

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
<https://www.flsb.uscourts.gov/>

In re: Case No. 23-17590-EPK
MV Realty PBC, LLC Chapter 11
Debtor. (Jointly Administered)

**UNITED STATES TRUSTEE’S RESPONSE TO FINAL FEE APPLICATION OF SEESE,
P.A., AS COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES**

The United States Trustee for Region 21 (the “United States Trustee”) respectfully submits this response to the *Final Fee Application of Seese Law, P.A., as Counsel to the Debtors and Debtors-in-Possession, for Allowance of Compensation and Reimbursement of Expenses* [ECF No. 1417], and states as follows:

BACKGROUND

1. Seese, P.A. (“Seese”), filed its *Final Fee Application of Seese, P.A., as Counsel to the Debtors and Debtors-in-Possession, for Allowance of Compensation and Reimbursement of Expenses* [ECF No. 1417] (the “Seese Fee Application”) on May 9, 2024.
2. The Seese Fee Application was initially scheduled for hearing on June 5, 2024.
3. On May 14, 2024, Seese filed a motion to advance the hearing on the Seese Fee Application from June 5, 2024, to May 29, 2024, due to a scheduling conflict.
4. On May 15, 2024, the Court granted such motion and rescheduled the hearing on the Seese Fee Application to May 29, 2024.

5. In the Seese Fee Application, Seese seeks this Court approve a final award of compensation in the amount of \$580,072.50 and reimbursement of expenses in the amount \$7,529.07 pursuant to § 330 of the Bankruptcy Code.

6. After the filing of the Seese Fee Application, the United States Trustee contacted Seese to discuss the United States Trustee's objections to the Seese Fee Application.

7. After extensive negotiations, the United States Trustee and Seese have, subject to this Court's approval, resolved the United States Trustee's objection on the following terms:

- Seese shall reduce its fee request by \$20,000.00, thus resulting in allowed final fees in the amount of \$560,072.50, together with costs in the amount of \$7,529.07, for a total final award in the amount of \$567,601.50 (the "Final Award");
- Seese shall waive any supplemental fees/costs incurred after May 8, 2024;
- The unpaid amount of the Final Award shall be entitled to immediate payment, and the US Trustee shall not object to the entry of an order awarding the Final Award, providing for immediate payment, and reserving jurisdiction to enforce; and

8. The United States Trustee believes that the foregoing consensual resolution is in the best interests of the Debtors, their creditors, and the estates.

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WHEREFORE, the United States Trustee respectfully requests the Court (i) enter an order with respect to the Seese Fee Application consistent herewith; and (ii) grant any further relief it deems just, equitable, and proper.

Dated: May 20, 2024

Mary Ida Townson
United States Trustee for Region 21

s/ Martin P. Ochs
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* I hereby certify that I am admitted to the Bars of the States of Georgia and New York and that I am excepted from additional qualifications to practice in this Court pursuant to Local Rule 9011-4 pertaining to attorneys representing the United States government.

CERTIFICATE OF SERVICE

I certify that the foregoing document was electronically filed on May 16, 2024, which will cause a copy to be sent to all users who have registered to receive electronic service via PACER's Notice of Electronic Filing ("NEF") in this case as noted below.

s/

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