

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

| | |
|-------------------------------------|------------------------|
| IN RE: | CHAPTER 11 |
| MV REALTY PBC, LLC, <i>et al.</i> , | CASE NO. 23-17590-EPK |
| Debtors. | (Jointly Administered) |

SUMMARY OF FIRST INTERIM FEE APPLICATION OF FRASCONA, JOINER, GOODMAN AND GREENSTEIN, P.C. AS SPECIAL COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES

1. Name of Applicant: Frascona, Joiner, Goodman and Greenstein, P.C.
2. Role of Applicant: Special Counsel to the Debtors
3. Name of Certifying Professional: Jordan C. May, Esq.
4. Date Case Filed: September 22, 2023
5. Date of Order Approving Employment: Nov 30, 2023 (ECF No. 315)
6. Period for this Application: September 22, 2023 through February 6, 2024
7. Amount of Compensation Sought: \$70,744.00¹
8. Amount of Expense Reimbursement Sought: \$3,315.33²
9. Amount of Retainer(s): \$0.00
10. Current Balance of Retainer Remaining: \$0.00

¹ On November 20, 2023, the Court entered the *Order Granting Debtors' Motion for Entry of Order Authorizing and Establishing Monthly Compensation Procedures for Professionals* [ECF No. 251] (the "Compensation Order"). In accordance with the Compensation Order, the Applicant has submitted the following invoices: (a) November 27, 2023 - \$5,852.50 (fees) ("Invoice 1"); (b) December 19, 2023 - \$14,444.00 (fees) and \$1,723.53 (costs) ("Invoice 2"); (c) January 8, 2024 - \$28,137.50 (fees) and \$1,201.60 (costs) ("Invoice 3"); (d) January 26, 2024 - \$17,400.00 (fees) and \$312.28 (costs) ("Invoice 4"); and (e) February 6, 2024 - \$4,910.00 (fees) and \$77.92 (costs) ("Invoice 5" and, collectively with Invoice 1, Invoice 2, Invoice 3, and Invoice 4, the "Invoices"). The Applicant has received the following payments on account of the Invoices: (a) \$17,835.73 on February 2, 2024; and (b) \$41,899.80 on March 4, 2024. The foregoing payments represent 80% of fees, and 100% of costs, requested by Applicant. Minimal objections were raised and resolved (\$125.00 reduction and no interest).

² See n.1, *supra*.

11. Last Monthly Operating Report Filed: April 22, 2024 [ECF Nos. 1250-1285]
12. If Case is Chapter 11, current funds in estate: \$590,977.00

History of Fees and Expenses

1. Dates, sources, and amounts of retainer received: N/A
2. Dates, sources, and amounts of third party payments received: N/A
3. Payments from Monthly Fee Statements:

| Time Period | Fees Requested | Expenses Requested | Date of Payment | Fees Paid | Expenses Paid |
|--|--|---------------------------|------------------------|--------------------|----------------------|
| October 3, 2023 through November 10, 2023 | \$5,852.50 | \$0.00 | 2-2-2024 | \$4,682.00 | \$0 |
| November 15, 2023 through December 8, 2023 | \$14,444.00 | \$1,723.53 | 2-2-2024 | \$11,430.20 | \$1,723.53 |
| December 11, 2023 through January 5, 2024 | \$28,137.50 | \$1,201.60 | March 4, 2024 | \$22,460.00 | \$1,201.60 |
| January 5, 2024 through January 10, 2024 | \$17,400.00 | \$312.28 | March 4, 2024 | \$13,920.00 | \$312.28 |
| January 2, 2024 through February 6, 2024 | \$4,910.00 | \$77.92 | March 4, 2024 | \$3,928.00 | \$77.92 |
| <i>Totals:</i> | <i>\$70,744.00</i> <i>\$56,595.20</i> <i>(80%)</i> | <i>\$3,315.33</i> | | <i>\$56,420.20</i> | <i>\$3,315.22</i> |

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

| | |
|-------------------------------------|------------------------|
| IN RE: | CHAPTER 11 |
| MV REALTY PBC, LLC, <i>et al.</i> , | CASE NO. 23-17590-EPK |
| Debtors. | (Jointly Administered) |

FIRST INTERIM APPLICATION OF FRASCONA, JOINER, GOODMAN AND GREENSTEIN, P.C., SPECIAL COUNSEL TO DEBTORS AND DEBTORS-IN-POSSESSION, FOR AN ALLOWANCE OF COMPENSATION OF FEES AND REIMBURSEMENT OF EXPENSES

Frascona, Joiner, Goodman and Greenstein, P.C. (the “Applicant” or “FJGG”), counsel to the Debtors³ (collectively, the “Debtors”), hereby applies for a first interim allowance of compensation of fees in the aggregate amount of \$56,595.20 (80%) and reimbursement of expenses in the aggregate amount of \$3,315.22 (100%) (the “Application”) to FJGG on behalf of the Debtors during the period September 22, 2023 through and including February 6, 2024 (the “Period”). Accordingly, FJGG requests a first interim award of fees and costs in the amount of \$59,910.53 for the period September 22, 2023 through and including February 6, 2024, which represents eighty-percent (80%) of the fees, and one-hundred percent (100%) of the expenses,

³ The last four digits of the Debtors’ federal tax identification numbers are: *MV Realty, PBC LLC (6755), MV Realty Holdings, LLC (3483), MV Receivables II, LLC (9368), MV Receivables III, LLC, MV Realty PBC, LLC (Pennsylvania) (7301), MV Realty of South Carolina, LLC (7322), MV Realty of North Carolina, LLC (3258), MV of Massachusetts, LLC (0864), MV Realty of Illinois, LLC (8814), MV Realty of Arizona, LLC (2725), MV Realty of Connecticut, LLC (8646), MV Realty PBC, LLC (Georgia) (6796), MV Realty of New Jersey, LLC (5008), MV Realty of Washington, LLC (7621), MV Realty of Maryland, LLC (9945), MV Realty of Virginia, LLC (2129), MV Realty of Tennessee, LLC (7701), MV Realty of Wisconsin, LLC (2683), MV Realty of Nevada, LLC (0799), MV Realty of Oregon, LLC (3046), MV Realty of Utah, LLC (4543), MV Realty of Minnesota, LLC (1678), MV Realty of Indiana, LLC (3566), MV Realty of Missouri, LLC (6503), MV Homes of New York, LLC (2727), MV Realty of Idaho, LLC (8185), MV Realty of Alabama, LLC (6462), MV Realty of Colorado, LLC (1176), MV Realty of Oklahoma, LLC (8174), MV Realty of Louisiana, LLC (3120), MV Realty of Kansas, LLC (2304), MV Realty of Kentucky, LLC (2302), MV Realty of California (7499), MV Realty of Texas, LLC (7182), MV Realty of Michigan, LLC (5280) and MV Realty of Ohio, LLC (0728).*

incurred by the Applicant during the Period, without prejudice to the rights of Applicant to seek an award of any all fee amounts held back during any interim Periods.

The Application is filed pursuant to 11 U.S.C. §§ 330 and Rule 2016, Federal Rules of Bankruptcy Procedure, and meets all of the requirements set forth in the Guidelines incorporated in Local Rule 2016-1(A), (B)(1) and (B)(3). In support of the Application, FJGG respectfully represents and sets forth as follows:

BACKGROUND

1. On September 22, 2023 (the “Petition Date”), each of the Debtors filed a voluntary petition under Chapter 11 of Title 11 of the United States Code. The Debtors’ cases are being jointly administered.

2. All services for which FJGG requests compensation were performed for on behalf of the Debtors, and not on behalf of any creditor or other person.

3. FJGG seeks compensation and reimbursement in connection with representation of the Debtors pursuant to sections 328, 330, 331 and 503(b) of the Bankruptcy Code, Rule 2016 and the Court’s Guidelines.

4. This application covers services rendered during the Period September 22, 2023 through and including December 31, 2023.

5. In support of the Application for an interim award of professional compensation and expense reimbursement, in accordance with the Guidelines, the following exhibits are attached to the Application:

Exhibit “1” – Fee Application Summary Chart

Exhibit “2-A” and “2-B” - Summary of Professional Time by Individual and by Activity Category

Exhibit “3” – Summary of Requested Reimbursement 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.

FACTORS TO BE CONSIDERED IN AWARDING FEES

6. The Applicant believes that the requested fee of \$34,939.20 (excluding costs) for 113.1 hours worked is reasonable considering the twelve factors enumerated in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974), made applicable to bankruptcy proceedings by *In re First Colonial Corp. of America*, 544 F.2d 1291 (5th Cir. 1977), which this Court may refer to in assessing the propriety of the fees sought herein. An explanation of how the foregoing factors apply to the fees sought by FJGG is contained immediately hereafter.

THE GENERAL NATURE AND THE SERVICES RENDERED:
THE RESULTS OBTAINED

7. It is respectfully submitted that the Applicant's efforts have assisted the Debtors in administering this estate. The following narrative provides a summary, by category, of the more salient professional services rendered by the Applicant, for and on behalf of the Debtors, during this compensation period: representation of Debtors in regulatory matters, including real estate commission license lawsuits.

(a) Case Administration: The Applicant consulted, advised, and represented the Debtors and their representatives on real estate commission regulatory proceedings addressing Debtors' various real estate licenses. The Applicant communicated with counsel for the opposing licensing authorities in connection with the litigation and potential settlement of licensing cases.

(b) Litigation: The Applicant attended real estate commission hearings in Debtors' cases and engaged in discussions with the opposing counsel regarding aspects of the litigation of Debtors' license cases, including evidentiary issues, stipulations, oral motion conferral, settlement discussions and related issues. The Applicant served as first chair trial counsel for the North Carolina Real Estate Commission hearings held December 14-15, 2023, and January 9-10,

2024. The Applicant has and continues to represent Debtors in pending Colorado Real Estate Commission administrative lawsuits. The Applicant has handled all aspects of responsive pleadings, motions practice, disclosure, discovery, discovery disputes, case development and settlement conferences in connection with this ongoing litigation. Further, Applicant is assisting with appeal of the North Carolina Real Estate Commission case.

TIME AND LABOR REQUIRED

8. The transcribed time records annexed hereto as Exhibit “4” show that the shareholder of the Applicant devoted not less than 185.2 hours of time to servicing the Debtors and this estate from September 22, 2023 through and including February 6, 2024.

THE NOVELTY AND DIFFICULTY OF THE SERVICE

9. The legal questions arising in the representation of the Debtors were at times novel or difficult, and they did require the exercise of skillful application of administrative law and real estate license regulations relating to the matters considered.

THE SKILL REQUISITE TO PERFORM THE SERVICES PROPERLY

10. In order to perform the legal services enumerated herein properly, substantive legal knowledge in the fields of administrative law and real estate license regulations were required.

THE PRECLUSION OF OTHER EMPLOYMENT BY THE PROFESSIONAL DUE TO THE ACCEPTANCE OF THE CASE

11. Applicant is aware of no other specific employment which was precluded as a result of accepting this case. However, to the extent Applicant’s efforts were devoted to this case, the Applicant was unable to devote that time to other matters, therein preventing your Applicant from billing and collecting fees in other cases.

THE CUSTOMARY FEE

12. The rates charged by the Applicant as set forth in the attached exhibits are well within the range (and likely much lower) charged by other professionals in the Districts of Colorado of similar skill and reputation in the area of administrative law and real estate license regulations law.

WHETHER THE FEE IS FIXED OR CONTINGENT

13. The fees requested by the Applicant are based upon time spent and hourly rates as is customary for such Special Litigation counsel in a Chapter 11 proceeding, and as set forth in the application to retain the Applicant.

14. For services of the type rendered herein where those services were performed for a private client, your Applicant would charge a reasonable fee for services rendered, on an hourly rate or, in addition, a contingent or fixed fee basis. The fee requested by your Applicant is comparable to those fees which would be charged to a private client for similar services rendered by your Applicant. The fees requested are entirely reasonable. Your Applicant respectfully asks that the Court take notice that counsel maintains office space in a commercial location. Consequently, a substantial portion of the hourly fee as may be awarded to your Applicant by this Court will be utilized to defray substantial overhead charges incurred and paid over the course of the administration which has elapsed since your Applicant was employed.

15. The fees sought are not contingent although they are dependent upon Court approval. The detailed time reports which comprise Exhibit "4" fully support the compensation sought.

**TIME LIMITATIONS IMPOSED BY THE
CLIENT OR OTHER CIRCUMSTANCES**

16. No specific time limitations were imposed by the Debtors.

EXPERIENCE, REPUTATION AND ABILITY OF APPLICANT

17. Applicant is a law firm having substantial experience in administrative law and real estate license regulations law. The experience, reputation, and ability of Jordan C. May are known to the Court.

THE UNDESIRABILITY OF THE CASE

18. Applicant did not and does not find it undesirable to represent the Debtors.

**THE NATURE AND LENGTH OF THE
PROFESSIONAL RELATIONSHIP WITH THE CLIENT**

19. The Applicant represented the Debtors prior to bankruptcy filings in connection with regulatory and litigation in administrative and real estate license regulatory matters.

AWARDS IN SIMILAR CASES

20. The amount requested is fair and reasonable when compared with awards in similar cases. The fees requested by Applicant comport with the mandate of the Code, which directs that services be evaluated in light of comparable services performed in bankruptcy cases in the community.

WHEREFORE, based upon the foregoing, FJGG hereby respectfully requests that the Court issue and enter an order awarding FJGG an allowance of interim compensation for professional services rendered for and on behalf of the Debtors during the Period in the amount of \$56,595.20 representing 80% of the gross fees requested in the Application, and reimbursement of expenses in the amount of \$3,315.22, representing 100% of the gross expenses requested in the Application, without prejudice to the rights of the Applicant to request and obtain an award of any and all fees held back, as well as granting such other and further relief as this Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the *First Interim Fee Application of Frasca, Joiner, Goodman and Greenstein, P.C., as Special Counsel to the Debtors and Debtors-in-Possession, for Allowance of Compensation of Fees and Reimbursement of Expenses* with exhibits was served (a) electronically to all parties authorized to receive a notice of filing by CM/ECF on the date filed, and (b) by United States Mail upon the Debtors, the chairperson of each official committee, the U.S. Trustee, and their respective counsels (unless served electronically).

I HEREBY CERTIFY that I am admitted to the Bar of the United States District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this Court set forth in Local Rule 2090-1(A).

/s/ Michael D. Seese
Michael D. Seese, Esq.
Florida Bar No. 997323
mseese@seeselaw.com
SEESE, P.A.
101 N.E. 3rd Avenue, Suite 1500
Fort Lauderdale, FL 33301
Telephone No. 595.: 954-745-5897

Counsel to the Debtors

EXHIBIT “1”

Fee Application Summary Chart

FEE APPLICATION SUMMARY CHART:

| REQUEST | | | | | APPROVAL | | | | | PAID* | | HOLDBACK | |
|------------|-------|------------------------|-------------------------------------|-----------------|--------------|-------|---------------|-------------------|-----------|---------------|---------------|-------------------|--|
| | | | | | | | | | | | | | |
| Date Filed | ECF # | Period Covered | Fees Requested | Costs Requested | Date Ordered | ECF # | Fees Approved | Expenses Approved | Fees Paid | Expenses Paid | Fee Holdbacks | Expense Holdbacks | |
| | | 9-14-23 through 2-6-24 | \$70,744.00 (\$56,595.20) 80% | \$3,315.33 | | | | | \$ | \$ | | | |

¹ On November 20, 2023, the Court entered the *Order Granting Debtors' Motion for Entry of Order Authorizing and Establishing Monthly Compensation Procedures for Professionals* [ECF No. 251] (the "Compensation Order"). In accordance with the Compensation Order, the Applicant has submitted the following invoices: (a) November 27, 2023 - \$5,852.50 (fees) ("Invoice 1"); (b) December 19, 2023 - \$14,444.00 (fees) and \$1,723.53 (costs) ("Invoice 2"); and (c) January 8, 2024 - \$23,377.50 (fees) and \$1,201.60 (costs) ("Invoice 3") and, collectively with Invoice 1 and Invoice 2, the "Invoices"). The Applicant has received the following payments on account of the Invoices: (a) \$17,835.73 on February 2, 2024; (b) \$41,899.80 on March 5, 2024. The foregoing payments represent 80% of fees, and 100% of costs, requested by Applicant. Minimal objections were raised and resolved and are reflected in payments received.

EXHIBIT “2-A”

**Summary of Professional Time
For the Period
September 22, 2023 through and including December 31, 2023**

| Partner, Associate, Paralegal | Year Licensed | Total Hours | Rate | Fees |
|--------------------------------------|--------------------------|------------------------|-------------|--------------------|
| Jordan C. May | 2007 | 121.9 | \$450 | \$54,855.00 |
| Caroline W. Young | 2021 | 37.6 | \$350 | \$13,160.00 |
| Alyssa R. Colwell -Paralegal | | 21.8 | \$125 | \$2,725.00 |
| Pamela S. Cione | | .10 | \$40.00 | \$4.00 |
| TOTALS: | | 181.4 | | \$70,744.00 |
| Blended Average Hourly Rate | | | \$389.99 | |

EXHIBIT “2-B”

Summary of Professional Time
For the Period by Activity Category
September 22, 2023 through and including February 6, 2024

| | | | |
|--------------------------------------|--------------|-------------|-------------|
| Activity Category: Litigation | | | |
| Partner, Associate, Paralegal | Hours | Rate | Fees |
| Jordan C. May | 121.9 | \$450 | \$54,855.00 |
| Caroline W. Young | 37.6 | \$350 | \$13,160.00 |
| Alyssa R. Colwell | 21.8 | \$125 | \$2,725.00 |
| Pamela S. Cione | .10 | \$40.00 | \$4.00 |

EXHIBIT “3”

**Summary of Requested Reimbursement of Expenses
For the Period
September 22, 2023 through and including September 6, 2024**

| | DESCRIPTION | AMOUNT |
|----|--|-------------------|
| 1 | Filing Fees: | \$-0- |
| | | |
| 2 | Process Service Fees: | \$-0- |
| | | |
| 3 | Witness Fees: | \$-0- |
| | | |
| 4 | Court Reporter Fees and Transcripts: | \$-0- |
| | | |
| 5 | Lien and Title Searches: | \$-0- |
| | | |
| 6 | Photocopies: | \$ |
| | (a) In House copies () | |
| | (b) Outside copies (-0-) | |
| | | |
| 7 | Postage: | \$.63 |
| | | |
| 8 | Overnight Delivery Charges: | \$0 |
| | (a) FedEx | |
| | | |
| 9 | Outside Courier/Messenger Service: | \$-0- |
| | | |
| 10 | Long Distance Telephone Charges: | \$-0- |
| | | |
| 11 | Long Distance Fax Transmissions: | \$-0- |
| | | |
| 12 | Computerized Research : | \$269.79 |
| | | |
| 13 | Travel | \$2,944.91 |
| | | |
| 14 | One-time Document Management Fee | \$100.00 |
| | | |
| | TOTAL EXPENSE REIMBURSEMENT REQUESTED | \$3,315.22 |

EXHIBIT “4”

Time Records

Frascona, Joiner, Goodman and Greenstein, P.C.

Attorneys at Law

A Professional Corporation

4750 Table Mesa Drive, Boulder, Colorado 80305

Telephone: (303) 494-3000

Tax ID: 84-1104293

MV Realty of Colorado LLC
 Steve Scott
 ap@homesatmv.com
 jonneuman@gmail.com

MATTER I.D.: 35318-23
 STATEMENT NO.: 270456
 STATEMENT DATE: November 27, 2023

AMOUNT ENCLOSED: \$ _____

(Please return this portion of statement with remittance.)

FOR PROFESSIONAL SERVICES RENDERED THROUGH: November 10, 2023

MATTER I.D. 35318-23
MATTER NAME: AG and Regulatory Matters

Statement No.: 270456

Statement Date: November 27, 2023

| PROFESSIONAL FEES | | | | <u>HOURS</u> | <u>RATE</u> | <u>TOTAL</u> |
|-------------------|-----|---|--|--------------|-------------|--------------|
| 10/03/2023 | CWY | Janet Clark - Response to Complaint. Finalize draft response to Colorado Real Estate Commission complaint for Ms. Clark. | | 0.70 | 350.00 | 245.00 |
| 10/04/2023 | CWY | JANET CLARK E-mail correspondence with Ms. Clark for her review and approval of drafted Response to the Colorado Real Estate Commission's complaint. | | 0.10 | 350.00 | 35.00 |
| 10/12/2023 | ARC | Review Commission's First Set of WD to MV Realty and e-mail clients (35318-15 matter) | | 0.20 | 125.00 | 25.00 |
| 10/26/2023 | CWY | Commence drafting mediation statement. | | 0.80 | 350.00 | 280.00 |
| 10/27/2023 | CWY | Continue drafting mediation statement. Pull comparable stipulations from prior licensee matters for similar violations and discipline sought by commission. | | 2.40 | 350.00 | 840.00 |
| 11/03/2023 | CWY | Luik Mediation. (no charge to client) | | 3.80 | 0.00 | 0.00 |
| 11/03/2023 | ARC | Prepare Jaana Luik stipulation and FAO for signatures to client and Jordan May | | 0.10 | 125.00 | 12.50 |
| 11/03/2023 | JCM | Attend and conduct mediation with COAG | | 7.00 | 450.00 | 3,150.00 |
| 11/04/2023 | JCM | Conference with client regarding mediation and related implications | | 1.10 | 450.00 | 495.00 |
| 11/06/2023 | JCM | Conference with client regarding mediation and next steps in litigation process | | 0.30 | 450.00 | 135.00 |
| 11/08/2023 | ARC | Finalize and file Motion for Extension of Time to respond to discovery requests for Jaana Luik's case RC 2023-0017 (-21) | | 0.40 | 125.00 | 50.00 |
| 11/08/2023 | JCM | Work on written discovery timing and responses to COAG | | 0.20 | 450.00 | 90.00 |
| 11/09/2023 | JCM | Call and e-mail with COAG consumer protection attorney, Brady Grassmeyer regarding case | | 0.30 | 450.00 | 135.00 |
| 11/09/2023 | JCM | Conference with client regarding new communication from COAG regarding subordination process in the case on consumer refinance | | 0.50 | 450.00 | 225.00 |
| 11/10/2023 | JCM | Work on responses to discovery request from Attorney General's office | | 0.30 | 450.00 | 135.00 |
| TOTAL FEES: | | | | | | 5,852.50 |

| RATE SUMMARY: | <u>HOURS</u> | <u>RATE</u> | <u>TOTAL</u> |
|-------------------|--------------|-------------|--------------|
| Alyssa R. Colwell | 0.70 | 125.00 | 87.50 |
| Jordan C. May | 9.70 | 450.00 | 4,365.00 |

| | | | |
|-------------------|-------|--------|----------|
| Caroline W. Young | 3.80 | 0.00 | 0.00 |
| Caroline W. Young | 4.00 | 350.00 | 1,400.00 |
| TOTALS: | 18.20 | | 5,852.50 |

| | |
|----------------------------------|-----------------|
| BALANCE AS OF LAST STATEMENT: | 0.00 |
| PAYMENTS SINCE LAST STATEMENT: | 0.00 |
| PAST DUE BALANCE: | 0.00 |
| INTEREST: | 0.00 |
| THIS STATEMENT: | 5,852.50 |
| TOTAL DUE THIS STATEMENT: | 5,852.50 |

ONLINE PAYMENTS CAN BE MADE AT WWW.FRASCONA.COM
MASTERCARD, VISA AND DISCOVER ARE ACCEPTED.
FULL PAYMENT IS DUE WITHIN 10 DAYS OF RECEIPT. INTEREST WILL BE CHARGED AT 1.5% MONTHLY.
IF UNABLE TO MAKE FULL PAYMENT, PLEASE CONTACT US IMMEDIATELY.

Frascona, Joiner, Goodman and Greenstein, P.C.

Attorneys at Law

A Professional Corporation

4750 Table Mesa Drive, Boulder, Colorado 80305

Telephone: (303) 494-3000

Tax ID: 84-1104293

MV Realty of Colorado LLC
 Steve Scott
 ap@homesatmv.com
 jonneuman@gmail.com
 ...

MATTER I.D.: 35318-23
 STATEMENT NO.: 271022
 STATEMENT DATE: December 19, 2023

AMOUNT ENCLOSED: \$ _____

(Please return this portion of statement with remittance.)

FOR PROFESSIONAL SERVICES RENDERED THROUGH: December 8, 2023

MATTER I.D. 35318-23
MATTER NAME: AG and Regulatory Matters

Statement No.: 271022

Statement Date: December 19, 2023

| PROFESSIONAL FEES | | | <u>HOURS</u> | <u>RATE</u> | <u>TOTAL</u> |
|-------------------|-----|--|--------------|-------------|--------------|
| 11/15/2023 | JCM | Work on written discovery responses from COAG to MV Realty of Colorado's employing broker | 0.90 | 450.00 | 405.00 |
| 11/16/2023 | JCM | Work on written discovery of employing broker | 1.10 | 450.00 | 495.00 |
| 11/17/2023 | JCM | Work on written discovery responses for employing broker of brokerage firm | 2.20 | 450.00 | 990.00 |
| 11/17/2023 | JCM | Call with current employing broker regarding investigations into brokerage firm and related matters | 0.20 | 450.00 | 90.00 |
| 11/26/2023 | JCM | Work on discovery responses to brokerage firm and employing broker | 3.20 | 450.00 | 1,440.00 |
| 11/27/2023 | JCM | Correspondence with Colorado attorney general's office regarding discovery issues | 0.30 | 450.00 | 135.00 |
| 11/27/2023 | JCM | Finalize written discovery to Colorado attorney general; call with Colorado employing broker | 0.80 | 450.00 | 360.00 |
| 11/28/2023 | JCM | Review of Real Estate Commission case involving Daryl Cook; conference with co-counsel regarding defense of Real Estate Commission case against Daryl Cook | 1.00 | 450.00 | 450.00 |
| 11/28/2023 | CWY | E-mail correspondence with investigator requesting extension to respond to supplemental production per client's request. | 0.10 | 350.00 | 35.00 |
| 11/29/2023 | JCM | Call with counsel John Gekas, Angie De Cespedes and Walter Brock regarding North Carolina regulatory matters | 1.10 | 450.00 | 495.00 |
| 11/30/2023 | JCM | Work on letter to Commission counsel regarding continuance of evidentiary hearing set for December 14, 2023 | 1.80 | 450.00 | 810.00 |
| 12/01/2023 | JCM | Conference with NC counsel Walter Brock and with client Darryl Cook | 3.70 | 450.00 | 1,665.00 |
| 12/03/2023 | JCM | Work on letter to Commission seeking an extension to the evidentiary hearing; conference with client regarding same and coordination of legal arguments with other positions | 2.50 | 450.00 | 1,125.00 |
| 12/04/2023 | JCM | Research and prepare bankruptcy court filing for stay/TRO of license proceeding against MV and Darryl Cook | 2.20 | 450.00 | 990.00 |
| 12/05/2023 | JCM | Conferral call with COAG regarding discovery dispute | 0.60 | 450.00 | 270.00 |
| 12/05/2023 | JCM | Work on preparation for NCREC hearing; call with Darryl Cook regarding same | 1.20 | 450.00 | 540.00 |
| 12/06/2023 | JCM | Conference with client regarding NCREC hearing defense | 1.20 | 450.00 | 540.00 |
| 12/07/2023 | JCM | Work on defense of NCREC matter; conference with Darryl Cook; conference with Cook and prosecutor Moody regarding procedure and settlement | 2.40 | 450.00 | 1,080.00 |

| | | | | | |
|-------------|-----|--|------|--------|-----------|
| 12/08/2023 | JCM | Attend and conduct hearing preparations for NC REC hearing; work on subpoenas | 3.40 | 450.00 | 1,530.00 |
| 12/08/2023 | CWY | Research on subpoena witness from Commission staff who can testify regarding prior discipline imposed. (.5) Draft subpoena for witnesses. (.7) | 1.20 | 350.00 | 420.00 |
| 12/08/2023 | CWY | 35318-22, Complaint No. 2023-1664 Review and Prepare supplemental documents requested from investigator. | 0.50 | 350.00 | 175.00 |
| 11/27/2023 | ARC | 35318-15: Produce documents and finalize responses to written discovery requests; prepare google link and documents and submit | 0.90 | 125.00 | 112.50 |
| 12/03/2023 | ARC | Assemble letter and signatures | 0.20 | 125.00 | 25.00 |
| 12/04/2023 | PSC | Preparation of Mailing to NC Real Estate Commission. | 0.10 | 40.00 | 4.00 |
| 12/06/2023 | ARC | Phone call w/Jordan May re MV realty North Carolina case and discovery; edit and revise discovery to Plaintiff | 0.60 | 125.00 | 75.00 |
| 12/07/2023 | ARC | Compile signatures and documents | 0.60 | 125.00 | 75.00 |
| 12/08/2023 | ARC | Draft Subpoenas of witnesses testifying in North Carolina case | 0.40 | 125.00 | 50.00 |
| 12/08/2023 | ARC | Research flight, hotel and car rental in NC for 12/13 through 12/15; book reservations | 0.50 | 125.00 | 62.50 |
| TOTAL FEES: | | | | | 14,444.00 |

| RATE SUMMARY: | <u>HOURS</u> | <u>RATE</u> | <u>TOTAL</u> |
|-------------------|--------------|-------------|--------------|
| Pamela S. Cione | 0.10 | 40.00 | 4.00 |
| Alyssa R. Colwell | 3.20 | 125.00 | 400.00 |
| Jordan C. May | 29.80 | 450.00 | 13,410.00 |
| Caroline W. Young | 1.80 | 350.00 | 630.00 |
| TOTALS: | 34.90 | | 14,444.00 |

DISBURSEMENTS

| | | | |
|----------------------|-----|--|------------|
| 12/8/2023 | FJG | Travel Expenses: Comfort Inn Raleigh Midtown - December 13 and 14, 2023 | 221.26 |
| 12/8/2023 | FJG | Travel Expenses: United Flight to/from Raleigh/Durham NC | 1,250.80 |
| 12/8/2023 | FJG | Travel Expenses: Budget Rent-A-Car car rental in Raleigh Durham NC - Dec 13-15, 2023 | 153.10 |
| | | Postage | 0.63 |
| 11/27/2023 | FJG | Westlaw Research | 97.74 |
| TOTAL DISBURSEMENTS: | | | \$1,723.53 |

| | |
|----------------------------------|------------------|
| BALANCE AS OF LAST STATEMENT: | 5,852.50 |
| PAYMENTS SINCE LAST STATEMENT: | 0.00 |
| PAST DUE BALANCE: | 5,852.50 |
| INTEREST: | 87.79 |
| THIS STATEMENT: | 16,167.53 |
| TOTAL DUE THIS STATEMENT: | 22,107.82 |

ONLINE PAYMENTS CAN BE MADE AT WWW.FRASCONA.COM
 MASTERCARD, VISA AND DISCOVER ARE ACCEPTED.
 FULL PAYMENT IS DUE WITHIN 10 DAYS OF RECEIPT. INTEREST WILL BE CHARGED AT 1.5% MONTHLY.
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Frascona, Joiner, Goodman and Greenstein, P.C.

Attorneys at Law

A Professional Corporation

4750 Table Mesa Drive, Boulder, Colorado 80305

Telephone: (303) 494-3000

Tax ID: 84-1104293

MV Realty of Colorado LLC
 Steve Scott
 mseese@seeselaw.com
 ...

MATTER I.D.: 35318-23
 STATEMENT NO.: 271427
 STATEMENT DATE: January 8, 2024

AMOUNT ENCLOSED: \$

(Please return this portion of statement with remittance.)

FOR PROFESSIONAL SERVICES RENDERED THROUGH: January 8, 2024

MATTER I.D. 35318-23
MATTER NAME: AG and Regulatory Matters

Statement No.: 271427

Statement Date: January 8, 2024

| PROFESSIONAL FEES | | | | <u>HOURS</u> | <u>RATE</u> | <u>TOTAL</u> |
|-------------------|-----|---|--|--------------|-------------|--------------|
| 12/11/2023 | ARC | Download documents and organize in folders; send witness list to Walter Brock | | 1.20 | 125.00 | 150.00 |
| 12/11/2023 | JCM | Work on response to Commission's written discovery to employing broker | | 0.50 | 450.00 | 225.00 |
| 12/11/2023 | JCM | Trial preparations for Commission hearing; work on stipulations with prosecuting attorney; coordinate witnesses and subpoenas; work on | | 5.80 | 450.00 | 2,610.00 |
| 12/12/2023 | ARC | Trouble shoot and pull documents from link for supplemental disclosure | | 1.40 | 125.00 | 175.00 |
| 12/12/2023 | ARC | Phone call w/Jordan May on Supplemental Response and documents | | 0.50 | 125.00 | 62.50 |
| 12/12/2023 | CWY | Draft witness scripts for cross examination. Specifically, Caroline Corwin Walker, Rose Marie Beddow, Desharon Kersey, Causey, and Fowler. | | 2.70 | 350.00 | 945.00 |
| 12/12/2023 | JCM | Oversee subpoenas to Commission hearing witnesses; conference with Darryl Cook regarding preparation for hearing testimony | | 5.80 | 450.00 | 2,610.00 |
| 12/13/2023 | ARC | Phone call with Jordan May regarding trial strategy and Rodney Benifield | | 0.80 | 125.00 | 100.00 |
| 12/13/2023 | ARC | Prepare amended witness list; 36 | | 0.20 | 125.00 | 25.00 |
| 12/13/2023 | CWY | Continue drafting cross scripts of witnesses for NC Hearing. Review exhibits and incorporate and help with hearing preparation | | 4.60 | 350.00 | 1,610.00 |
| 12/13/2023 | JCM | Prepare for Commission hearing; preparation of exhibits and witness examination scripts; work on stipulations for hearing; correspondence with opposing counsel regarding hearing logistics, written discovery, | | 7.30 | 450.00 | 3,285.00 |
| 12/13/2023 | JCM | Attend and conduct discovery conferral conference with attorney general regarding written discovery | | 0.50 | 450.00 | 225.00 |
| 12/14/2023 | ARC | Finalize emergency exhibit for trial | | 0.10 | 125.00 | 12.50 |
| 12/14/2023 | JCM | Attend and conduct Commission hearing on license of employing broker Darryl Cook and brokerage firm license | | 12.30 | 450.00 | 5,535.00 |
| 12/15/2023 | ARC | Review supplemental responses and send for Jaana Luik (-21) signatures | | 0.80 | 125.00 | 100.00 |
| 12/15/2023 | ARC | Draft third amended witness list and e-mail | | 0.10 | 125.00 | 12.50 |
| 12/15/2023 | JCM | Attend and conduct Commission hearing; Correspondence with client regarding hearing notes and related hearing issues and strategy | | 4.20 | 450.00 | 1,890.00 |
| 12/18/2023 | ARC | For -21: Phone call with Jordan May; Review and edit supplemental responses; edit responsive documents, finalize responses, prepare hightail link, e-mail | | 0.40 | 125.00 | 50.00 |
| 12/18/2023 | JCM | Work on written discovery supplement | | 1.10 | 450.00 | 495.00 |
| 12/19/2023 | CWY | (Reference 35318-22, 2023-1664) Review e-mail correspondence regarding | | 0.60 | 350.00 | 210.00 |

| | | | | | |
|-------------|-----|---|------|-----------|----------|
| | | supplemental request for information from investigator. Draft response to requested documents | | | |
| 12/19/2023 | CWY | Telephone conference with attorney Jordan May, investigator Pat Hardy, and Respondent Janet Clark. | 0.30 | 350.00 | 105.00 |
| 12/20/2023 | CWY | (Reference 35318-22, 2023-1664) Review e-mail correspondence from Janet regarding requested documents | 0.10 | 350.00 | 35.00 |
| 12/21/2023 | ARC | Reserve flight, hotel and car rental for Jan 9th trial | 0.50 | 125.00 | 62.50 |
| 12/21/2023 | ARC | Phone call and e-mail communications to Janet regarding documents needed for current matters -19, -22 and -25 | 0.40 | 125.00 | 50.00 |
| 12/21/2023 | CWY | Complaint matter no. 35318-19 Telephone conference with attorney Jordan May, investigator Pat Hardy, and Respondent Janet Clark. (| 0.50 | 350.00 | 175.00 |
| 12/21/2023 | JCM | Attend and conduct interview with MV Realty employing broker | 1.00 | 450.00 | 450.00 |
| 12/26/2023 | ARC | (-15) Draft petition for mediation and requests for production of documents; (-20) Draft petition for mediation and requests for production of documents; (-21) draft requests for production of documents | 1.10 | 125.00 | 137.50 |
| 12/27/2023 | ARC | Prepare supplemental disclosure and amend exhibit list | 0.30 | 125.00 | 37.50 |
| 12/27/2023 | ARC | (-20): Finalize and file Petition for Mediation; (-15): Finalize and file Petition for Mediation | 0.30 | 125.00 | 37.50 |
| 12/28/2023 | CWY | Complaint No. 2023-2456 (internal ref: 35318-25) Draft Response Letter to Complaint. | 0.70 | 350.00 | 245.00 |
| 12/29/2023 | CWY | Prepare supplemental documents and response per investigator's request. | 0.40 | 350.00 | 140.00 |
| 12/30/2023 | JCM | Work on Real Estate Commission hearing preparation; preparation call with witness Christina Mandlopho; preparation call with Michelle Stafford; preparation call with Darryl Cook; call with Jonathan Nueman; review of potential expert witness opinions | 3.50 | 450.00 | 1,575.00 |
| 01/02/2024 | ARC | For -25: Finalize and review response to notification letter and send to Pat Hardy | 0.30 | 125.00 | 37.50 |
| 01/02/2024 | CWY | Draft scripts for NCREC hearing. | 0.10 | 350.00 | 35.00 |
| 01/02/2024 | CWY | File matter 35318-25 E-mail correspondence with Janet requesting entire transaction file. Continue to draft response to complaint | 0.80 | 350.00 | 280.00 |
| 01/03/2024 | ARC | For NC case; download documents and de-duplicate; upload into discovery local; meeting with Jackie on discovery local | 1.70 | 125.00 | 212.50 |
| 01/03/2024 | CWY | Confer with Jordan May regarding NCREC Matter. | 0.30 | 350.00 | 105.00 |
| 01/03/2024 | CWY | NCREC matter Revise stipulation to avoid hearsay admissions | 1.10 | 350.00 | 385.00 |
| 01/03/2024 | CWY | Telephone conference with Janet Clark to request document notes for Chariot drive property. E-mail correspondence with investigator Pat Hardy regarding same | 0.40 | 350.00 | 140.00 |
| 01/04/2024 | ARC | Prepare text message for disclosure sent by Christina Mandolfo | 0.20 | 125.00 | 25.00 |
| 01/04/2024 | ARC | For -21: Compile Jaana's signature on supplemental discovery responses and send to opposing counsel | 0.20 | 125.00 | 25.00 |
| 01/04/2024 | CWY | Draft Closing Argument and factual findings and legal conclusions for NCREC matter. Draft arguments for HBA as non-brokerage activity, clear error regarding complainant's testimony, and prior HBA program as not illegal as well as mitigation section. Review and incorporate certified script for testimony from Bandy and Benifield, and reference in closing along with requisite exhibits. | 4.80 | 350.00 | 1,680.00 |
| 01/04/2024 | JCM | Trial preparation with witness Michelle Stafford; conference with client regarding same | 2.60 | 450.00 | 1,170.00 |
| 01/05/2024 | CWY | Continue Draft Closing Argument and factual findings and legal conclusions for NCREC matter. Review certified script for testimony from complainant Cook, and reference in closing along with requisite exhibits. (+.6) | 1.90 | 350.00 | 665.00 |
| TOTAL FEES: | | | | 28,137.50 | |

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|-------------------|--------------|-------------|--------------|
| RATE SUMMARY: | <u>HOURS</u> | <u>RATE</u> | <u>TOTAL</u> |
| Alyssa R. Colwell | 10.50 | 125.00 | 1,312.50 |

| | | | |
|-------------------|-------|--------|-----------|
| Jordan C. May | 44.60 | 450.00 | 20,070.00 |
| Caroline W. Young | 19.30 | 350.00 | 6,755.00 |
| TOTALS: | 74.40 | | 28,137.50 |

DISBURSEMENTS

| | | | |
|------------|-----|---|--------|
| 12/14/2023 | FJG | Travel Expenses: United - flight from Raleigh Durham to Denver 12-15-23 | 114.00 |
| 12/21/2023 | FJG | Travel Expenses: Hotel for nights of January 8, 9 and 10, 2024 - Comfort Inn Raleigh Midtown | 360.32 |
| 12/21/2023 | FJG | Travel Expenses: Flight to/from Raleigh/Durham, NC / January 8th and January 11th, 2024 / United Airlines | 633.15 |
| 12/4/2023 | FJG | Westlaw Research | 94.13 |

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| TOTAL DISBURSEMENTS: | \$1,201.60 |
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| BALANCE AS OF LAST STATEMENT: | 22,107.82 |
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|--------------------------------|------|
| PAYMENTS SINCE LAST STATEMENT: | 0.00 |
|--------------------------------|------|

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|-------------------|-----------|
| PAST DUE BALANCE: | 22,107.82 |
|-------------------|-----------|

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|-----------|------|
| INTEREST: | 0.00 |
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| THIS STATEMENT: | 29,339.10 |
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| TOTAL DUE THIS STATEMENT: | 51,446.92 |
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FULL PAYMENT IS DUE WITHIN 10 DAYS OF RECEIPT. INTEREST WILL BE CHARGED AT 1.5% MONTHLY.
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Frascona, Joiner, Goodman and Greenstein, P.C.

Attorneys at Law

A Professional Corporation

4750 Table Mesa Drive, Boulder, Colorado 80305

Telephone: (303) 494-3000

Tax ID: 84-1104293

MV Realty of Colorado LLC
 Steve Scott
 mseese@seeselaw.com
 ...

MATTER I.D.: 35318-23
 STATEMENT NO.: 271958
 STATEMENT DATE: January 26, 2024

AMOUNT ENCLOSED: \$

(Please return this portion of statement with remittance.)

FOR PROFESSIONAL SERVICES RENDERED THROUGH: January 15, 2024

MATTER I.D. 35318-23
MATTER NAME: AG and Regulatory Matters

Statement No.: 271958

Statement Date: January 26, 2024

| PROFESSIONAL FEES | | | | <u>HOURS</u> | <u>RATE</u> | <u>TOTAL</u> |
|-------------------|-----|--|--|--------------|-------------|--------------|
| 01/05/2024 | CWY | NCREC CLOSING | | 1.30 | 350.00 | 455.00 |
| 01/05/2024 | CWY | CREC Complaint No. 2023-133/ Reference: 35318-15 Draft Supplemental response to Attorney General's request for written discovery. | | 1.40 | 350.00 | 490.00 |
| 01/08/2024 | JCM | Preparation for NCREC hearing; meetings with witnesses; prepare brief for submission | | 7.30 | 450.00 | 3,285.00 |
| 01/08/2024 | CWY | North Carolina case: Assist with preparation for continued hearing. Continue to Draft Closing to incorporate additional legal arguments and all witness testimony and exhibits. Revise stipulation for exhibits. | | 6.60 | 350.00 | 2,310.00 |
| 01/09/2024 | JCM | Attend and conduct NCREC hearing | | 11.20 | 450.00 | 5,040.00 |
| 01/10/2024 | JCM | Attend and conduct NCREC hearing, offer oral argument, analysis of Commission order and communication with client regarding same | | 10.60 | 450.00 | 4,770.00 |
| 01/10/2024 | CWY | NCREC Revise and finalize closing | | 0.30 | 350.00 | 105.00 |
| 01/12/2024 | JCM | Conference with MV of NC broker on effect of Commission case on listings; correspondence with Darryl Cook regarding same | | 0.60 | 450.00 | 270.00 |
| 01/05/2024 | ARC | For -15: Phone call to client regarding documents requested | | 0.40 | 125.00 | 50.00 |
| 01/08/2024 | ARC | Work on supplemental disclosure; multiple phone call with Jordan May regarding disclosure and exhibits | | 3.60 | 125.00 | 450.00 |
| 01/10/2024 | ARC | Proofread and finalize closing brief | | 1.40 | 125.00 | 175.00 |
| TOTAL FEES: | | | | | | 17,400.00 |

| RATE SUMMARY: | <u>HOURS</u> | <u>RATE</u> | <u>TOTAL</u> |
|-------------------|--------------|-------------|--------------|
| Alyssa R. Colwell | 5.40 | 125.00 | 675.00 |
| Jordan C. May | 29.70 | 450.00 | 13,365.00 |
| Caroline W. Young | 9.60 | 350.00 | 3,360.00 |
| TOTALS: | 44.70 | | 17,400.00 |

DISBURSEMENTS

1/11/2024 FJG Travel Expenses: Avis rental car - January 8, 9 and 10, 2024 212.28

| | | | |
|--------------------------------|-----|--|-----------|
| 1/13/2024 | FJG | Eclipse Document Management One-Time Fee | 100.00 |
| TOTAL DISBURSEMENTS: | | | \$312.28 |
| BALANCE AS OF LAST STATEMENT: | | | 51,446.92 |
| PAYMENTS SINCE LAST STATEMENT: | | | -87.79 |
| PAST DUE BALANCE: | | | 51,359.13 |
| INTEREST: | | | 0.00 |
| THIS STATEMENT: | | | 17,712.28 |
| TOTAL DUE THIS STATEMENT: | | | 69,071.41 |

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Frascona, Joiner, Goodman and Greenstein, P.C.

Attorneys at Law

A Professional Corporation

4750 Table Mesa Drive, Boulder, Colorado 80305

Telephone: (303) 494-3000

Tax ID: 84-1104293

MV Realty of Colorado LLC
 Steve Scott
 mseese@seeselaw.com
 ...

MATTER I.D.: 35318-23
 STATEMENT NO.: 272380
 STATEMENT DATE: February 6, 2024

AMOUNT ENCLOSED: \$

(Please return this portion of statement with remittance.)

FOR PROFESSIONAL SERVICES RENDERED THROUGH: February 6, 2024

MATTER I.D. 35318-23
MATTER NAME: AG and Regulatory Matters

Statement No.: 272380

Statement Date: February 6, 2024

| PROFESSIONAL FEES | | | <u>HOURS</u> | <u>RATE</u> | <u>TOTAL</u> |
|-------------------|-----|---|--------------|-------------|--------------|
| 01/02/2024 | JCM | Work on written discovery for Attorney General's case | 0.40 | 450.00 | 180.00 |
| 01/17/2024 | JCM | Conference with client regarding license law considerations in Attorney General case and trigger for brokerage relationship and associated disclosure forms | 0.90 | 450.00 | 405.00 |
| 01/18/2024 | ARC | For -20: check attorney's calendar and e-mail client on available dates for mediation | 0.20 | 125.00 | 25.00 |
| 01/18/2024 | CWY | Complaint No. 2023-0031 Telephone conference with Terri Clark to discuss discovery requests and posture of the case. E-mail correspondence with Terri regarding same. | 0.30 | 350.00 | 105.00 |
| 01/22/2024 | ARC | Compile list of all complaints against MV | 0.20 | 125.00 | 25.00 |
| 01/22/2024 | CWY | Confer with Jordan May regarding Terri Clark discovery and posture of case regarding potential for settlement. | 0.20 | 350.00 | 70.00 |
| 01/23/2024 | ARC | For -20: Prepare shell of written discovery responses | 0.30 | 125.00 | 37.50 |
| 01/23/2024 | JCM | Prepare for deposition of prior MV Realty employing broker by Attorney General's office | 1.10 | 450.00 | 495.00 |
| 01/24/2024 | JCM | Attend and conduct deposition of Jaana Luik | 0.60 | 450.00 | 270.00 |
| 01/24/2024 | JCM | Attend and conduct deposition of Jaana Luik | 3.50 | 450.00 | 1,575.00 |
| 01/25/2024 | CWY | For matter 35318-20, NOC against Terri Clark. Draft discovery responses to Colorado Real Estate Commission's discovery | 0.90 | 350.00 | 315.00 |
| 01/26/2024 | ARC | For -20: Finalize responses to Colorado Real Estate Commission's written discovery | 0.50 | 125.00 | 62.50 |
| 01/26/2024 | CWY | For matter 35318-20, NOC against Terri Clark. E-mail correspondence with Ms. Clark regarding her responses to the discovery requests. Implement her answers to the discovery requests. Review and compile requested documents for production. | 1.50 | 350.00 | 525.00 |
| 01/26/2024 | JCM | Work on written discovery to Attorney General | 0.90 | 450.00 | 405.00 |
| 02/02/2024 | JCM | Conference with client regarding real estate commission case and related strategy questions; correspondence with co-counsel and client regarding same | 0.60 | 450.00 | 270.00 |
| 02/06/2024 | ARC | Provide list of cases for Janet Clark information | 0.80 | 125.00 | 100.00 |
| 02/06/2024 | JCM | Review of complaint history as requested by client | 0.10 | 450.00 | 45.00 |
| TOTAL FEES: | | | | | 4,910.00 |

| RATE SUMMARY: | <u>HOURS</u> | <u>RATE</u> | <u>TOTAL</u> |
|-------------------|--------------|-------------|--------------|
| Alyssa R. Colwell | 2.00 | 125.00 | 250.00 |
| Jordan C. May | 8.10 | 450.00 | 3,645.00 |
| Caroline W. Young | 2.90 | 350.00 | 1,015.00 |
| TOTALS: | 13.00 | | 4,910.00 |

DISBURSEMENTS

| | | | |
|----------------------|-----|------------------|---------|
| 1/5/2024 | FJG | Westlaw Research | 17.91 |
| 1/10/2024 | FJG | Westlaw Research | 60.01 |
| TOTAL DISBURSEMENTS: | | | \$77.92 |

TRUST ACTIVITY:

| | | |
|------------|--|-------------|
| | Previous Trust Balance: | 0.00 |
| 01/31/2024 | ACH Direct Deposit: MV Realty # 271022 & 270456 | 17,455.41 |
| 01/31/2024 | Pmt on acct from trust 1030/MV Realty of Colorado | (17,455.41) |
| 02/05/2024 | ACH Direct Deposit: MV Realty - remainder on #271022 | 380.32 |
| 02/06/2024 | Pmt on acct from trust 1030/MV Realty of Colorado | (380.32) |
| | Current Trust Balance: | 0.00 |

| | |
|----------------------------------|------------------|
| BALANCE AS OF LAST STATEMENT: | 69,071.41 |
| PAYMENTS SINCE LAST STATEMENT: | -17,455.41 |
| PAST DUE BALANCE: | 51,616.00 |
| INTEREST: | 0.00 |
| THIS STATEMENT: | 4,987.92 |
| TOTAL DUE THIS STATEMENT: | 56,603.92 |

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CERTIFICATION

1. I have been designated by FJGG (the “Applicant”) as the professional with responsibility in this case for compliance with the “Guidelines for Fee Applications for Professionals in the Southern District of Florida in Bankruptcy Cases” (the “Guidelines”).

2. I have read the Applicant's *First Interim Application of Frascona, Joiner, Goodman and Greenstein, P.C., as Counsel for Debtors and Debtors-in-Possession, for Compensation and Reimbursement of Expenses* (the “Application”). The Application complies with the Guidelines, and the fees and expenses sought fall within the Guidelines, except as specifically noted in this Certification and described in the Application.

3. The fees and expenses sought are billed at rates and in accordance with practices customarily employed by the Applicant and generally accepted by the Applicant's clients.

4. The Debtors, the chairperson of each official committee, the U.S. Trustee, and their respective counsels, will be mailed, simultaneously with the filing of the Application with the Court, a complete copy of the Application (including all relevant exhibits). Copies will also be provided *via* CM/ECF to all parties entitled to receive electronic service on the date filed.

5. The following are the variances with the provisions of the Guidelines, the date of each Court Order approving the variance, and the justification for the variance: NONE.

Frascona, Joiner, Goodman and Greenstein, P.C.
4750 Table Mesa Dr.
Boulder, CO 80305
(303) 494 3000
jordan@frascona.com

By: /s/ Jordan C. May
Jordan C. May