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*Counsel for The Official Committee of  
 Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
 FOR THE DISTRICT OF NEVADA**

In re:

RED ROSE, INC.

- ☐ Affects Beachhead Roofing and Supply, Inc.  
☐ Affects California Equipment Leasing Association, Inc.  
☐ Affects Beachhead Roofing and Supply, Inc.  
☐ Affects Fences 4 America, Inc.  
☐ Affects James Petersen Industries, Inc.  
☐ Affects PD Solar, Inc.  
☐ Affects Petersen Roofing and Solar LLC  
☐ Affects Petersen-Dean, Inc.  
☐ Affects PetersenDean Hawaii LLC  
☐ Affects PetersenDean Roofing and Solar Systems, Inc.  
☐ Affects PetersenDean Texas, Inc.  
☐ Affects Red Rose, Inc.  
☐ Affects Roofs 4 America, Inc.  
☐ Affects Solar 4 America, Inc.  
☐ Affects Sonoma Roofing Services, Inc.  
☐ Affects TD Venture Fund, LLC  
☐ Affects Tri-Valley Supply, Inc.  
☒ Affects All Debtors

Case No.: 20-12814-mkn

Jointly Administered with

Case No. BK-S-20-12815-mkn  
 Case No. BK-S-20-12816-mkn  
 Case No. BK-S-20-12818-mkn  
 Case No. BK-S-20-12819-mkn  
 Case No. BK-S-20-12820-mkn  
 Case No. BK-S-20-12821-mkn  
 Case No. BK-S-20-12822-mkn  
 Case No. BK-S-20-12823-mkn  
 Case No. BK-S-20-12824-mkn  
 Case No. BK-S-20-12825-mkn  
 Case No. BK-S-20-12826-mkn  
 Case No. BK-S-20-12827-mkn  
 Case No. BK-S-20-12829-mkn  
 Case No. BK-S-20-12831-mkn  
 Case No. BK-S-20-12833-mkn

Chapter 11

Debtors.

**MONTHLY FEE STATEMENT OF  
SERVICES RENDERED AND EXPENSES INCURRED  
BY SCHWARTZ LAW, PLLC AS ATTORNEYS FOR THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE PERIOD OF MARCH 1, 2021 THROUGH MARCH 31, 2021**

In accordance with the Administrative Order Pursuant to 11 U.S.C. §§ 105(a), 328 and 331 Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses of Professionals (the “**Administrative Order**”) granted by the Court on August 7, 2020, Schwartz Law, PLLC (“**SL**”), as attorneys for the Official Committee of Unsecured Creditors (the “**Committee**”) in the above-referenced cases, submits this Interim Statement of Services Rendered and Expenses Incurred (the “**Statement**”) for the period of March 1, 2021 through March 31, 2021 (the “**Compensation Period**”). As set forth herein, SL seeks interim approval of its fees in the amount of \$7,562.00 and costs in the amount of \$134.88.

**I. THE ITEMIZATION OF SERVICES RENDERED BY SL**

**A. Services Rendered**

1. The hours devoted to this case by the SL professionals and paraprofessionals during the Compensation Period, the hourly rate for each professional and paraprofessional and the resulting fees are itemized as set forth on **Exhibit A**, attached hereto. The name and position of each professional and paraprofessional are as follows:

<b>Name</b>	<b>Timekeeper</b>	<b>Position</b>	<b>2020 Hourly Rate</b>
Samuel A. Schwartz, Esq.	SAS	Attorney	\$825.00
Athanasios Agelakopoulos, Esq.	AA	Attorney	\$615.00
Sasha Aliakbar-Amid, Esq.	SA	Attorney	\$415.00
Emily D. Anderson, Esq.	EA	Attorney	\$365.00
Brian J. Braud	BB	Paralegal	\$225.00
Kristina Perez	KP	Paralegal	\$225.00
Susan Roman	SR	Paralegal	\$225.00

2. The time records of SL submitted herewith, and incorporated herein, consist of a daily breakdown of the time spent by each SL professional and paraprofessional on each day during

1 the Compensation Period. See Exhibit A.

2 3. The blended hourly rate for all services rendered by SL during the Compensation  
3 Period is \$444.82.<sup>1</sup>

4 4. Each SL professional and paraprofessional listed above brought a high level of  
5 expertise and experience which inured to the benefit of the Committee. Indeed, the hourly rate of  
6 each professional and paraprofessional listed above is comparable to the rates charged by other  
7 firms in Nevada for bankruptcy and restructuring matters, and SL believes the hourly rates listed  
8 above are reasonable and justified.

10 5. Indeed, SL submits that the above-listed professionals and paraprofessionals  
11 provided significant value to the Committee during the Compensation Period.

## 12 **II. ITEMIZATION OF SERVICES RENDERED AND DISBURSEMENTS MADE** 13 **BY CATEGORY**

### 14 **A. Disbursements Made**

15 6. Disbursements of \$134.88 were made by SL, as set forth in **Exhibit A**, attached to  
16 this statement.

### 18 **B. Total Services Rendered and Disbursements**

19 7. The total services rendered, costs and disbursements made are as follows:

20 Total: \$7,696.88

### 21 **C. Amount Payable After Holdback**

22 8. The amount payable to SL for the Statement Period, after adjusting for the twenty  
23 percent (20%) holdback, is \$6,184.48.<sup>2</sup>

24 ///

26 <sup>1</sup> The blended hourly billing rate of \$444.82 per hour is derived by dividing the total fees of  
27 \$7,562.00 by the total hours of 17.0.

28 <sup>2</sup> The amount payable of \$6,184.48 is calculated by adding eighty percent (80%) of the total  
fees to the total disbursements (i.e.  $\$7,562.00(0.80) + \$134.88 = \$6,184.48$ ).

1           9.       Accordingly, SL respectfully requests that said amount be paid pursuant to the  
2 Court's Administrative Order.

3           Dated this 12<sup>th</sup> day of April, 2021.

4           SCHWARTZ LAW, PLLC

5           By: /s/ Samuel A. Schwartz

6 Samuel A. Schwartz, Esq.

7 Nevada Bar No. 10985

8 601 East Bridger Avenue

9 Las Vegas, NV 89101

10 *Counsel for The Official Committee of Unsecured Creditors*

# **Exhibit A**

**Schwartz Law, PLLC**

601 E. Bridger Ave.  
Las Vegas, NV 89101  
United States

**INVOICE**

Invoice # 456  
Date: 03/31/2021  
Due Upon Receipt

Red Rose

**60.00001-Red Rose****The Official Committee of Unsecured Creditors****Services**

Type	Time Keeper	Date	Notes	Quantity	Rate	Total
Service	SR	03/01/2021	A101 Plan and prepare for B110 Case Administration: Review and analyze order shortening time re motion to extend and modify interim management agreement	0.10	\$225.00	\$22.50
Service	SA	03/01/2021	A107 Communicate (other outside counsel) B110 Case Administration: Email correspondence with K. Owens(.2), debtor counsel, and C. Castaldi (.3) re settlement agreement.	0.50	\$415.00	\$207.50
Service	SAS	03/03/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Telephone conference and correspondence w/ B. Axelrod (.2) and C. Castaldi (.2) re fees and identified assets; review of the debtors' spreadsheet re same (.3)	0.70	\$825.00	\$577.50
Service	SAS	03/03/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Attention to the entry of the orders approving the first interim applications and review of the second interim applications.	0.50	\$825.00	\$412.50
Service	SR	03/04/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Correspondence with C. Castaldi re Brown Rudnick order approving first interim fee application (1); review and analyze orders approving first interim fee applications of Brown Rudnick, Schwartz Law, and Glass Ratner (.3); prepare notice of entry (.3); file (.1) and serve (.1) same; request hearing re second interim fee applications (.1)	1.00	\$225.00	\$225.00

Service	KP	03/04/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Review February invoice and time entries in preparation of filing 120 day fee	0.40	\$225.00	\$90.00
Service	SAS	03/04/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Review of the ACF settlement (.3) and telephone conference w/ the debtors re admin claims (.5)	0.80	\$825.00	\$660.00
Service	SR	03/05/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Revise and finalize applications for compensation of Schwartz Law, Glass Rather and Brown Rudnick (.3); prepare proposed orders (.6) and notices of hearing (.5); file applications (.3), notices of hearing (.3) and serve (.3) same	2.30	\$225.00	\$517.50
Service	SR	03/05/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Draft declaration of S. Schwartz in support of second application for compensation of Schwartz Law (.5); correspondence with S. Schwartz re same (.1); finalize (.1), file (.1) and serve (.1) same; draft errata to declaration of C. Castadi in support of second interim fee application (.3); file (.1) and serve (.1) same	1.40	\$225.00	\$315.00
Service	SR	03/08/2021	A101 Plan and prepare for B110 Case Administration: Review and organize pleadings for 3/9/21 hearing (.2); correspondence with S. Schwartz and S. Amid re same (.1)	0.30	\$225.00	\$67.50
Service	SA	03/09/2021	A109 Appear for/attend B130 Asset Disposition: Review docket and pleadings for hearing on motion to extend and modify interim management agreement(.3) attend hearing (.2)	0.50	\$415.00	\$207.50
Service	SR	03/09/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Correspondence with J. Mendez at Brown Rudnick re monthly fee statement (.1); correspondence with S. Freeman re Glass Ratner February statement needed for preparation of the monthly fee statement (.1)	0.20	\$225.00	\$45.00
Service	KP	03/09/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Prepare February components of the 120 day application for compensation	0.20	\$225.00	\$45.00
Service	SA	03/09/2021	A108 Communicate (other external) B120 Asset Analysis and Recovery:	0.20	\$415.00	\$83.00

			Correspondence with co-counsel M. Schlan re hearing on motion to modify management agreement.			
Service	SA	03/09/2021	A108 Communicate (other external) B130 Asset Disposition: Correspondence re order on motion to extend and modify interim management agreement with M. Wilson counsel for Debtor (.1) and review of same (.2)	0.30	\$415.00	\$124.50
Service	SAS	03/10/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Review and analysis of the debtors fee payment schedule and correspondence w/ CW re same	1.10	\$825.00	\$907.50
Service	SR	03/11/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Prepare Schwartz Law monthly fee statement for February, 2021 (.3); file (.1) and serve (.1) same; correspondence with J. Mendez re Brown Rudnick monthly fee statement (.1); review and analyze Brown Rudnick monthly fee statement (.1); file (.1) and serve (.1) same	0.90	\$225.00	\$202.50
Service	SAS	03/11/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Correspondence and telephone conferences w/ the debtors re payment of admin claims	0.80	\$825.00	\$660.00
Service	SAS	03/12/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Review of the monthly committee fee applications and correspondence w/ the debtors re payments of admin claims	1.60	\$825.00	\$1,320.00
Service	SR	03/15/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Correspondence with S. Freeman re February statement needed for monthly fee statement	0.10	\$225.00	\$22.50
Service	KP	03/17/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Review summary analysis and invoices re Epiq charges	0.50	\$225.00	\$112.50
Service	SR	03/18/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Draft monthly fee statement of GlassRatner for February, 2021 (.3); correspondence with K. Perez re same (.1); finalize (.1), file (.1) and serve (.1) same	0.60	\$225.00	\$135.00
Service	SA	03/24/2021	A107 Communicate (other outside counsel) B320 Plan and Disclosure Statement	0.30	\$415.00	\$124.50



			(including Business Plan): Correspondence with Debtor counsel B. Axelrod regarding Status of plan (.1) teleconference re same (.2)			
Service	SR	03/25/2021	A107 Communicate (other outside counsel) B320 Plan and Disclosure Statement (including Business Plan): Review and analyze stipulation and order continuing hearing re Serrato's motion for relief (.2); review and analyze order re motion for relief from stay of Argonaut (.1); correspondence with S. Schwartz, S. Amid and K. Perez re same (.2)	0.50	\$225.00	\$112.50
Service	SR	03/25/2021	A101 Plan and prepare for B160 Fee/ Employment Applications: Review and analyze US Trustee's omnibus reservation of rights re Committee's interim fee applications (.1); correspondence with S. Schwartz, S. Amid and K. Perez re same (.1)	0.20	\$225.00	\$45.00
Service	SA	03/25/2021	A107 Communicate (other outside counsel) B320 Plan and Disclosure Statement (including Business Plan): Correspondence with M. Schlan regarding Possible Committee Plan	0.20	\$415.00	\$83.00
Service	SA	03/26/2021	A108 Communicate (other external) B320 Plan and Disclosure Statement (including Business Plan): Correspondence with co-counsel M. Schlan re Committee plan.	0.30	\$415.00	\$124.50
Service	SR	03/29/2021	A101 Plan and prepare for B110 Case Administration: Review and analyze stipulation and order for relief from filed by Davis (.2); review and analyze stipulation and order to allow proof of claim of Deacon to be filed without objection (.2); correspondence with S. Schwartz, S. Amid and K. Perez re same (.1)	0.50	\$225.00	\$112.50
				<b>Quantity Subtotal</b>		<b>17.0</b>
				<b>Services Subtotal</b>		<b>\$7,562.00</b>

**Expenses**

Type	Date	Notes	Quantity	Rate	Total
Expense	03/23/2021	Photocopies/Printing/Postage: Response to Sale Motion	1.00	\$134.88	\$134.88
			Expenses Subtotal		\$134.88

Quantity Total 17.0

Subtotal \$7,696.88

Total \$7,696.88

**Detailed Statement of Account****Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
300	10/31/2020	\$54,115.20	\$43,537.10	\$10,578.10
338	11/30/2020	\$34,524.54	\$28,414.44	\$6,110.10
371	12/31/2020	\$18,484.20	\$14,868.00	\$3,616.20
402	01/31/2021	\$28,142.80	\$9,159.29	\$18,983.51
425	02/28/2021	\$24,114.30	\$0.00	\$24,114.30

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
456	03/31/2021	\$7,696.88	\$0.00	\$7,696.88
Outstanding Balance				<b>\$71,099.09</b>
Total Amount Outstanding				<b>\$71,099.09</b>

Please make all amounts payable to: Schwartz Law, PLLC

Payment is due upon receipt.