	D	HOLD	BACK		
Date Filed	ECF#	Period	Fees	Expenses	Date	ECF#	Fees	Expenses	Fees Paid	Expenses	Fees	Expenses
		Covered	Requested	Requested	Ordered		Approved	Approved		Paid	Holdback	Holdback
06/30/2020	2339	11/21/2019	\$470,470.50	\$4,258.72	07/29/20201	2358	\$446,946.98	\$4,258.72	\$446,946.98	\$4,258.72	\$23,523.53	\$0.00
		-										
		05/31/2020										
10/04/2020	2418	06/01/2020	\$113,838.60	\$3,980.95	12/21/2020	2443	\$113,838.60	\$3,980.95	\$113,838.60	\$3,980.95	\$0.00	\$0.00
		-										
		11/30/2020										

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

Name	Shareholder, Associate or Para- professional	Year	Total Hours	Hourly Rate	Fee
Kenneth N. Zuckerbrot	Shareholder	1968	1.90	\$750.00	\$1,425.00
Scott E. Fink	Shareholder	2001	1.00	\$750.00	\$750.00
Stephen A. Mendelsohn	Shareholder	1984	28.90	\$580.00	\$16,762.00
Jed Dwyer	Shareholder	2013	10.20	\$484.00	\$4,936.80
Stephanie Peral	Associate	2015	5.40	\$340.00	\$1,836.00
Sabrina D. Niewialkouski	Associate	2016	11.30	\$332.00	\$3,751.60
Totals for Professionals			58.70		\$29,461.40
Patricia P. Lin	D 1 1	D T/A	60	Ф222.00	¢120.20
Total for Paraprofessionals	Paralegal	N/A	.60 .60	\$232.00	\$139.20 \$139.20
Total			59.30		\$29,600.60
Blended Average Hourly Rate				\$499.17	· · · · · · · · · · · · · · · · · · ·

SUMMARY OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY FOR SECOND INTERIM APPLICATION PERIOD (EXHIBIT "2-B")

See Attached

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Case 18-19121-RAM Doc 2525 Filed 06/11/21 Summary of Profesional and Paraprofessional Time by Activity Code Category for this Time Period Only

	Hours	Rate	Fees
Activity Code 804: Case Administration			
Kenneth N. Zuckerbrot	1.90	\$750.00	\$1,425.00
Scott E. Fink	1.00	\$750.00	\$750.00
Totals for Activity Code 804: Case Administration	2.90		\$2,175.00
Activity Code 810: Litigation Matters			
Stephen A. Mendelsohn	28.90	\$580.00	\$16,762.00
Jed Dwyer	10.20	\$484.00	\$4,936.80
Sabrina D. Niewialkouski	11.30	\$332.00	\$3,751.60
Patricia P. Lin	0.60	\$232.00	\$139.20
Totals for Activity Code 810: Litigation Matters	51.00		\$25,589.60
Activity Code 844: SEC Matters			
Stephanie Peral	5.40	\$340.00	\$1,836.00
Totals for Activity Code 844: SEC Matters	5.40		\$1,836.00
Total All Activity Codes			
	59.30		\$29,600.60

SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY EXHIBIT 3

Category	Amount
Information and Research	\$1,134.70
Subpoenas	\$2,607.60
Total	\$3,742.30

INVOICES EXHIBIT 4

Invoice No.: 5574880 Page 1

Matter No.: 180567.010300

Description of Professional Services Rendered:

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	DESCRIPTION	<u>HOURS</u>	<u>AMOUNT</u>
12/02/20	Stephen A. Mendelsohn	Call with Joe Luzinski re: status of open cases.	0.60	348.00
12/02/20	Stephen A. Mendelsohn	EAST COAST re: emails with Nick Davitian opposing counsel re: final settlement payments.	0.30	174.00
12/03/20	Stephen A. Mendelsohn	SOFTEK re: review of order approving Softek settlement and emails with opposing counsel.	0.20	116.00
12/03/20	Stephen A. Mendelsohn	EAST COAST re: emails with attorney for East Coast Nick Davitian as to remaining payment.	0.30	174.00
12/04/20	Stephen A. Mendelsohn	WALL STREET re: emails with Trustee as to counteroffer.	0.30	174.00
12/04/20	Stephen A. Mendelsohn	WALL STREET re: emails with Wall Street counsel as to settlement.	0.20	116.00
12/06/20	Stephen A. Mendelsohn	WALL STREET re: emails with counsel for Wall Street Mendy Piekarski as to settlement.	0.60	348.00
12/07/20	Stephen A. Mendelsohn	WALL STREET: Calls with Mendy Piekarksi as to settlement	1.60	928.00
12/07/20	Stephen A. Mendelsohn	WALL STREET re: emails with Jim Cassel Trustee as to settlement of case.	0.40	232.00
12/11/20	Stephen A. Mendelsohn	WALL STREET re: review of draft settlement agreement and email to Mendy Piekarksi attorney for Wall Street.	0.30	174.00
12/13/20	Stephen A. Mendelsohn	WALL STREET re: emails with Trustee as to terms of settlement agreement.	0.20	116.00
12/14/20	Stephen A. Mendelsohn	WALL STREET re: changes to settlement agreement and comments from opposing counsel Mendy Pieksarski.	0.40	232.00
12/14/20	Stephen A. Mendelsohn	WALL STREET re: email with John Dodd as to edits requested by opposing counsel.	0.20	116.00
12/15/20	Stephen A. Mendelsohn	Wall Street re: call with trustee as to changes requested to settlement agreement by Wall Street.	0.30	174.00
12/15/20	Stephen A. Mendelsohn	Wall Street re: emails with John Dodd as to proposed changes to settlement agreement.	0.20	116.00
12/15/20	Stephen A. Mendelsohn	WALL STREET re: email to Mendy P. opposing counsel as to amendments to settlement draft.	0.30	174.00
12/17/20	Stephen A. Mendelsohn	Preparation for fee hearing.	0.50	290.00
12/17/20	Stephen A. Mendelsohn	Attendance at fee hearing.	0.40	232.00
12/18/20	Stephen A. Mendelsohn	WALL STREET re: draft changes to settlement agreement.	0.60	348.00
12/23/20	Stephen A. Mendelsohn	Call with creditor's attorney as to distribution.	0.20	116.00

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Invoice No.: 5574880 Page 2

Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

12/23/20 Stephen A. Mendelsohn WALL STREET re: emails with Wall 0.50

Street's counsel Mendy Piekarski as to

changes to settlement draft.

Total Hours: 8.60

Total Amount: \$4,988.00

290.00

TIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

Timekeeper Name	Hours Billed	Rate	Total \$ Amount	
Stephen A. Mendelsohn	8.60	580.00		4,988.00
Totals:	8.60	580.00	\$	4,988.00

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Invoice No.: 5574880 Page 3
Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount		
Stephen A. Mendelsohn	8.60	580.00		4,988.00	
Totals:	8.60	580.00	\$	4,988.00	

Invoice No.: 5588454 Page 1

Matter No.: 180567.010300

Description of Professional Services Rendered:

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	TIMEKEEPER	DESCRIPTION	<u>HOURS</u>	AMOUNT
01/04/21	Stephen A. Mendelsohn	WALL STREET re: emails with counsel to Wall Street as to finalization of settlement.	0.30	174.00
01/05/21	Stephen A. Mendelsohn	DART SEASONAL re: email to defense counsel re: depositions.	0.30	174.00
01/05/21	Stephen A. Mendelsohn	EAST COAST re: notices of dismissal and order review and comments.	0.20	116.00
01/06/21	Jed Dwyer	Extended telephone call with USAO and S. Peral re certain issues	0.50	242.00
01/10/21	Jed Dwyer	Review and analyze proposed motion being filed by USAO; draft and send extended update email to J. Cassell re the same with advice	1.60	774.40
01/11/21	Jed Dwyer	Telephone call with J. Cassell	0.20	96.80
01/11/21	Stephen A. Mendelsohn	Draft of email to Joseph Luzinski of DSI re: status of open and pending litigation.	0.50	290.00
01/12/21	Jed Dwyer	Review, analyze and respond to email from S. Peral re issues related to DOJ request	0.20	96.80
01/12/21	Stephen A. Mendelsohn	WALL STREET re: review of changes to 9019 motion from opposing counsel.	0.30	174.00
01/13/21	Jed Dwyer	Prepare for and participate in telephone call with J. Cassell and others re DOJ issues	0.60	290.40
01/15/21	Stephen A. Mendelsohn	DART SEASONAL re: draft of email to opposing counsel as to discovery and motion to dismiss.	0.30	174.00
01/15/21	Stephen A. Mendelsohn	Vero Logistics re: draft of settlement letter.	0.30	174.00
01/19/21	Stephen A. Mendelsohn	DART SEASONAL re: deposition notices for defendants.	0.20	116.00
01/20/21	Jed Dwyer	Draft and send extended email to DOJ re issues related to privileged materials	0.20	96.80
01/21/21	Sabrina D. Niewialkouski	[Dart Seasonal] Reviewed rule of procedure to determine whether 6 month dismissal rule in Broward applies to action to ensure it will not be dismissed for lack of prosecution	0.20	66.40
01/22/21	Stephen A. Mendelsohn	DART SEASONAL re: draft of schedule A to corporate representative subpoena.	0.40	232.00
01/25/21	Jed Dwyer	Review and analyze email traffic from DOJ, determine path forward, and suggest filing with S. Peral	0.20	96.80
01/25/21	Jed Dwyer	Review and analysis of SEC filing in federal court matter, draft and send email to J. Cassell re same	0.20	96.80
01/26/21	Stephen A. Mendelsohn	Status conference in Ellwood case in Broward Court.	0.60	348.00
01/28/21	Stephen A. Mendelsohn	Review of settlement proposal from Dart Seasonal.	0.40	232.00

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Invoice No. Matter No.:	5588454 180567.010300			Page 2
Description	of Professional Services Re	<u>endered</u>		
01/28/21	Stephen A. Mendelsohn	Email analysis of Dart Seasonal settlement proposal to Liquidating Trustee.	0.30	174.00
01/29/21	Stephen A. Mendelsohn	Emails with trustee as to counteroffer for Dart Seasonal settlement.	0.30	174.00
01/29/21	Stephen A. Mendelsohn	DART SEASONAL re: email to counsel for dart SEasonal as to counter settlement offer.	0.40	232.00
		Total Hours:	8.70	

Total Amount: \$ 4,641.20

TIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

Timekeeper Name	Hours Billed	Rate	 Total \$ Amount
Jed Dwyer	3.70	484.00	1,790.80
Stephen A. Mendelsohn	4.80	580.00	2,784.00
Sabrina D. Niewialkouski	0.20	332.00	66.40
Totals:	8.70	533.47	\$ 4,641.20

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Invoice No.: 5588454 Page 3

Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

TASK CODE: 844 SEC MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/04/21	Stephanie Peral	Correspondence re: setting call.	0.10	34.00
01/05/21	Stephanie Peral	Correspondence re: setting up call with government.	0.10	34.00
01/06/21	Stephanie Peral	Conference call with government.	0.90	306.00
01/08/21	Stephanie Peral	Analyze previous claw back and filter team production for purposes of responding to government's recent oral request.	0.60	204.00
01/11/21	Stephanie Peral	Analyze clawed back documents against privilege log per government's request.	0.40	136.00
01/12/21	Stephanie Peral	Analyze production of privilege log and documents to government and correspondence with J. Dwyer re: same.	0.40	136.00
01/13/21	Stephanie Peral	Correspondence with J. Dwyer re: privilege log.	0.20	68.00
01/27/21	Stephanie Peral	Draft motion for Rule 502(d) order and proposed order.	1.40	476.00

Total Hours: 4.10

Total Amount: \$ 1,394.00

TIMEKEEPER SUMMARY FOR TASK CODE 844,

SEC MATTERS

Timekeeper Name		Hours Billed	Rate	 Total \$ Amount
Stephanie Peral		4.10	340.00	 1,394.00
	Totals:	4.10	340.00	\$ 1,394.00

Invoice No.: 5588454 Page 4

Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Jed Dwyer	3.70	484.00	1,790.80
Stephen A. Mendelsohn	4.80	580.00	2,784.00
Sabrina D. Niewialkouski	0.20	332.00	66.40
Stephanie Peral	4.10	340.00	1,394.00
Totals:	12.80	471.50	\$ 6,035.20

Invoice No.: 5622393 Page 1

Matter No.: 180567.010300

Description of Professional Services Rendered:

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/01/21	Stephen A. Mendelsohn	VERO LOGISTICS re: review of file and proposal for summary judgment.	0.40	232.00
02/02/21	Stephen A. Mendelsohn	Draft of outline of motion for summary judgment.	0.30	174.00
02/02/21	Sabrina D. Niewialkouski	[Vero Logistics] Strategise on Motion for Summary Judgment against Vero and individual parties	0.10	33.20
02/03/21	Stephen A. Mendelsohn	DART SEASONAL re: emails with Trustee as to counteroffer.	0.40	232.00
02/03/21	Stephen A. Mendelsohn	DART SEASONAL re: email from opposing counsel as to counter settlement offer.	0.30	174.00
02/04/21	Stephen A. Mendelsohn	DART SEASONAL re: calls with opposing counsel as to settlement.	0.40	232.00
02/05/21	Stephen A. Mendelsohn	DART SEASONAL re: emails with Trustee and DSI Joseph Luzinski re: settlement terms.	0.20	116.00
02/08/21	Stephen A. Mendelsohn	DART SEASONAL re: email to opposing counsel as to new settlement offer.	0.50	290.00
02/09/21	Jed Dwyer	Review and edit proposed motion for district court GJ matter	0.20	96.80
02/09/21	Stephen A. Mendelsohn	WALL STREET re: emails with Mendy P. as to dismissal motion for the case.	0.20	116.00
02/09/21	Stephen A. Mendelsohn	WALL STREET re: review of joint motion to dismiss.	0.20	116.00
02/10/21	Jed Dwyer	Edits on motion for GJ Issues	0.50	242.00
02/11/21	Jed Dwyer	Final review, edit and filing of motion for 502d order in GJ matter	2.10	1,016.40
02/12/21	Jed Dwyer	Attention to filing issues	0.10	48.40
02/12/21	Stephen A. Mendelsohn	Work on settlement draft agreement for Dart Seasonal.	0.70	406.00
02/12/21	Stephen A. Mendelsohn	DART SEASONAL re: emails with opposing counsel as to final settlement offers.	0.50	290.00
02/16/21	Stephen A. Mendelsohn	DART SEASONAL: Draft of settlement agreement	0.60	348.00
02/17/21	Stephen A. Mendelsohn	Edits to settlement agreement with Dart Seasonal.	0.30	174.00
02/18/21	Stephen A. Mendelsohn	Draft of settlement agreement and emails with opposing counsel as to settlement.	1.40	812.00
02/19/21	Stephen A. Mendelsohn	COOTS re: email recommendations to Trustee as to Coots matter based upon possible dismissal of bankruptcy case.	0.30	174.00
02/19/21	Stephen A. Mendelsohn	DART SEASONAL re: edits to settlement agreement.	0.40	232.00
02/22/21	Stephen A. Mendelsohn	COOTS re: emails with Trustee as to	0.40	232.00

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Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

02/25/21	Sabrina D. Niewialkouski	possible pursuit of state court action. [Vero]Began reviewing all documents and drafting MSJ; received, reviewed order to	4.50	1,494.00
02/26/21	Stephen A. Mendelsohn	show cause for lack of prosecution DART SEASONAL re: email with attorney for Dart Seasonal Lloyd Comiter re: settlement.	0.20	116.00
02/26/21	Stephen A. Mendelsohn	VERO LOGISTICS re: edits to motion for summary judgment.	0.60	348.00
02/26/21	Sabrina D. Niewialkouski	[Vero] Finished Motion for Summary Judgment; Drafted Affidavit in support of MSJ	5.10	1,693.20

Total Hours: 20.90

Total Amount: \$ 9,438.00

TIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

Timekeeper Name	Hours Billed	Rate	 Total \$ Amount
Jed Dwyer	2.90	484.00	1,403.60
Stephen A. Mendelsohn	8.30	580.00	4,814.00
Sabrina D. Niewialkouski	9.70	332.00	 3,220.40
Totals:	20.90	451.58	\$ 9,438.00

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Invoice No.: 5622393 Page 3

Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

TASK CODE: 844 SEC MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/09/21	Stephanie Peral	Correspondence re: motion for entry of Rule 502(d) order.	0.10	34.00
02/10/21	Stephanie Peral	Edit and work on motion for entry of Rule 502(d) order.	0.90	306.00
02/11/21	Stephanie Peral	Correspondence re: hearing.	0.10	34.00

Total Hours: 1.10

Total Amount: \$ 374.00

TIMEKEEPER SUMMARY FOR TASK CODE 844,

SEC MATTERS

Timekeeper Name		Hours Billed	Rate	7	Cotal \$ Amount
Stephanie Peral		1.10	340.00		374.00
	Totals:	1.10	340.00	\$	374.00

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Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amoun
Jed Dwyer	2.90	484.00	1,403.60
Stephen A. Mendelsohn	8.30	580.00	4,814.00
Sabrina D. Niewialkouski	9.70	332.00	3,220.40
Stephanie Peral	1.10	340.00	374.00
Totals:	22.00	446.00	\$ 9,812.00

Invoice No.: 5639582 Page 1

Matter No.: 180567.010300

Description of Professional Services Rendered:

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/02/21	Stephen A. Mendelsohn	DART SEASONAL re: changes to settlement draft.	0.50	290.00
03/02/21	Stephen A. Mendelsohn	VERO LOGISTICS re: calls with DSI Joe Luzinski as to motion for summary	0.50	290.00
03/02/21	Stephen A. Mendelsohn	judgment. DART SEASONAL: Emails with counsel for Dart Seasonal as to changes to	0.20	116.00
03/02/21	Stephen A. Mendelsohn	settlement agreement. DART SEASONAL re: emails with Trustee as to changes to settlement	0.10	58.00
03/02/21	Sabrina D. Niewialkouski	agreement. [Vero]Received reviewed affidavit from client along with exhibit of payment history for motion for summary judgment; spoke to Joe Luzinski re: payment process	1.40	464.80
03/03/21	Stephen A. Mendelsohn	DART Seasonal: Calls with Lloyd Comiter attorney for dart Seasonal re: settlement	0.30	174.00
03/04/21	Stephen A. Mendelsohn	Call with John Dodd re: dismissal of state court case for lack of prosecution.	0.20	116.00
03/04/21	Stephen A. Mendelsohn	DART SEASONAL re: emails with Trustee as to settlement agreement.	0.20	116.00
03/04/21	Stephen A. Mendelsohn	DART SEASONAL re: Emails with Opposing counsel as to settlement	0.50	290.00
03/05/21	Jed Dwyer	Prepare for upcoming district court hearing on government motion (Sealed); attend court hearing on same issue	2.10	1,016.40
03/05/21	Stephen A. Mendelsohn	DART SEASONAL re: emails with opposing counsel Lloyd Comiter as to changes to settlement agreement.	0.20	116.00
03/05/21	Stephen A. Mendelsohn	VERO LOGISTICS re: call with Patrick Seigfired of Rapid Funding as to case status.	0.40	232.00
03/10/21	Stephen A. Mendelsohn	Dart Seasonal re: review of draft 9019 motion to approve settlement and comments.	0.30	174.00
03/12/21	Stephen A. Mendelsohn	DART Seasonal re: comments from Trustee as to motion to approve settlement.	0.20	116.00
03/16/21	Patricia P. Lin	Work with Affidavits of Non-Service on all party Defendants including communication with process server regarding same	0.50	116.00
03/17/21	Patricia P. Lin	Follow up with process server regarding Felix Pena's Affidavit of Non-Service	0.10	23.20
03/25/21	Jed Dwyer	Telephone call with J. Luzinski regarding dealings with DOJ	0.30	145.20

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Description	of Professional Services Re	<u>endered</u>		
03/28/21	Jed Dwyer	Prepare and draft emails to client re shutting down certain aspects of production	0.40	193.60
03/30/21	Stephen A. Mendelsohn	DART SEASONAL re: issues as to first settlement payment and emails with opposing counsel Comiter and DSI Joe Luzinski.,	0.20	116.00
03/31/21	Jed Dwyer	Finalize issues re preservation and email to DOJ	0.20	96.80
		Total Hours:	8.80	

Total Hours: 8.80

Total Amount: \$ 4,260.00

TIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

Timekeeper Name	Hours Billed	Rate	То	tal \$ Amount
Jed Dwyer	3.00	484.00		1,452.00
Stephen A. Mendelsohn	3.80	580.00		2,204.00
Sabrina D. Niewialkouski	1.40	332.00		464.80
Patricia P. Lin	0.60	232.00		139.20
Totals:	8.80	484.09	\$	4,260.00

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Invoice No.: 5639582 Page 3

Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

TASK CODE: 844 SEC MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/04/21	Stephanie Peral	Preparation of documents for J. Dwyer for tomorrow's hearing.	0.20	68.00
		Total Hours:	0.20	

Total Amount: \$ 68.00

TIMEKEEPER SUMMARY FOR TASK CODE 844,

SEC MATTERS

Timekeeper Name	Hours E	Billed	Rate	Total \$ Amount
Stephanie Peral		0.20 34	40.00	68.00
To	tals:	0.20	40.00 \$	68.00

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Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	T	otal \$ Amount
Jed Dwyer	3.00	484.00		1,452.00
Stephen A. Mendelsohn	3.80	580.00		2,204.00
Sabrina D. Niewialkouski	1.40	332.00		464.80
Stephanie Peral	0.20	340.00		68.00
Patricia P. Lin	0.60	232.00		139.20
Totals:	9.00	480.89	\$	4,328.00

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Page 1 Invoice No.: 5678792

180567.010300 Matter No.:

<u>Description of Professional Services Rendered:</u>

TASK CODE: 804 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/14/21	Kenneth N. Zuckerbrot	PC Joe Luzinski re necessity to issue small dollar or no dollar K-1s; suggested additional research	0.60	450.00
04/15/21	Scott E. Fink	Conferring with K. Zuckerbrot regarding the issuance of K-1s from liquidating trust and possible threshold amounts to require the filing; Reviewing issue; Follow up.	1.00	750.00
04/15/21	Kenneth N. Zuckerbrot	Exchange emails with J Luzinski-discuss research with S fink; review and forward S Fink message; reply to Luzinski emails	1.30	975.00
		Total Hours:	2.90	

\$ 2,175.00 Total Amount:

TIMEKEEPER SUMMARY FOR TASK CODE 804,

CASE ADMINISTRATION

Timekeeper Name	Hours Billed	Rate	 Total \$ Amount
Scott E. Fink	1.00	750.00	750.00
Kenneth N. Zuckerbrot	1.90	750.00	1,425.00
Totals:	2.90	750.00	\$ 2,175.00

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Invoice No.: 5678792 Page 2

Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	DESCRIPTION	<u>HOURS</u>	<u>AMOUNT</u>
04/15/21	Jed Dwyer	Extended telephone call with AUSA; follow up email	0.60	290.40
04/21/21	Stephen A. Mendelsohn	VERO LOGISTICS re: emails with Patrick Seigfried of Rapid Funding as to	0.20	116.00
04/23/21	Stephen A. Mendelsohn	motion for summary judgment. Emails with Rapid Funding counsel as to substitution of counsel.	0.20	116.00
04/30/21	Stephen A. Mendelsohn	VERO LOGISTICS re: attendance at case status conference.	0.20	116.00
		_		

Total Hours: 1.20

Total Amount: \$ 638.40

TIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

Timekeeper Name	Hours Billed	Rate	T	otal \$ Amount
Jed Dwyer	0.60	484.00		290.40
Stephen A. Mendelsohn	0.60	580.00		348.00
Totals:	1.20	532.00	\$	638.40

Invoice No.: 5678792 Page 3

Matter No.: 180567.010300

<u>Description of Professional Services Rendered</u>

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amoun	t
Jed Dwyer	0.60	484.00	290.40	С
Scott E. Fink	1.00	750.00	750.00	Э
Stephen A. Mendelsohn	0.60	580.00	348.00	С
Kenneth N. Zuckerbrot	1.90	750.00	1,425.00	С
Totals:	4.10	686.20	\$ 2,813.40)

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Invoice No.: 5684071 Page 1

Matter No.: 180567.010300

<u>Description of Professional Services Rendered:</u>

TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/19/21	Stephen A. Mendelsohn	ELLWOOD re: attendance at court status conference.	0.40	232.00
05/20/21	Stephen A. Mendelsohn	Emails to Jim Cassel and Joe Luzinski re: Ellwood litigation.	0.50	290.00
05/21/21	Stephen A. Mendelsohn	ELLWOOD re: draft notice of dismissal.	0.20	116.00
05/21/21	Stephen A. Mendelsohn	Emails with Joe Luzinski of DSI re: status of litigation matters and settlements.	0.60	348.00
05/24/21	Stephen A. Mendelsohn	Emails with Joe Luzinski as to defaults in settlement agreements.	0.30	174.00
05/25/21	Stephen A. Mendelsohn	Draft of default letter to Global Merchant Cash under settlement agreement.	0.40	232.00
05/25/21	Stephen A. Mendelsohn	Email to attorney to Platinum re: May payment.	0.20	116.00
05/27/21	Stephen A. Mendelsohn	Emails with Joe Luzinski and John Dodd re: payments by third party for Platinum settlement.	0.20	116.00

Total Hours: 2.80

Total Amount: \$ 1,624.00

TIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

Timekeeper Name	Hours Billed	Rate	 Total \$ Amount
Stephen A. Mendelsohn	2.80	580.00	1,624.00
Totals:	2.80	580.00	\$ 1,624.00

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Invoice No.: 5684071 Page 2 Matter No.: 180567.010300

Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Stephen A. Mendelsohn	2.80	580.00	1,624.00
Totals:	2.80	580.00	\$ 1,624.00

INVOICES EXHIBIT 5

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Invoice No.: 5588454 Page 5

Re: Liquidating Trust Matter No.: 180567.010300

<u>Description of Expenses Billed</u>:

<u>DATE</u>	DESCRIPTION		<u>AMOUNT</u>
11/23/20	Docket: L-00171019 Motn Extnd Diss Case Title: Mitnick Steven Vs Austin Commercial Lp (Hudson) Atty on Rec'd.		50.00
	Total Expenses	s: \$	50.00

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Invoice No.: 5639582 Page 5

Re: Liquidating Trust Matter No.: 180567.010300

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
02/25/21	Lexis Charges: 02/25/21 SEARCH Requested by NIEWIALKOUSKI, SABRINA Ref: 180567.010200	\$ 118.80
02/26/21	Lexis Charges: 02/26/21 SEARCH Requested by NIEWIALKOUSKI, SABRINA Ref: 180567.010200	\$ 247.50
02/26/21	WestlawNext Research by NIEWIALKOUSKI,SABRINA.	\$ 709.8+0
03/10/21	VENDOR: DLE Process Servers INVOICE#: DLE-2020029024 DATE: 3/10/2021 9/17/20 To be served on: CCS3 LLC d/b/a CARTOON CUTS do Magda C. Rodriguez as Registered Agent	\$ 404.60
03/10/21	VENDOR: DLE Process Servers INVOICE#: DLE-2020029026 DATE: 3/10/2021 9/17/20 To be served on: Healthy Way Holding. Inc d/b/a Subway Roosvelt a/k/a Healthy Way Holdings. Inc c/o Felix Pena as Registered Agent	\$ 404.60
03/10/21	VENDOR: DLE Process Servers INVOICE#: DLE-2020029028 DATE: 3/10/2021 9/17/20 To be served on: LCA Puerto Rico, Inc d/b/a Lice Clinics of America PR c/o Felix Pena as Registered Agent	\$ 404.60
03/10/21	VENDOR: DLE Process Servers INVOICE#: DLE-2020029025 DATE: 3/10/2021 9/17/20 To be served on: Felix Pena a/k/a Felix A. Pena	\$ 584.60
03/10/21	VENDOR: DLE Process Servers INVOICE#: DLE-2020029029 DATE: 3/10/2021 9/17/20 To be served on: CCS1 LLC d/b/a CARTOON CUTS CCS1 c/o Magda C. Rodriguez as Registered Agent	\$ 404.60
03/10/21	VENDOR: DLE Process Servers INVOICE#: DLE-2020029030 DATE: 3/10/2021 9/17/20 To be served on: HWH RIVERVIEW LLC c/o Magda C. Rodriguez as Registered Agent	\$ 404.60
	Total Expenses:	\$ 3,683.70

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Invoice No.: 5678792 Page 4

Re: Liquidating Trust Matter No.: 180567.010300

<u>Description of Expenses Billed</u>:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
08/03/20	Search Criteria: (None); August 2020	Document Type: Pacer Research Charges for	\$ 1.60
08/20/20	Search Criteria: (None); August 2020	Document Type: Pacer Research Charges for	\$ 7.00
		Total Expenses:	\$ 8.60