

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**
www.flsb.uscourts.gov

In re:

Chapter 11

1 GLOBAL CAPITAL LLC, *et al.*,¹

Case No. 18-19121-RAM

Debtors.

(Jointly Administered)

**SUMMARY OF FOURTH INTERIM FEE APPLICATION OF
GREENBERG TRAURIG, LLP AS COUNSEL FOR
THE LIQUIDATING TRUSTEE**

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:	June 1, 2021 through November 30, 2021
7. Amount of Compensation Sought:	\$5,305.00 ²
8. Amount of Expense Reimbursement Sought:	\$14.60

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).

²This 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 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 Monthly Operating Report:	September 1, 2021 - September 30, 2021
14. If case is Chapter 11, current funds in the Chapter 11 estate:	\$7,054,722 ³
15. If case is Chapter 7, current funds held by Chapter 7 trustee:	N/A

³ Amount as of September 30, 2021, per Liquidating Trustee's Post-Confirmation Monthly Operating Report for the Period from September 1, 2021 through September 30, 2021. This document does not get filed with the Court. It is provided to the U.S. Trustee only.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
www.flsb.uscourts.gov

In re:

Chapter 11

1 GC COLLECTIONS, *et al.*,¹

Case No. 18-19121-RAM

Debtors.

(Jointly Administered)

_____/

**FOURTH 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 \$5,305.00 for the Fourth 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

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 fourth 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 \$5,305.00 and \$14.60 for reimbursement of expenses incurred for the period from June 1, 2021 through November 30, 2021 (the “**Fourth Interim Period**”).

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

a) Litigation Matters and Case Assessment, Development & Administration

Fourth Interim Period: 3.40 hours; \$1,780.00 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 have been settled or the defendants have filed for bankruptcy protection and proofs of claim have been filed.

b) Analysis / Strategy

Fourth Interim Period: 4.70 hours; \$3,525.00 in fees

This category includes services relating to analysis of grantor-beneficiary abandoning interest in liquidating trust.

11. The professional services that Greenberg Traurig rendered as counsel to the Liquidating Trustee during the Fourth 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 8.10 hours of time in the representation of the Liquidating Trustee during the Fourth 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 \$654.94 per hour for the professionals and paraprofessionals working on these cases during the Fourth 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.

Time Limitations Imposed by the Client or Other Circumstances: 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 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.

The Experience, Reputation, and Ability of the Professional: 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

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.

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.

The Nature and Length of the Professional Relationship of the Client: 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 \$654.94 during the Fourth 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 \$14.60 during the Fourth 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 \$5,305.00⁴ and reimbursement of expenses in the amount of \$14.60 for the Fourth 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: December 17, 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

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				PAID		HOLDBACK	
Date Filed	ECF #	Period Covered	Fees Requested	Expenses Requested	Date Ordered	ECF #	Fees Approved	Expenses Approved	Fees Paid	Expenses Paid	Fees Holdback	Expenses Holdback
06/30/2020	2339	11/21/2019 - 05/31/2020	\$470,470.50	\$4,258.72	07/29/2020	2358	\$446,946.98	\$4,258.72	\$446,946.98	\$4,258.72	\$23,523.53	\$0.00
10/04/2020	2418	06/01/2020 - 11/30/2020	\$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
06/11/2021	2525	12/01/2020 - 05/31/2021	\$29,600.60	\$3,742.30	07/09/2021	2550	\$29,600.60	\$3,742.30	\$29,600.60	\$3,742.30	\$0.00	\$0.00

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

Name	Shareholder, Associate or Para- professional	Year Licensed	Total Hours	Hourly Rate	Fee
Kenneth N. Zuckerbrot	Shareholder	1968	3.20	\$750.00	\$2,400.00
John Prusiecki	Shareholder	1975	1.50	\$750.00	\$1,125.00
Stephen A. Mendelsohn	Shareholder	1984	1.40	\$580.00	\$812.00
Jed Dwyer	Shareholder	2013	2.00	\$484.00	\$968.00
Totals for Professionals			8.10		\$5,305.00
Total			8.10		\$5,305.00
Blended Average Hourly Rate				\$654.94	

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

See Attached

**Summary of Professional and
Paraprofessional Time by
Activity Code Category
for this Time Period Only**

	Hours	Rate	Fees
Activity Code 810: Litigation Matters			
Stephen A. Mendelsohn	0.80	\$580.00	\$464.00
Jed Dwyer	2.00	\$484.00	\$968.00
Totals for Activity Code 810: Litigation Matters	2.80		\$1,432.00
Activity Code B190: OTHER CONTESTED MATTERS			
Stephen A. Mendelsohn	0.60	\$580.00	\$348.00
Totals for Activity Code B190: OTHER CONTESTED MATTERS	0.60		\$348.00
Activity Code L120: Analysis / Strategy			
John Prusiecki	1.50	\$750.00	\$1,125.00
Kenneth N. Zuckerbrot	3.20	\$750.00	\$2,400.00
Totals for Activity Code L120: Analysis / Strategy	4.70		\$3,525.00
Total All Activity Codes			
	8.10		\$5,305.00

**SUMMARY OF EXPENSE REIMBURSEMENT
REQUESTED BY CATEGORY
EXHIBIT 3**

Category	Amount
Information and Research	\$14.60
Total	\$14.60

INVOICES
EXHIBIT 4

Invoice No.: 5770869
 Matter No.: 180567.010300

Page 1

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>
08/12/21	Stephen A. Mendelsohn	Review of state court orders for Felix Perez case.	0.40	232.00
08/23/21	Stephen A. Mendelsohn	Emails with Darla Grodin re: service in the Cartoon Cuts case.	0.20	116.00
			<hr/>	
			Total Hours:	0.60
			Total Amount:	\$ 348.00

TIMEKEEPER SUMMARY FOR TASK CODE 810.

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	0.60	580.00	348.00
Totals:	0.60	580.00	\$ 348.00

Invoice No.: 5770869
 Matter No.: 180567.010300

Page 2

Description of Professional Services Rendered

TASK CODE: L120 ANALYSIS/STRATEGY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/21	John Prusiecki	Grantor-beneficiary abandonment of interest in liquidating trust.	1.50	1,125.00
08/12/21	Kenneth N. Zuckerbrot	Review J Dodd email re abandonment of interest; resaearch issue; confer wit J Prusiecki re 1-671-2-(e)(5); preparfe draft email to J Dodd; pc J Dodd	3.20	2,400.00
			<hr/>	
			Total Hours:	4.70
			Total Amount:	\$ 3,525.00

TIMEKEEPER SUMMARY FOR TASK CODE L120,

ANALYSIS/STRATEGY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Kenneth N. Zuckerbrot	3.20	750.00	2,400.00
John Prusiecki	1.50	750.00	1,125.00
Totals:	4.70	750.00	\$ 3,525.00

Invoice No.: 5770869
Matter No.: 180567.010300

Page 3

Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	0.60	580.00	348.00
Kenneth N. Zuckerbrot	3.20	750.00	2,400.00
John Prusiecki	1.50	750.00	1,125.00
Totals:	5.30	730.75	\$ 3,873.00

Invoice No.: 5798642
 Matter No.: 180567.010300

Page 1

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>
09/28/21	Jed Dwyer	Extended telephone call with Beth Young	0.30	145.20
			Total Hours:	0.30
			Total Amount:	\$ 145.20

TIMEKEEPER SUMMARY FOR TASK CODE 810.

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Jed Dwyer	0.30	484.00	145.20
Totals:	0.30	484.00	\$ 145.20

Invoice No.: 5798642
Matter No.: 180567.010300

Page 2

Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Jed Dwyer	0.30	484.00	145.20
Totals:	0.30	484.00	\$ 145.20

Invoice No.: 5819765
 MatterNo.: 180567.010300

Page 1

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>
10/04/21	Jed Dwyer	Telephone call with counsel for related party; review pleadings from grand jury proceeding; review of correspondence from Tennessee; draft and send update email to management	1.50	726.00
10/07/21	Jed Dwyer	Telephone call with Jim Cassel	0.20	96.80
TotalHours:			1.70	
TotalAmount:				\$ 822.80

TIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total\$ Amount</u>
Jed Dwyer	1.70	484.00	822.80
Totals:	1.70	484.00	\$ 822.80

Invoice No.: 5819765
MatterNo.: 180567.010300

Page 2

Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total\$ Amount</u>
Jed Dwyer	1.70	484.00	822.80
Totals:	1.70	484.00	\$ 822.80

Invoice No.: 5849226
 Matter No.: 180567.010300

Page 1

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>
11/16/21	Stephen A. Mendelsohn	Emails with Jim Cassel re: dismissal of Ellwood case.	0.20	116.00
			<hr/>	
			Total Hours:	0.20
			Total Amount:	\$ 116.00

TIMEKEEPER SUMMARY FOR TASK CODE 810,

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	0.20	580.00	116.00
Totals:	0.20	580.00	\$ 116.00

Invoice No.: 5849226
 Matter No.: 180567.010300

Page 2

Description of Professional Services Rendered

TASK CODE: L190 CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/22/21	Stephen A. Mendelsohn	Review of Ellwood Medical Center Case Management Order.	0.20	116.00
11/22/21	Stephen A. Mendelsohn	Draft of notice of voluntary dismissal of Ellwood Medical center case.	0.20	116.00
11/30/21	Stephen A. Mendelsohn	Review of Ellwood court docket and order dismissing case.	0.20	116.00
			<hr/>	
			Total Hours:	0.60
			Total Amount:	\$ 348.00

TIMEKEEPER SUMMARY FOR TASK CODE L190.

CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	0.60	580.00	348.00
Totals:	0.60	580.00	\$ 348.00

Invoice No.: 5849226
Matter No.: 180567.010300

Page 3

Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Stephen A. Mendelsohn	0.80	580.00	464.00
Totals:	0.80	580.00	\$ 464.00

INVOICES
EXHIBIT 5

Invoice No.: 5770869
Re: Liquidating Trust
Matter No.: 180567.010300

Page 4

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
09/14/20	Search Criteria: (None); Document Type: Pacer Research Charges for September 2020	\$ 7.30
09/25/20	Search Criteria: (None); Document Type: Pacer Research Charges for September 2020	\$ 0.50
09/29/20	Search Criteria: (None); Document Type: Pacer Research Charges for September 2020	\$ 4.30
09/30/20	Search Criteria: (None); Document Type: Pacer Research Charges for September 2020	\$ 2.50
Total Expenses:		<hr/> \$ 14.60