

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

| | | |
|------------------------------|---|-------------------------|
| | X | |
| | : | |
| In re: | : | Chapter 11 |
| | : | |
| HO WAN KWOK, <i>et al.</i> , | : | Case No. 22-50073 (JAM) |
| | : | |
| Debtors. ¹ | : | Jointly Administered |
| | : | |
| | X | |

**MONTHLY FEE STATEMENT OF WINNE, BANTA, BASRALIAN & KAHN, P.C. FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR PERIOD
FROM AUGUST 19, 2024 THROUGH SEPTEMBER 30, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals, dated August 18, 2023* [Docket No. 2094] (the “Interim Compensation Order”),² Winne, Banta, Basralian & Kahn, P.C. (“WBB&K”) hereby submits this monthly statement (the “Monthly Fee Statement”) seeking compensation for services rendered as New Jersey real estate counsel to Luc A. Despins, in his capacity as the chapter 11 trustee (the “Trustee”) appointed in the chapter 11 case of Ho Wan Kwok, for the period from August 19, 2024 through and including September 30, 2024 (the “Fee Period”). By this Monthly Fee Statement, WBB&K respectfully requests payment of 80% of all fees actually and necessarily incurred for services rendered during the Fee Period, in the amounts of \$1,918.80.

¹ The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.

SERVICES RENDERED AND EXPENSES INCURRED

1. Attached hereto as Exhibit A are WBB&K's fee statements for services provided during the Fee Period along with a timekeeper summary that includes the name, rate, total hours and total fees earned for each WBB&K individual who provided services during the fee period.

NOTICE AND OBJECTION PROCEDURES

2. Notice of this Monthly Fee Statement will be given by email on the Notice Parties: (i) Luc A. Despins, as chapter 11 trustee for the estate of Ho Wan Kwok (lucdespins@paulhastings.com); (ii) Counsel for the Trustee, (x) Paul Hastings LLP, 200 Park Avenue, New York, New York 10166 (Attn: G. Alexander Bongartz (alexbongartz@paulhastings.com) and Douglass Barron (douglassbarron@paulhastings.com)) and (y) Neubert, Pepe & Monteith, P.C., 195 Church Street, 13th Floor, New Haven, Connecticut 06510 (Attn: Douglas S. Skalka (dskalka@npmlaw.com) and Patrick R. Linsey (plinsey@npmlaw.com)); (iii) the Office of The United States Trustee, Giaimo Federal Building, 150 Court Street, Room 302, New Haven, Connecticut 06510 (Attn: Holley L. Claiborn (holley.l.claiborn@usdoj.gov)); (iv) counsel for the Official Committee of Unsecured Creditors, Pullman & Comley, LLC, 850 Main Street, 8th Floor, PO Box 7006, Bridgeport, Connecticut 06601-7006 (Attn: Irve J. Goldman (igoldman@pullcom.com); and (v) counsel for Pacific Alliance Asia Opportunity Fund L.P., O'Melveny & Myers LLP, 7 Times Square, New York, New York 10036 (Attn: Peter Friedman (pfriedman@omm.com) and Stuart M. Sarnoff (ssarnoff@omm.com) (collectively, the "Notice Parties").

3. Objections to this Monthly Fee Statement, if any, must be filed with the Court and served upon (i) Winne, Banta, Basralian & Kahn, P.C., (Attn: Richard R. Kahn and (ii) the Notice Parties by email no later than **December 12, 2024 (prevailing Eastern Time)** (the

“Objection Deadline”), setting forth the nature of the objection and the specific amount of fees or expenses at issue.

4. If no objections to this Monthly Fee Statement are filed and received on or before the Objection Deadline, the estate shall promptly pay WBB&K 80% of the fees identified in this Monthly Fee Statement.

5. To the extent that an objection to this Monthly Fee Statement is filed and received on or before the Objection Deadline, the estate shall withhold payment of that portion of this Monthly Fee Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such an objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing.

[THE REMAINDER OF THIS PAGE IS INTENTIONALLY BLANK.]

Dated: November 19, 2024

By: 

Richard R. Kahn
Winne Banta Basralian & Kahn, PC
Court Plaza South, East Wing Suite 101
21 Main Street
Hackensack, New Jersey 07601

**UNITED STATES BANKRUPTCY COURT
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| | : | |
| Debtors. | : | (Jointly Administered) |
| | : | |
| | -----X | |

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 19, 2024 the foregoing Monthly Fee Statement was electronically filed. In addition, a copy of the Monthly Fee Statement was served by email on the Notice Parties. Parties may access this filing through the Court's CM/ECF system.

Dated: November 19, 2024
at New Haven, Connecticut

By: /s/ Nancy Bohan Kinsella
Nancy Bohan Kinsella (ct12109)
NEUBERT, PEPE & MONTEITH, P.C.
195 Church Street, 13th Floor
New Haven, Connecticut 06510
(203) 781-2847
nkinsella@npmlaw.com

Counsel for the Chapter 11 Trustee

¹ The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despina, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

EXHIBIT A

Winne, Banta, Basralian & Kahn, P.C. Fee Statement



COURT PLAZA SOUTH – EAST WING
21 MAIN STREET, SUITE 101
P.O. BOX 647
HACKENSACK, NJ 07601-7021

(201) 487-3800
FACSIMILE (201) 487-8529

www.winnebanta.com

November 8, 2024

Luc A. Despins - Trustee
Paul Hastings LLP
200 Park Avenue
New York, NY 10166

Invoice #: 253199
Client #: 11157
Matter #: 1
Billing Attorney: RRK

INVOICE SUMMARY

For professional services rendered and disbursements advanced through September 30, 2024:

RE: Local NJ Real Estate Counsel regarding the sale of Crocker Mansion (Mahwah Mansion), located at 675 Ramapo Valley Road, Mahwah, New Jersey

| | |
|------------------------------|--------------------|
| Professional Services | \$ 2,398.50 |
| Total Disbursements Advanced | <u>\$.00</u> |
| TOTAL THIS INVOICE | \$ 2,398.50 |

WBB&K P.C.

Invoice #: 253199

November 8, 2024

PROFESSIONAL SERVICES RENDERED

| Date | Tkpr | Narrative of Services | Hours |
|-------------|-------------|---|--------------|
| 8/19/24 | RRK | Emails with P. Linsey and "clear" conflict check. | .25 |
| 8/20/24 | RRK | Clearing conflict. | .25 |
| 8/23/24 | RRK | Confer with P. Linsey and W. Sherman on retention. | .50 |
| 8/26/24 | RRK | Emails with P. Linsey. | .10 |
| 9/06/24 | RRK | Patrick Lindsey call and emails. | .25 |
| 9/09/24 | RRK | Emails re: status of retention. | .10 |
| 9/12/24 | RRK | Follow up on retention; review Memorandum of Law and Retention application. | .75 |
| 9/13/24 | RRK | Execute and transmit Declaration and begin Broker search. | .25 |
| 9/16/24 | RRK | Review, execute and transmit revised retention application-declaration. | .15 |
| 9/17/24 | RRK | Finalize application. | .10 |
| 9/26/24 | RRK | Recommendations to W. Sherman for pool maintenance and roof repairs. | .40 |
| 9/27/24 | RRK | Calls and emails re: retention; follow up on pool and roof repair vendors. | .50 |
| 9/30/24 | RRK | Review and respond to N. Kinsella email; email to P. Linsey. | .50 |

TOTAL PROFESSIONAL SERVICES**\$ 2,398.50****TIMEKEEPER SUMMARY**

| Name | Rate | Hours | Total |
|------------------|-------------|--------------|--------------------|
| Kahn, Richard R. | 585.00 | 4.10 | 2,398.50 |
| TOTALS | | 4.10 | \$ 2,398.50 |

TOTAL THIS INVOICE**\$ 2,398.50**



COURT PLAZA SOUTH - EAST WING
21 MAIN STREET, SUITE 101
P.O. BOX 647
HACKENSACK, NJ 07601-7021

(201) 487-3800
FACSIMILE (201) 487-8529

www.winnebanta.com

November 8, 2024

Luc A. Despins - Trustee
Paul Hastings LLP
200 Park Avenue
New York, NY 10166

Invoice #: 253199
Client #: 11157
Matter #: 1
Billing Attorney: RRK

REMITTANCE ADVICE

RE: Local NJ Real Estate Counsel regarding the sale of Crocker Mansion (Mahwah Mansion), located at 675 Ramapo Valley Road, Mahwah, New Jersey

BALANCE DUE THIS INVOICE

\$ 2,398.50

Please return this advice with payment to:

WBB&K P.C.
ATTN: Accounts Receivable
P.O. Box 647
Hackensack, NJ 07602-0647

DUE UPON RECEIPT

To Pay By Credit Card:

Visa _____ Mastercard _____ Discover _____

Account No.: _____ Expiration Date: ____/____ Security Code: _____

Amount : \$ _____ Name on Account: _____

Cardholder Billing Address: _____

Authorization Signature: _____

E-Mail Address: _____