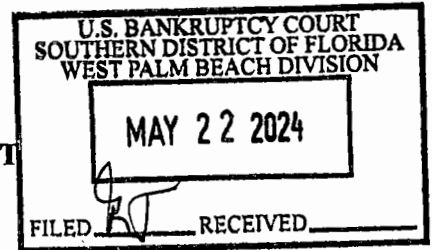


**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**



In re:	)	Chapter 11
	)	
MV REALTY PBC, LLC <i>et. al.</i> ,	)	Case No. 23-17590-EPK
	)	
Debtors.	)	Honorable Erik P. Kimball
	)	(Jointly Administered)

**NOTICE OF FILING OF EPIQ CORPORATE RESTRUCTURING, LLC'S MOTION FOR THE  
ALLOWANCE AND PAYMENT OF SECTION 503(b)(1)(A) ADMINISTRATIVE CLAIM**

**TO ALL PARTIES IN INTEREST:**

1. PLEASE TAKE NOTICE that on May 21, 2024, a Motion for the Allowance and Payment of Section 503(b)(1)(A) Administrative Claim was sent to the Court via UPS overnight mail.
2. RELIEF SOUGHT: Epiq hereby requests that, the Court/ Trustee(s) approve the Request.
3. COMPENSATION SOUGHT: The Request seeks expenses in the amount of Six Hundred Six Thousand Seven Hundred Twenty-Five and 85/100 Dollars (\$606,725.85) for the provision of noticing, claims, solicitation agent, and call center operator services during the Chapter 11 proceedings.
4. NOTICE IS FURTHER GIVEN that objections to this Application, if any, must be filed within twenty-one (21) days with the Bankruptcy Clerk for the United States Bankruptcy Court for the Southern District of Florida, West Palm Beach Division, at Flagler Waterview Building, 1515 North Flagler Drive, 8th Floor, Courtroom: B, West Palm Beach, FL 33401. A copy of any objection must be served on the undersigned. If no objections are filed, the Court may, in its discretion, enter an order approving the Application without a hearing.
5. Parties in interest with questions may contact the undersigned.

Respectfully submitted,

Date: May 21, 2024

Signature: \_\_\_\_\_  
Name: Shiloh White  
Title: Senior Corporate Paralegal &  
Assistant Secretary  
Address: 11880 College Blvd.  
Suite 200  
Overland Park, KS 66210  
E-Mail: [swhite@epiglobal.com](mailto:swhite@epiglobal.com)

**EXHIBIT A**

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

In re:

MV REALTY PBC, LLC, *et al.*,

Debtors.

) Chapter 11  
)  
)  
)  
)

Case No. 23-17590-EPK

Honorable Erik P.

Kimball

(Jointly Administered)

**EPIO CORPORATE RESTRUCTURING, LLC'S MOTION FOR THE  
ALLOWANCE AND PAYMENT OF SECTION 503(b)(1)(A) ADMINISTRATIVE  
CLAIM**

Epiq Corporate Restructuring, LLC ("Epiq"), by and through its undersigned counsel, submits this Request for Allowance and Payment of Section 503(b)(1)(A) Administrative Claim (the "Request" or the "Administrative Expense Request") and in support thereof respectfully states as follows:

**JURISDICTION**

1. This Court has jurisdiction over this Request pursuant to 28 U.S.C. § 156(c) and 11 U.S.C. § 503(b)(1)(A). This matter is a core proceeding pursuant to 28 U.S.C. § 156(c) and 11 U.S.C. § 503(b)(1)(A). Venue is proper in this Court under 28 U.S.C. §§ 1408 and 1409.

### **BACKGROUND**

2. On September 22, 2023, MV Realty PBC, LLC and thirty-five (35) affiliated companies (collectively, the “Debtors”) each filed a voluntary petition in the United States Bankruptcy Court for the Southern District of Florida (West Palm Beach) seeking relief under chapter 11 of the United States Bankruptcy Code. The Debtors’ cases have been assigned to Judge Erik P. Kimball. The cases are jointly administered for procedural purposes, meaning all pleadings will be maintained on the case docket for MV Realty PBC, LLC, Case No. 23-17590 (the “Main Case Docket”).

3. Epiq provides noticing, claims processing and balloting administration services, across the country for government agencies, law firms, corporate legal departments (“Services”) and corporations, with its principal place of business at 777 Third Avenue, 12th Floor, New York, NY 10017.

4. On October 6, 2023, the Court issued the Order Granting Debtor's Emergency Motion for Entry of Order Authorizing Debtor's to Employ Epiq Corporate Restructuring, LLC as Notice, Claims, and Solicitation Agent, and Call Center Operator, as such Services may be Necessary and Required, Effective September 22, 2023, Re: (Re: [49] Application to Employ filed by Debtor MV Realty PBC, LLC, Interested Party MV Realty PBC, LLC).for the Bankruptcy Court., in which Epiq would provide among other things: *(1) Prepare and serve required notices and documents in the cases in accordance with the Bankruptcy Code and the Bankruptcy Rules in the form and manner directed by the Debtors and/or the Court...; (2) Maintain an official copy of the Debtors’ schedules of assets and liabilities and statements of financial affairs* (collectively, “Schedules”), listing the Debtors’ known creditors and the amounts owed *thereto*; *(3) Maintain (i) a list of all potential creditors,*

*equity holders and other parties-in-interest; and (ii) a "Master Service List" in accordance with Local Rule 2002-1(H); update said lists and make said lists available upon request by a party-in-interest or the Clerk;; and; (4) Maintain a post office box or address for the purpose of receiving claims and returned mail, and process all mail received; (the "October 6<sup>th</sup> Order") (docket entry no. 49).*

5. Epiq performed but has not yet been paid for the Services performed for the period December 1, 2023 through April 31, 2024.

**BASIS FOR RELIEF- § 503(b)(1)(A)**  
**CLAIM**

6. Section 503(b)(1)(A) of the Bankruptcy Code provides that, after notice and a hearing, there shall be allowed administrative expenses, other than claims allowed under section 502(f) of this title, including the actual, necessary costs and expenses of preserving the estate (11 U.S.C. § 503(b)(1)(A)).

7. As evidenced by the invoices attached hereto as Exhibit A to this Request, Debtors received from Epiq, Services valued in amount of Six Hundred Six Thousand Seven Hundred Twenty-Five and 85/100 Dollars (\$606,725.85). As of the date of this Request, Epiq has not yet received full payment for the Services. Epiq is accordingly entitled to an allowed administrative expense claim against the Debtors.

**RESERVATION OF RIGHTS**

8. While, under the June 15th Order, the fees and expenses of Epiq incurred in the performance of services shall be treated as administrative expenses of the estate, and be paid by the Debtors' estates in the ordinary course of business and without the need for Epiq to file

any fee statements, applications, or proof of claim or otherwise seek Court approval, Epiq submits this request as a reservation of its rights.

9. Epiq reserves its right to assert additional claims against the Debtors for amounts not contemplated by this Request or allowed by the Court pursuant to section 503(b)(1)(A) of the Bankruptcy Code and to amend, modify, and/or supplement this request, as appropriate under the circumstances.

**WHEREFORE**, upon the foregoing representations, Epiq respectfully requests the entry of an order in the form of **Exhibit B** granting the following relief:

- A. Allowing Epiq the following administrative expense claim in the amount of Six Hundred Six Thousand Seven Hundred Twenty-Five and 85/100 Dollars (\$606,725.85) against the Debtors.
- B. Granting such other and further relief as the Court deems just and proper.

*[Signature page follows]*

Respectfully submitted,

Date: May 21, 2024

Signature: \_\_\_\_\_  
Name: Shiloh White  
Title: Senior Corporate Paralegal &  
Assistant Secretary  
Address: 11880 College Blvd.  
Suite 200  
Overland Park, KS 66210  
E-Mail: [swhite@epiglobal.com](mailto:swhite@epiglobal.com)



**EXHIBIT A**

**OUTSTANDING INVOICES**



# Invoice

Page 1 of 2

Epiq Corporate Restructuring LLC  
777 Third Ave, 12th Floor  
New York, NY 10017

Remit to  
Epiq Corporate Restructuring LLC Tax ID: 33-1041096  
P.O.Box 674677 For Billing questions call 913-621-9980  
Dallas, TX 75267-4677 or ECRbilling@epiqglobal.com

Electronic Payments:  
Bank: PNC Bank, N.A.  
Wire Routing: 0096  
ACH Routing: 7607  
Acct No: 2437  
SWIFT: US33

## Bill-To

MV Realty PBC LLC  
Attn: Tony Scott  
815 Broken Sound Parkway  
Suite 140  
Boca Raton FL 33487-3625

## Information

Invoice No.	90816068	Invoice Date	01/01/2024
Purchase Order No.			
Customer No.	3019002		
Currency	USD		
Contract No.	40068972		
Contract Description	MVH MV Realty PBC LLC		
Terms of Payment	Payable upon receipt		
Internal Reference No.	MVH		

## Comments

Services for the month of December 2023

Code	Service	Quantity	Unit	Unit Price	Amount
CN300	Director/V.P. Consulting	4	H	175.0000	700.00
CN200	Senior Consultant II	27.600	H	165.0000	4,554.00
CN100	Senior Consultant I	41.400	H	155.0000	6,417.00
DM100	Director of Case Management I	1.900	H	150.0000	285.00
AS300	Senior Case Manager III	34.500	H	150.0000	5,175.00
AS200	Senior Case Manager II	48	H	145.0000	6,960.00
AS100	Senior Case Manager I	78.500	H	135.0000	10,597.50
CM200	Case Manager II	40.900	H	110.0000	4,499.00
CM100	Case Manager I	130.600	H	85.0000	11,101.00
OS815	Call Center Operator	436.200	H	55.0000	23,991.00
NO100	Noticing	155,148	PAG	0.1000	15,514.80
NO100T	Noticing - In state	1,431	PAG	0.1000	143.10
OS120	Claim Acknowledgement	123	NOT	0.0500	6.15
OS224	Envelope - 6X9	38,852	EA	0.1500	5,827.80



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# Invoice

Page 2 of 2

Epiq Corporate Restructuring LLC  
777 Third Ave, 12th Floor  
New York, NY 10017

Information			
Invoice No.	90816068	Invoice Date	01/01/2024
Purchase Order No.			
Customer No.	3019002		

## Comments

Services for the month of December 2023

Code	Service	Quantity	Unit	Unit Price	Amount
OS223	Envelope - #10	38,975	EA	0.0500	1,948.75
CA100	Database Maintenance	39,196	CRC	0.1000	3,919.60
OS821	Voice Recorded Message	50,565.320	MIN	0.3400	17,192.21
OS200	Electronic Imaging	2,873	IMG	0.1000	287.30
RE100	Postage	29,304.780	EA	1.0000	29,304.78
RE105	Shipping and Courier Fees	150	DLR	1.0000	150.00
RE800	Court Docket Services	915	DLR	1.0000	915.00
<b>Net Amount</b>					149,488.99
<b>Sales Tax</b>					1,640.85
<b>Total Amount Due</b>					151,129.84

## Open Items for Contract 40068972 as of 04/23/2024

Trans. Date	Type	Reference	Due Date	Amount	Curr.
01/01/2024	Invoice	90816068	Upon Receipt	151,129.84	USD
02/01/2024	Invoice	90825663	Upon Receipt	76,825.27	USD
03/01/2024	Invoice	90835739	Upon Receipt	44,460.43	USD
04/01/2024	Invoice	90844114	Upon Receipt	281,973.75	USD
<b>Total:</b>				554,389.29	USD



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# Invoice

Page 1 of 2

Epiq Corporate Restructuring LLC  
777 Third Ave, 12th Floor  
New York, NY 10017

Remit to  
Epiq Corporate Restructuring LLC Tax ID: 33-1041096  
P.O.Box 674677 For Billing questions call 913-621-9980  
Dallas, TX 75267-4677 or ECRbilling@epiqglobal.com

**Electronic Payments:**

Bank: PNC Bank, N.A.  
Wire Routing: 0096  
ACH Routing: 7607  
Acct No: 2437  
SWIFT: US33

**Bill-To**

MV Realty PBC LLC  
Attn: Tony Scott  
815 Broken Sound Parkway  
Suite 140  
Boca Raton FL 33487-3625

**Information**

Invoice No.	90825663	Invoice Date	02/01/2024
Purchase Order No.			
Customer No.	3019002		
Currency	USD		
Contract No.	40068972		
Contract Description	MVH MV Realty PBC LLC		
Terms of Payment	Payable upon receipt		
Internal Reference No	MVH		

**Comments**

Services for the month of January 2024

Code	Service	Quantity	Unit	Unit Price	Amount
CN300	Director/V.P. Consulting	0.500	H	192.0000	96.00
CN200	Senior Consultant II	31.200	H	181.0000	5,647.20
CN100	Senior Consultant I	64.400	H	170.0000	10,948.00
DM100	Director of Case Management I	3.300	H	165.0000	544.50
AS300	Senior Case Manager III	37.800	H	165.0000	6,237.00
AS200	Senior Case Manager II	86.500	H	159.0000	13,753.50
AS100	Senior Case Manager I	71.700	H	148.0000	10,611.60
CM200	Case Manager II	47.600	H	121.0000	5,759.60
CM100	Case Manager I	50.700	H	93.0000	4,715.10
OS815	Call Center Operator	210.800	H	60.0000	12,648.00
NO100	Noticing	4,932	PAG	0.1000	493.20
NO100T	Noticing - In state	31	PAG	0.1000	3.10
OS120	Claim Acknowledgement	98	NOT	0.0500	4.90
OS224	Envelope - 6X9	53	EA	0.1500	7.95



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# Invoice

Page 2 of 2

Epiq Corporate Restructuring LLC  
777 Third Ave, 12th Floor  
New York, NY 10017

Information			
Invoice No.	90825663	Invoice Date	02/01/2024
Purchase Order No.			
Customer No.	3019002		

## Comments

Services for the month of January 2024

Code	Service	Quantity	Unit	Unit Price	Amount
OS225	Envelope - 9x12	109	EA	0.2500	27.25
OS223	Envelope - #10	155	EA	0.0500	7.75
CA100	Database Maintenance	39,608	CRC	0.1000	3,960.80
OS821	Voice Recorded Message	8,963.170	MIN	0.3400	3,047.48
OS200	Electronic Imaging	2,670	IMG	0.1000	267.00
RE100	Postage	2,442.750	EA	-1.0000	-2,442.75
RE105	Shipping and Courier Fees	450	DLR	1.0000	450.00
<b>Net Amount</b>					76,787.18
<b>Sales Tax</b>					38.09
<b>Total Amount Due</b>					76,825.27

## Open Items for Contract 40068972 as of 04/23/2024

Trans. Date	Type	Reference	Due Date	Amount	Curr.
01/01/2024	Invoice	90816068	Upon Receipt	151,129.84	USD
02/01/2024	Invoice	90825663	Upon Receipt	76,825.27	USD
03/01/2024	Invoice	90835739	Upon Receipt	44,460.43	USD
04/01/2024	Invoice	90844114	Upon Receipt	281,973.75	USD
<b>Total:</b>				554,389.29	USD



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# Invoice

Page 1 of 2

Epiq Corporate Restructuring LLC  
777 Third Ave, 12th Floor  
New York, NY 10017

Remit to  
Epiq Corporate Restructuring LLC Tax ID: 33-1041096  
P.O.Box 674677 For Billing questions call 913-621-9980  
Dallas, TX 75267-4677 or ECRbilling@epiqglobal.com

**Electronic Payments:**

Bank: PNC Bank, N.A.  
Wire Routing: 0096  
ACH Routing: 7607  
Acct No: 2437  
SWIFT: US33

**Bill-To**

MV Realty PBC LLC  
Attn: Tony Scott  
815 Broken Sound Parkway  
Suite 140  
Boca Raton FL 33487-3625

**Information**

Invoice No.	90835739	Invoice Date	03/01/2024
Purchase Order No.			
Customer No.	3019002		
Currency	USD		
Contract No.	40068972		
Contract Description	MVH MV Realty PBC LLC		
Terms of Payment	Payable upon receipt		
Internal Reference No.	MVH		

**Comments**

Services for the month of February 2024

Code	Service	Quantity	Unit	Unit Price	Amount
CN200	Senior Consultant II	11.700	H	181.0000	2,117.70
CN100	Senior Consultant I	58.800	H	170.0000	9,996.00
DM100	Director of Case Management I	0.400	H	165.0000	66.00
AS300	Senior Case Manager III	11.800	H	165.0000	1,947.00
AS200	Senior Case Manager II	58.800	H	159.0000	9,349.20
AS100	Senior Case Manager I	27.800	H	148.0000	4,114.40
CM200	Case Manager II	50.300	H	121.0000	6,086.30
CM100	Case Manager I	28.200	H	93.0000	2,622.60
OS815	Call Center Operator	45.700	H	60.0000	2,742.00
NO100	Noticing	1,050	PAG	0.1000	105.00
NO100T	Noticing - In state	18	PAG	0.1000	1.80
OS120	Claim Acknowledgement	81	NOT	0.0500	4.05
OS224	Envelope - 6X9	92	EA	0.1500	13.80
OS223	Envelope - #10	81	EA	0.0500	4.05



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# Invoice

Page 2 of 2

Epiq Corporate Restructuring LLC  
777 Third Ave, 12th Floor  
New York, NY 10017

<b>Information</b>			
Invoice No.	90835739	Invoice Date	03/01/2024
Purchase Order No.			
Customer No.	3019002		

## Comments

Services for the month of February 2024

Code	Service	Quantity	Unit	Unit Price	Amount
CA100	Database Maintenance	39,668	CRC	0.1000	3,966.80
OS821	Voice Recorded Message	2,512.650	MIN	0.3400	854.30
OS200	Electronic Imaging	2,914	IMG	0.1000	291.40
RE100	Postage	169.020	EA	1.0000	169.02
<b>Net Amount</b>					44,451.42
<b>Sales Tax</b>					9.01
<b>Total Amount Due</b>					44,460.43

## Open Items for Contract 40068972 as of 04/23/2024

Trans. Date	Type	Reference	Due Date	Amount	Curr.
01/01/2024	Invoice	90816068	Upon Receipt	151,129.84	USD
02/01/2024	Invoice	90825663	Upon Receipt	76,825.27	USD
03/01/2024	Invoice	90835739	Upon Receipt	44,460.43	USD
04/01/2024	Invoice	90844114	Upon Receipt	281,973.75	USD
<b>Total:</b>				554,389.29	USD



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# Invoice

Page 1 of 2

Epiq Corporate Restructuring LLC  
777 Third Ave, 12th Floor  
New York, NY 10017

Remit to  
Epiq Corporate Restructuring LLC Tax ID: 33-1041096  
P.O.Box 674677 For Billing questions call 913-621-9980  
Dallas, TX 75267-4677 or ECRbilling@epiqglobal.com

Electronic Payments:  
Bank: PNC Bank, N.A.  
Wire Routing: 0096  
ACH Routing: 7607  
Acct No: 2437  
SWIFT: US33

**Bill-To**  
MV Realty PBC LLC  
Attn: Tony Scott  
815 Broken Sound Parkway  
Suite 140  
Boca Raton FL 33487-3625

**Information**  
Invoice No. 90844114 Invoice Date 04/01/2024  
Purchase Order No.  
Customer No. 3019002  
Currency USD  
Contract No. 40068972  
Contract Description MVH MV Realty PBC LLC  
Terms of Payment Payable upon receipt  
Internal Reference No. MVH

## Comments

Services for the month of March 2024

Code	Service	Quantity	Unit	Unit Price	Amount
CN200	Senior Consultant II	14.600	H	181.0000	2,642.60
CN100	Senior Consultant I	56.500	H	170.0000	9,605.00
DM100	Director of Case Management I	2.500	H	165.0000	412.50
AS300	Senior Case Manager III	19.800	H	165.0000	3,267.00
AS200	Senior Case Manager II	62	H	159.0000	9,858.00
AS100	Senior Case Manager I	26.700	H	148.0000	3,951.60
CM200	Case Manager II	19.500	H	121.0000	2,359.50
CM100	Case Manager I	55	H	93.0000	5,115.00
OS815	Call Center Operator	252.800	H	60.0000	15,168.00
NO100	Noticing	1,135,037	PAG	0.1000	113,503.70
NO100T	Noticing - In state	12,255	PAG	0.1000	1,225.50
OS120	Claim Acknowledgement	61	NOT	0.0500	3.05
OS224	Envelope - 6X9	39,569	EA	0.1500	5,935.35
OS225	Envelope - 9x12	108	EA	0.2500	27.00



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# Invoice

Page 2 of 2

Epiq Corporate Restructuring LLC  
777 Third Ave, 12th Floor  
New York, NY 10017

Information			
Invoice No.	90844114	Invoice Date	04/01/2024
Purchase Order No.			
Customer No.	3019002		

## Comments

Services for the month of March 2024

Code	Service	Quantity	Unit	Unit Price	Amount
OS223	Envelope - #10	62	EA	0.0500	3.10
CA100	Database Maintenance	40,028	CRC	0.1000	4,002.80
OS821	Voice Recorded Message	32,636.980	MIN	0.3400	11,096.57
OS200	Electronic Imaging	3,928	IMG	0.1000	392.80
RE100	Postage	83,701.040	EA	1.0000	83,701.04
RE105	Shipping and Courier Fees	150	DLR	1.0000	150.00
RE800	Court Docket Services	1,104.800	DLR	1.0000	1,104.80
<b>Net Amount</b>					273,524.91
<b>Sales Tax</b>					8,448.84
<b>Total Amount Due</b>					281,973.75

## Open Items for Contract 40068972 as of 04/23/2024

Trans. Date	Type	Reference	Due Date	Amount	Curr.
01/01/2024	Invoice	90816068	Upon Receipt	151,129.84	USD
02/01/2024	Invoice	90825663	Upon Receipt	76,825.27	USD
03/01/2024	Invoice	90835739	Upon Receipt	44,460.43	USD
04/01/2024	Invoice	90844114	Upon Receipt	281,973.75	USD
<b>Total:</b>				554,389.29	USD



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# Invoice

Page 1 of 3

Epiq Corporate Restructuring LLC  
777 Third Ave, 12th Floor  
New York, NY 10017

Remit to  
Epiq Corporate Restructuring LLC Tax ID: 33-1041096  
P.O.Box 674677 For Billing questions call 913-621-9980  
Dallas, TX 75267-4677 or ECRbilling@epiqglobal.com

Electronic Payments:  
Bank: PNC Bank, N.A.  
Wire Routing: 0096  
ACH Routing: 7607  
Acct No: 2437  
SWIFT: US33

**Bill-To**  
MV Realty PBC LLC  
Attn: Tony Scott  
815 Broken Sound Parkway  
Suite 140  
Boca Raton FL 33487-3625

**Information**  
Invoice No. 90853686 Invoice Date 05/01/2024  
Purchase Order No.  
Customer No. 3019002  
Currency USD  
Contract No. 40068972  
Contract Description MVH MV Realty PBC LLC  
Terms of Payment Payable upon receipt  
Internal Reference No. MVH

## Comments

Services for the month of April 2024

Code	Service	Quantity	Unit	Unit Price	Amount
PD100	Practice Director	0.300	H	203.0000	60.90
CN200	Senior Consultant II	5.900	H	181.0000	1,067.90
CN100	Senior Consultant I	49.700	H	170.0000	8,449.00
DM100	Director of Case Management I	2	H	165.0000	330.00
AS300	Senior Case Manager III	17.900	H	165.0000	2,953.50
AS200	Senior Case Manager II	25	H	159.0000	3,975.00
AS100	Senior Case Manager I	42.300	H	148.0000	6,260.40
CM200	Case Manager II	73.500	H	121.0000	8,893.50
CM100	Case Manager I	175.300	H	93.0000	16,302.90
OS815	Call Center Operator	151.800	H	60.0000	9,108.00
NO100	Noticing	78,707	PAG	0.1000	7,870.70
NO100T	Noticing - In state	838	PAG	0.1000	83.80
OS224	Envelope - 6X9	27	EA	0.1500	4.05
OS225	Envelope - 9x12	2	EA	0.2500	0.50



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# Invoice

Page 2 of 3

Epiq Corporate Restructuring LLC  
777 Third Ave, 12th Floor  
New York, NY 10017

Information			
Invoice No.	90853686	Invoice Date	05/01/2024
Purchase Order No.			
Customer No.	3019002		

## Comments

Services for the month of April 2024

Code	Service	Quantity	Unit	Unit Price	Amount
OS223	Envelope - #10	39,627	EA	0.0500	1,981.35
CA100	Database Maintenance	40,086	CRC	0.1000	4,008.60
OS821	Voice Recorded Message	7,646.580	MIN	0.3400	2,599.84
OS200	Electronic Imaging	1,909	IMG	0.1000	190.90
RE105	Shipping and Courier Fees	150	DLR	1.0000	150.00
RE100	Postage	22,650.110	EA	-1.0000	-22,650.11
<b>Net Amount</b>					51,640.73
<b>Sales Tax</b>					695.83
<b>Total Amount Due</b>					52,336.56

## Open Items for Contract 40068972 as of 05/15/2024

Trans. Date	Type	Reference	Due Date	Amount	Curr.
01/01/2024	Invoice	90816068	Upon Receipt	151,129.84	USD
02/01/2024	Invoice	90825663	Upon Receipt	76,825.27	USD
03/01/2024	Invoice	90835739	Upon Receipt	44,460.43	USD
04/01/2024	Invoice	90844114	Upon Receipt	281,973.75	USD
04/09/2024	Payment	1400018207		25,320.32-	USD
05/01/2024	Invoice	90853686	Upon Receipt	52,336.56	USD
<b>Total:</b>				581,405.53	USD



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# Noticing Detail

Invoice No.: 90853686

Customer : MV Realty Holdings LLC

LEGEND:							
NO100 - Noticing(Out of State)		NO100T - Noticing(In State)		NO120 - Email Notice Per File			
OS205 - Facsimiles(Out of State)		OS205T - Facsimiles(In State)		NO110 - Email Notice Per Page			
Document Title	Pages/Notice	NO100	NO100T	OS205	OS205T	NO110	NO120
DOCKET NO. 1203 - RENOTICE OF HEARING	2	78,360	838	0	0	0	0
MAILER SHEETS	1	25	0	0	0	0	0
ORDER SETTING EVIDENTIARY HEARING ON AND RELATED DEADLINES IN CONTESTED MATTER [DOCKET NO. 1243]	5	125	0	0	0	0	0
ORDER REGARDING PROPOSED NOTICE TO HOMEOWNER BENEFIT AGREEMENT PARTIES AND REQUEST FOR INPUT [DOCKET NO. 1244]	3	75	0	0	0	0	0
""Official Form 309F1 (For Corporations or Partnerships) Notice of Chapter 11 Bankruptcy Case,"" filed on October 11, 2023 [Docket No. 78]"	3	6	0	0	0	0	0
""Official Form 410 Proof of Claim,"" filed on October 11, 2023 [Docket No. 79]"	4	8	0	0	0	0	0
""Amended Order Granting Official Committee of Home Benefits Agreement Holders' Motion to Extend Bar Date to File Proofs of Claim for Home Benefit Agreement Holders,"" dated February 27, 2024 [Docket No. 956]"	2	4	0	0	0	0	0
""Notice of Extended Bar Date"" "	1	2	0	0	0	0	0
"Mailer sheets for DI 78-79, 956, Notice"	1	2	0	0	0	0	0
DOCKET NO. 1335 - ORDER AUTHORIZING CONTINUED USE OF CASH COLLATERAL	3	75	0	0	0	0	0
MAILERSHEETS	1	25	0	0	0	0	0
Total Pages		78,707	838	0	0	0	0

CONFIDENTIAL

**EXHIBIT B**

**PROPOSED ORDER**

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

In re:	)	Chapter 11
	)	Case No. 23-17590-EPK
MV REALTY PBC, LLC, et. al,	)	Honorable Erik P. Kimball
	)	(Jointly Administered)
<u>Debtors.</u>	)	

**ORDER GRANTING EPIQ CORPORATE RESTRUCTURING, LLC'S LLC'S MOTION FOR  
THE ALLOWANCE AND PAYMENT OF SECTION 503(b)(1)(A) ADMINISTRATIVE CLAIM**

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The Court has considered the Motion for the Allowance and Payment of Section (503)(b)(1)(A) and finds that the relief requested should be granted. It is, therefore,

ORDERED that Epiq Corporate Restructuring, LLC shall have an allowed administrative expense priority claim against the Debtors' estate under 11 U.S.C. § 503(b)(1)(A) in the amount of Six Hundred Six Thousand Seven Hundred Twenty-Five and 85/100 Dollars (\$606,725.85).

**DATED:**\_\_\_\_\_.

**BY THE COURT:**

---

**Honorable Erik P. Kimball  
United States Bankruptcy Judge**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on May 21, 2024, the original of the foregoing instrument was filed and served via UPS overnight mail and, copies were served on the master service list via USPS/Email

Shiloh White

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on May 21, 2024, the original of the foregoing instrument was filed and served via UPS overnight mail and, copies were served on the master service list via USPS/Email

Shiloh White



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