

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

In re:

Chapter 11

1 GC COLLECTIONS, *et al.*,<sup>1</sup>

Case No. 18-19121-RAM

Debtors.

(Jointly Administered)

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**SUMMARY OF FOURTH INTERIM FEE APPLICATION OF**  
**BAKER & MCKENZIE LLP AS CO-COUNSEL FOR**  
**THE LIQUIDATING TRUSTEE**

1. Name of Applicant:	Baker & McKenzie LLP
2. Role of Applicant:	Co-Counsel for the Liquidating Trustee
3. Name of Certifying Professional:	John R. Dodd
4. Date case filed:	July 27, 2018
5. Date of Retention Order:	June 12, 2020 <i>Nunc Pro Tunc</i> to April 7, 2020
<b>IF INTERIM APPLICATION, COMPLETE 6, 7 AND 8 BELOW:</b>	
6. Period for this Application:	June 1, 2021 through November 30, 2021
7. Amount of Compensation Sought:	\$61,666.60
8. Amount of Expense Reimbursement Sought:	\$880.68

<sup>1</sup> 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)

<b>IF FINAL APPLICATION, COMPLETE 9 AND 10 BELOW:</b>	
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:	\$7,006,738 <sup>2</sup>
15. If case is Chapter 7, current funds held by Chapter 7 trustee:	N/A

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<sup>2</sup> Amount as of November 30, 2021, per Liquidating Trustee's Consolidated Post-Confirmation Monthly Operating Report for the Period from November 1, 2021 through November 30, 2021. This document is not filed with the Court. It is provided to only the U.S. Trustee and the Securities and Exchange Commission.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
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In re:

Chapter 11

1 GC COLLECTIONS, *et al.*,<sup>1</sup>

Case No. 18-19121-RAM

Debtors.

(Jointly Administered)

\_\_\_\_\_ /

**FOURTH INTERIM APPLICATION OF BAKER & MCKENZIE LLP  
AS CO-COUNSEL FOR THE LIQUIDATING TRUSTEE**

Baker & McKenzie LLP (“**Baker McKenzie**”), co-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:

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<sup>1</sup> 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 \$61,666.60 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**”), 1GC Collections LLC f/k/a 1 Global Capital LLC and 1 West Collections LLC f/k/a 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* [ECF No. 805] (as it may be further amended, supplemented

or modified from time to time, the “Plan”).<sup>2</sup>

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 June 12, 2020, this Court entered an order authorizing the employment and retention of Baker McKenzie as co-counsel for the Liquidating Trustee in these cases *nunc pro tunc* to the Effective Date, April 7, 2020 [ECF No. 2332].

#### **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.

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

**Summary of Services Rendered**

9. This Application is the fourth interim application for compensation for services rendered and reimbursement of expenses incurred filed by Baker McKenzie, as co-counsel for the Liquidating Trustee, in these cases. In connection with the professional services described below, by this Application, Baker McKenzie seeks Court approval of compensation in the amount of \$61,666.60 and \$880.68 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 Baker McKenzie 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) Asset Disposition (802)

Fourth Interim Period: .70 hours; \$333.20 in fees

This category includes services relating to asset disposition, including but not limited to communications regarding MCA portfolio sale and potential distribution of Ledbetter restitution assets.

b) Business Operations (803)

Fourth Interim Period: .90 hours; \$428.40 in fees

This category includes services relating to business operations, including but not limited to communications regarding Florida Department of Revenue intent to audit books.

c) Case Administration (804)

Fourth Interim Period: 23.20 hours; \$10,221.00 in fees

This category includes services relating to case administration, including

but not limited to communications regarding court hearings, review of plan for trust termination and possible motion to extend trust, monthly operating reports and other case status related issues; preparation for and attendance at hearings; and review of monthly and quarterly operating reports.

d) Claims Administration and Objections (805)

Fourth Interim Period: 89.50 hours; \$32,600.00 in fees

This category includes services relating to claims administration and objections, including but not limited to communications seeking withdrawal of proofs of claim, analysis whether co-claimant can effect treatment of claim, analysis of defenses to preference and fraudulent transfer claims asserted by chapter 7 trustee of Wild Calling Pet Foods and distributions to certain claim holders; drafting and revising objections to disputed claims; reviewing and analyzing disputed claims, settling or otherwise resolving claims objections and preparing settlement agreements and Fed. R. Bankr. P. 9019 motions regarding same; preparing motion to extend deadline to object to claims; and responding to investor and creditor inquiries.

e) Fee/Employment Applications (813)

Fourth Interim Period: 32.30 hours; \$11,396.00 in fees

This category includes services relating to fee and employment applications, including but not limited to communications regarding BDO application to employ, preparing Baker McKenzie and Greenberg Traurig third interim fee applications and monthly fee statements; reviewing and revising or preparing various professionals fee applications and monthly fee statements, notice of excess fees for FTI, and preparing notice of filing OCP quarterly report.

f) Avoidance Action Analysis (B180)

Fourth Interim Period: 1.50 hours; \$714.00 in fees

This category includes services relating to avoidance action analysis, including but not limited to analyzing and drafting summary regarding Trust's decision to not bring

certain fraudulent transfer and preference claims.

g) Other Contested Matters (B190)

Fourth Interim Period: 15.90 hours; \$5,316.80 in fees

This category includes services relating to other contested matters, including but not limited to settling and otherwise resolving multiple adversary proceedings and claim objections, discovery related to Complete Music; and preparing Fed. R. Bankr. P. 9019 motions and related pleadings regarding same.

h) Tax Issues (B240)

Fourth Interim Period: 2.20 hours; \$1,047.20 in fees

This category includes services relating to tax issues, including but not limited to communications regarding treatment of creditors who seek to abandon their trust interest for tax reasons and drafting of letter to investors regarding same.

11. The professional services that Baker McKenzie rendered as co-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 Agreement;
- 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, including the sale of the MCA portfolio;



- 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 "2", show that the professionals and paraprofessionals of Baker McKenzie devoted 166.20 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. Baker McKenzie submits that whether viewed individually as to each of the tasks or collectively as a whole, the time expended and fees incurred during the Fourth Interim Period have been reasonable and efficient to accomplish the needs of these cases.

**The Novelty and Difficulty of the Services Rendered:** Baker McKenzie 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:** Baker McKenzie 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:** Baker McKenzie 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 \$371.04 per hour for the professionals and paraprofessionals working on these cases during the Fourth Interim Period is substantially less than the rates customarily charged by Baker McKenzie for similar cases. 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, Baker McKenzie agreed with the Liquidating Trustee, to keep Mr. Keenan, Mr. Dodd and Mr. Sainvil’s hourly rates the same as charged while at their prior firm, and to reduce its customary hourly rates for all other personnel who may work on this matter by 20% with a maximum discounted 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 nature of matters involved in these cases required Baker McKenzie's attorneys to devote a substantial amount of their time to handle matters concerning the Liquidating Trust. In the course of providing the services covered in this Application, Baker McKenzie attorneys consistently responded to the Liquidating Trustee's needs promptly. These cases required Baker McKenzie to devote substantial time, often on an urgent basis, to a great number of issues.

**The Experience, Reputation, and Ability of the Professional:** Baker McKenzie 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:** Baker McKenzie 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.

**The Nature and Length of the Professional Relationship of the Client:** Baker McKenzie 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 \$371.04 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. Baker McKenzie incurred or disbursed actual and necessary costs and expenses related to these cases in the aggregate amount of \$880.68 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 Baker McKenzie is attached hereto as Exhibit “4”.

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, Baker McKenzie represents as follows with regard to its charges for actual and necessary costs and expenses incurred during the Interim Application Period:

- a) copy charges are \$.15 per page for black-and-white copies, 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, Baker McKenzie often uses 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; and
- d) Local telephone charges are not billed; however, long distance and international calls are billed at the rate charged by the provider.

WHEREFORE, Baker McKenzie 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 \$61,666.60 and reimbursement of expenses in the amount of \$880.68 for the Fourth Interim Period; (c) directing immediate payment of amounts so allowed and awarded less payments that have previously been made to Baker McKenzie by the Liquidating Trustee; and (d) affording such other and further relief as may be fair and reasonable under the circumstances.

Dated: December 29, 2021

BAKER & MCKENZIE LLP

/s/ John R. Dodd

Paul J. Keenan Jr.

Fla. Bar No. 594687

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John R. Dodd

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Miami, Florida 33131

Tel: 305 789-8900

Fax: 305 789-8953

*Co-Counsel for the Liquidating Trustee*

**FEE APPLICATION SUMMARY CHART  
EXHIBIT 1**

<b>REQUEST</b>					<b>APPROVAL</b>				<b>PAID</b>		<b>HOLDBACK</b>	
<b>Date Filed</b>	<b>ECF #</b>	<b>Period Covered</b>	<b>Fees Requested</b>	<b>Expenses Requested</b>	<b>Date Ordered</b>	<b>ECF #</b>	<b>Fees Approved</b>	<b>Expenses Approved</b>	<b>Fees Paid</b>	<b>Expenses Paid</b>	<b>Fees Holdback</b>	<b>Expenses Holdback</b>
12/16/2020	2433	04/07/2020 - 05/31/2020	\$19,988.00	\$0.00	01/21/2021	2462	\$19,988.00	\$0.00	\$19,988.00	\$0.00	\$0.00	\$0.00
02/09/2021	2475	06/01/2020 - 11/30/2020	\$153,851.00	\$1,254.79	03/05/2021	2482	\$153,851.00	\$1,254.79	\$153,851.00	\$1,254.79	\$0.00	\$0.00
06/28/2021	2539	12/01/2020 - 05/31/2021	\$110,367.40	\$2,437.11	07/09/2021	2548	\$110,367.40	\$2,437.11	\$110,367.40	\$2,437.11	\$0.00	\$0.00

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

<b>Name</b>	<b>Partner, Associate or Para- professional</b>	<b>Year Licensed</b>	<b>Total Hours</b>	<b>Hourly Rate</b>	<b>Fee</b>
John R. Dodd	Partner	2007	60.50	\$476.00	\$28,798.00
Reginald Sainvil	Associate	2015	69.80	\$332.00	\$23,173.60
<b>Totals for Professionals</b>			<b>130.30</b>		<b>\$51,971.60</b>
Lori Seavey	Paralegal	N/A	0.30	\$390.00	\$117.00
Maribel R. Fontanez	Paralegal	N/A	35.60	\$280.00	\$ 9,968.00
<b>Total for Paraprofessionals</b>			<b>35.90</b>		<b>\$ 10,085.00</b>
<b>Total</b>			<b>166.20</b>		<b>\$62,056.60</b>
<b>Discount <sup>1</sup></b>					<b>-\$390.00</b>
<b>Total (including discount)</b>					<b>\$61,666.60</b>
<b>Blended Average Hourly Rate</b>				<b>\$371.04</b>	

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<sup>1</sup> Discount given to compensate for higher rate for Lori Seavey, Paralegal hour rate charged.

**SUMMARY OF PROFESSIONAL AND PARAPROFESSIONAL TIME  
BY ACTIVITY CODE CATEGORY FOR  
FOURTH 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
<b>Activity Code 802: Asset Disposition</b>			
John R. Dodd	0.70	\$476.00	\$333.20
<b>Totals for Activity Code 802: Asset Disposition</b>	<b>0.70</b>		<b>\$333.20</b>
<b>Activity Code 803: Business Operations</b>			
John R. Dodd	0.90	\$476.00	\$428.40
<b>Totals for Activity Code 803: Business Operations</b>	<b>0.90</b>		<b>\$428.40</b>
<b>Activity Code 804: Case Administration</b>			
John R. Dodd	18.20	\$476.00	\$8,663.20
Lori Seavey	0.30	\$390.00	\$117.00
Reginald Sainvil	2.40	\$332.00	\$796.80
Maribel R. Fontanez	2.30	\$280.00	\$644.00
<b>Totals for Activity Code 804: Case Administration</b>	<b>23.20</b>		<b>\$10,221.00</b>
<b>Activity Code 805: Claims Administration &amp; Objections</b>			
John R. Dodd	23.40	\$476.00	\$11,138.40
Reginald Sainvil	56.80	\$332.00	\$18,857.60
Maribel R. Fontanez	9.30	\$280.00	\$2,604.00
<b>Totals for Activity Code 805: Claims Administration &amp; Objections</b>	<b>89.50</b>		<b>\$32,600.00</b>
<b>Activity Code 813: Fee/Employment Applications</b>			
John R. Dodd	12.00	\$476.00	\$5,712.00
Maribel R. Fontanez	20.30	\$280.00	\$5,684.00
<b>Totals for Activity Code 813: Fee/Employment Applications</b>	<b>32.30</b>		<b>\$11,396.00</b>
<b>Activity Code B180: AVOIDANCE ACTION ANALYSIS</b>			
John R. Dodd	1.50	\$476.00	\$714.00
<b>Totals for Activity Code B180: AVOIDANCE ACTION ANALYSIS</b>	<b>1.50</b>		<b>\$714.00</b>
<b>Activity Code B190: OTHER CONTESTED MATTERS</b>			
John R. Dodd	1.60	\$476.00	\$761.60
Reginald Sainvil	10.60	\$332.00	\$3,519.20

	Hours	Rate	Fees
Maribel R. Fontanez	3.70	\$280.00	\$1,036.00
<b>Totals for Activity Code B190: OTHER CONTESTED MATTERS</b>	<b>15.90</b>		<b>\$5,316.80</b>
<b>Activity Code B240: TAX ISSUES</b>			
John R. Dodd	2.20	\$476.00	\$1,047.20
<b>Totals for Activity Code B240: TAX ISSUES</b>	<b>2.20</b>		<b>\$1,047.20</b>
<b>Total All Activity Codes</b>			
	<b>166.20</b>		<b>\$62,056.60</b>
<b>Discount</b>			<b>-\$390.00<sup>1</sup></b>
<b>Total</b>			<b>\$61,666.60</b>

<sup>1</sup>Discount given to compensate for higher rate for Lori Seavey, Paralegal hour rate charged.

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

<b>Category</b>	<b>Amount</b>
Computerized Research	\$713.27
Courier / Messenger	\$64.86
Postage	\$2.55
Telephone/Conference	\$100.00
<b>Total</b>	<b>\$880.68</b>

**INVOICES  
EXHIBITS 4 & 5 (COMBINED)**



**Matter Number:** 50727705  
**Invoice Number:** 9655771230  
**Invoice Due Date:** Payable in 30 days

July 15, 2021

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RE: Chapter 11 Liquidation

**Time Details**

**B110-Case Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/07/2021	John Dodd	Review and respond to emails regarding Greenberg Traurig fee application, USAO distribution status request, status of FirstUSA state court litigation (.2); review correspondence and attachment from R. Sainvil regarding FTI Notice of OCP Fees and with B. Levenson regarding same (.1); review and analyze new UST post-confirmation report form and instructions (.5) and call with M. Fontanez regarding same and next steps with Trust's financial advisor (.1).	0.90	476.00	428.40
06/07/2021	Maribel Fontanez	Review new UST monthly reporting templates; communicate with J. Dodd regarding same.	0.10	280.00	28.00
06/07/2021	Reginald Sainvil	Review and finalize FTI Notice re OCP fees.	0.40	332.00	132.80
06/11/2021	John Dodd	Review and comment on monthly operating report (.1), review status of MBAF/BDO fees and retention and correspondence with BDO (Trust's tax accounting firm) regarding retention and fee applications	0.60	476.00	285.60



**Matter Number:** 50727705  
**Invoice Number:** 9655771230  
**Invoice Due Date:** Payable in 30 days

July 15, 2021

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/11/2021	Maribel Fontanez	following MBAF expansion (.5). Review the Trust's monthly operating report and circulate via email.	0.20	280.00	56.00
06/15/2021	John Dodd	Call with J. Luzinski regarding case status, claim objection status, Epiq matters, and BDO/MBAF matters.	0.30	476.00	142.80
06/16/2021	John Dodd	Correspondence with J. Luzinski and Y. Bogen regarding new UST quarterly reporting forms (.1); correspondence with J. Luzinski regarding payment of CT's annual invoice as registered agent (.1); review and comment on monthly Master Service List for chapter 11 cases (.1).	0.30	476.00	142.80
06/16/2021	Maribel Fontanez	Review updated Master Service List; communicate with J. Dodd regarding same.	0.20	280.00	56.00
06/16/2021	Maribel Fontanez	Communicate with J. Luzinski and Y. Boden regarding new UST form for post confirmation reports.	0.10	280.00	28.00
06/17/2021	Maribel Fontanez	Prepare notice of filing Master Service List, finalize, e-file and process for service; communicate with J. Dodd and Epiq regarding same.	0.40	280.00	112.00
06/21/2021	John Dodd	Correspondence with J. Luzinski regarding obtaining back up of	0.10	476.00	47.60



**Matter Number:** 50727705  
**Invoice Number:** 9655771230  
**Invoice Due Date:** Payable in 30 days

July 15, 2021

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/28/2021	John Dodd	FTI data and payment for FTI services. Review and revise letter to FL DOR regarding payroll audit for 2019.	1.00	476.00	476.00
06/29/2021	John Dodd	Call with J. Luzinski regarding Epiq Systems, file retention, and July 8th hearing.	0.50	476.00	238.00

**B130-Asset Disposition**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/09/2021	John Dodd	Call with merchant regarding MCA portfolio sale (.2).	0.20	476.00	95.20

**B160-Fee/Employment Applications**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/02/2021	Maribel Fontanez	Review prior GT monthly fee statements in preparation for third GT interim fee application; communicate with S. Mendelsohn regarding same.	0.10	280.00	28.00
06/02/2021	Maribel Fontanez	Communicate with S. Mendelsohn regarding GT interim fee application.	0.10	280.00	28.00
06/03/2021	Maribel Fontanez	Work on third interim fee application for Greenberg Traurig.	0.10	280.00	28.00
06/04/2021	Maribel Fontanez	Prepare third interim fee application for Greenberg Traurig.	1.30	280.00	364.00
06/07/2021	Maribel Fontanez	Revisions to notice of FTI fees; communicate with R. Sainvil regarding same.	0.40	280.00	112.00



**Matter Number:** 50727705  
**Invoice Number:** 9655771230  
**Invoice Due Date:** Payable in 30 days

July 15, 2021

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/09/2021	Maribel Fontanez	Work on third interim GT fee application.	1.20	280.00	336.00
06/10/2021	Maribel Fontanez	Work on GT third interim fee application; communicate with J. Castillo at GT regarding same.	2.60	280.00	728.00
06/11/2021	Maribel Fontanez	Communicate with J. Dodd and K. Newmarch regarding application to employ BDO.	0.20	280.00	56.00
06/11/2021	Maribel Fontanez	Work on BM Third Interim Fee Application.	2.80	280.00	784.00
06/11/2021	Maribel Fontanez	Finalize GT third interim fee application, e-file and process for service.	0.60	280.00	168.00
06/14/2021	John Dodd	Prepare Baker Third Interim Fee Application (.5); call with BDO (Trust's tax accountants) in-house counsel regarding BDO retention application and interim fee application (.5).	1.00	476.00	476.00
06/15/2021	John Dodd	Prepare and revise draft Baker Third Interim Fee Application (.5); review Liquidating Trustee's invoices and correspondence with Oversight Committee and UST regarding same (.2).	0.70	476.00	333.20
06/16/2021	John Dodd	Revise Baker Third Interim Fee Application.	1.00	476.00	476.00
06/16/2021	Maribel Fontanez	Review J. Dodd's edits to Baker's third	0.70	280.00	196.00





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/16/2021	Maribel Fontanez	interim fee application; communicate with J. Dodd regarding same. Review notice of hearing of Greenberg Taurig fee application; arrange for J. Dodd to appear telephonically; communicate with J. Dodd regarding same.	0.20	280.00	56.00
06/17/2021	John Dodd	Review and revise form of proposed order on Baker Third Interim Fee Application and the draft Application.	0.20	476.00	95.20
06/21/2021	John Dodd	Review and comment on DSI May monthly fee statement.	0.20	476.00	95.20
06/23/2021	Maribel Fontanez	Review draft DSI third interim fee application.	0.20	280.00	56.00
06/24/2021	John Dodd	Review and comment on DSI Interim Fee Application.	0.30	476.00	142.80
06/24/2021	Maribel Fontanez	Finalize, e-file, process for service DSI Third Interim Fee app.	0.20	280.00	56.00
06/25/2021	Maribel Fontanez	Updated BM 3rd Interim Fee Application; communicate with M. Barnes and J. Dodd regarding same.	0.40	280.00	112.00

**B190-Other Contested Matters**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/01/2021	Reginald Sainvil	Continue to draft responses and objections to third-party subpoena duces	0.90	332.00	298.80



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/02/2021	Reginald Sainvil	tecum related to Complete Music. Draft and revise responses and objections to requests for production of documents regarding Complete Music Subpoena..	3.10	332.00	1,029.20
06/02/2021	Reginald Sainvil	Analyze merchant agreement to determine any limitations on production of related documents regarding Complete Music.	0.90	332.00	298.80
06/02/2021	Reginald Sainvil	Draft and revise correspondence regarding FTI OCP fees and invoices.	0.40	332.00	132.80
06/02/2021	Reginald Sainvil	Analyze documents to be produced in connection with subpoena issued by Complete Music.	1.80	332.00	597.60
06/03/2021	Maribel Fontanez	Complete Music Subpoena - communicate with R. Sainvil regarding document production; redact and bates stamp documents to be produced as part of non-party production.	1.00	280.00	280.00
06/03/2021	Maribel Fontanez	Review docket for Wild Calling Pet Foods regarding adversaries against various parties; retrieve dockets for those adversaries, motions and corresponding orders settling adversaries; communicate with R.	0.50	280.00	140.00



**Matter Number:** 50727705  
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/03/2021	Maribel Fontanez	Sainvil regarding same. Retrieve docket, complaint and motion for default judgment for Amerant Bank v. RCW; communicate with R. Sainvil regarding same.	0.30	280.00	84.00
06/03/2021	Reginald Sainvil	Analyze pleadings concerning lawsuit in which IGC is a nominal defendant.	0.50	332.00	166.00
06/03/2021	Reginald Sainvil	Review documents to be produced in connection with subpoena duces tecum issued by Complete Music in Miami-Dade County Court.	0.40	332.00	132.80
06/06/2021	Reginald Sainvil	Prepare and finalize production of documents relating to subpoena issued by Complete Music in action pending in Miami-Dade County Court.	1.00	332.00	332.00
06/07/2021	John Dodd	Review draft response and document production to third-party subpoena regarding merchant Complete Music and call with R. Sainvil regarding same (.6); review status of FirstUSA MCA litigation and proof of claim and call with R. Sainvil regarding same (.5) and follow up e-mail with R. Sainvil regarding same (.1); review and comment	1.40	476.00	666.40



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/07/2021	Maribel Fontanez	regarding state court action against merchant RCW Interiors LLC (.2). Assist with production of non party production request regarding Complete Music Subpoena.	0.20	280.00	56.00
06/07/2021	Maribel Fontanez	Review notice of State court hearing regarding FirstUSA matter; communicate with R. Sainvil regarding same.	0.20	280.00	56.00
06/07/2021	Maribel Fontanez	Foster: review docket for recent motions to stay adversary proceeding; communicate with J. Dodd regarding same.	0.10	280.00	28.00
06/07/2021	Reginald Sainvil	Finalize responses and objections to subpoena and requests for production regarding Complete Music Subpoena.	1.60	332.00	531.20
06/08/2021	John Dodd	Multiple correspondence each with J. Luzinski, P. Siegfried, and S. Mendelsohn regarding state court action against merchant RCW Interiors LLC (.2).	0.20	476.00	95.20
06/23/2021	Maribel Fontanez	Communicate with R. Sainvil regarding returned mail address to Crystal Rd. address.	0.10	280.00	28.00
06/24/2021	Maribel Fontanez	Assist with initial draft of preference defense letter regarding Wild Calling Pet Foods; communicate with R.	0.30	280.00	84.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Sainvil regarding same.			
<b>B210-Business Operations</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/15/2021	John Dodd	Review and plan response to FL Dept. Revenue Notice of Intent to Audit Books and Records (.5); call with J. Luzinski regarding same (.3).	0.80	476.00	380.80
06/17/2021	John Dodd	Correspondence with Y. Bogen regarding new UST quarterly reporting requirements.	0.10	476.00	47.60
<b>B310-Claims Administration and Objections</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/02/2021	Reginald Sainvil	Revise letters seeking withdrawal of proofs of claim.	0.40	332.00	132.80
06/03/2021	Reginald Sainvil	Analyze whether a co-claimant can effect treatment of a claim.	1.00	332.00	332.00
06/03/2021	Reginald Sainvil	Analyze defenses to preference and fraudulent transfer claims asserted by chapter 7 trustee of Wild Calling Pet Foods.	1.70	332.00	564.40
06/03/2021	Reginald Sainvil	Analyze merits of claims asserted by Chapter 7 trustee in proof of claim relating to merchant agreement between Wild Calling Pet Foods and 1GC.	1.60	332.00	531.20
06/03/2021	Reginald Sainvil	Draft and revise objection to disputed claim of R. Seth.	2.50	332.00	830.00
06/04/2021	Reginald Sainvil	Analyze settlements reached with chapter 7	0.70	332.00	232.40



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/06/2021	Reginald Sainvil	trustee for Wild Calling. Analyze merits of claim filed by Besvea Media.	1.30	332.00	431.60
06/06/2021	Reginald Sainvil	Prepare analysis regarding reasonable settlement proposals to resolve the Wild Calling Pet Food claim.	1.20	332.00	398.40
06/06/2021	Reginald Sainvil	Analyze case law regarding whether merchant cash advances are subject to liability relating to preference and fraudulent transfers claimed by Wild Calling chapter 7 trustee.	1.00	332.00	332.00
06/06/2021	Reginald Sainvil	Draft and revise letter regarding defenses to alleged preferential and fraudulent transfers claimed by Wild Calling chapter 7 trustee.	4.20	332.00	1,394.40
06/06/2021	Reginald Sainvil	Analyze and revise objection to claim of R. Seth.	0.40	332.00	132.80
06/07/2021	Reginald Sainvil	Telephone conference with J. Dodd regarding strategy to resolve several outstanding claims.	0.40	332.00	132.80
06/09/2021	Reginald Sainvil	Prepare correspondence regarding settlement demand directed to First USA.	0.90	332.00	298.80
06/10/2021	John Dodd	Revise letter and settlement offer to FirstUSA and Todd Myers regarding their	2.00	476.00	952.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/10/2021	Maribel Fontanez	Proofs of Claim and state court action. Assist in preparation and service of letter to FirstUSA and T. Myers regarding settlement proposal.	0.60	280.00	168.00
06/13/2021	Reginald Sainvil	Analyze plan and develop legal points for basis to object to claim filed by Besvea.	1.00	332.00	332.00
06/14/2021	Reginald Sainvil	Analyze memorandums of indebtedness and prepare strategy regarding claim objection.	0.90	332.00	298.80
06/15/2021	John Dodd	Review draft Claim Objection and Order against Seth Proof of Claim, and related papers (.7); review status of claims administration (.3).	1.00	476.00	476.00
06/15/2021	Reginald Sainvil	Analyze substantive and procedural defects concerning Diversified claim and prepare outline for objection.	0.80	332.00	265.60
06/15/2021	Reginald Sainvil	Review and revise objection to claim of R. Seth and prepare related correspondence.	0.40	332.00	132.80
06/15/2021	Reginald Sainvil	Analyze substantive and procedural defects concerning Besvea claim and prepare outline for objection.	0.60	332.00	199.20
06/16/2021	John Dodd	Review summary of claims objections (filed or potential) against Cassius, BESVEA, FirstUSA, AP & RAE	1.00	476.00	476.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/16/2021	Maribel Fontanez	Construction, and R. Seth (.5); call with R. Sainvil regarding same and next steps (.5). Review docket and retrieve objection, order and proofs of claim relating to Snowflake (creditor); communicate with R. Sainvil regarding same.	0.30	280.00	84.00
06/16/2021	Reginald Sainvil	Prepare correspondence regarding payment related to claim filed by Wild Calling Pet Foods.	0.20	332.00	66.40
06/16/2021	Reginald Sainvil	Strategy conference with J. Dodd regarding resolving pending claims.	0.50	332.00	166.00
06/16/2021	Reginald Sainvil	Prepare correspondence regarding potential reduction of claim of Cassius Holdings.	0.20	332.00	66.40
06/17/2021	John Dodd	Review and correspond with J. Luzinski and S. Cuff regarding investor claim withdrawal (claim no. 2532).	0.10	476.00	47.60
06/17/2021	Maribel Fontanez	Review objection to R. Seth proof of claim, finalize, e-file, and process for service; communicate with R. Sainvil regarding same.	0.50	280.00	140.00
06/17/2021	Reginald Sainvil	Review and finalize objection to claim filed by R. Seth.	0.40	332.00	132.80
06/17/2021	Reginald Sainvil	Analyze payment histories regarding	0.30	332.00	99.60





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/21/2021	John Dodd	Wild Calling Pet Foods preference claims. Review letter correspondence concerning withdrawal of Claim No. 939 and e-mail with J. Luzinski regarding same (.1).	0.10	476.00	47.60
06/21/2021	Reginald Sainvil	Analyze returned settlement communication and coordinate next steps.	0.50	332.00	166.00
06/21/2021	Reginald Sainvil	Strategy conference with J. Dodd regarding claim objections.	0.40	332.00	132.80
06/21/2021	Reginald Sainvil	Draft and revise claim objection regarding Besvea proof of claim.	0.50	332.00	166.00
06/23/2021	John Dodd	Call with R. Sainvil regarding FirstUSA and Todd Myers MCA and Proof of Claim (.3); correspondence with J. Cassel and J. Luzniski regarding same (.1).	0.40	476.00	190.40
06/23/2021	Reginald Sainvil	Correspondence with J. Dodd regarding strategy for resolving First USA claims and handling hearing regarding lack of prosecution.	0.40	332.00	132.80
06/23/2021	Reginald Sainvil	Telephone conference with T. Meyers regarding potential resolution of state court action and First USA proofs of claim.	0.20	332.00	66.40
06/24/2021	Maribel Fontanez	Prepare initial draft of objection to Besvea proof of claim; communicate with R.	0.30	280.00	84.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/24/2021	Reginald Sainvil	Sainvil regarding same. Analyze whether First USA counterclaims may proceed against 1GC where 1GC claims are dismissed.	0.60	332.00	199.20
06/25/2021	Maribel Fontanez	Review docket for responses to objections to A P Construction claims; finalize order sustaining same and upload to Court; communicate with R. Sainvil regarding same.	0.30	280.00	84.00
06/25/2021	Maribel Fontanez	Review docket for responses to objection to claims no. 2565 and 2566; finalize order sustaining objection to claims no. 2566 and 2565 and upload to Court; communicate with R. Sainvil regarding same.	0.30	280.00	84.00
06/25/2021	Reginald Sainvil	Finalize proposed orders regarding claim objections.	0.40	332.00	132.80
06/25/2021	Reginald Sainvil	Strategy conference with J. Dodd regarding hearing related to FirstUSA claims and counterclaims.	0.20	332.00	66.40
06/27/2021	Reginald Sainvil	Draft and revise objection to insider claim filed by Besvea Media.	1.60	332.00	531.20
06/27/2021	Reginald Sainvil	Draft and revise preference analysis and settlement offer letter directed to chapter 7 trustee for	1.50	332.00	498.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Wild Calling Pet Food.			
06/27/2021	Reginald Sainvil	Draft and revise letter directed to Cassius Holdings to resolve disputed claim.	1.70	332.00	564.40
06/27/2021	Reginald Sainvil	Prepare for hearing regarding request for dismissal of 1GC claims.	1.90	332.00	630.80
06/28/2021	John Dodd	Correspondence with Stoltmann Law Firm regarding distributions (.1); call with M. Dellaporta regarding distributions (.1); consider options for FirstUSA/Todd Myers proofs of claim following state-court hearing, and correspondence with R. Sainvil regarding same (.3).	0.50	476.00	238.00
06/28/2021	Reginald Sainvil	Attend State court hearing regarding First USA's request for dismissal and prepare status report.	0.90	332.00	298.80
06/28/2021	Reginald Sainvil	Telephone conference with T. Meyers regarding resolving the First USA lawsuit and proofs of claim.	0.40	332.00	132.80
06/29/2021	John Dodd	Review, comment and revise draft object to Besvea proof of claim (Scott Ruderman) (3); review and comment on draft settlement letter regarding Wild Pets proof of claim (.5).	3.50	476.00	1,666.00
06/30/2021	Reginald Sainvil	Correspondence	0.20	332.00	66.40



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		regarding orders disallowing claims.			
<b>Total Hours: 80.50</b>			<b>Total:</b>	<b>28,486.40 USD</b>	



Matter Number: 50727705  
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July 15, 2021

## Time Summary

### B110-Case Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	3.70	476.00	1,761.20
Maribel Fontanez	1.00	280.00	280.00
Reginald Sainvil	0.40	332.00	132.80
<b>Total</b>	<b>B110-Case Administration</b>		<b>2,174.00</b>

### B130-Asset Disposition

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	0.20	476.00	95.20
<b>Total</b>	<b>B130-Asset Disposition</b>		<b>95.20</b>

### B160-Fee/Employment Applications

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	3.40	476.00	1,618.40
Maribel Fontanez	11.10	280.00	3,108.00
<b>Total</b>	<b>B160-Fee/Employment Applications</b>		<b>4,726.40</b>

### B190-Other Contested Matters

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	1.60	476.00	761.60
Maribel Fontanez	2.70	280.00	756.00
Reginald Sainvil	10.60	332.00	3,519.20
<b>Total</b>	<b>B190-Other Contested Matters</b>		<b>5,036.80</b>

### B210-Business Operations

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	0.90	476.00	428.40
<b>Total</b>	<b>B210-Business Operations</b>		<b>428.40</b>

### B310-Claims Administration and Objections

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	8.60	476.00	4,093.60
Maribel Fontanez	2.30	280.00	644.00
Reginald Sainvil	34.00	332.00	11,288.00



**Matter Number:** 50727705  
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July 15, 2021

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<b>Total</b>		<b>B310-Claims Administration and Objections</b>	<b>16,025.60</b>
<b>Total Hours</b>	<b>80.50</b>	<b>Total Fees</b>	<b>28,486.40 USD</b>



**Matter Number:** 50727705  
**Invoice Number:** 9655778466  
**Invoice Due Date:** Payable in 30 days

August 10, 2021

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RE: Chapter 11 Liquidation

**Time Details**

**B110-Case Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/06/2021	John Dodd	Preparing for July 8th hearing (1); call with J. Luzinski regarding UST fees (.5).	1.50	476.00	714.00
07/07/2021	John Dodd	Correspondence with J. Luzinski and Y. Bogen regarding BDO retention and fees as tax accountant for the Liquidating Trust (.1); correspondence with J. Luzinski and R. Sainvil regarding FTI fees (.1).	0.20	476.00	95.20
07/07/2021	Reginald Sainvil	Correspondence regarding FTI fees and backup data held by FTI.	0.20	332.00	66.40
07/07/2021	Reginald Sainvil	Telephone conference with former investor regarding distributions.	0.50	332.00	166.00
07/08/2021	John Dodd	Prepare for and attend bankruptcy court hearing (1); review status of adv. no. 19-1366 and correspondence with former collections special counsel and buyer successor counsel regarding same (.3); review forms of fee orders for Baker, GT and DSI (.1); prepare written analysis regarding obligation to pay UST fees (1.5).	2.90	476.00	1,380.40
07/09/2021	John Dodd	Multiple correspondence	0.10	476.00	47.60



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August 10, 2021

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2021	John Dodd	regarding status of adv. no. 19-1366. Call with J. Luzinski regarding de- commissioning or downsizing of non- FTI data.	0.70	476.00	333.20
07/12/2021	John Dodd	Correspondence with S. Mendelsohn regarding GT holdbacks (.1).	0.10	476.00	47.60
07/13/2021	John Dodd	Review and comment on Rule 2002-1(H) master service list (.1); call with courtroom deputy regarding adv. no. 19-1366 (.2).	0.30	476.00	142.80
07/14/2021	Maribel Fontanez	Prepare notice of filing MSL (July 2021), efile and process for service.	0.20	280.00	56.00
07/23/2021	Maribel Fontanez	Prepare notice of filing OCP report for 2nd quarter of 2021, finalize, e-file and process for service.	0.50	280.00	140.00
07/29/2021	John Dodd	Correspondence with J. Luzinski and B. Ramos regarding archive copy of 1GC data formerly hosted by FTI. (0.1); Call with J. Luzinski call regarding questions on UCC-1 for Klein merchant cash advance. (0.2).	0.30	476.00	142.80

**B130-Asset Disposition**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/28/2021	John Dodd	Correspondence with P. Keenan and J. Kalloo (FL Off. Fin. Reg.) regarding Kornfelds (.1);	0.20	476.00	95.20





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		correspondence with E. Young (USAO) and 1GC team regarding potential distribution Ledbetter restitution assets (.1).			
07/29/2021	John Dodd	Analysis Regarding potential D. Ledbetter restitution assets.	0.20	476.00	95.20
07/30/2021	John Dodd	Correspondence with J. Nearing (Amerifactors) regarding Klein Construction.	0.10	476.00	47.60

**B160-Fee/Employment Applications**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/08/2021	Maribel Fontanez	Prepare, finalize and upload to court orders awarding third interim fees to BM, GT and DSI; communicate with J. Dodd, S. Mendelsohn and J. Luzinski regarding same.	0.80	280.00	224.00
07/12/2021	Maribel Fontanez	Review orders awarding fees and process for service.	0.10	280.00	28.00
07/13/2021	John Dodd	Prepare MBAF First and Final Fee Application (1); correspondence with K. Newmarch regarding same (.1).	1.10	476.00	523.60
07/14/2021	John Dodd	Revise MBAF First and Final Fee Application.	0.30	476.00	142.80
07/14/2021	Maribel Fontanez	Review MBAF first and final fee application.	1.10	280.00	308.00
07/15/2021	John Dodd	Correspondence regarding First and Final Fee Application	0.10	476.00	47.60



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/15/2021	Maribel Fontanez	of MBAF and hearing regarding same (.1). Review notice of hearing MBAF fee application; communicate with E. Escandon and J. Dodd regarding same; communicate with Epiq regarding service.	0.40	280.00	112.00
07/15/2021	Maribel Fontanez	Finalize, e-file and process MBAF fee application for service.	0.20	280.00	56.00
07/16/2021	Maribel Fontanez	Prepare eighth monthly fee statement for Baker McKenzie.	0.80	280.00	224.00
07/19/2021	John Dodd	Review monthly fee statement for June 2021.	0.10	476.00	47.60
07/20/2021	John Dodd	Review Liquidating Trustee June 2021 invoices and correspond with Oversight Committee and UST regarding same.	0.10	476.00	47.60
07/20/2021	Maribel Fontanez	Compile final draft of BM 8th monthly fee application for transmittal to J. Luzinski and others; communicate with J. Dodd regarding same.	0.20	280.00	56.00
07/21/2021	Maribel Fontanez	Prepare DSI 17th monthly fee statement for June 2021.	0.30	280.00	84.00
07/22/2021	Maribel Fontanez	Finalize DSI monthly fee statement for June 2021 and circulate via email.	0.30	280.00	84.00
07/22/2021	Maribel Fontanez	Finalize and circulate BM monthly fee statement.	0.30	280.00	84.00
07/26/2021	John Dodd	Correspond with B.	0.20	476.00	95.20



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Levenson regarding Wild Pet proof of claim and Complete Music subpoena.			
<b>B310-Claims Administration and Objections</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/01/2021	Reginald Sainvil	Prepare correspondence regarding recommendation to resolve claim filed by Wild Calling Pet Foods.	0.70	332.00	232.40
07/02/2021	Maribel Fontanez	FirstUSA: review court docket for notice of hearing and calendar; communicate with R. Sainvil regarding same.	0.30	280.00	84.00
07/02/2021	Maribel Fontanez	Finalize and serve correspondence regarding Wild Calling Pet Food.	0.30	280.00	84.00
07/05/2021	Reginald Sainvil	Review and revise objection regarding claim of Besvea.	0.80	332.00	265.60
07/06/2021	John Dodd	Review Schwartz Proof of Claim and related SEC and DOJ filings in connection with preparing claim objection (1.0); call with R. Sainvil regarding (.3).	1.30	476.00	618.80
07/06/2021	Reginald Sainvil	Prepare correspondence regarding objection to Besvea claim.	0.40	332.00	132.80
07/06/2021	Reginald Sainvil	Telephone conference with J. Dodd regarding status of outstanding disputed claims.	0.30	332.00	99.60
07/07/2021	John Dodd	Review and respond to	0.20	476.00	95.20



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		comments regarding draft Claim Objection against BESVEA Media (S. Ruderman entity).			
07/07/2021	Reginald Sainvil	Correspondence regarding objection to Besvea claim.	0.20	332.00	66.40
07/07/2021	Reginald Sainvil	Begin draft motion for extension of claim objection deadline.	0.40	332.00	132.80
07/07/2021	Reginald Sainvil	Prepare objection to claim filed by S. Schwartz.	0.90	332.00	298.80
07/08/2021	John Dodd	Calls with D. DuVall (investor) regarding distributions (.3); review D. DuVall proof of claim and correspondence with J. Luzinski and S. Cuff regarding same (.3); call with J. Jones regarding claim issues (.2).	0.80	476.00	380.80
07/08/2021	Maribel Fontanez	Finalize objection to Besvia proof of claim, file and process for service; calendar same; communicate with R. Sainvil regarding same.	0.30	280.00	84.00
07/08/2021	Reginald Sainvil	Telephone conference with former investor regarding status of distributions.	0.50	332.00	166.00
07/09/2021	John Dodd	Review, comment and revise on Sixth Motion to Extend Claims Objections Deadline (2); Review, comment and revise S. Schwartz claim objection (1.3); initial review and comment regarding	4.00	476.00	1,904.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/09/2021	Maribel Fontanez	draft settlement letter regarding proof of claim of Cassius (.7). Review sixth motion to extend deadline to object to claims; communicate with J. Dodd regarding service list.	0.10	280.00	28.00
07/09/2021	Reginald Sainvil	Review and revise motion regarding claim objection deadline.	0.40	332.00	132.80
07/09/2021	Reginald Sainvil	Review and revise objection to claim filed by S. Schwartz.	0.30	332.00	99.60
07/09/2021	Reginald Sainvil	Telephone conference with former investor regarding grantor letter and distributions.	0.30	332.00	99.60
07/12/2021	Maribel Fontanez	Retrieve service list for motion to extend deadline to object to claim; communicate with J. Dodd regarding same.	0.10	280.00	28.00
07/13/2021	John Dodd	Review and comment regarding the Paragon Offshore decision and payment of UST fees (0.7); review and comment on motion to extend claims objection deadline and supplemental service list (0.4).	1.10	476.00	523.60
07/13/2021	Maribel Fontanez	Finalize 6th motion to extend deadline to object to claims, e-file and process for service; update service list, per J. Dodd's comments; communicate with R.	0.50	280.00	140.00



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07/13/2021	Reginald Sainvil	Sainvil regarding same. Review and revise motion regarding claim objection deadline.	0.20	332.00	66.40
07/14/2021	John Dodd	Call with R. Sainvil regarding pending or potential claim objections to claims of S. Schwartz, FirstUSA/Myers, Wild Calling, Besvea, Cassius Holdings (.7); review status of all Disputed Claims, update chart summarizing same, and correspondence with J. Cassel regarding same (.8).	1.50	476.00	714.00
07/14/2021	Maribel Fontanez	Review notice of hearing of 6th motion to extend deadline to object to claims; calendar; process for service.	0.40	280.00	112.00
07/14/2021	Reginald Sainvil	Evaluate T. Meyer counteroffer and prepare proposed strategy to address the counteroffer.	0.70	332.00	232.40
07/14/2021	Reginald Sainvil	Telephone conference with T. Meyers regarding resolving First USA proof of claim.	0.50	332.00	166.00
07/14/2021	Reginald Sainvil	Strategy conference with J. Dodd regarding claim objections.	0.60	332.00	199.20
07/15/2021	John Dodd	Call with R. Sainvil regarding FirstUSA and T. Myers proof of claim (.1).	0.10	476.00	47.60
07/15/2021	Maribel Fontanez	Finalize objection to	0.40	280.00	112.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/15/2021	Reginald Sainvil	S. Schwartz proof of claim, e-file and process for service; communicate with R. Sainvil regarding claim number.	1.50	332.00	498.00
07/15/2021	Reginald Sainvil	Analyze case law regarding whether automatic stay bars defendants from asserting counterclaims against plaintiff debtor.	0.30	332.00	99.60
07/16/2021	John Dodd	Review and finalize objection to claim of S. Schwartz.	1.40	476.00	666.40
07/16/2021	John Dodd	Prepare for calls regarding status of claim objections and Objection to Claim of S. Schwartz (.2); call with J. Cassel and J. Luzinski regarding status of claim objections (.5); call with J. Cassel, J. Luzinski and G. Moses regarding S. Schwartz Claim Objection (.3) call with R. Sainvil regarding preparing settlement letters to holders of agent related claims, FirstUSA/Myers claim, and Schwartz claim (.4).			
07/16/2021	Maribel Fontanez	Assist in preparation of Cassius Settlement Offer Letter.	0.40	280.00	112.00
07/16/2021	Reginald Sainvil	Telephone conference with J. Dodd regarding notice to former agents regarding	0.20	332.00	66.40



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2021	John Dodd	potential resolution of claims. Review draft settlement agreement for Wild Pet claim objection (.2).	0.20	476.00	95.20
07/20/2021	Maribel Fontanez	Review docket to determine if any responses filed to objection to Seth proof of claim;finalize order sustaining objection and upload to court; communicate with R. Sainvil regarding same.	0.30	280.00	84.00
07/20/2021	Reginald Sainvil	Review and revise proposed settlement agreement between the Trust and the chapter 7 trustee for Wild Calling Pet Foods.	0.90	332.00	298.80
07/20/2021	Reginald Sainvil	Telephone conference with T. Meyers regarding resolution of lawsuit and proofs of claim.	0.40	332.00	132.80
07/20/2021	Reginald Sainvil	Prepare outline regarding negotiation with T. Meyers.	0.80	332.00	265.60
07/20/2021	Reginald Sainvil	Correspondence with T. Meyers regarding offer and counteroffer to resolve lawsuit and proofs of claim.	0.20	332.00	66.40
07/21/2021	John Dodd	Final review of Wild Pet Calling claim objection draft settlement agreement and comment on draft regarding the same (.3); review regarding and correspondence with J. Miller regarding Cs. Wendel	0.60	476.00	285.60





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		claims (.2); call with J. Miller regarding same (.1).			
07/22/2021	John Dodd	Prepare Notice of Filing to withdraw proof of claim numbers 2168 and 2170.	0.50	476.00	238.00
07/23/2021	John Dodd	Call with R. Sainvil regarding FirstUSA / T.Myers potential claim objection and state court proceedings (.1), status of other claims objections (.1), status and updates to claims register (.1).	0.30	476.00	142.80
07/23/2021	Reginald Sainvil	Review and revise settlement agreement regarding Wild Calling Pet Foods.	0.30	332.00	99.60
07/23/2021	Reginald Sainvil	Review order sustaining objection and prepare related correspondence.	0.20	332.00	66.40
07/23/2021	Reginald Sainvil	Telephone conference and correspondence with T. Myers regarding resolving First USA proof of claim and lawsuit.	0.70	332.00	232.40
07/27/2021	John Dodd	Correspondence with J. Miller regarding Co. & Ca. Wendel proofs of claim (.1).	0.10	476.00	47.60
07/29/2021	John Dodd	Finalize withdrawals of claims of C. and C. Wendel (.1).	0.10	476.00	47.60
07/29/2021	Maribel Fontanez	Finalize and e-file notices of withdrawal of proofs of claim; communicate with J. Dodd regarding same.	0.60	280.00	168.00
<b>Total Hours: 43.00</b>			<b>Total:</b>	<b>16,794.00 USD</b>	



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## Time Summary

### B110-Case Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	6.10	476.00	2,903.60
Maribel Fontanez	0.70	280.00	196.00
Reginald Sainvil	0.70	332.00	232.40
<b>Total</b>	<b>B110-Case Administration</b>		<b>3,332.00</b>

### B130-Asset Disposition

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	0.50	476.00	238.00
<b>Total</b>	<b>B130-Asset Disposition</b>		<b>238.00</b>

### B160-Fee/Employment Applications

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	1.90	476.00	904.40
Maribel Fontanez	4.50	280.00	1,260.00
<b>Total</b>	<b>B160-Fee/Employment Applications</b>		<b>2,164.40</b>

### B310-Claims Administration and Objections

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	12.20	476.00	5,807.20
Maribel Fontanez	3.70	280.00	1,036.00
Reginald Sainvil	12.70	332.00	4,216.40
<b>Total</b>	<b>B310-Claims Administration and Objections</b>		<b>11,059.60</b>

<b>Total Hours</b>	<b>43.00</b>	<b>Total Fees</b>	<b>16,794.00 USD</b>
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RE: Chapter 11 Liquidation

**Time Details**

**B110-Case Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/02/2021	John Dodd	Review payment and settlement details regarding Klein Construction (.2); correspondence with J. Luzinski and M. Fontanez regarding same (.1); correspondence with J. Nearing regarding same (.1).	0.40	476.00	190.40
08/03/2021	John Dodd	Review Kornfeld investments and distributions in response to question of FL OFR (.2); finalize termination of Klein UCC (.1).	0.30	476.00	142.80
08/04/2021	John Dodd	Correspondence with J. Kalloo (FL OFR) regarding pre-bankruptcy payments to B. and F. Kornfeld (.2); correspondence with D. Warner (counsel for Wild Pet chapter 7 trustee) regarding future distributions (.1).	0.30	476.00	142.80
08/05/2021	John Dodd	Prepare for (1) and attend (.5) hearing on MBAF Fee Application and Motion to Extend Claims Objection Deadline; correspondence regarding FTI archive drive (.1); review and revise forms of order on MBAF Fee	1.80	476.00	856.80



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/06/2021	John Dodd	Application and Claim Objection Deadline Extension Motion (.2). Correspondence with J. Cassel and J. Luzinski regarding outcome of 8/5 bankruptcy court hearing and next steps (.1).	0.10	476.00	47.60
08/11/2021	John Dodd	Review matters related to Epiq unpaid fees and monthly fees.	0.20	476.00	95.20
08/12/2021	John Dodd	Correspond separately with J. Kallo (FL OFR) and J. Luzniski regarding FL OFR information request (.2).	0.20	476.00	95.20
08/13/2021	Maribel Fontanez	Prepare notice of filing master service list, finalize, e-file and process for service.	0.20	280.00	56.00
08/16/2021	John Dodd	Correspond with B. Levenson regarding UST fee issue.	0.10	476.00	47.60
08/17/2021	Lori Seavey	Emails with R. Sainvil regarding order upload on claim objection to claim 28; attend to preparation of filing and upload to Judge Mark; email confirmation to R. Sainvil.	0.30	390.00	117.00
08/18/2021	John Dodd	Correspond with J. Cassel and S. Mendelsohn regarding substitution of counsel (GT) for Rapid Financial's counsel for purchased MCA (.1).	0.10	476.00	47.60
08/27/2021	John Dodd	Call with SEC counsel and J. Cassel regarding certain	0.30	476.00	142.80



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/30/2021	John Dodd	investors and related claims (.2) and follow up call with J. Cassel (.1). Review SDFla USAO press release concerning Ledbetter, Schwartz and Atlas criminal proceedings and sentencing (.1); correspond with S. Schneiderman regarding same and preparing short case status update (.1); prepare draft status update for S. Schneiderman (.3).	0.50	476.00	238.00
08/31/2021	John Dodd	Prepare draft status update for S. Schneiderman.	0.20	476.00	95.20

**B160-Fee/Employment Applications**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/05/2021	Maribel Fontanez	Prepare draft order awarding MBAF fees, finalize and upload to court; communicate with J. Dodd regarding same.	0.40	280.00	112.00
08/09/2021	Maribel Fontanez	Provide E. Escandon and D. Silver with copy of order awarding MBAF fees.	0.10	280.00	28.00
08/10/2021	Maribel Fontanez	Work on BM ninth monthly fee statement.	0.30	280.00	84.00
08/11/2021	John Dodd	Review draft Baker Monthly Fee Statement for July 2021.	0.10	476.00	47.60
08/11/2021	John Dodd	Initial review of authority to disallow claims of creditors who have not provided	0.20	476.00	95.20



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		W9s or good addresses.			
08/11/2021	Maribel Fontanez	Work on monthly fee statement for BM.	0.30	280.00	84.00
08/13/2021	Maribel Fontanez	Circulate BM Ninth Monthly Fee Statement.	0.20	280.00	56.00
08/16/2021	John Dodd	Review Epiq billing issues (1); call with J. Luzinski regarding same (.6); review J. Cassel July 2021 invoice (.1); review DSI July 2021 invoice (.1).	1.80	476.00	856.80
08/17/2021	John Dodd	Correspond with J. Luzinski regarding DSI July monthly fee statement (.1).	0.10	476.00	47.60
08/18/2021	John Dodd	Review and revise DSI monthly fee statement for July 2021 (M. Fontanez out) (.3).	0.30	476.00	142.80
08/26/2021	John Dodd	Call with K. Mailloux (Epiq), S. Garabato (Epiq), and J. Luzinski regarding status and amount of Epiq fees (.9); follow up call with J. Luzinski regarding same (.2).	1.10	476.00	523.60

#### **B180-Avoidance Action Analysis**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/04/2021	John Dodd	Review files relating to and prepare draft written summary regarding Trust's decision not to bring certain fraudulent transfer and preference claims.	1.50	476.00	714.00

#### **B190-Other Contested Matters**



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/12/2021	Maribel Fontanez	Prepare notice of status conference, finalize and e-file; communicate with R. Sainvil regarding same.	0.80	280.00	224.00
<b>B240-Tax Issues</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/11/2021	John Dodd	Call with J. Luzinski regarding treatment of creditors who seek to abandon their trust interest for tax reasons.	0.30	476.00	142.80
08/12/2021	John Dodd	Prepare detailed email to K. Zuckerbrot regarding tax treatment of investors withdrawing their claim or seeking to withdraw their claim (.5); call with K. Zuckerbrot regarding same (.2); prepare form of letter and notice of withdrawal for investors to abandon their trust interest and withdraw their proof of claim (.5).	1.20	476.00	571.20
08/13/2021	John Dodd	Revise form of letter and notice of withdrawal for investors to abandon their trust interest and withdraw their proof of claim (.2); prepare short summary of issue for J. Cassel and seek authority to proceed (.3).	0.50	476.00	238.00
08/16/2021	John Dodd	Correspond with J. Cassel and J. Luzinski	0.20	476.00	95.20



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		regarding investor abandonment of claims for tax reasons (.1); correspond with B. Levenson regarding same (.1).			
<b>B310-Claims Administration and Objections</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/02/2021	Maribel Fontanez	Review IL UCC-3 filing requirements; prepare UCC-3; communicate with J. Dodd regarding same.	0.20	280.00	56.00
08/02/2021	Reginald Sainvil	Correspondence with T. Myers regarding settlement discussions in connection with First USA proofs of claim.	0.20	332.00	66.40
08/03/2021	John Dodd	Initial review and response to question of L. Armitage regarding withdraw of right to future distribution (.2).	0.20	476.00	95.20
08/03/2021	Maribel Fontanez	File UCC-3 regarding Klein Construction; communicate with J. Dodd regarding same.	0.30	280.00	84.00
08/03/2021	Reginald Sainvil	Telephone conference and correspondence with T. Myers regarding resolving disputes between First USA and IGC.	0.40	332.00	132.80
08/04/2021	John Dodd	Review status of claim objections and update summary chart regarding same.	0.50	476.00	238.00
08/05/2021	Maribel Fontanez	Prepare draft order extending deadline to object to claims (sixth, finalize and upload to Court); communicate	0.20	280.00	56.00





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/06/2021	Reginald Sainvil	with J. Dodd regarding same. Communications with T. Meyers regarding resolution of disputes between 1GC and First USA.	0.50	332.00	166.00
08/09/2021	Maribel Fontanez	Review order granting sixth extension to object to claims; arrange for service and calendar; communicate with J. Dodd regarding calendaring of deadline.	0.30	280.00	84.00
08/09/2021	Reginald Sainvil	Numerous correspondence and discussions with First USA regarding resolution of proofs of claim and state court litigation.	0.50	332.00	166.00
08/10/2021	John Dodd	Correspondence with R. Sainvil regarding FirstUSA/Myers state court hearing (.1); correspondence with R. Sainvil and M. Fontanez regarding BESVEA claim objection and form of order granting (.1); call with E. Loyacano regarding in-kind distribution from IRA accounts and status of distributions (.1).	0.30	476.00	142.80
08/10/2021	Maribel Fontanez	Finalize order granting objection to Besvia proof of claim and upload to court; communicate with J. Dodd and R. Sainvil regarding same.	0.20	280.00	56.00



**Matter Number:** 50727705  
**Invoice Number:** 9655803166  
**Invoice Due Date:** Payable in 30 days

November 04, 2021

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/10/2021	Reginald Sainvil	Telephone conference with T. Meyers regarding proofs of claim and disputes between 1GC and First USA.	0.20	332.00	66.40
08/11/2021	John Dodd	Review as-entered order disallowing BESVEA proof of claim (.1).	0.10	476.00	47.60
08/11/2021	Maribel Fontanez	Retrieve order sustaining objection to Besvea claim; communicate with R. Sainvil regarding same.	0.10	280.00	28.00
08/11/2021	Reginald Sainvil	Prepare proposal regarding resolution of First USA claims and pending litigation and numerous related correspondence.	1.40	332.00	464.80
08/12/2021	Reginald Sainvil	Prepare for and attend status conference regarding state court litigation between 1GC and First USA.	1.00	332.00	332.00
08/12/2021	Reginald Sainvil	Draft and revise settlement agreement regarding First USA litigation and proofs of claim.	0.90	332.00	298.80
08/13/2021	Maribel Fontanez	Prepare form letter form creditor withdrawing claim and claim withdrawal form; communicate with J. Dodd regarding same.	0.40	280.00	112.00
08/13/2021	Maribel Fontanez	Review docket for withdrawal of claim by creditor; communicate with R. Sainvil regarding same.	0.10	280.00	28.00



**Matter Number:** 50727705  
**Invoice Number:** 9655803166  
**Invoice Due Date:** Payable in 30 days

November 04, 2021

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/13/2021	Maribel Fontanez	Prepare shell 9019 motion for settlement with FirstUSA; communicate with R. Sainvil regarding same.	0.40	280.00	112.00
08/16/2021	John Dodd	Review draft 9019 motion for Wild Pet and correspondence with D. Warner regarding same (.1); review and comment on FirstUSA/Myers settlement agreement and draft 9019 motion (.5).	0.60	476.00	285.60
08/16/2021	Reginald Sainvil	Draft and revise 9019 motion and settlement agreement related to First USA proofs of claim and litigation.	2.00	332.00	664.00
08/16/2021	Reginald Sainvil	Review motion to approve settlement between Wild Calling Pet Foods, LLC and 1GC.	0.20	332.00	66.40
08/17/2021	John Dodd	Correspond with G. Moses regarding Schwartz Claim Objection (.1); review and correspond with D. Warner regarding form of Wild Pet 9019 motion (.2).	0.30	476.00	142.80
08/17/2021	Reginald Sainvil	Correspondence regarding terms of settlement between 1GC and First USA and guarantor.	0.90	332.00	298.80
08/19/2021	Reginald Sainvil	Correspondence with T. Myers regarding settlement agreement between First USA and the 1GC Trust.	0.70	332.00	232.40
08/23/2021	John Dodd	Correspond with M.	0.10	476.00	47.60



**Matter Number:** 50727705  
**Invoice Number:** 9655803166  
**Invoice Due Date:** Payable in 30 days

November 04, 2021

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/23/2021	Maribel Fontanez	Fontanez regarding L. Armitage Notice of Filing of Abandonment of Claim (.1). Finalize notice of filing abandonment of claim by L. Armitage and efile;	0.40	280.00	112.00
08/25/2021	John Dodd	communicate with J. Dodd regarding same. Review and comment regarding Pelligrino and Goldstone	0.20	476.00	95.20
08/25/2021	Maribel Fontanez	Financial question. Finalize 9019 motion, e-file and process for service; communicate with R. Sainvil regarding same.	0.70	280.00	196.00
08/25/2021	Reginald Sainvil	Prepare proposed order resolving state court action regarding First USA counterclaims.	0.50	332.00	166.00
08/26/2021	Reginald Sainvil	Prepare for and attend status conference regarding settlement of claims and counterclaims of First USA.	0.50	332.00	166.00
08/26/2021	Reginald Sainvil	Review final order entered regarding First USA counterclaims.	0.20	332.00	66.40
08/27/2021	John Dodd	Call with J. Cassel, B. Levenson, S. Klawans, and J. O'Keefe regarding distribution of agent settlement funds (.2).	0.20	476.00	95.20
<b>Total Hours: 30.30</b>			<b>Total:</b>	<b>11,845.00 USD</b>	



Matter Number: 50727705  
 Invoice Number: 9655803166  
 Invoice Due Date: Payable in 30 days

November 04, 2021

## Time Summary

### B110-Case Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	4.50	476.00	2,142.00
Lori Seavey	0.30	390.00	117.00
Maribel Fontanez	0.20	280.00	56.00
<b>Total</b>	<b>B110-Case Administration</b>		<b>2,315.00</b>

### B160-Fee/Employment Applications

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	3.60	476.00	1,713.60
Maribel Fontanez	1.30	280.00	364.00
<b>Total</b>	<b>B160-Fee/Employment Applications</b>		<b>2,077.60</b>

### B180-Avoidance Action Analysis

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	1.50	476.00	714.00
<b>Total</b>	<b>B180-Avoidance Action Analysis</b>		<b>714.00</b>

### B190-Other Contested Matters

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Maribel Fontanez	0.80	280.00	224.00
<b>Total</b>	<b>B190-Other Contested Matters</b>		<b>224.00</b>

### B240-Tax Issues

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	2.20	476.00	1,047.20
<b>Total</b>	<b>B240-Tax Issues</b>		<b>1,047.20</b>

### B310-Claims Administration and Objections

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	2.50	476.00	1,190.00
Maribel Fontanez	3.30	280.00	924.00
Reginald Sainvil	10.10	332.00	3,353.20
<b>Total</b>	<b>B310-Claims Administration and Objections</b>		<b>5,467.20</b>



**Matter Number:** 50727705  
**Invoice Number:** 9655803166  
**Invoice Due Date:** Payable in 30 days

November 04, 2021

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**Total Hours 30.30**

**Total Fees**

**11,845.00 USD**



**Matter Number:** 50727705  
**Invoice Number:** 9655796344  
**Invoice Due Date:** Payable in 30 days

October 13, 2021

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RE: Chapter 11 Liquidation

**Time Details**

**B110-Case Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/03/2021	John Dodd	Call with R. Sainvil regarding review of plan for trust termination and possible motion to extend trust(.1); draft case "snapshot" for investor litigation counsel (.5).	0.60	476.00	285.60
09/07/2021	John Dodd	Correspondence with M. Fontanez regarding pulling reports for SEC receivership action (.1); correspondence with J. Cassel and J. Luzinski regarding update for class action investors (.2).	0.30	476.00	142.80
09/09/2021	John Dodd	Call with J. Luzinski regarding new UST forms (.2); review new UST quarterly report guidelines in light of draft 1GC quarterly report (.4).	0.60	476.00	285.60
09/10/2021	John Dodd	Comment on draft post-confirmation quarterly report based on new UST form (.5).	0.50	476.00	238.00
09/16/2021	John Dodd	Review SEC motion to lift Ruderman asset freeze and correspond with J. Cassel and J. Luzinski regarding same.	0.10	476.00	47.60
09/20/2021	John Dodd	Correspond with J. Cassel regarding tax advice (.1).	0.10	476.00	47.60
09/28/2021	John Dodd	Review and revise	0.30	476.00	142.80



Matter Number: 50727705  
 Invoice Number: 9655796344  
 Invoice Due Date: Payable in 30 days

October 13, 2021

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/30/2021	John Dodd	Post-Confirmation Report and Exhibit (.3). Correspond with J. Wojciechowski regarding investor IRA issues (.3).	0.30	476.00	142.80

**B160-Fee/Employment Applications**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/08/2021	John Dodd	Review "unbilled" time entries for Epiq from effective date to August 2020.	0.50	476.00	238.00
09/09/2021	John Dodd	Prep call with J. Luzinski re Epiq fees (.1); call with K. Maillow, S. Garabato, J. Luzinski regarding Epiq fees (.7).	0.80	476.00	380.80
09/24/2021	John Dodd	Correspondence with S. Mendelsohn regarding GT tax assistance with grantor trust letters.	0.10	476.00	47.60
09/30/2021	John Dodd	Review draft BDO retention application, retention order, declaration in support (1); correspondence regarding same with M. Fontanez (.1) and J. Luzinski (.1).	1.20	476.00	571.20

**B310-Claims Administration and Objections**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/03/2021	John Dodd	Call with R. Sainvil regarding status of Cassius claim objection and specimen letter to agent related-parties.	0.10	476.00	47.60

**Total Hours: 5.50**

**Total: 2,618.00 USD**





Matter Number: 50727705  
 Invoice Number: 9655796344  
 Invoice Due Date: Payable in 30 days

October 13, 2021

## Time Summary

### B110-Case Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	2.80	476.00	1,332.80
<b>Total</b>	<b>B110-Case Administration</b>		<b>1,332.80</b>

### B160-Fee/Employment Applications

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	2.60	476.00	1,237.60
<b>Total</b>	<b>B160-Fee/Employment Applications</b>		<b>1,237.60</b>

### B310-Claims Administration and Objections

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	0.10	476.00	47.60
<b>Total</b>	<b>B310-Claims Administration and Objections</b>		<b>47.60</b>

<b>Total Hours</b>	<b>5.50</b>	<b>Total Fees</b>	<b>2,618.00 USD</b>
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**Matter Number:** 50727705  
**Invoice Number:** 9655814454  
**Invoice Due Date:** Payable in 30 days

December 13, 2021

RE: Chapter 11 Liquidation

**Time Details**

**B110-Case Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/05/2021	John Dodd	Correspondence with D. Rodriguez and R. Sainvil regarding message from merchant (Shamrock Group).	0.10	476.00	47.60
10/05/2021	Reginald Sainvil	Prepare analysis regarding assets sold to Rapid.	0.80	332.00	265.60
10/06/2021	John Dodd	Review In re John Q Hammons Fall 2006, LLC Tenth Circuit decision regarding constitutionality of UST fees (.2).	0.20	476.00	95.20
10/07/2021	John Dodd	Review chapter 11 service list.	0.10	476.00	47.60
10/07/2021	Maribel Fontanez	Finalize and e-file MSL; communicate with Epiq regarding service.	0.20	280.00	56.00
10/14/2021	John Dodd	Respond to inquiry from M. Dellaporta (.1).	0.10	476.00	47.60
10/26/2021	John Dodd	Correspondence with J. Feldman and P. Seigfried regarding collection action and status of adversary proceeding.	0.20	476.00	95.20

**B160-Fee/Employment Applications**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/19/2021	Maribel Fontanez	Prepare 11th monthly fee statement for Baker & McKenzie; communicate with J. Luzinski and J. Cassel regarding same.	0.50	280.00	140.00
10/20/2021	Maribel Fontanez	Finalize monthly fee	0.30	280.00	84.00



**Matter Number:** 50727705  
**Invoice Number:** 9655814454  
**Invoice Due Date:** Payable in 30 days

December 13, 2021

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		statement and circulate via email as required.			
<b>B190-Other Contested Matters</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/01/2021	Maribel Fontanez	Review docket for Wild Calling Pet Foods to determine if order approving settlement entered; communicate with R. Sainvil regarding same.	0.20	280.00	56.00
<b>Total Hours: 2.70</b>			<b>Total:</b>	<b>934.80 USD</b>	



Matter Number: 50727705  
 Invoice Number: 9655814454  
 Invoice Due Date: Payable in 30 days

December 13, 2021

## Time Summary

### B110-Case Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	0.70	476.00	333.20
Maribel Fontanez	0.20	280.00	56.00
Reginald Sainvil	0.80	332.00	265.60
<b>Total</b>	<b>B110-Case Administration</b>		<b>654.80</b>

### B160-Fee/Employment Applications

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Maribel Fontanez	0.80	280.00	224.00
<b>Total</b>	<b>B160-Fee/Employment Applications</b>		<b>224.00</b>

### B190-Other Contested Matters

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Maribel Fontanez	0.20	280.00	56.00
<b>Total</b>	<b>B190-Other Contested Matters</b>		<b>56.00</b>

<b>Total Hours</b>	<b>2.70</b>	<b>Total Fees</b>	<b>934.80 USD</b>
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**Matter Number:** 50727705  
**Invoice Number:** 9655814455  
**Invoice Due Date:** Payable in 30 days

December 13, 2021

RE: Chapter 11 Liquidation

**Time Details**

**B110-Case Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/05/2021	John Dodd	Review correspondence directed to Debtors regarding MCA agreement.	0.20	476.00	95.20
11/09/2021	Maribel Fontanez	Prepare, finalize, e-file and process for service Notice of Filing MSL.	0.20	280.00	56.00
11/22/2021	John Dodd	Review draft BDO retention application and compare with as-filed MBAF application.	0.20	476.00	95.20
11/24/2021	Reginald Sainvil	Telephone conference with former IGC investor regarding distributions.	0.50	332.00	166.00

**B160-Fee/Employment Applications**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/04/2021	Maribel Fontanez	Finalize August monthly fee statement for Baker McKenzie.	0.30	280.00	84.00
11/04/2021	Maribel Fontanez	Prepare, finalize and circulate 19th and 20th monthly fee statements for DSI.	0.90	280.00	252.00
11/05/2021	Maribel Fontanez	Circulate 10th Baker and McKenzie fee statement; update fee chart.	0.60	280.00	168.00
11/16/2021	Maribel Fontanez	Prepare draft GT fourth interim fee application; communicate with S. Mendelsohn and J. Dodd regarding same.	0.50	280.00	140.00
11/18/2021	Maribel Fontanez	Update draft fourth interim fee application for GT.	0.30	280.00	84.00



**Matter Number:** 50727705  
**Invoice Number:** 9655814455  
**Invoice Due Date:** Payable in 30 days

December 13, 2021

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/23/2021	John Dodd	Review draft engagement agreement and draft statement of work for BDO for trust tax returns and grantor trust letters.	0.50	476.00	238.00
<b>Total Hours: 4.20</b>			<b>Total:</b>	<b>1,378.40 USD</b>	



**Matter Number:** 50727705  
**Invoice Number:** 9655814455  
**Invoice Due Date:** Payable in 30 days

December 13, 2021

## Time Summary

### B110-Case Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	0.40	476.00	190.40
Maribel Fontanez	0.20	280.00	56.00
Reginald Sainvil	0.50	332.00	166.00
<b>Total</b>	<b>B110-Case Administration</b>		<b>412.40</b>

### B160-Fee/Employment Applications

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	0.50	476.00	238.00
Maribel Fontanez	2.60	280.00	728.00
<b>Total</b>	<b>B160-Fee/Employment Applications</b>		<b>966.00</b>

<b>Total Hours</b>	<b>4.20</b>	<b>Total Fees</b>	<b>1,378.40 USD</b>
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**Matter Number:** 50727705  
**Invoice Number:** 9655771230  
**Invoice Due Date:** Payable in 30 days

July 15, 2021

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**Disbursement Summary**

<b><u>Description</u></b>	<b><u>Amount</u></b>	
Courtlink June 2021	40.43	
Courtlink May 2021	46.95	
<b><u>Description</u></b>	<b><u>Amount</u></b>	
Courier/Messenger Service	47.91	
Outside Information Services	89.76	
Postage	2.55	
<b>Total Disbursements</b>	<b>227.60</b>	<b>USD</b>





**Matter Number:** 50727705  
**Invoice Number:** 9655778466  
**Invoice Due Date:** Payable in 30 days

August 10, 2021

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**Disbursement Summary**

<b><u>Description</u></b>	<b><u>Amount</u></b>	
Telephonic Hearing 07.08.2021	50.00	
Courtlink online usage allocations - July 2021	70.84	
<b><u>Description</u></b>	<b><u>Amount</u></b>	
Courier/Messenger Service	16.95	
<b>Total Disbursements</b>	<b>137.79</b>	<b>USD</b>



**Matter Number:** 50727705  
**Invoice Number:** 9655803166  
**Invoice Due Date:** Payable in 30 days

November 04, 2021

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**Disbursement Summary**

<b><u>Description</u></b>	<b><u>Amount</u></b>	
Hearing on 08.05.2021	50.00	
Courtlink 08 2021	61.51	
<b><u>Description</u></b>	<b><u>Amount</u></b>	
Outside Information Services	132.35	
<b>Total Disbursements</b>	<b>243.86</b>	<b>USD</b>



**Matter Number:** 50727705  
**Invoice Number:** 9655796344  
**Invoice Due Date:** Payable in 30 days

October 13, 2021

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**Disbursement Summary**

<b><u>Description</u></b>	<b><u>Amount</u></b>
PACER invoice expense report	19.80
<b><u>Description</u></b>	<b><u>Amount</u></b>
Outside Information Services	55.96
<b>Total Disbursements</b>	<b>75.76 USD</b>



**Matter Number:** 50727705  
**Invoice Number:** 9655814454  
**Invoice Due Date:** Payable in 30 days

December 13, 2021

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**Disbursement Summary**

<b><u>Description</u></b>	<b><u>Amount</u></b>	
Pacer Service Center Inv 2797442-Q32021	3.20	
Courtlink October 2021	60.53	
Courtlink - September 2021	65.30	
<b><u>Description</u></b>	<b><u>Amount</u></b>	
Outside Information Services	9.34	
<b>Total Disbursements</b>	<b>138.37</b>	<b>USD</b>



**Matter Number:** 50727705  
**Invoice Number:** 9655814455  
**Invoice Due Date:** Payable in 30 days

December 13, 2021

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**Disbursement Summary**

<u>Description</u>	<u>Amount</u>	
Outside Information Services	57.30	
<b>Total Disbursements</b>	<b>57.30</b>	<b>USD</b>