UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

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In re:

Case No. 18-19121-RAM

1GC COLLECTIONS, et al.

Chapter 11

Debtors.

Jointly Administered

SUMMARY APPLICATION OF MARCUS NEIMAN RASHBAUM & PINEIRO LLP TO UNDERWRITERS FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR THE PERIOD FROM JANUARY 1, 2021 THROUGH MARCH 31, 2021 IN ACCORDANCE WITH COURT ORDER¹

Name of Law Firm:	Marcus Neiman Rashbaum & Pineiro LLP		
Services Provided to:	Carl Ruderman		
Period for this Application:	January 1, 2021 through March $31, 2021^2$		
Amount Paid to Date:	\$1,329,589.20		
Amount of Defense Costs Sought/Fees:	\$15,785.00		
Amount of Defense Costs	N/A		
Sought/Reimbursement of Expenses:			

¹ This summary application is being submitted in accordance with this *Court's Agreed Order Granting Motion for Relief From the Automatic Stay, to the Extent Applicable, to Allow Payment and/or Advancement of Defenses Costs Under a Management Liability Insurance Policy* [ECF No. 563], entered on February 26, 2019.

² This application seeks reimbursement for defense fees and costs incurred by Marcus Neiman Rashbaum & Pineiro LLP (MNR) and the Jones Law Office (JLO) in the *Foster* adversary proceeding (Adv. No. 18-01438), the adversary proceeding brought by James S. Cassel, as liquidating trustee of 1 GC Collections Creditors' Liquidating Trust (Adv. No. 20-01301), and *SEC v. Ruderman*, Case No. 18-cv-61991, from March 1, 2021 through March 31, 2021. This also includes MNR's defense fees and costs in connection with certain Grand Jury proceedings from January 1, 2021 through March 31, 2021. All of the fees and costs sought herein have been approved by the Underwriters.

		Requested		Approved		Paid	
Filed	Period	Fees	Expenses	Fees	Expenses	Fees	Expenses
2/25/2019	7/18- 1/31/19	\$449,894.50	\$5,404.80	\$449,894.50	\$5,404.80	\$449,894.50	\$5,404.80
4/17/2019	2/1- 2/28/19	\$141,115.50	\$62,307.62	\$141,115.50	\$62,307.62	\$141,115.50	\$62,307.62
5/29/2019	3/1- 3/31/19	\$87,622.50	\$15,954.15	\$87,622.50	\$15,954.15	\$87,622.50	\$15,954.15
8/20/2019	4/1- 5/30/19	\$151,525.00	\$30,756.71	\$151,525.00	\$30,756.71	\$151,525.00	\$30,756.71
9/11/2019	6/1- 6/30/19	\$56,477.50	\$2,422.30	\$56,477.50	\$2,422.30	\$56,477.50	\$2,422.30
10/15/2019	4/1- 8/31/19	\$29,102.50	\$32,671.12	\$29,102.50	\$32,671.12	\$29,102.50	\$32,671.12
3/23/2020	9/1/19- 1/31/20	\$42,347.50	\$787.75	\$42,347.50	\$787.75	\$42,347.50	\$787.75
5/20/2020	1/31/20- 4/30/20	\$122,835.00	\$144.75	\$122,835.00	\$144.75	\$122,835.00	\$144.75
9/4/2020	5/1/20- 6/30/20	\$19,402.50	N/A	\$19,402.50	N/A	\$19,402.50	N/A
12/4/2020	7/1/20- 10/31/20	\$39,217.50	N/A	\$39,217.50	N/A	\$39,217.50	N/A
2/5/2021	11/1/20- 11/30/20	\$7,307.50	N/A	\$7,307.50	N/A	\$7,307.50	N/A
4/15/2021	12/1/20- 2/28/21	\$33,142.50	N/A	\$32,292.50	N/A	\$32,292.50	N/A
TOTAL:		\$1,179,990.00	\$150,449.20	\$1,179,140.00	\$150,449.20	\$1,179,140.00	\$150,449.20

Disclose the following for each prior application to this Court.

Dated: June 14, 2021

MARCUS NEIMAN RASHBAUM & PINEIRO LLP

2 South Biscayne Boulevard, Suite 1750 Miami, Florida 33131 Telephone: (305) 400-4260

By: <u>/s Michael A. Pineiro</u> Michael A. Pineiro Florida Bar No. 41897 <u>mpineiro@mnrlawfirm.com</u>

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was served on June 14, 2021 via transmission of Notices of Electronic Filing generated by CM/ECF to all parties registered to receive notice in this case.

> **JONES LAW OFFICE, P.A.** 9130 S. Dadeland Boulevard, Suite 1209 Miami, Florida 33156 Tel: (305) 918-2299 Fax: (305) 938-5040

By: <u>/s Jason Z. Jones</u> Jason Z. Jones Florida Bar No. 186554 Email: jjones@joneslawpa.com